



## Duty to Cooperate Statement

To accompany the Hastings Local Plan Draft Local Plan –  
Preferred Options (Regulation 18) February 2026

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# 1. Maintaining Cross-Boundary Co-operation: Disclaimer and Limitations.

- 1.1. In relation to this Statement, and any other document relating or referring to its findings, Hastings Borough Council makes the following disclaimer without prejudice:
- 1.2. The Duty to Co-operate Statement is an aid for plan-making and not a statement of council policy.
- 1.3. The Duty to Co-operate Statement is a record of information held at the time of assessment, and represents an iterative or 'snapshot' position. It is expected that some of the information held will change over time. The Duty to Co-operate Statement is updated regularly to ensure that the information within remains up to date.
- 1.4. The development of the Hastings Local Plan 2023-2041 and its submission to the Secretary of State remain the responsibility of Hastings Borough Council in its role as the plan making Authority.
- 1.5. The Duty to Co-operate is a legal duty under the [Localism Act 2011](#) (Section 110) and Section 33A of the [Planning and Compulsory Purchase Act 2004](#), and requires English plan making Authorities and key stakeholders to engage with each other actively and constructively on an ongoing basis on matters of cross-boundary or strategic importance, including housing, climate change and infrastructure. Engagement under the Duty to Co-operate does not equate to formal legal agreement or consensus, and any points of agreement or disagreement must be formalised through appropriate mechanisms including Statements of Common Ground, Memorandums of Understanding, Heads of Terms, Universal Undertakings or through the Infrastructure Delivery Plan.
- 1.6. Duty to Co-operate Statement covers strategic and/ or cross-boundary matters only and is not a record of all engagement undertaken.
- 1.7. This version of the Duty to Co-operate Statement supersedes all previous versions.

## 2. Acronyms and Abbreviations

Acronyms and Abbreviations:

Dpa: Dwellings per Annum

DtC: Duty to Cooperate

EA: Environment Agency

ESCC: East Sussex County Council

FEMA: Functional Economic Market Area

GTAA: Gypsy, Traveller and Travelling Showpeople Needs Assessment

HBC: Hastings Borough Council

HEDNA: Housing and Economic Development Needs Assessment

HMA: Housing Market Area

HRA: Habitats Regulations Assessment

IDP: Infrastructure Delivery Plan

l/p/d: Litres per Person per Day LSS

LAA: Land Availability Assessment (also HELAA, SHELAA, HLAA, ELAA)

LPA: Local Planning Authority

LPMR: Local Plan Monitoring Report

MoU: Memorandum of Understanding

NL: National Landscape

NPPF: National Planning Policy Framework

PPG: (National) Planning Practice Guidance

RDC: Rother District Council

SA: Sustainability Appraisal

SEA: Strategic Environmental Assessment

SFRA: Strategic Flood Risk Assessment

SHELAA: Strategic Housing Land Availability Assessment

SoCG: Statement of Common Ground

### 3. Introduction and purpose

- 3.1. Hastings Council is preparing a new local plan for the period up to 2041. It will set out a strategy for the spatial development of Hastings identifying the amount and location of new housing and commercial development.
- 3.2. Duty to Co-operate is a legal duty under the [Localism Act 2011](#) (Section 110) and Section 33A of the [Planning and Compulsory Purchase Act 2004](#), and places a legal requirement on Local Planning Authorities (LPA) and other prescribed bodies to work together on cross-boundary strategic matters. The prescribed bodies relevant to Strategic Planning in Hastings are listed in Appendix A.
- 3.3. The National Planning Policy Framework (NPPF) provides further guidance on demonstrating how the Duty has been applied to plan-making. This includes:
- Making sure that plan policies developed by strategic policy-making authorities align as fully as possible with those of other bodies where a strategic relationship exists and take a consistent approach to planning major infrastructure delivery (NPPF, 2024, Paragraph 27 and 27a);
  - Take into account the relevant investment policies of strategic infrastructure providers (NPPF, 2024, Paragraph 27);
  - Unmet development needs from neighbouring areas are provided for in accordance with paragraph 11b (NPPF, 2024, Paragraph 27);
  - Any allocation or designation (e.g., an Area of Search) that cuts across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities (NPPF, 2024, Paragraph 27c)
  - Statements of Common Ground ('SoCG) should be used to document cross-boundary or strategic areas of co-operation and any progress made in co-operating to address these (NPPF, 2024, Paragraph 28);
- 3.4. Effective co-operation with neighbours and strategic bodies is essential for Hastings due to its small size, tight borough boundary in relation to the existing urban area, and significant physical constraints including flood risk, coastal change and environmental character. The current position is that Hastings cannot meet its objectively assessed housing needs in full within its own boundaries for either general needs housing or permanent gypsy and traveller pitch sites.

- 3.5. Hastings shares all land boundaries and a proportion of social, transport, education and economic infrastructure with neighbouring Rother District with the two areas together forming both a Housing Market Area (HMA) and a Functional Economic Market Area (FEMA). Due to this constraint, the council has not limited operations under the Duty to Rother alone and has taken the information contained in the Housing and Economic Development Needs Assessment (HEDNA, 2023) regarding in and out migration and commuting flows into account when considering where and by whom unmet housing needs might be addressed.
- 3.6. On 27 November 2025 the Secretary of State [wrote to the Chief Executive of the Planning Inspectorate](#)<sup>1</sup> setting out his intention to abolish the Duty to Co-operate through the introduction of new regulations in early 2026. This would have the effect of replacing the current legal Duty to Co-operate with a need to demonstrate effective co-operation between plan-making authorities through the ‘Soundness’ test<sup>2</sup>. It should be noted that at the time of publication, no new regulations have been laid, and cross-boundary co-operation continues to be governed by the legal Duty.

## Neighbourhood Forums

- 3.7. Hastings has no town or parish councils. A Neighbourhood Forum for the West St Leonards Neighbourhood Plan area was established in 2024, and fulfils the function of preparing and reviewing any Neighbourhood Plan relating to their area. Whilst Neighbourhood Forums are not a prescribed body under the Duty to Co-operate, the council recognises the importance of Neighbourhood Planning and will continue to engage with the forum during the plan-making process.

## Framework for Co-operation

- 3.8. Co-operation takes place within a wider framework that has evolved during the plan-making process to reflect the specific cross-boundary issues that the council and other co-operating authorities face.
- 3.9. The table below sets out the main groups and mechanisms in which the council is an active participant.

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<sup>1</sup> Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate (November 2025).

<sup>2</sup> Soundness in local plans refers to the evaluation criteria used by independent inspectors to determine if a local planning authority’s strategy is fit for purpose, legal, and capable of adoption.

Table 1: List of groups and mechanisms for co-operation

Group	Scope	Members
<b>East Sussex Strategic Planning Group</b>	Quarterly officer and member-level group to discuss strategic planning matters on a county-wide basis, including unmet needs.	Local Authorities: East Sussex County Council, Wealden District Council, Lewes District Council, Eastbourne Borough Council, Rother District Council, Hastings Borough Council, and Brighton and Hove City Council.
<b>East Sussex Local Plan Managers Group</b>	Meets every two months to discuss strategic planning matters at officer level on a county-wide basis, including unmet need.	Local Authorities: East Sussex County Council, Wealden District Council, Lewes District Council, Eastbourne Borough Council, Rother District Council, Hastings Borough Council, and Brighton and Hove City Council.
<b>High Weald AONB Joint Advisory Committee</b>	Meets twice a year to provides strategic oversight and guidance on the collective management and conservation of the High Weald National Landscape. Oversees delivery of the HW Management Plan, promotes coordinated policy and investment, and supports partnership working across the Twice per year 26 National Landscape	Local Authorities (15): Includes East Sussex, Kent, and Surrey County Councils, as well as borough/district councils such as Rother, Wealden, and Tunbridge Wells.  Conservation and Advisory Bodies: Natural England (account manager).  Community and Environmental Representatives: Co-opted members from

Group	Scope	Members
	The group also includes elected members.	the High Weald Forum, covering interests like farming, forestry, and nature conservation.
<b>Ashdown Forest Working Group</b>	<p>Quarterly meeting, to address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) that may arise from traffic associated with new development.</p> <p>Hastings Borough Council is a corresponding member.</p>	<p>Local Authorities: East Sussex County Council, West Sussex County Council, Rother District Council, Hastings Borough Council, Wealden District Council, Lewes District Council, Eastbourne Borough Council, Tunbridge Wells Borough Council, Sevenoaks District Council, Mid Sussex District Council, Crawley Borough Council, Tandridge District Council, and Brighton and Hove City Council.</p> <p>Conservation and Advisory Bodies: Natural England, South Downs National Park Authority.</p>
<b>Sussex Local Nature Partnership: Local Authorities Network</b>	The Sussex Nature partnership bring together county councils, unitary authorities, district councils, and national park authorities to integrate, manage, and deliver local nature recovery strategies. These networks facilitate collaboration, knowledge sharing, and technical support to enhance biodiversity	Composition: Officers and representatives from Districts, Boroughs, Unitary Authorities and County Councils in East Sussex.

<b>Group</b>	<b>Scope</b>	<b>Members</b>
	and environmental health.	
<b>Team East Sussex</b>	Team East Sussex is a business-led partnership driving economic growth in East Sussex.	Composition: Representatives from businesses, business federations, officers, members and representatives from Districts, Boroughs, Unitary Authorities and County Councils in East Sussex and education providers.
<b>East Sussex and South Downs National Park Authority Area Gypsy and Traveller Accommodation Needs Group</b>	Meets every other month, with Hastings as chair. Works collaboratively on cross-boundary strategic planning issues relating to the provision of Gypsy, Traveller and Travelling Showpeople Sites.	Composition: Officers from Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, Rother District Council, South Downs National Park Authority, East Sussex County Council.
<b>East Sussex Coastal Change Management sub-group</b>	Not currently in session. Works collaboratively on matters relating to the management of coastal change and flood risk from the sea.	Composition: Officers from Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, Rother District Council, South Downs National Park Authority, East Sussex County Council.  Advisory bodies: Environment Agency
<b>SFRA advisory panel</b>	Collaborative working group that oversees the production of the Strategic Flood Risk Assessment and policies related to flood	Composition: Officers from Hastings Borough Council, East Sussex County Council,

Group	Scope	Members
	risk, drainage and water infrastructure.	Southern Water, The Environment Agency.
<b>One-to-One meetings on specific matters with individual bodies.</b>	Meetings with statutory bodies regarding strategic matters.	See Statements of Common Ground.

## Statement of Common Ground

- 3.10. Paragraph 28 of the NPPF states that *“In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency. Plans come forward at different times, and there may be a degree of uncertainty about the future direction of relevant development plans or the plans of infrastructure providers. In such circumstances strategic policy-making authorities and Inspectors will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities. Co-operation takes place within a wider framework that has evolved during the plan-making process to reflect the specific cross-boundary issues that the council and other co-operating authorities face.”*
- 3.11. The council is in the process of producing a number of Statements of Common Ground (SoCG), intended to accompany the next stage of plan-making (Regulation 19) to demonstrated how and across which strategic topic areas the council has worked collaboratively with stakeholders.
- 3.12. These SoCG address matters of varying detail and scale as relevant for the respective strategic partners. The documents and their addressed matters will be as follows:
- a. Rother District Council
    - Matters addressed: housing, landscape, strategic gap, urban fringe, employment, land stability, environment, flooding, renewable energy, gypsy and traveller accommodation, infrastructure delivery.
  - b. Wealden District Council
    - Matters addressed: housing, employment, gypsy and traveller accommodation, coastal change management.
  - c. Natural England
    - Matters addressed: habitats, Ashdown Forest, water resources management, Impact Risk Zones and SSSI, flood risk, biodiversity.

- d. National Highways and East Sussex County Council Highways Authority
  - Matters addressed: Strategic and local highways network
- e. East Sussex County Council Lead Local Flood Authority
  - Matters addressed: flood risk and drainage.
- f. Southern Water
  - Matters addressed: water resources management, flood risk, drainage, sewerage, water infrastructure needs.
- g. East Sussex County Council Employment and Skills
  - Matters addressed: employment and skills, local labour agreements.
- h. Environment Agency
  - Matters addressed: flood risk and water quality.
- i. East Sussex County Council Healthy Places
  - Matters addressed: health impact assessments, health and wellbeing.
- j. Ashdown Forest Working Group
  - Air quality management in the Ashdown Forest.

## Consultation Statement

- 3.13. At each stage of consultation, the council has received comments from stakeholders. This includes East Sussex County Council, neighbouring Rother District Council, public bodies and other non-statutory stakeholders.
- 3.14. A summary of comments received are set out at each Local Plan Stage through the corresponding Consultation Statement under Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations. These statements will be made available on the [New local plan | Planning Policy | Hastings Borough Council](#) web page. These documents show progression made on matters between the council and key stakeholders throughout the plan-making process.

## Shared Evidence Base

- 3.15. As part of the Duty to Co-operate, the council has prepared a number of evidence base documents working collaboratively with other organisations.
- 3.16. A significant amount of evidence base has been prepared jointly with neighbouring Rother District Council, with the goal of ensuring that where possible both Local Plans are able to reflect the same evidence and have a clear understanding of interdependencies between the two areas. The councils share both a housing Market Area (HMA) and a Functional Economic Market Area (FEMA).
- 3.17. Joint evidence base with Rother includes:
  - a. Sustainability Appraisal / Strategic Environmental Assessment Scoping Report (2021);
  - b. Housing and Economic Development Needs Assessment (2020 and 2024);

- c. Playing Pitch Strategy (PPS) and Built Facilities Strategy (2023) and ongoing Stage E Review (TBC);
  - d. Tourism and Visitor Accommodation Study (TBC).
- 3.18. The council, working with East Sussex County Council, is seeking to develop updated evidence base around the potential impact of proposed development on the local and strategic highways network. This work will be further progressed following the Regulation 18 consultation.
- 3.19. Together with all East Sussex Districts and Boroughs, South Downs National Park Authority and East Sussex County Council the council has jointly prepared an East Sussex Gypsy and Traveller Accommodation Assessment (GTAA), which will be updated during the 2026/27 financial year.

## 4. Meeting Housing Needs

- 4.1. National Planning Policy sets out the minimum number of homes needed in each area using the standard method (NPPF, 2024, Paragraph 62) as described in national Planning Practice Guidance (PPG).
- 4.2. The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of new homes an area needs to plan for (PPG Paragraph: 002 Reference ID: 2a-002-20241212).
- 4.3. Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document (NPPF, Footnote 27).
- 4.4. Once this number has been identified, local planning authority must then make an assessment of the amount of new homes that can be provided in their area (PPG Paragraph: 040 Reference ID: 2a-040-20241212). If this exceeds the minimum housing need set out in the standard method, the local planning authority may be able to demonstrate a surplus that could be used to meet the housing needs of other areas.
- 4.5. If the amount of new homes that can be provided is below the minimum housing need set out in the standard method, then local planning authorities must revisit their assessment of land supply by both seeking to identify an additional supply of land and testing assumptions applied to the sites available, including proposed densities and typologies.
- 4.6. PPG Paragraph: 025 Reference ID: 3-025-20190722 advises that where there is clear evidence that the needs of the area cannot be met, the council should seek to engage with other local planning authorities in accordance with the Duty to Co-operate (Localism Act 2011) to establish how unmet needs might be met in these areas.

- 4.7. Housing need in Hastings is currently 697 dwellings per annum, amounting to 12,546 over the period 2023-2041. A Gypsy and Traveller Permanent Pitch need in Hastings is 12 pitches.
- 4.8. Hastings available land supply allows for around 25% of its housing needs to be met, potentially rising to around 35% should the development potential of areas identified for regeneration and for additional work to establish development suitability are full optimised.
- 4.9. In order to maintain this level of supply, the council has:
- Included a windfall figure of 35 dpa (incorporating windfall from Permitted Development Rights (PDR));
  - Increased densities of existing sites where possible following a site-by-site reassessment;
  - Relaxed minimum site size requirements for inclusion in the SHELAA and relied on potential dwelling yield to identify further sites.
- 4.10. This 25% figure also reflects moderate delivery rates that have already taken place at the start of the plan period during 2023-24 and 2024-25, and the extension of the plan period to 2041 to cover the full 15 years beyond the Plan's adoption.
- 4.11. Regarding Gypsy and Traveller Pitch needs, the council's available land supply allows for around 17% of its pitch needs to be met.

## Cycle 1: 3 November 2021

- 4.12. Hastings Borough Council contacted 17 Local Planning Authorities in East Sussex, Kent and the Greater London Authority (GLA) on 3 November 2021.
- 4.13. At this time, the standard method identified a housing need in Hastings of 9,075 new homes over the period 2021-2039. It was anticipated that the council require support to meet a shortfall of 5,175 dwellings over this period.

*Table 2: Summary of responses to Cycle 1 unmet need letters*

<b>Local Authority</b>	<b>Summary Of Comments</b>
Ashford Borough Council	<ul style="list-style-type: none"> <li>• Not able to assist as have just adopted a new local plan with challenging housing targets.</li> <li>• As we are not in the same housing market area do not think that they can practically meet our need.</li> </ul>
Brighton and Hove	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need.</li> <li>• Current housing requirement in Brighton of 2331 per annum.</li> <li>• Physical geography of a tightly constrained boundary and coastal position, make it unviable to meet any need arising from Hastings.</li> </ul>

Crawley Borough Council	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> <li>• Current housing requirement in Crawley of 718 per annum.</li> <li>• Unmet housing need of 6168 dwellings over the plan period.</li> <li>• Tight geographical constraints alongside issues surrounding airport noise at Gatwick make it unviable to meet own needs and Hastings.</li> </ul>
Eastbourne and Lewes	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> </ul> <p>Lewes:</p> <ul style="list-style-type: none"> <li>• Current identified requirement is 782 homes per annum (602 homes for area outside the South Downs National Park)</li> <li>• Will not be able to meet own needs due to the environmental, landscape and infrastructure constraints identified in previous examination, which are unchanged.</li> </ul> <p>Eastbourne:</p> <ul style="list-style-type: none"> <li>• Current identified requirement is 693 per annum.</li> <li>• Eastbourne has similar constraints to Hastings which mean it will not be able to meet own need or Hastings numbers.</li> </ul>
Folkestone and Hythe	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> <li>• Have just been through examination and are about to adopt plan.</li> <li>• As we are not in the same housing market area do not think that they can practically meet our need.</li> <li>• development capacity within Folkestone &amp; Hythe is severely limited, constrained as the district is by extensive areas of high flood risk and the Kent Downs Area of Outstanding Natural Beauty.</li> </ul>
London Borough of Bexley	<ul style="list-style-type: none"> <li>• No response</li> </ul>
London Borough of Croydon	<ul style="list-style-type: none"> <li>• No response</li> </ul>
London Borough of Southwark	<ul style="list-style-type: none"> <li>• No response</li> </ul>
Maidstone	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> <li>• No functional link between our two housing areas</li> <li>• Do not think we have appropriately assessed all options through our SHELAA (e.g. Breadsall site)</li> </ul>
Mid Sussex	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> <li>• Are currently starting a review of the plan and are developing work around SHELAA so are not yet in a position to determine capacity.</li> <li>• However, any capacity to meet neighbouring need would be prioritised to those authorities in the housing market area, which Hastings is not.</li> </ul>
Rother District Council	<ul style="list-style-type: none"> <li>• Are not currently in a position to confirm whether they will be able to meet their own housing needs, however given</li> </ul>

	<p>housing numbers it is unlikely they will be able to meet their own numbers.</p> <ul style="list-style-type: none"> <li>• Welcome the opportunity to further discuss options for sites on the Hastings-Rother Urban fringe</li> </ul>
Sevenoaks	<ul style="list-style-type: none"> <li>• No response</li> </ul>
Swale	<ul style="list-style-type: none"> <li>• No response</li> </ul>
Tandridge	<ul style="list-style-type: none"> <li>• No response</li> </ul>
Tonbridge and Malling	<ul style="list-style-type: none"> <li>• No response</li> </ul>
Tunbridge Wells	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> <li>• As we are not in the same housing market area do not think that they can practically meet our need.</li> <li>• Do not believe we have appropriately assessed all opportunities within our area or others to meet the appropriate need.</li> <li>• Are not clear why our proposed numbers have reduced since the regulation 18 document and the letter.</li> <li>• Further consideration of windfall numbers from PD rights should be assessed.</li> <li>• Consideration of Covid-19's effect on economic land allocations and their potential for residential uses should be investigated.</li> <li>• Exploration of sites on the urban fringe.</li> <li>• Any possibility of capacity for unmet need in Tunbridge wells will be considered for the wider delivery of the West Kent HMA first.</li> </ul>
Wealden District Council	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need at this stage.</li> <li>• Are not yet at a stage in the local plan progress to confirm numbers.</li> <li>• Given the geographical distance between the two authorities, they do not consider that this would be a sustainable option for development.</li> <li>• Do not consider that they are within the same Housing Market Area as HBC</li> </ul>

- 4.14. 7 local planning authorities did not respond nor provide a position.
- 4.15. Of those that responded, all advised that they were not in a position to assist or meet in full the identified unmet need.
- 4.16. Maidstone and Tunbridge Wells councils considered that they were unable to access sufficient evidence that the council and neighbouring Rother district had been robust in their approach. This included:
- a. Confirmation that the development potential Land at Breadsell had been fully explored and was up to date.
  - b. Clarity on how the windfall figure had been derived;
  - c. Clarity on assessments leading to retention of employment land;

- d. Confirmation that opportunities within the urban fringe have been fully explored.
- 4.17. In the majority of cases the council were advised that should a surplus be identified, priority would be given to plan-making authorities within adjacent boroughs or the Housing Market Area.
- 4.18. The council remained unable to meet housing needs either within their area or through co-operation.

## Cycle 2: 19 March 2024

- 4.19. Hastings Borough Council contacted 18 Local Planning Authorities in East Sussex, Kent and the Greater London Authority (GLA) on 19 March 2024.
- 4.20. At this time, the standard method identified a housing need in Hastings of 9,620 dwellings over the period 2023-2041. It was anticipated that the council require support to meet a shortfall of 6,432 dwellings over this period.
- 4.21. The letter confirmed that additional work had been undertaken or made available to address the considerations raised during the previous cycle in 2021. These were:
- a. A re-evaluation of some sites in relation of some sites in terms of the suitability and achievability tests.
  - b. A deeper exploration of windfall potential.
  - c. A detailed exploration of potential sites on, or in close proximity to, the Hastings-Rother boundary, in cooperation with Rother District Council officers.
  - d. Development of additional relevant supporting studies, including a playing pitch and built facilities strategy. We have also continued to develop our sustainability appraisal, which critically now assesses reasonable alternatives.

Table 3: Summary of responses to Cycle 2 unmet need letters

	Local Authority	Summary Of Comments
1	Ashford Borough Council  Letter 9 April 2024	<ul style="list-style-type: none"> <li>• Ashford Borough Council cannot assist</li> <li>• Early stages of preparing a new Local Plan to 2041</li> <li>• recently undertaken a Call for Sites exercise</li> <li>• “We are likely to face a difficult challenge in meeting our own housing need going forward, in part due to the issues we face around dealing with nutrient neutrality”</li> <li>• “Not convinced how Ashford could practically meet demand for housing in Hastings in any event”</li> </ul>
2	Brighton and Hove City	<ul style="list-style-type: none"> <li>• Repeat response can’t help HBC unmet need.</li> </ul>

	Local Authority	Summary Of Comments
	<p>Council</p> <p>Letter 27 March 2024</p>	<ul style="list-style-type: none"> <li>Physical geography of a tightly constrained boundary and coastal position, make it unviable to meet any need arising from Hastings</li> <li>City Plan Part 1 (2016) sets out 660 dpa = 44% of OAN in 2015 was 1506 dpa (13200 dpa v 30120 dpa) therefore own substantial shortfall</li> <li>Current assessed housing need using standard method is 1728 dpa subject to 35% uplift (top 20 urban centres) increases to 2,333 dpa</li> <li>Completions 2010-2023 522 dpa.</li> <li>Revised SHMA published and to consider call for sites Summer 2024</li> <li>Early-stage Review of City Plan Part One but consider it unlikely to change position due to high level of housing need and limited housing delivery</li> </ul>
3	<p>Crawley Borough Council</p> <p>Letter 20 March 2024</p>	<ul style="list-style-type: none"> <li>Not in a position to meet HBC unmet need and limited opportunities to deliver own housing need</li> <li>Has tight administrative boundaries and its constraints, including aircraft noise arising from Gatwick Airport</li> <li>The draft Crawley Borough Local Plan 2023-2040 submitted in July 2023 final Main Modifications published March 2024</li> <li>Crawley to accommodate 5,330 dwellings mainly in a new neighbourhood and the TC = meeting 42% of housing needs</li> <li>Standard method need 12,835 total dwellings = 755 dpa</li> <li>Thus, overall unmet housing need arising from within the borough is 7,505 dwellings for Plan period 2023 – 2040.</li> </ul>
4	<p>Eastbourne Borough Council</p> <p>Letter 29<sup>th</sup> May 2024</p>	<ul style="list-style-type: none"> <li>Not able to meet own unmet need nor assist HBC</li> <li>Eastbourne Core Strategy LP 2013 requirement for 5022 homes 2006-2027 = 240 dpa. OAN = 400 dpa</li> <li>To justify reduced requirement Eastbourne (like Hastings) the Inspector considered to be a tightly confined urban authority with significant physical and environment constraints - surrounded by South Downs National Park, the English Channel to the south, and boundary with Wealden District to the north and east, and much of the land in central area (Eastbourne Park) functional floodplain.</li> <li>The Eastbourne Local Housing Needs Assessment (LHNA) (2023) housing market area covers Eastbourne and South Wealden not Hastings</li> </ul>

	Local Authority	Summary Of Comments
		<ul style="list-style-type: none"> <li>• does note that Eastbourne’s housing market area does have migration links to others inc. Hastings.</li> <li>• The current Local Housing Need (‘standard method)’= 735 dpa</li> <li>• Between 2006 and 2023 delivered 3,554 homes = Av 209 dpa Since 2018 Av = 170 homes dpa</li> <li>• 2022 Housing Delivery Test result of +32%.</li> <li>• New local plan Issues &amp; Options consultation in 2019 and Growth Strategy consultation in 2022 indicate potential capacity to accommodate 6,401 homes (2019-2039) = 320 dpa.</li> <li>• Shortfall of 415 dpa against local housing need</li> <li>• identified potential future capacity “making the most efficient use of previously developed land within the built-up area through increasing the density of new development in locations that are highly accessible to services and public transport, whilst also respecting the character of the local area, and seeking higher densities on sites in the town centre through the provision of taller buildings. It also includes sites within Flood Zone 3a, subject to exception testing”.</li> <li>• Regular engagement with Wealden District Council (Duty to Co-operate) whether any Eastbourne’s unmet need can be accommodated</li> </ul>
5	<p>Lewes District Council</p> <p>Letter 29<sup>th</sup> May 2024</p>	<ul style="list-style-type: none"> <li>• Not be able to assist Hastings Borough Council in addressing their unmet development need as issues over meeting own needs in full</li> <li>• Lewes has also declared an unmet need and advised neighbouring authorities to help</li> <li>• Environmental, landscape and infrastructure constraints restrict capacity. 56% of area is within the South Downs National Park and other large parts of remaining has significant environmental constraints that limit the level of housing growth to below the level of housing need</li> <li>• Issues also with infrastructure capacity</li> <li>• Local Plan Part 1 (Joint Core Strategy with the South Downs National Park) adopted 2016 identified requirement for 6,900 net additional dwellings between 2010 and 2030 across the whole District, disaggregated to 5,494 net additional dwellings outside the South Downs National Park = 275 dpa</li> <li>• Lewes consulted on ‘Issues &amp; Options’ July 2021, ‘Preferred Options’ February 2024, now progressing towards a Reg 19 plan.</li> </ul>

	Local Authority	Summary Of Comments
		<ul style="list-style-type: none"> <li>• Lewes Local Housing Needs Assessment (2023) sits within a Greater Brighton housing market area. The strongest relationship in terms of household migration with Brighton, Lewes has migration links to Brighton, Eastbourne Wealden &amp; Gatwick/Crawley</li> <li>• The baseline housing need figure for the whole of Lewes (including the SDNP) using the Standard Method = 782 dpa excluding SDNP = 602 dpa which is 12,040 new homes for the plan area from 2020 to 2040.</li> <li>• Land Availability Assessment (LAA) says not enough land available to meet growth needs given constraints</li> <li>• November 2023, 'Towards a Lewes Local Plan: Spatial Strategy and Policy Direction Reg 18. more appropriate to express the requirement as the range for the housing requirement between 5,412 homes (271 dpa) and 9,365 homes (468 dpa) = shortfall between 2,675 to 6,628 dwellings.</li> <li>• LDC contacted surrounding authorities to inform them that it is likely that there will be unmet needs arising from the Lewes Local Plan, which will be required to consider as part of their review and/or production of a new local plan.</li> </ul>
6	<p>Folkestone and Hythe District Council</p> <p>22<sup>nd</sup> March 2024</p>	<ul style="list-style-type: none"> <li>• adopted Core Strategy Review March 2022 for the period to 2036/37.</li> <li>• Beginning new local plan with a new Strategic Housing and Employment Land Availability Assessment and 'call for sites'.</li> <li>• "We do not know what development capacity the 'call for sites' will reveal, nor what housing need figure Folkestone &amp; Hythe will be required to meet over the plan period of the new local plan. Therefore, we cannot assist Hastings Borough Council in meeting its housing need, although as we progress with our new local plan we will keep this situation under review."</li> <li>• the district is subject to significant constraints to the north-east protected Kent Downs National Landscape (Area of Outstanding Natural Beauty) To the north-east constrained by problems of wastewater discharges into the River Stour catchment affecting the Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site within the Canterbury City administrative area, due nitrogen and phosphorus nutrient levels. To the</li> </ul>

	Local Authority	Summary Of Comments
		<p>south and west of the district large areas of land are classed as Flood Zone 3 and areas of extreme flood hazard. Dungeness continuing into Rother District, is protected including as an SAC, SPA, Ramsar site and SSSI.</p> <ul style="list-style-type: none"> <li>• As part of the Core Strategy Review, the council undertook a Growth Options Study to explore the potential for strategic-scale growth within the district. This identified an area to the north-east, adjoining the Kent Downs AONB, as potentially suitable for large-scale growth. This was allocated in the Core Strategy Review for development as a new garden settlement for 8,000-10,000 new homes. The new garden town Otterpool Park up to 8,500 homes and other uses, was granted outline planning permission subject to legal agreement in April 2023.</li> <li>• Folkestone &amp; Hythe can meet its housing need in full to 2036/37 through existing planning permissions and development allocations in the 2020 Places and Policies Local Plan and 2022 Core Strategy Review, including Otterpool Park.</li> <li>• Quote Inspectors found that the council Core Strategy Review had: "... undertaken a thorough and robust appraisal of the options to accommodate the growth necessary to deliver the housing requirement. The majority of the district is subject to significant environmental or physical constraints and the potential for development within or adjoining existing settlements has been maximised."</li> </ul>
7	London Borough of Bexley	<ul style="list-style-type: none"> <li>• No response</li> </ul>
8	London Borough of Croydon	<ul style="list-style-type: none"> <li>• No response</li> </ul>
9	London Borough of Southwark	<ul style="list-style-type: none"> <li>• No response</li> </ul>
10	<p>Maidstone Borough Council</p> <p>Letter 2<sup>nd</sup> April 2024</p>	<ul style="list-style-type: none"> <li>• Not in a position to meet our unmet need</li> <li>• Maidstone Local Plan Review (LPR) adopted March 2024. Given the very recent adoption of the LPR and the growth requirements contained within it, MBC is not in a position to review the LPR nor to assist in meeting any of the unmet housing needs of Hastings Borough.</li> <li>• 'The Duty to Co-operate, as set out in Section 110 of the Localism Act 2011, requires local planning authorities to co-operate in relation to strategic cross-boundary issues. MBC would</li> </ul>

	Local Authority	Summary Of Comments
		therefore expect Hastings Borough Council to further engage with their neighbouring authorities with which they share a boundary in seeking to meet any unmet needs’.
11	Mid Sussex	<ul style="list-style-type: none"> <li>No response – previously gave comments.</li> </ul>
12	Rother District Council  NB discussions over MoUs and request received to finalise a Statement of Common Ground	<ul style="list-style-type: none"> <li>No response – previously gave comments</li> </ul>
13	Sevenoaks District Council  Email 27/3/2024	<ul style="list-style-type: none"> <li>undertook Reg.18 (part 2) which ended in Jan 2024. Reg.19 in planned for summer 2024, with submission by the end of the year</li> <li>“unable to assist – we are struggling to meet our own need, and have previously submitted a (unsuccessful) plan which did not meet full need due to constraints”</li> <li>environmental and planning constraints prevent being able to meet own LHN figure. – 93% Green Belt, 60% National Landscape, extensive heritage constraints etc.</li> <li>recently consulted on three options which approximately meet LHN, but all of these options include GB release</li> </ul>
14	Swale	<ul style="list-style-type: none"> <li>No response</li> </ul>
15	Tandridge District Council  Letter 9 April 2024	<ul style="list-style-type: none"> <li>not currently in a position where it could help HBC achieve housing needs.</li> <li>TDC ‘Our Local Plan 2033 on recommendation of the Examination Inspector will be formally withdrawn and work will begin on a new Local Plan in Spring 2024.</li> <li>Tandridge District has major policy constraints, including Green Belt covering 94% of the District, two Areas of Outstanding Natural Beauty (National Landscapes), and extensive areas subject to flooding, as well as significant infrastructure capacity constraints within the District (for example around the M25 J6 and other parts of the strategic road network), all of which can reasonably be expected to significantly reduce the housing requirement.</li> <li>Objectively Assessed Need (OAN) did not reach conclusion due to cessation of the Examination, however OAN was calculated as</li> </ul>

	Local Authority	Summary Of Comments
		<p>ranging between 266 and 470, depending on the choice of annual population projections, substantially less than the estimated Local Housing Need of 639 resulting from the standard method.</p> <ul style="list-style-type: none"> <li>• The Inspector concluded that the housing requirement should be less than OAN, as defined in the 2012 NPPF, due to a number of factors, including the degree of major policy constraints within the district” .... ‘It is clear to me that there are specific policies of the Framework which indicate that development should be restricted in Tandridge and that in principle, the Plan would be sound in not meeting the OAN in full.’ (Inspectors Report, Annex 1 - ID16, paragraph 44)</li> <li>• “Whilst subsequent revisions to the NPPF have introduced the concept of local housing need, the Council nevertheless fully anticipates that the likely future housing requirement will similarly be lower than the local housing need due to the presence of constraints”</li> </ul>
16	Tonbridge and Malling	<ul style="list-style-type: none"> <li>• No response</li> </ul>
17	Tunbridge Wells  Letter 26 March 2024	<p>Reg.18 (part 2) which ended in Jan 2024. Reg.19 in planned for summer 2024, with submission by the end of the year</p> <ul style="list-style-type: none"> <li>• TW are struggling to meet own need, and have previously submitted a (unsuccessful) plan which did not meet full need due to constraints</li> <li>• environmental and planning constraints– 93% Green Belt, 60% National Landscape, extensive heritage constraints etc.</li> <li>• “We recently consulted on three options which approximately to meet LHN, but all of these options include GB release”</li> </ul>
18	Wealden District Council  11 <sup>th</sup> April 2024	<ul style="list-style-type: none"> <li>• Not in a position to confirm numbers at this stage but indication is that there will be local unmet need and therefore an inability to contribute towards meeting other areas unmet need. This to be reviewed as the Plan progresses.</li> <li>• Do not consider that HBC and Wealden are within the same Housing Market</li> <li>• Geographical distance between the two authorities</li> <li>• A lack of “sustainable locations” suitable for new major development.</li> <li>• The district is constrained by 53% High Weald National Landscape &amp; 7% South Downs</li> </ul>

	Local Authority	Summary Of Comments
		<p>National Park. Also, Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), Pevensey Levels SAC/Ramsar site and other Sites of Special Scientific Interest (SSSI) almost 10% of the district</p> <ul style="list-style-type: none"> <li>• Other constraints mentioned: infrastructure provision (particularly major highway improvements), Ancient Woodland and areas that fall within Flood Zones 2 and 3</li> <li>• Housing needs requirement, under the current 'standard method' described (paragraph 61 NPPF December 2023) is 1,200 dpa.</li> <li>• New Local Plan early consultation 'Direction of Travel' Jan 2021. And Wealden draft Local Plan (Regulation 18) March 2024</li> <li>• Over the proposed Plan period (October 2023 to March 2040) this equates to an overall need to deliver 19,800 net new homes, excluding any potential unmet housing needs of other neighbouring local authorities.</li> <li>• Reg 18 Local Plan March 2024 indicated an overall housing figure of 15,729 homes annual target of 953 dpa.</li> <li>• This suggests a shortfall in housing delivery of 4,071 (net) dwellings, 247 (dpa).</li> <li>• the overall housing supply figure for our Regulation 18 consultation is 'capacity' based - that can realistically be delivered within the plan period.</li> <li>• Further evidence gathering will be undertaken prior to future Regulation 19 consultation.</li> <li>• Should our overall housing supply continue to be a 'capacity' based figure it will mean that we are unlikely to be in a position to meet our own housing need or indeed assist neighbouring local authorities with their 'unmet' housing need.</li> <li>• WDC will "consider this further as we progress the plan to account for any new sites submitted to us through the second 'call for sites' process that is running concurrently with the Regulation 18 Local Plan consultation and as we test sites and our growth strategy further with infrastructure providers, including highway modelling".</li> <li>• The Wealden Local Housing Needs Assessment (LHNA) August 2021 concludes with respect to Housing Market Areas (HMAs) that Wealden is overlapped by several different HMAs, which cross and fall within the district boundary in several locations.</li> </ul>

	<b>Local Authority</b>	<b>Summary Of Comments</b>
		<ul style="list-style-type: none"> <li data-bbox="715 259 1401 497">• The HBC and Rother District Council (RDC) Housing and Economic Development Needs Assessment (HEDNA) was published in August 2020. It confirms that Hastings has the strongest relationship in terms of commuting patterns, migration and house price change with Rother.</li> </ul>

- 4.22. 5 local planning authorities did not respond nor provide a position.
- 4.23. Of those that responded or provided a position, all advised that they were not in a position to assist or meet in full the identified unmet need, with the majority indicating they could not meet their own needs in full.
- 4.24. The council were again advised that should a surplus be identified, priority would be given to plan-making authorities within adjacent boroughs or the Housing Market Area.

### Cycle 3: 16 September and 5 November 2025

- 4.25. Hastings Borough Council contacted 18 Local Planning Authorities in East Sussex, Kent and the Greater London Authority (GLA) as well as the London Mayoral Authority on 16 September, 5 November 2025 and 11 November 2025.
- 4.26. At this time, the standard method identified a housing need in Hastings of 12,546 over the period 2023-2041. It was anticipated that the council require support to meet a shortfall of 9,405 - 9,173 dwellings over this period.
- 4.27. The letter explained that the council was seeking clarity on the actions taken in response to the approach set out in the NPPF (2024), including a reassessment of both local and relevant national constraints in light of recent decisions. It also sought to understand whether these factors may indicate a surplus that could help the council meet part of its unmet need.

Table 4: Summary of responses to Cycle 3 unmet need letters

<b>Letter Serial UIN</b>	<b>Local Planning Authority</b>	<b>Date Sent</b>	<b>Response received</b>	<b>Can assist for HN</b>	<b>Plan making Stage</b>	<b>Actions</b>	<b>Notes</b>
UNH-100925-001	Ashford Borough Council	16-Sep-25	Yes	No	Regulation 18	Contact again following closure of Ashford Regulation 18 to facilitate discussions.	Ashford have not referred to a detailed position linked to their evidence base justifying inability to meet a proportion of Hastings' Housing Need. Additional discussions to be undertaken under DTC.
UNH-100925-003	Brighton and Hove Council	10-Sep-25	Yes	No	Regulation 18	Agreed to meet again following densification and capacity study phase 1.	Additional response requested after Brighton have completed review of densities and greenfield sites and Hastings have progressed further with capacity work. Met with Brighton on 10/11/25 and a new response will be submitted.
UNH-100925-005	Crawley Borough Council	16-Sep-25	No	No	Adopted 2024	Contact again seeking response.	Contacted Crawley on 24 Nov 2025 (phone). Additional discussions to be undertaken under DTC to confirm formal response.

<b>Letter Serial UIN</b>	<b>Local Planning Authority</b>	<b>Date Sent</b>	<b>Response received</b>	<b>Can assist for HN</b>	<b>Plan making Stage</b>	<b>Actions</b>	<b>Notes</b>
UNH-100925-007	Eastbourne Borough Council	16-Sep-25	Yes	No	Regulation 18	Contact again after next phase of plan making.	Response received, and indicates that although work to identify additional land supply is ongoing, Eastbourne cannot meet own need and cannot support HBC to meet theirs.
UNH-100925-009	Folkstone and Hythe District Council	16-Sep-25	Yes	No	Scoping	Contact again to agree a timeline for next steps.	Continue to engage during ongoing plan-making stages.
UNH-100925-011	Lewes District Council	16-Sep-25	Yes	No	Regulation 18	Contact again after next phase of plan making.	Response received, and indicates that although work to identify additional land supply is ongoing, Lewes cannot meet own need and cannot support HBC to meet theirs.
UNH-100925-013	Maidstone Borough Council	16-Sep-25	No	Unknown	Adopted 2024	Contact again following Regulation 18 2026.	Contacted on 24 Nov 2025 (phone). Additional discussions to be undertaken under DTC to confirm formal response.
UNH-100925-015	Sevenoaks District Council	16-Sep-25	Yes	No	Regulation 18	Contact again following	Contacted on 05 Sept 2025 (phone). Soaks have extensively worked to release greenbelt in attempt to meet need in full and explored a number of

<b>Letter Serial UIN</b>	<b>Local Planning Authority</b>	<b>Date Sent</b>	<b>Response received</b>	<b>Can assist for HN</b>	<b>Plan making Stage</b>	<b>Actions</b>	<b>Notes</b>
						Regulation 18 2026.	other options to increase potential supply. However, they are unable currently to meet their own need and cannot support HBC to meet theirs.
UNH-100925-017	London Borough of Bexley	05-Nov-25	No	Unknown			
UNH-100925-019	London Borough of Croydon	05-Nov-25	Yes	Unknown	EIP	Contact again following Regulation 18 2026.	Croydon queried if the letter had been sent in error and suggested contacting the mayor's office. Query on rationale for inclusion. Hastings confirmed justification.
UNH-100925-021	Mid Sussex District Council	05-Nov-25	Yes	No	EIP	Contact again following Regulation 18 2026.	Mid-Sussex are currently at EIP and if successful will deliver an oversupply of c.966 dwellings. However, as set out in the draft District Plan (policy DPH1: Housing), MSDC have an established hierarchy with respect to any over-supply. In the first instance, priority is given to the Northern West Sussex HMA, followed by the Greater Brighton/Coastal HMA. Their position is therefore the same as when they wrote to HBC in 2021 – it remains unlikely that Mid Sussex would be able to assist in

<b>Letter Serial UIN</b>	<b>Local Planning Authority</b>	<b>Date Sent</b>	<b>Response received</b>	<b>Can assist for HN</b>	<b>Plan making Stage</b>	<b>Actions</b>	<b>Notes</b>
							meeting the unmet need arising from Hastings.
UNH-100925-023	Rother District Council		See SoCG	See SoCG	See SoCG	See SoCG	See SoCG
UNH-100925-025	London Borough of Southwark	05-Nov-25	No	Unknown		Contact again following Regulation 18 2026.	
UNH-100925-027	Swale District Council	05-Nov-25	Yes	Unknown		Contact again following Regulation 18 2026.	Swale are currently unable currently to meet their own need and cannot support HBC to meet theirs. Further investigation to identify additional land supply in ongoing.
UNH-100925-029	Tandridge District Council	16-Sep-25	No	Unknown	Scoping	Contact again chasing for a response.	Chased 24 November by phone. It is unlikely they can support our request.
UNH-100925-031	Tonbridge and Malling District Council	05-Nov-25	No	Unknown	Regulation 18	Contact again following	

Letter Serial UIN	Local Planning Authority	Date Sent	Response received	Can assist for HN	Plan making Stage	Actions	Notes
						Regulation 18 2026.	
UNH-100925-033	Tunbridge Wells Borough Council	16-Sep-25	Yes	No	EIP	Contact again following Regulation 18 2026.	Response is detailed and sets out the position of TWBC including recent losses to land supply as a result of modifications to the plan, resulting in a 10-year HLS as opposed to a 15-year. The council should ask TWBC to meet with Hastings BC again following adoption of their plan.
UNH-100925-035	Wealden District Council	16-Sep-25	Yes	No	Regulation 18	Arrange series of regular meetings to progress SoCG.	Meeting between both councils 22 Sept 25. Agreed to keep position live regarding both housing and employment land supply following Regulation 18 with both councils and SoCG will be produced. Also identified additional cross boundary issue of coastal change management.
UNH-10092025-00	Greater London Authority	11-Nov-25	No	Unknown		Contact again following Regulation 18 2026.	

- 4.28. 7 local planning authorities did not respond nor provide a position.
- 4.29. Of those that responded or provided a position, all advised that they were not currently in a position to assist or meet in full the identified unmet need, with the majority indicating they could not meet their own needs in full or that any surplus had already been accounted for within their discrete HMA.
- 4.30. LPAs all provided evidence of work undertaken, or due to be undertaken, to identify sufficient land to meet local and neighbouring housing needs. This included:
- a. Exploring opportunities for green belt release;
  - b. Exploring opportunities for densification;
  - c. Exploring greenfield opportunities;
  - d. Reducing LAA thresholds below minimum sizes recommended by the PPG;
  - e. Holding 'calls for sites';
  - f. Regular reviews of LAA sites to identify new opportunities as they become available;
  - g. Settlement capacities studies.
- 4.31. The council were again advised that should a surplus be identified, priority would be given to plan-making authorities within adjacent boroughs, the Housing Market Area or within the proposed geography of the anticipated combined mayoral authorities to be established under the English Devolution and Community Empowerment Bill (2025).

## **5. Meeting Gypsy and Traveller Accommodation needs**

- 5.1. The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA, May 2022) identified a permanent pitch need of 12 pitches for the traveller community for period 2021-2040. Following a review of all proposed site allocations within the Regulation 18 (2021) Draft Local Plan and an additional 'call for [Traveller] sites' that took place in late 2023, the council remained unable to identify sufficient sites to meet the gypsy and traveller pitch need.
- 5.2. A detailed summary of work to meet traveller pitch needs will be available in the Gypsy and Traveller Land Supply Topic Paper.
- 5.3. In February 2024, the council contacted near neighbours and LPA within the GTAA study area to formally ask whether they might be in a position to assist with the unmet traveller pitch needs. A summary of those contacted and their responses is set out below.

Table 5: Summary of responses to 2024 GTTSP unmet need letters

Local Planning Authority	Response
Eastbourne Borough Council	Received 29 April 2024. Not in a position to meet any of Hastings' unmet pitch need, as EBC are unable able to meet their own need and will also be formally asking near neighbours to assist with unmet traveller pitch needs.
Lewes District Council	Received 29 April 2024. Unlikely to be able to meet any of Hastings' unmet pitch need, as it is not anticipated LBC will be able to meet their own need. To be reviewed as work on land supply and the new Lewes Local Plan continues.
Rother District Council	Received 23 April 2024. Unlikely to be able to meet any of Hastings' unmet pitch need, as it is not anticipated RDC will be able to meet their own need. To be reviewed in Autumn 2024.
Wealden District Council	Received 29 May 2024. WDC are in the process of reviewing land supply to meet their own traveller need. Until this work has progressed, WDC are unable to commit to assisting with Hastings' unmet need. This may be reviewed as the evidence base progresses.
South Downs National Park authority	Received 10 May 2024. Unlikely to be able to meet any of Hastings' unmet pitch need, as it is unknown at this stage if the SDNPA will be able to meet their own need. Additionally, the distance of the SDNP from Hastings and the elevated level of protection conferred on the SDNP through its designation present barriers to accommodating unmet needs. Land supply information will be updated in Autumn 2024.

- 5.4. Following this activity, the East Sussex Districts and Boroughs, East Sussex County Council and the South Downs National Park Authority formed the East Sussex and South Downs National Park Authority Area Gypsy and Traveller Accommodation Needs Working Group, which is chaired by Hastings.

- 5.5. The group meets every two months and has been working collectively to grow the potential land supply of gypsy and traveller sites through:
- a. LAA reviews;
  - b. An aligned 'call for sites' in August 2025;
  - c. Joint site assessment criteria for gypsy, traveller and travelling showperson sites to ensure a consistent approach is taken by all parties;
  - d. The joint commissioning of an updated area wide GTAA, to be undertaken in 2026.
- 5.6. The council has identified one additional site as a result of this work which may be capable of yielding one or more traveller pitches, site (HL92: Land at Tilekiln Lane) and is currently in the process of assessing the development potential of the site. However, it is unlikely that this site will be able to accommodate the full need of 10 pitches, and the council will continue to work collaboratively to attempt to address any remaining unmet need moving forward.

## 6. Meeting Employment Land Needs

- 6.1. Employment land needs across the plan period for Hastings show a requirement for 51,297m<sup>2</sup>. In terms of meeting employment needs, like housing, there is limited land available within Hastings to meet employment needs. The Hastings Local Plan Preferred Options (Regulation 18) 2026 is proposing to allocate 40,000 m<sup>2</sup> of employment floorspace in the borough.
- 6.2. Much of the remaining (c.11,000 m<sup>2</sup>) required floorspace may potentially be delivered through regeneration and renewal of existing outdated stock mainly located within the town's existing industrial and employment areas, and in the case of office space, town centres. However, this would be subject to regeneration activity that is not yet demonstrated achievable.
- 6.3. The majority of Hastings unmet need is anticipated to be non-ancillary office space, with a typology-specific deficit of c.16,000 m<sup>2</sup> for which the most suitable location remains the town centre hierarchy, potentially as part of mixed-use developments that also incorporate an element of residential.
- 6.4. There is an additional identified deficit of c.2,500 m<sup>2</sup> B8 (warehousing/ logistics) space. However, this may be offset by a moderate excess of B2, which has similar locational requirements to B8.
- 6.5. Hastings and Rother are working jointly to consider whether typology deficits may be addressed through any surplus in Rother District. However, this may be subject to change following a future update to the HEDNA prior to both council's Regulation 19 stage and remains under review.

## **7. Other matters of cross-boundary strategic importance**

- 7.1. Hastings Borough Council will continue to work with partners to address other matters of cross boundary importance, including but not limited to: employment and skills provision, coastal change management, climate change mitigation and adaptation, renewable energy generation, health and wellbeing, infrastructure planning and delivery, regeneration, economic development, flood risk and coastal change, transport, logistics, freight, High Weald National Landscape, Combe Valley Countryside Park.
  
- 7.2. A record of meetings and engagement will be made available for the next version of this document, to be published in support of the Regulation 19 stage of plan making.