

EVIDENCE NOTE

Re: Hastings Borough Council Local Plan **Date:** October 2025
Subject: Housing and Employment Evidence Position Statement

This note sets out the current position on Hastings Borough Council's housing and employment needs evidence. The latest published evidence is set out in the Rother & Hastings Housing and Economic Development Needs Assessment (HEDNA) Update (February 2024).

In the context of this previously published evidence, this note presents an overview of:

1. The key changes to the national policy context which have occurred since the HEDNA Update was published in February 2024.
2. The evidence within the HEDNA Update which requires updating as a result of the national policy changes, publication of other datasets (including mid-year population estimates/new employment forecasts etc.) and amendments to the plan period.
3. The evidence within the HEDNA Update which may require updating due to the expected publication of new datasets.

1. National Policy Context

The HEDNA Update (February 2024) was prepared under the December 2023 version of the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG). A new NPPF was published in December 2024 which has a number of implications for the way housing and employment needs are assessed, including:

- Revisions to the Government's Standard Method for calculating minimum annual local housing need.
- An amendment to the list of groups who, as a minimum, should have their needs reflected in local planning policy, which now also includes looked after children (paragraph 63).
- An amendment revoking the requirement to deliver a minimum of 25% of affordable housing as First Homes.
- An updated list of sectors whose specific locational requirements should be taken into account in planning for economic development or future employment land needs, including uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics (paragraph 86c).

These will be taken into account in any future update to the HEDNA evidence.

2. HEDNA Update evidence which needs to be reviewed

In addition to taking account of the above changes to national policy and guidance, the following updates to the evidence will also be required to take account of newly published

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datasets and amendments to the plan period:

- Updated demographic modelling to take account of latest available mid-year population estimates including the post-Census rebased estimates 2011-2020 and the 2022-based household projections. This updated modelling would include dwelling-led scenarios linked to the revised Standard Method and would produce revised housing mix calculations, older persons' housing need estimates, disabilities modelling and the needs of other groups.
- Updated assessment of affordable housing needs to take account of the latest house price and rental cost data, an updated local household income profile, latest housing register and Census data including changes by tenure such as the role of the private rented sector.
- Recalculation of the employment land supply/demand balance to take account of 2024-2025 completions and existing commitments which affect take-up trends and identified provision towards future needs.
- Review and sense check of the flexibility margin and loss replacement adjustment that were applied in calculating employment land needs, in order to take account of recent completions data and current market signals.
- Amendments to take account of the revised plan period of 2023 to 2041.

3. HEDNA Update evidence which may require updating

The following further updates to the HEDNA evidence may also be required depending upon the timing of the proposed update relative to the expected publication of new datasets:

- Updated affordability ratios are expected to be published in March 2026 and updated dwelling stock figures are expected to be published in May 2026. Both of these datasets will impact the Standard Method calculation. The new Standard Method outputs will therefore need to be reviewed to determine the scale of any change to the local housing need figure and whether the dwelling-led modelling outputs would benefit from being updated to take account of this change.
- The baseline employment forecasts in the HEDNA may require updating where these become more than two years old. It would also be beneficial to review the local growth sectors that were used to produce the employment growth scenario to confirm that these are still relevant in the current context and determine whether any updates or adjustments to the locally-specific growth scenario projections are required.
- Other national policy changes may potentially impact future plan-making, including the introduction of national development management policies and the proposed new approach to plan-making. The implications of these for the housing and employment needs evidence, as well as their wider implications for the new Local Plan, will need to be assessed as and when published. Although it is assumed there will be some transitional arrangements put in place for authorities that have already progressed a significant way through the plan-making process and are looking to submit by December 2026 – as is the case for Hastings.

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4. Next Steps

It is proposed that the HEDNA evidence will be updated following the Local Plan Regulation 18 consultation stage to take account of the above changes to national policy and the most recently published datasets. It is not deemed necessary to update the HEDNA evidence prior to the Regulation 18B consultation stage due the HEDNA Update (February 2024) providing a comprehensive evidence base which is less than two years old and which has informed a positive strategy for growth across the Borough.

It is considered more appropriate, given the timescales the Council is working towards, and a better use of resources, to consult on the existing HEDNA Update (February 2024) evidence as part of the Regulation 18B consultation and then to undertake a more comprehensive update of the HEDNA evidence prior Regulation 19 consultation. This will help to ensure that the evidence remains up to date at the point of Plan submission.

Any future updates to the HEDNA evidence will also take into account and respond to any comments which may be received during the Regulation 18B consultation relating to the HEDNA Update (February 2024).