

Hastings Planning Strategy Examination

**Matter 5 – Employment, Economic Development and
Town Centres**

Statement by Rother District Council

January 2013

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Introduction

This statement presents Rother District Council's evidence in relation to Matter 5: Employment, Economic Development and Town Centres, namely:

Is the Local Plan's approach to economic development and the protection of employment land clearly articulated, sufficiently justified and in line with national policy?

The statement is structured to address the specific issues for examination as identified by questions raised by the Inspector. It focuses on issues of cross-boundary significance. Not all issues are commented upon.

5.1 *Does the Local Plan set out a clear economic vision and strategy for the Borough which positively and proactively promotes sustainable economic growth and suitably responds to any relevant wider opportunities for growth? Does it take sufficient account of the Chancellor's 2011 Budget proposals to help the economy, including the "Plan for Growth", and the Written Ministerial Statement "Planning for Growth"? How material are these considerations for the Borough?*

5.1a The District Council has supported the economic objectives and the provisions for business land in the Planning Strategy. Its positive approach to economic growth, with particular support for key sectors, resonates with national policy and related statements.

5.1b The District Council is party to the 'shared approach to future prosperity', contained in the Local Plan Strategy, and has a clear economic focus.

5.2 *Does the Local Plan ensure, as far as it can, that sufficient land of the right type is available in the right places and at the right time to support economic growth and innovation? Has the Council worked together with neighbouring authorities, the Local Enterprise Partnerships and the local business community, in accordance with the Framework paragraph 160?*

5.2a Both Rother District and Hastings Borough Councils' have worked together on a joint evidence base – 'the Employment Land and Strategy Review' and its recent update. The work was primarily carried out jointly for the following reasons:

- The two Districts relate well to the extent of the Hastings 'Travel to Work Area' (TTWA).
- The coverage of the "Hastings and Rother Housing Market Assessment"
- The work responds to the particular economic circumstances and needs of what has previously been a 'Priority Area for Economic Regeneration' (RPG9),
- The area of Hastings/Bexhill is identified as an area in greatest need of regeneration in [South East Plan](#) Policy SCT1)

5.2b The Review supports economic growth across the TTWA and identifies the appropriate level of employment growth to achieve an economic step-change across both Hastings and Bexhill.

5.2c The Review also benefits from contributions from East Sussex County Council's demographers and from the economic development officers of all three Councils. Other vital input has come from commercial agents and from key members of the Local Strategic Partnerships, Learning and Skills Council, Sea Space, Locate East Sussex and Job Centre Plus.

5.3c While the the joint '[Employment Strategy and Land Review](#)', and its '[Update](#)' were produced prior to the publication of the National Planning Policy Framework, it is considered that the evidence presented in these documents is wholly consistent with guidance contained within it. The Councils have taken an "objective" view of the need for jobs in the sense that it looks to address low economic activity rates, high unemployment and limited opportunities locally, rather than rely on past development rates.

5.3 Are the proposals for new office space appropriate? If implemented, what benefits would they bring and could they damage the employment prospects of neighbouring authorities and result in any more commuting into the Borough?

5.3a Policies within the Hastings Planning Strategy support the provision of office space in accessible locations, primarily in Hastings town centre, and to a lesser extent, other district centres (Old Town, St Leonards centre, Silverhill and Ore Village). Office space in accessible town centre locations is supported by the NPPF and as such, this approach is supported by Rother District Council.

5.4 Is there sufficient protection for existing industrial and warehousing floorspace in the Borough for the requirements of start-ups and other enterprises needing low rent premises?

5.4a Rother District Council does not wish to make a specific comment in relation to this question raised by the Inspector

5.5 Is the Local Plan's stance and policy on employment land protection clearly defined and adequately justified? Does it accord with the Framework paragraph 22 that the long term protection of sites allocated for employment where there is no reasonable prospect of their being used for that purpose? Would alternative uses of such land and buildings be considered? Have land allocations been regularly reviewed as a basis for the Local Plan's approach?

5.5a Overall, the poor economic conditions and related weak commercial and industrial property market in Hastings mean that it is difficult, in viability terms, to achieve new employment development. Therefore, it is vital to protect business sites which are, or was last used, for employment purposes.

5.5b Rother District Council has an equivalent policy both within its adopted Local Plan (2006)¹ and its' Proposed Submission Core Strategy² which seeks to protect employment sites within the District. As for Hastings, this is to ensure there is adequate land for employment uses within the District.

5.5c Similarly, it is right that both Councils have a presumption of safeguarding employment land, as this is also seen as essential to achieving the respective visions.

5.5d The viability and deliverability of sites is a key issue, as highlighted in the Framework³. It is noted that Policy FA5: 'Strategic Policy for Eastern Area' includes a table that refers to the provision of 11,400 square metres of employment floorspace at Ivyhouse Lane Industrial Estate. Whilst it is appreciated that the Core Strategy is not a site specific document, the District Council has two reservations about this:

1. Deliverability: This site was allocated in 2004, but there has been no development activity, or interest, over the 8 years of relatively buoyant times since. At the time of the Rother Local Plan Inquiry (c2005) the viability of development was questioned. The Council is not aware of any recent appraisal.
2. Developability; The acceptability of the extent of development proposed must be questioned given its location in the High Weald Area of Outstanding Natural Beauty. Indeed, it was objected to by the District Council and was not supported by the Inspector at the Hastings local Plan Inquiry. Furthermore, an objection by the borough council seeking an extension of the allocation into Rother was rejected by the Inspector at the Rother District Local Plan Inquiry (see extract at Appendix 1). The Council has voiced its continuing concerns in relation to the emerging Hastings Local Plan Development Management Plan.

¹ Policy EM2: Retention of employment sites and buildings, page 61

² Policy EC3: Existing Employment Sites, page XX

³ Paragraph 173 - NPPF

5.5e It is noted that two Councils have agreed a joint approach to the management and use of land between Ivyhouse Lane and Rock Lane, within which area this land falls, be addressed through a joint approach. This approach is supported by the findings of the Hastings Borough Council Landscape Assessment (August 2008), the Rother Local Plan Inspectors Report (2005) and the Rother District Council Hastings Fringes Background Paper (Appendix 2). It is contained in the Hastings Planning Strategy at part (a) of Policy FA5 and in Policy HF1 of the Rother Proposed submission Core Strategy.

5.5h To be consistent with the policy for the joint approach to this area, it is suggested that the quantum of additional floorspace at Ivyhouse Lane is omitted from Policy FA5 and that the text at paragraph 5.56 is expended along the lines of:

In assessing the most appropriate balance of land uses, and their management, further consideration will be given to the scale of future employment development at Ivyhouse lane, as well as the potential for housing and for securing environmental, amenity and access improvements'

5.6 Does the Local Plan provide clear guidance on the acceptability (or otherwise) of housing development on sites currently used or allocated for employment? If not, how could this be clarified?

5.6a The proposed policy is similar to that in the Rother Proposed Submission Core Strategy.

Rother District Council does not wish to make a specific comment in relation to questions 5.7 -5.12 raised by the Inspector.

Appendix 1

	<i>to accommodate a development of about 80 dwellings.</i>
Capacity of existing and potential infrastructure to absorb further development	<i>Not assessed</i>
The ability to build communities to support physical and social infrastructure and to provide sufficient demand to sustain appropriate local services and facilities	<i>No local facilities identified as in need of support and no proposals for improvements to local infrastructure and facilities to accommodate the needs of development.</i>
The physical and environmental constraints on development	<i>Within High Weald AONB (unlike adjoining built up area to the south). Sloping land which includes mature trees, many of which risk being lost as a result of the development and associated regrading of the sloping land. Development would be widely seen within the AONB and would harm the natural beauty of the landscape and the rural character of the surroundings. Necessary improvements to Chowms Hill to accommodate a development could damage country lane character.</i>
Conclusion	<i>The site is not needed to meet the social and economic needs of communities in the AONB or the District as a whole. Development would be harmful to the character and appearance of the site and its surroundings in the AONB.</i>

Supplementary Reasoning

14.34 The development of this site for housing would conflict with Policy S24 of the Structure Plan which states in reference to Hastings that ‘No further outward expansion of the town beyond existing commitments will be allowed except for that permissible for early economic development in Policy E10.’

Recommendation

14.35 **I recommend that the Local Plan is not modified in respect of this site**

EMPLOYMENT OMISSION SITE - IVYHOUSE LANE, HASTINGS

Objections

119/3271 Hastings Borough Council (Ivyhouse Lane)
267/3358 Sea Space (Ivyhouse Lane)

Supporting Statements

THE FOLLOWING STATEMENTS OPPOSED THE INITIAL DEPOSIT ALLOCATION OF THE IVYHOUSE LANE EMPLOYMENT SITE AND ARE THUS TAKEN AS SUPPORT FOR THE DELETION OF THAT ALLOCATION IN THE REVISED DEPOSIT PLAN

149/2019 Mr Roy Higgs
150/2020 Mrs. Julie Higgs
154/2024 Mrs M Roberts
155/2025 Mr D Gore
156/2026 Mr R W N Scollay

Issues

- a. Impact on the AONB;
- b. Need for release of further employment land

Reasoning and Conclusions

Impact on AONB

14.36 The triangular-shaped objection site is 5.6ha in area, comprising grassland, scrub and small groups of trees. There is a general fall across the site towards the south-east. This field extends to the west beyond the District boundary into the administrative area of Hastings Borough Council to a tree belt which runs N-S along the line of an old trackway. The administrative boundary is not defined physically on the ground.

In assessing this issue I recognise that the area of land which extends on both sides of the old track, and which lies within Hastings, is allocated for employment purposes in the adopted Hastings Local Plan, notwithstanding a recommendation to the contrary by the Local Plan Inspector.

- 14.37 Paragraph 21 of *PPS7* confirms that AONBs carry the highest status of protection in relation to landscape and scenic beauty and that in these areas the conservation of the natural beauty of the landscape and countryside should be given great weight in planning policies. I accept that paragraph 22 allows for major developments in exceptional circumstances, nevertheless, in the absence of a clear definition of what this entails, the specific reference to ‘major developments that raise issues of national significance’ suggests to me that this would not apply to employment development on this site. I acknowledge that the guidance, in paragraph 21, encourages support for suitably located and designed development necessary to facilitate the economic and social well-being of AONBs and their communities. In my view, any assessment of this need has to be balanced against the potential landscape impact.
- 14.38 The site lies at the southern head of a south-north valley which extends northwards at a right angle away from the Hastings Ridge. It forms part of a relatively broad valley, forming a belt of countryside extending up to the urban edge of Hastings. Two spurs of more elevated land leading away from the main E-W ridge flank the valley. Large stands of woodland, much of it designated as Ancient Woodland, occupy extensive areas of the valley floor. Apart from the Hastings-Ashford railway line which runs through this woodland and overhead power lines that also cross the valley, the southern end of this landscape tract is affected by other urban features, including a cemetery on higher ground to the west; the existing industrial estate and a caravan park to the south and residential development located on rising ground well to the east.
- 14.39 I recognise that various urban features close to the periphery of this valley affect its character at present. As the objection site is at the southern end of the valley, it is in a sensitive and vulnerable location. The land is poorly managed, with invasive scrub a particular feature and on my visit I noted various examples of urban detritus dumped on the land. However, most of the urban developments are placed either on the main ridge to the south or the elevated areas flanking the valley. The exception to this is the Ivyhouse Lane industrial area, along with the neighbouring caravan park, which extends beyond the ridge down its north-facing slope. Nevertheless, the existing valley woodland tends to mitigate the visual effect of the urban development, including a mature tree belt which physically contains the present industrial area on its northern edge. To the east the lower slopes of the valley below the existing housing is undeveloped open land. Having walked through the objection site, and studied it from various more distant elevated viewpoints on both sides of the valley, I am convinced that its character relates clearly to the adjoining countryside to the north and north-west, as opposed to the urban area to the south.
- 14.40 In my view, the valley is a significant landscape feature forming an integral part of the wider Brede Valley countryside to the north. I consider it to be a critically important element of the rural setting of Hastings, immediately beyond the interface with the urban area. Notwithstanding the mature hedgerow along the northern boundary of the site, there is no distinct topographical or substantial landscape feature which would define or contain an extension of the existing employment uses in this direction. I

believe that to release this site for development would seriously erode the character of this valley, compromise its function as an important part of the defined AONB and run counter to the national policy which seeks to protect and conserve the natural beauty of the AONB. My visual assessment of the site from a number of vantage points to the east and west convince me that these conclusions are justified. In my opinion, development on this site would be conspicuous and would seriously intrude upon the extensive views of the valley from these more elevated areas. This conclusion is given added force when account is taken of the site’s sloping topography which would require substantial and potentially intrusive earthworks.

- 14.41 I accept that the allocation of the area to the west within Hastings may lead to development which would extend existing employment uses further into the valley. This would clearly change the character of the valley at this point. Nevertheless, I do not consider that the effect of this development on its own would be quite so adverse. The site tapers to the north and, therefore, its northern projection into the valley would be less extensive and it would be contained by roads and development on two of its three sides. Fundamentally, however, I do not consider that this neighbouring allocation should be used to justify the release of the further large site within Rother because of the significantly cumulative adverse impact on this sensitive part of the AONB.

Need for the Release of Further Employment Land

- 14.42 I have carefully noted the evidence and concerns regarding the acknowledged weakness of the Hastings economy, which also impacts upon Bexhill and other neighbouring areas in Rother. These concerns are reflected in the designation of Hastings and Bexhill as part of the Sussex Coast and Towns Priority Area for Economic Regeneration; the setting up of the South-East Economic Development Agency (SEEDA) Task Force in partnership with both Rother and Hastings Councils and the formation of Sea Space as the executive delivery vehicle for the Task Force. Strategic planning policies also seek to address these concerns. Policy RE7 of RPG9 supports the economic regeneration of the designated Priority Areas. Structure Plan Policy S4(d) requires the making of new allocations of land early in the Plan period for employment use as close to the Hastings urban area as practicable and is linked to Policy S24 with its emphasis on regeneration and economic diversification. Finally, Policy E10(b) seeks to boost the local economy and redress acknowledged shortages of suitable sites in the Hastings/Bexhill area with the release of up to 15ha of land in the short term for high quality business development, subject to the outcome of studies to examine the potential and location of sites. This policy imperative is the subject of an important cross-reference in Policy S24 of the Structure Plan which states in reference to Hastings that ‘No further outward expansion of the town beyond existing commitments will be allowed except for that permissible for early economic development in Policy E10.’ (my emphasis).
- 14.43 It is clear that the two Authorities concerned with the Hastings/Bexhill area have struggled to meet the short-term imperative of Policy E10(b), particularly bearing in mind that the Structure Plan was adopted well over 5 years ago, with the Policy first published in draft form in 1996. Furthermore, Hastings Borough Council in their evidence has stressed the great difficulty that they have experienced in finding suitable sites, notwithstanding the ‘A21 Corridor Study’ in 1996. The Hastings adopted Local Plan has allocated 5 new sites. Two, on land west of Queensway, total

just under 8ha gross. Two other sites together have a gross area of just under 3ha, including a small extension to Burgess Road of 0.4ha, with the remaining allocation to the west of the objection site totalling 5.8ha. Purely in numerical terms the Local Plan would meet the 15ha requirement within Hastings. In addition, within the Hastings Fringe area of Rother covered by the Deposit Draft Local Plan, further allocations are made on Burgess Road (0.8ha) and the 3 small areas at Westfield and Marley Lane which total 1.64ha.

- 14.44 The Structure Plan does not define the term ‘high quality business development’ and the parties at the inquiry were unable to throw clear light on this matter. It is possible that the two Queensway sites may fall within this category. The two small sites would not. In terms of the extension to Ivyhouse Lane, both in relation to the adopted allocation in Hastings and the objection site in Rother, my view is that any employment development would struggle to attain the status of “high quality” principally because the combined sites have no primary frontage to attract potential developers or occupiers and because of the rather tortuous access through an unattractive industrial area. Additionally, as the G.L.Hearn Study of 2002 confirms, the site is straddled by high voltage transmission lines and the ground quality is likely to be poor. When these factors are combined with the potential highway difficulties of channelling more traffic from Ivyhouse Lane on to The Ridge, which already suffers from congestion, I do not believe that the site could be classed as ‘high quality’.
- 14.45 The Structure Plan policy sets out 3 requirements; that 15ha should be released; that this should be in the short term and that it would lead to ‘high quality business development’. The timing imperative has not been met and, although the numerical total may achieve the 15ha figure, it would not lead to “high quality business development”. In addition, there must be some doubt as to whether the whole of the 15ha allocated would be developed. The G.L.Hearn Study of Ivyhouse Lane not only drew attention to the likelihood of poor ground conditions, but also pointed to the sloping topography which would require extensive infrastructure and earth moving investment and the absence of services within the site. None of the development appraisals undertaken by the study produced a positive figure. Consequently, the viability of developing the combined site must be called into question.
- 14.46 Putting the timing question to one side, my conclusion is that the adopted Hastings Local Plan on its own would not produce the Structure Plan requirement in terms of employment land. However, the Strategic Policy refers to the wider Hastings and Bexhill area. Consequently, the Rother District Local Plan also comes into play. With regard to the quantum and quality aspects of Policy E10(b), these would be fulfilled by implementation of 16.3ha of business uses as part of the new community at N E Bexhill, set out in Policies BX2 & BX3. In that sense, therefore, the Revised Deposit Local Plan would resolve the situation. These provisions would be critical in meeting the need for a high quality business location and, in particular, attracting inward investment.
- 14.47 Once more, however, the issue with N E Bexhill, as with the housing provision of the Deposit Draft Local Plan, focuses on the timing of development with regard to the employment provision. This is related to the timing of the completion of the Link Road. Both Policies require that no occupation shall take place until the Link Road is constructed and open. Whilst I recommend some modification in respect of the

housing development, it would be impractical to achieve earlier release of the employment land there without adequate new roads. The forecast date for the Link Road opening has slipped to, at best, the middle of 2009. Not all the employment floor space would be completed before the end of the Plan period. If the completion of the Link Road were to be delayed further, then less floor space would be constructed and available in the Plan period. These considerations, in my view, indicate that, in terms of the provision of employment land, the adopted Local Plan in Hastings and the Deposit Draft Local Plan for Rother, taken together, may fall short of the strategic requirements. As a result, the question to be examined is whether the employment land position is of such concern that the objections identified in relation to the objection site ought to be set aside and the site allocated for employment use.

- 14.48 The objective of Policy E10(b) is to address acknowledged shortages of suitable sites in the Hastings/Bexhill area. In addition to the allocated sites, summarised in paragraph 14.27 above, other sites need to be taken into account. According to the business land supply evidence (2003), undeveloped sites on existing estates in Hastings total some 6.5ha, providing a potential estimated gross floor space total of 26,351sqm. There are no such sites recorded for the Hastings Fringe (including Bexhill). Sites with planning permission in Hastings have a combined gross floor space total of 10,744sqm. The equivalent figure for the Hastings Fringe, including Bexhill, is 4,598sqm. I accept that these floor space estimates are not insignificant, particularly when combined with the total gross floor space estimate of the allocated sites in both Plans (57,060sqm).
- 14.49 There is no doubt that, once implemented, this floor space would assist in meeting the need for jobs and growth in the defined Priority Area. The fact that some of these sites may already be earmarked for development and occupation by specific local firms who are seeking to relocate is not the important consideration. It is the job-creating potential of this future space that is critical. In that context the range of schemes being brought forward by the Task Force in the town centres of Hastings and Bexhill (58,00sqm) must be taken into account, notwithstanding the fact that these are proposed for office use, with a substantial proportion of the two large sites in Hastings planned for educational purposes.
- 14.50 My judgement is that the period between the likely adoption date of the Local Plan in 2006 and the completion of the Link Road, when some of the main employment provision at N E Bexhill would become available, may span approximately 4 years. In my view, given the current supply of allocated, committed and available sites and the employment opportunities they would provide, the situation in the Priority Area is not so calamitous as to require urgent attention in terms of the allocation of additional sites. I acknowledge that the present position in terms of employment site provision may not be wholly comfortable, but in reaching this view I have taken particular note of the active involvement of the Task Force in the area and the fact that within this period the Council’s work on the emerging Local Development Framework will be progressed when further thought would be given to the issue of employment land supply. My overall conclusion, therefore, is that, although the range of sites is not wide, with the majority being relatively small, the need for additional sites in the Hastings/Bexhill area is not so pressing as to outweigh the cogent objections that I have highlighted in relation to the objection site. I consider that the site’s contribution to the role of the AONB and its landscape character must remain paramount.

Recommendation

- 14.51 **I recommend that no modifications are made to the Local Plan in relation to these objections.**

TOURIST ACCOMMODATION OMISSION SITE – COGHURST WOOD, GUESTLING THORN**Objection**

34/1093 Coghurst Wood Leisure Park, Coghurst Wood, Guestling Thorn (Proposals Map)

Issues

Allocation of land for mobile home/holiday chalet development

Reasoning and Conclusions

- 14.52 Objection 34/1093 referred to paragraph 9.24 of the Initial Deposit Local Plan which in turn referred to a then forthcoming appeal inquiry to determine (in summary) whether a 1990 planning permission for 250 self-catering chalets at this site could lawfully be implemented. The objection sought that, notwithstanding these circumstances, part of the site should be allocated for a mobile home park or chalet development in the Local Plan together with an amenity area with enhanced public access. The precise extent and location of the proposed development is not defined in the objection although a letter of 14 February 2005 from the Objector’s agent refers to possible developments of 50-100 chalets depending upon the available access arrangements. However, rather than seeking an allocation for a specific number of chalets, the letter concludes by requesting the allocation of a site of some 4-5 hectares for a ‘tourist development’ associated with a management plan for the balance of 34.8 hectares. The location within the wood for the chalets is not defined.
- 14.53 Since the objection was submitted, the appeal seeking a lawful development certificate has been dismissed [Appeal Ref: APP/U1430/X/03/1124716].
- 14.54 Coghurst Wood lies to the north of Hastings within the designated High Weald AONB. It has been classified as ancient ‘semi natural’ woodland. However in Section 4 I support the Council’s Proposed Change PC/04/03 which would delete the words ‘semi-natural’ and thus bring the local plan definition into line with that in the Structure Plan. I do not consider that the modification would materially affect Coghurst Wood since I understand that it is the longevity of a woodland which is more material to the definition than is the origin of the trees. Structure Plan policy EN17 and Policy DS1 of this plan seek amongst other things to protect such habitats. I acknowledge that some aspects of the defined area of the ancient woodland and of the species present are questioned by the Objector. However, my understanding is that the presence of non-native species is not itself a determining factor. Moreover even were there proven to be errors in the classification it is not open to me to recommend any alteration to that status as it is not part of the Local Plan process.
- 14.55 Even were the woodland not ancient woodland, it would remain a very large and important landscape feature in the AONB. In an AONB, *PPS7* accords great weight to the conservation of the natural beauty of the landscape and countryside and states the conservation of wildlife and cultural heritage as important considerations.