

Hastings Borough Council

Housing Delivery Test Action Plan

August 2021

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1. Introduction

- 1.1. As part of the national drive to increase housing supply, in 2018 the Government introduced an annual housing delivery test as a means of measuring housing delivery at a local level. The housing delivery test measures net new additional homes delivered in the locality against the homes required, over a rolling three year period. Where delivery falls below 95% of the planned housing requirement the Council must produce an action plan; and currently there are further implications where delivery falls below 75%.
- 1.2. Under the first housing delivery test (HDT) published in February 2019 HBC achieved 98% of the three-year target and as result no further action was required. However, the 2020 HDT, published in January 2021, shows housing delivery has fallen below the 95% target, which triggers the requirement to prepare an action plan.
- 1.3. This report provides the action plan and has the following scope:
 - Describes the national planning context relating to the housing delivery test and the results of the HDT 2020 for Hastings
 - Describes the local context of housing delivery, including the relationship to other HBC plans and strategies
 - Analyses and identifies the reasons for under-delivery and the key issues and challenges
 - Explores ways to reduce the risk of further under-delivery
 - Sets out the actions the Council intends to take to improve the supply of much needed homes, where it can
 - Sets out future management and monitoring arrangements

2. Background

What is the Housing Delivery Test?

21. The [National Planning Policy Framework \(NPPF\)](#)¹ sets out the role of the Housing Delivery Test, as follows:

‘To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.’

22. The Housing Delivery Test (HDT) is completed by local planning authorities in the November of any given year and provides a measure based on the preceding three financial years. The Government usually publishes the results for all authorities in the first quarter of the following year.

23. The HDT compares the net homes delivered over three years to the homes required over the same period calculated as a percentage, as follows:

Housing delivery test (%)

$$= \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over two year eleven months period}^*}$$

**For the 2020 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a three-year period but an 11-month period has been used for the 2019/20 monitoring year. This is to account for disruption to housing delivery and monitoring caused by restrictions announced on 23 March 2020, in response to the COVID-19 pandemic.*

24. The [Housing Delivery Test Measurement Rulebook](#)² sets out the methodology for the HDT calculation and is based on the Ministry for Housing Communities and Local Government (MHCLG) statistics for the total net housing completions in a local planning authority area over a three year rolling programme, which includes student and other communal accommodation using a ratio to adjust for occupancy.

25. The national [Planning Practice Guidance \(PPG\)](#)³ states that:

‘From the day following publication of the Housing Delivery Test measurement, where delivery of housing has fallen below the housing requirement, certain policies set out in the National Planning Policy Framework will apply.’

¹ Para. 76, National Planning Policy Framework – July 2021, Ministry for Housing, Communities & Local Government (MHCLG)

² Method for calculating the housing delivery test result, MHCLG – July 2018

³ Para. 042, Planning Practice Guidance (housing Supply & delivery) – 22 July 2019, MHCLG

Depending on the level of delivery, the implications arising are set out in Table 2.1 below.

Table 2.1: Housing Delivery Test – Implications	
Delivery Rate - %	Implication
< 95%	<p><i>Action Plan</i></p> <p>The Council must produce an action plan to identify the causes of under delivery and the necessary actions to address it.</p>
< 85%	<p><i>Buffer</i></p> <p>In addition to producing an action plan, the Council must add a 20% buffer of additional deliverable sites, brought forward from later years, for housing on its five year land supply.</p>
< 75%	<p><i>Presumption</i></p> <p>In addition to producing an action plan and adding a 20% buffer, the Council is also subject to the Presumption.</p> <p>This means that in determining Planning applications the Council must apply the presumption in favour of sustainable development, i.e., planning permission should be granted unless the site is protected under the National Planning Policy Framework or the adverse impacts demonstrably outweigh the benefits.</p>

26. The appropriate implications(s) will continue to apply until the subsequent HDT measurement is published. The relevant consequence for any under-delivery will then be applied. Should delivery meet or exceed 95% there are no further consequences.
27. Where an Action Plan is required, this should be published within six months of publication of the Housing Delivery Test results and the action plan is intended to identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

HDT 2020 - What are the implications for Hastings

28. The results for 2020 were published by MHCLG in January 2021. The calculation and result for Hastings are set out at Table 2.2 below.

Table 2.2: Housing Delivery Test 2020 – Calculation & Result

Number of homes required each year			Total number of homes required
2017-18	2018-19	2019-20	
200	209	394	803

Number of homes delivered each year			Total number of homes delivered
2017-18	2018-19	2019-20	
175	178	86	439

Housing Delivery Test: 2020 measurement	55%
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Housing Delivery Test: 2020 implications	Action Plan, 20% buffer and Presumption
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29. The number of new homes required by MHCLG over the three years to the end of March 2020 was 803. Set against the 439 new homes delivered over this period this results in a 55% HDT calculation. The implication of this is the requirement to develop and publish an action plan. In addition, it means that Hastings is subject to the ‘Presumption’, described in Table 2.2 above, in favour of sustainable development, which provides a ‘tilted balance’ in favour of the developer, i.e., planning permission should be granted unless the site is protected under the National Planning Policy Framework or the adverse impacts demonstrably outweigh the benefits. It also means the Council is required to add a 20% buffer of additional delivery sites for housing to the Council’s five year land supply.
210. Housing delivery is a complex issue not only requiring input from the Council but also from a range of other stakeholders such as land/property owners, developers, housing associations/registered housing providers and Homes England⁴. There is a high demand for good quality affordable homes in Hastings and the Council is committed to working with all stakeholders to achieve the challenging housing targets in the current Local Plan and those it has set for the next 20 years in the draft Hastings Local Plan 2019-2039.
211. This action plan is the Council’s response to addressing the shortfall in delivery of new homes identified by the 2020 Housing Delivery Test. It explains the reason

⁴The Government agency responsible for increasing the number of new homes that are built in England, including affordable homes and homes for market, sale or rent.

why delivering new homes in Hastings is particularly challenging. The Council has undertaken a root cause analysis across a wide range of indicators and activities to help it understand the main issues and challenges affecting housing delivery. This includes an assessment of the barriers that may be preventing new homes being built together with other issues that are having an impact, such as the level and type of planning applications, engagement with key stakeholders, and the Council's own ambitions and organisational arrangements.

212. The plan sets out the measures required to help deliver improvements and identifies a number of actions (immediate, short term and long term) needed to help increase housing delivery and achieve Local Plan housing targets. It also includes robust monitoring and reporting arrangements as these are key to understanding the impact of the action plan and to inform future decision making.

Methodology

213. In preparing the action plan the Council has reviewed a range of information and evidence that it uses to identify and assess opportunities for delivering new homes. This has helped better understand possible barriers to delivery and how best to address them. The key documents reviewed are as follows:

- Local Plan annual monitoring report
- Planning service performance data
- Strategic Housing and Economic Land Availability Assessment (2020)
- Local Plan Viability Study (2021)
- Brownfield Land Register
- Future Housing requirements in Hastings & Rother (2018)
- Empty Homes Strategy⁵

214. The main source of information on housing delivery arising from the current Local Plan is contained in the [Local Plan monitoring report](#). This is prepared using the Council's Planning Policy monitoring system and provides a wide range of information about housing delivery together with an update on the five-year housing land supply.

215. A multi-disciplinary officer working group has overseen the housing delivery analysis and preparation of the action plan report.

Local Plan – Current Position

216. There are two components to the current [Hastings Local Plan](#). Hastings Planning Strategy (adopted in 2014) provides an overall framework for future development within the Hastings Borough up to 2028. The accompanying Hastings Development Management Plan (adopted in 2015) identifies development sites

⁵ See paragraph 3.19 of this report

to meet the vision within the Planning Strategy and contains detailed policies for development management, against which planning applications are assessed.

217. Although the Council can demonstrate a land supply that meets or exceeds the current Local Plan requirement, the fact that the Local Plan is more than 5 years old means that the available land supply has to be assessed against the local housing need, in accordance with national guidance. The current identified housing need is 457 new homes a year based on the [standard assessment method of local housing need](#). Consequently, because this is more than double the annualised Planning Strategy target of 200, the Council is unable currently to demonstrate a positive 5-year housing land supply.
218. Hastings has started the process of developing a new Local Plan for 2019-2039. The [draft Hastings Local Plan \(Regulation 18\)](#) was published for consultation in early 2021. Consultation ended on 24 March 2021 and subsequent versions of the plan will follow statutory processes, including examination in public. Currently, it is anticipated that it will be possible to adopt the final version of the plan before the close of 2023 in line with the Government’s target.

Relationship with other plans and strategies

219. The importance of housing delivery in Hastings is shared across a number of key Council plans and strategies as set out in the table below. Improving housing delivery and increasing the supply of affordable housing are important priorities within the Council’s Corporate Plan, which supports shared responsibility across Council services for responding to the Borough’s acute housing need.

Strategic Document	Description
Local Plan 2011-2028 comprising: Hastings Planning Strategy (HPS) & Hastings Development Management Plan (HDMP)	HPS (adopted 2014) sets out overall framework for future development within Hastings Borough up to 2028. HDMP (adopted in 2015) identifies development sites to meet the vision within the HPS and contains detailed policies for development management, against which planning applications are assessed.
Hastings Borough Council Corporate Plan 2020-2024	Sets out the Council’s vision and ambitions for the next three years within available resources. Maximising the delivery of new homes through the planning system, by the development of the Council’s limited land and property assets and by working in partnership with housing providers is a key strategic priority contributing to the Borough’s regeneration plans. Establish a 5 year target with partners for the provision of additional affordable homes in the Borough and implement a delivery plan for their achievement.
Housing Strategy	Comprises three main workstreams: <ul style="list-style-type: none"> • Homelessness and rough sleeping • Increasing Supply of accommodation

	<ul style="list-style-type: none"> Improving the quality of housing and neighbourhoods <p>Sets out commitment to encourage development and make best use of existing housing stock including:</p> <ul style="list-style-type: none"> Working in partnership with private developers and social housing providers Use of Council owned land for residential development Delivery of more affordable housing Long-term empty homes programme
Hastings & St Leonards Sustainable Community Strategy 2009-2026	'A town with a decent home for everyone' is a key strategic priority in the Hastings & St Leonards community strategy which is overseen by the Local Strategic Partnership, with representation from health, police, ESCC, social housing providers, voluntary sector, business and the local community.
Pride of Place – A Sustainable Community Strategy 2009-2026	<p>Sets out a long term vision for East Sussex 'to create places where everyone can prosper, be safe and healthy and live in a high quality environment'.</p> <p>Providing high quality and affordable housing is a key strategic priority to help deliver this vision across East Sussex.</p>
Hastings Town Investment Plan (TIP) 2021 - 2026	<p>The Town Investment Plan represents the Town Deal Board's vision and ambition for Hastings and will help them towards taking steps to achieving many of their objectives and aim to benefit all parts of the community and businesses. It is a prospectus for the future, showing both public and private funders and investors that Hastings is open for business. The Town Deal projects fall within seven key programme priorities designed to address local skills needs create new and long-term investment, new jobs, increased visitor numbers, footfall and spend within the town.</p> <p>Projects include:</p> <ul style="list-style-type: none"> The construction of new green and low carbon centre of excellence; New employment spaces; Mixed-use developments with new homes; Leisure and creative and cultural facilities; Major improvements to Hastings Castle and other public spaces in the town.

Government Guidance

- Ø The national [Planning Practice Guidance](#) (PPG)⁶ on housing supply and delivery (paragraph 50) suggests a range of issues that Councils can explore as part of the HDT action planning process. This includes reviewing barriers to schemes

⁶Planning Practice Guidance - Housing Supply and Delivery, 22 July 2019, MHCLG

proceeding after planning approval or issues affecting progress of schemes in the Council's five-year housing supply; whether enough planning permissions are being granted and within statutory timescales; whether the mix of sites is proving to be effective at achieving the anticipated rate of delivery; whether pro-active pre-application discussions are taking place to speed up determination periods; the level of ongoing engagement with key stakeholders; and whether issues such as infrastructure or transport need to be addressed at a strategic level within the authority and perhaps also with neighbouring authorities and upper tier authorities.

- 2** The PPG (paragraph 51) also suggests a number of actions that local planning authorities could consider as part of the action plan. This includes revisiting the Strategic Housing Land Availability Assessment to identify suitable sites; working with developers on the phasing or subdivision of sites; the use of planning performance agreements (PPAs); carry out a call for sites; review site allocation policies where they might be acting as a barrier; engaging with key stakeholders on the build out of current sites to identify any issues or barriers; establish whether certain applications can be prioritised and conditions simplified or standardised; ensuring evidence on particular sites is informed by an understanding of viability; reviewing Article 4 Directions; use of CPO powers to unlock suitable housing sites; using the Brownfield Land Register to grant permission in principle to previously developed land; and encourage the development of small and medium sized sites.

- 2** The following analysis of past performance and future housing supply draws on information from both the current Local Plan and the evidence base and aspirations underpinning the draft 2019-2039 Local Plan. The Council has been mindful of Government advice and guidance and, where relevant, has incorporated much of it in the preparation of the Local Plan Consultation Draft (Regulation 18). A ['call for sites'](#) was used to help inform the preparation of the recent [Strategic Housing and Employment Land Availability Assessment](#)⁷ (SHELAA, 2020) and professional advice was sought on the [viability of housing sites](#)⁸ in different zones across the Borough to inform the Local Plan development. This advice is ongoing as the Local Plan update continues. The Council has also sought advice on the Housing Delivery Test from the [Planning Advisory Service](#) (PAS) and Council officers have attended a number of PAS workshops on the HDT and action planning process. This has informed the Council's approach to developing the action plan and the housing delivery analysis.

⁷ Strategic Housing & Economic Land Availability Assessment, October 2020, Hastings Borough Council

⁸ Hastings Whole Plan and CIL Viability Study, January 2021, Aspinall Verdi

3. Housing Delivery - Analysis

Housing Completions

- 31 The Local Plan monitoring report is prepared using the Council's monitoring system and provides a wide range of information about housing delivery together with an update on the five-year housing land supply. Data in the following tables has come from the most recent draft annual monitoring report for 2019/20. The monitoring highlights the significant challenges for housing delivery in Hastings.
- 32 Since the start of the Local Plan period in 2011, housing delivery has resulted in 1,546 net new homes over 9 years, with an average annual rate of 172 (see Table 3.1 below). 516 (33%) of the new homes were achieved on small windfall sites, indicating the LPA's proactive stance to windfall where it contributes to Local Plan objectives. The windfall completion figures demonstrate that the projected allowance within the local plan for small windfall sites of 35 dwellings per annum remains robust and continues to be justified.

Table 3.1: Net new dwellings by monitoring year 2011/12 - 2019/20		
Year	Net new dwellings	Windfall Sites (<6 dwellings)
2011/12	195	65 (33%)
2012/13	148	52 (35%)
2013/14	133	31 (23%)
2014/15	167	67 (40%)
2015/16	244	59 (24%)
2016/17	191	56 (23%)
2017/18	204	67 (33%)
2018/19	178 ¹	62 (35%)
2019/20	86 ²	57 (66%)
Totals	1546	516 (33%)
Annual Average	172	57

Source: HBC Planning Policy

- 33 Prioritising new housing on previously developed/brownfield land to assist regeneration is an important strategic objective in the current planning strategy. Since 2011 87% of gross housing completions have been achieved on brownfield sites. The position is summarised in Table 3.2 below, which shows that on average 182 of the 208 gross housing completions each year were completed on brownfield land.

¹ Adjusted based on HDT calculation methodology for year

² Adjusted based on HDT calculation methodology for year

Table 3.2: New and converted dwellings on previously developed land (PDL) in comparison to greenfield land – 2011/12-2019/20			
	Gross completions on greenfield and PDL	Gross completions on PDL only	% of gross completions on PDL (rounded to nearest)
Average (for the 9 years rounded)	208	182	87%

Source: HBC Planning Policy

- 34 Table 3.3 provides a snapshot for 2019/20 of net housing completions from allocated sites, including those from windfall sites. It also shows the gross number of affordable homes delivered. 16 affordable rented homes were delivered on one site which was a medium sized windfall site and one was developed in its entirety as affordable housing by a private Registered Provider.

Table 3.3: Net housing completions by site 2019/2020		
Site Name (followed by the Development Management Plan or other reference where relevant)	Total net completions	Gross affordable completions
Allocated Sites		
Land West of Frederick Road (former Little Acres Farm) (CVO2)	8	0
sub total	8	0
Other large sites		
Hollington Methodist Church, 325 Battle Road (including 325a Battle Road), TN38 0TA (H45)	6	0
The Robert De Mortain, 373 The Ridge, TN34 2RD (H44)	10	0
56 Alma Terrace, TN37 6BQ (H26)	9	0
former Leolyn Nursing Home, 63-65 Pevensey Road, TN38 0LE (H46)	16	16
91-93, 109 and land rear of 103 Middle Road (H29)	8	0
73 London Road, TN37 6AR (H63)	5	0
sub total	54	16
overall total of large sites completed	62	16
small site windfalls (<5 units) net total	57	0
Overall net total	119	16

Source: HBC Planning Policy

- 35 Table 3.4 shows affordable housing completions as a percentage of all developments since 2011. Over the 9 year period 442 affordable homes were delivered out of the total net dwelling completions representing an average of 28% overall.

	Number of dwellings completed (net)	Number of affordable dwellings completed (gross)	Affordable housing - percentage of all developments
Total	1585	442	28%

Source: HBC Planning Policy

Planning Process

Applications and Decision Making

- 36 Analysis of monitoring information for all planning applications in 2019-2020 is set out at Table 3.5 below. This suggests that the planning process is not a major barrier to housing delivery with 81% of applications approved during 2020 and 84.6% of major decisions and 78.6% of minor decisions made within statutory timescales or agreed timeframe during the two calendar years – 2019-2020.

1. Planning applications 2020 (12 months)	563 applications received
	488 decisions
	395 granted (81%)
2. Major decisions 2019-20 (24 months)	26
Decisions within 13 weeks or agreed timescale	22 (84.6%)
3. Minor decisions 2019-20 (24 months)	928
Decisions within 8 weeks or agreed timescale	729 (78.6%)

Source: MHCLG – Performance Statistics

- 37 Residential planning applications and approvals are a significant part of the Development Management Team's workload. Much of the decision making is carried out under the Council's scheme of delegation as indicated in Tables 3.6 and 3.7 below. Whilst 82% of minor residential applications are decided under delegated authority, as might be expected a greater proportion of major schemes (40%) are referred to Planning Committee for decision. Nonetheless, on average 60% of major housing schemes are approved under delegated authority.

Decision	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Total	%
Delegated	6	6	27	11	8	7	7	7	5	1	85	60%
Planning Committee	13	5	7	7	5	7	2	6	4	0	56	40%
Overall Totals	19	11	34	18	13	14	9	13	9	1	141	

Source: HBC Development Management

Decision	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Totals	%
Delegated	53	67	69	62	51	45	55	74	58	55	589	82%
Planning Committee	19	19	15	8	20	14	14	10	6	2	127	18%
Overall Totals	72	86	84	70	71	59	69	84	64	57	718	

Source: HBC Development Management

- 38 A review of invalid residential planning applications over the past three years is set out at Table 3.8 below. This highlights that on average 60% of all applications are invalid, i.e., required information is missing. The annual average percentage drops to 49% for larger schemes but this is still a significant proportion. Inevitably invalid applications add to the Team’s administrative workload and this is an area for further exploration to identify possible ways of improving the position.

Application Type	% Invalid applications per year			Average p.a.
	2018	2019	2020	
10 + New Dwellings	60%	33.3%	53.8%	49%
1-9 New Dwellings	54.1%	68.1%	61.2%	61%
All Dwellings	54.7%	65.6%	60.4%	60%

Source: HBC Development Management

- 39 The Planning Team aim for a pro-active pre-application process. For large schemes the Team offer a Developer Forum, chaired by a lead Councillor, with invites to ward councillors and adjacent residents, and attended by the developer and or their professional advisers to give an opportunity to discuss the emerging proposals with key stakeholders and members of the public. On the whole pre-application discussions on larger schemes lead to a full application. However, the reverse is true regarding pre-applications from householders or in respect of small schemes. A review of pre-applications leading to full applications over the past three years is set out in Table 3.9 below and this indicates that only 8% resulted in full applications being submitted. The most likely explanation for this is that many of the pre-applications from householders or for small schemes are from applicants wishing to test whether planning permission might be forthcoming and subsequently decide not to proceed.

Table 3.9: Favourable pre-application to submission of full application (%) - 1st January 2018 – 31 December 2020		
Total Pre-Applications for 1 or more dwelling	161	
With Full Applications lodged afterwards*	13	8.1%
* This is based on an application being received more than 5 days after the Pre-Application response being issued		

Source: HBC Development Management

- 3.10 Negotiating section 106 agreements, especially in relation to affordable housing requirements, is a notoriously challenging issue. The impact of affordable housing on scheme viability is well rehearsed elsewhere and negotiations are often protracted and lead to lower than desired levels. Over the past three years the time taken to deal with section 106 negotiations has varied between 56 to 110 median days. This range of performance is within acceptable limits and the time taken to process residential planning applications is not a cause for concern.
- 3.11 Under the current Local Plan and with reference to national policy changes, the council seeks affordable housing contributions on sites of 10 units or more. On brownfield land the requirement ranges from 20% to 25%, depending upon the size of the scheme, and on greenfield land is 40%. However, in practice, with the exception of larger sites, most housebuilders will argue successfully that delivery of affordable housing at these levels makes their scheme unviable and if the scheme is to proceed a lower percentage will need to be agreed.
- 3.12 The pandemic inevitably will have had an impact on planning performance and housing delivery during 2020. Whilst meeting targets 100% of the time is a legitimate aspiration, few if any district local planning authorities are able to achieve this, given current resource constraints. The recent external review carried out by the Planning Advisory Service⁹ identified some areas for improvement that are being acted on but ‘found a team working to a high level and wanting to improve further’. Undoubtedly, the Hastings planning staff team deal with a high volume of work and are operating at capacity. All staff, including senior officers and principal officers, have a significant and probably above average caseload. This means there are limits on the team’s ability to be as proactive as they might like. A key issue identified recently by the Team that is affecting performance are significant delays in obtaining responses from statutory consultees, such as Natural England, Sport England, Southern Water and other utilities, in some cases as much as nine months. Exploring ways of improving response times of statutory consultees is included in the action plan.

Planning Committee

- 3.13 There may be instances where Planning Committee may not always accept officer recommendations even though they are based on relevant Local and National planning policies. This opens the Council up to the time-consuming

⁹ Report on Hastings Planning Service, December 2018, Planning Advisory Service

appeal process and the possibility of significant costs being awarded against HBC.

- 3.14 As around 40% of the larger housing schemes are referred to Planning Committee for decision this could become a barrier to housing delivery. Planning Committee membership can be subject to regular change due to the election cycle, and it is therefore important that committee members are supported in their decision making through a regular programme of training, including setting out the distinction between their role as ward councillors and their judicial planning role. They may also be supported through additional safeguards. For example, Colchester Borough Council, has a 'cooling off' policy when Planning Committee turns down officer recommendations relating to strategically significant sites. This is something the Council plans to explore further as part of the action plan.
- 3.15 A good training programme for Planning Committee councillors already exists and such issues are addressed through the programme. Briefings on the HDT action plan will be provided for Planning Committee and all other councillors, once it is agreed.

Housing Supply

Current Local Plan – 2011-2028

- 3.16 The 5-year housing land supply numbers have been updated to reflect the period from 1 April 2021 – 31 March 2026. In previous Local Plan Monitoring Reports, this was calculated using the Planning Strategy target of at least 3,400 new homes (to be provided between 2011 and 2028). However, the Planning Strategy was adopted in February 2014, and is therefore more than 5 years old. This means until such time as a new housing target is identified in an adopted updated Local Plan, the standard methodology for assessing Local Housing Need (LHN) must be used in calculating the Borough's 5-year housing land supply requirement. The standard methodology currently uses the 2014-based household projections. Using this methodology, the current LHN at 1 April 2021, is 457 dwellings per annum.
- 3.17 This figure is more than double the annualised Planning Strategy housing target of 200 dwellings per annum. Consequently, the Council is unable currently to demonstrate a positive 5-year housing land supply and will be unable to do so until the updated Local Plan is adopted.
- 3.18 In line with the NPPF (paragraph 74) the supply of deliverable sites should in addition, include a buffer, i.e., sites moved forward from later in the plan period. In accordance with the Housing Delivery Test (HDT), because of significant under delivery in the last 3 years, a 20% buffer has been applied to the 5-year requirement (Table 3.10, line (C)). The requirement to include a 20% buffer in the housing land supply calculations compounds the existing problem of being able to meet the 5-year requirement.

3.19 In compiling the 5 year supply figure for the current Local Plan, all sites have been assessed against the three factors: available; suitable and achievable within 5 years. Expected rates of delivery year by year up to 2028 is based on the latest information available from landowners and developers regarding site disposal and timescales for site build-out. Regard is also had to progress around pre-application discussions, monitoring of the discharging of pre-commencement planning conditions, progress on legal agreements (s.106 agreements), and the submission of building control applications. Marketing and estate agent sales information, where available, is also monitored. Whilst the Council has a robust approach to dealing with long term empty homes and this has resulted in many being returned to use, these cannot be counted towards housing supply as they are within existing buildings, unless bringing the dwelling back in to use involves subdivision such as policy-compliant conversion into flats. Table 3.10 below sets out how the 5 year supply has been calculated.

Table 3.10: Five Year Housing Land Supply - v. Land Requirement April 2021- March 2026	
(A) Housing Target	457
(B) 5-year housing land supply requirement (A x 5)	2,285
(C) 5-year housing land supply requirement plus 20% buffer	2,742
(D) Supply of deliverable sites (see table 7 below)	1,155
(E) % supply (D / C)	42%
(F) supply expressed in years	2.10 years

Source: HBC Planning Policy

3.20 The supply of deliverable sites over the 5-year period is based on three categories:

1. Sites which are under construction, have full permission or are at a very advanced stage in the planning application process (resolution to grant full permission subject to the signing of a legal agreement). These sites meet the NPPF delivery test and are capable of being delivered within 5 years.
2. Sites which have outline planning permission or are allocated in the adopted Local Plan for residential development. Based on current information gathered directly from the developers or landowners on these sites, there is clear evidence that developments can be completed or start to be completed within the 5 year period on these sites and that the NPPF test is therefore met.
3. Delivery from the development of small windfall sites, based on current experience.

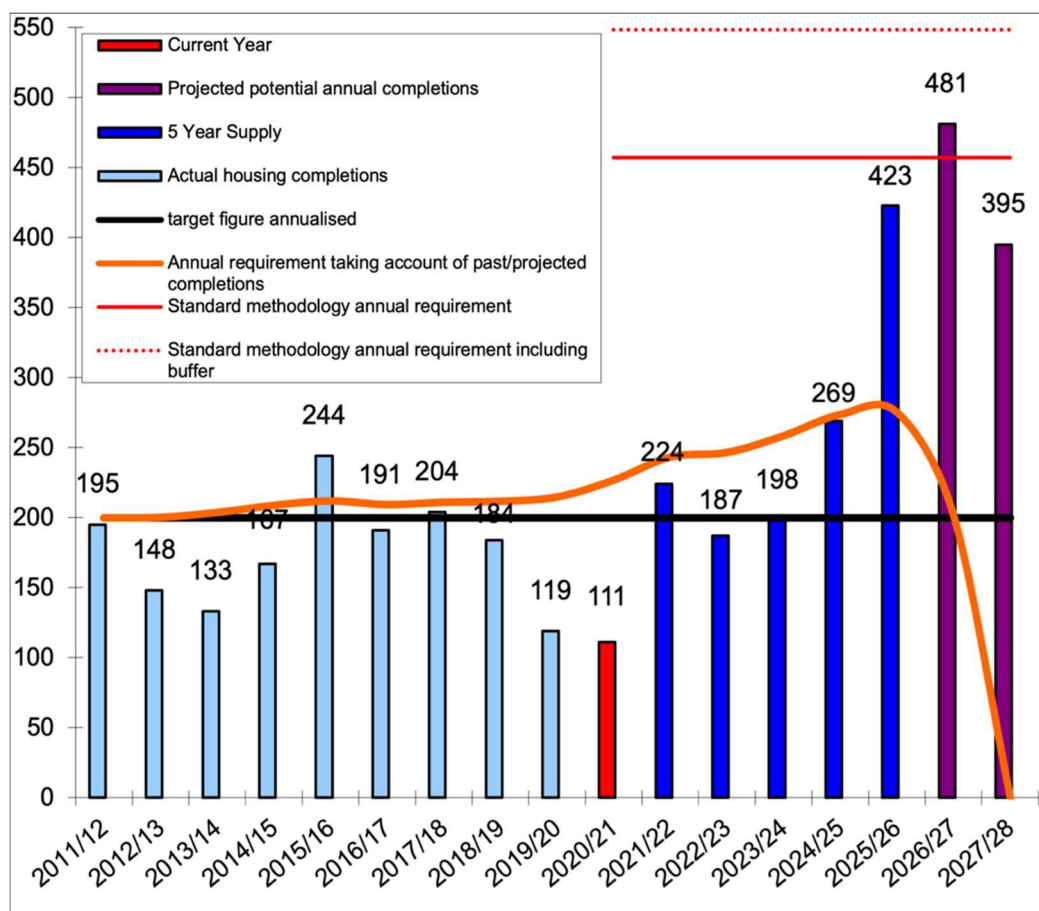
3.21 The overall position is summarised in Table 3.11 below which shows a shortfall in supply of just under 1,500 homes over the next five years.

April 2021- March 2026	
Category of site	No of Homes
Sites under construction, or with full permission, or at advanced stage	707
Sites with developer/landowner engagement likely to progress in full or part	448
Small windfall sites – based on 35 per annum	175
Total 5 Year Supply	1,330
Housing Land Requirement – including 20% buffer	2,742
Shortfall in supply	1,483

Source: HBC Planning Policy

322 Figure 3.1 below sets out historical housing delivery from 2011 up to 2020/21, projected annual completions to 2028 and the 5 year housing supply to 2026, against the annualised breakdown of the current Local Plan target. It also highlights the challenges set by the increased housing requirement using the standard methodology as well as the impact of this plus the 20% buffer on the annual requirement.

Figure 3.1: Housing Trajectory – 2011-2028



Source: HBC Planning Policy

Draft Local Plan – 2019-2039

- 323 Demand for housing, and especially affordable homes, is high in Hastings. As indicated above the latest estimate of housing need using the required national methodology is 457 homes a year, equating to 9,140 over the 20 year life of the draft Local Plan. Based on the recent SHELAA¹⁰ the draft Local Plan includes sites that could sustainably deliver a minimum of 4,275 new homes over the life of the plan, with the possibility of additional new homes delivered in mixed use developments in Hastings town centre. In other words, the land supply within the Borough has the potential to deliver around 215 new homes each year, which is half the current identified housing need. Even with the contribution of the town centre ‘opportunity’ sites the estimated housing need clearly exceeds the availability of potential housing sites across the Borough.
- 324 The draft Local Plan includes the following minimum housing trajectory, set out in Table 3.12 below:

Housing Trajectory by Year	Projected new homes
Year 1 - 5 (2019/20-2023/24)	1,169
Year 6 - 10 (2024/25-2028/29)	1,610
Year 11 - 20 (2029/30-2038/39)	1,495
Total housing supply	4,275

Source: Hastings Local Plan Consultation Draft (regulation 18) Winter 2020/21

- 325 Following the Local Plan Viability Study¹¹, the draft new Local Plan acknowledges the challenge of affordable housing requirements¹² and proposes no minimum requirement on brownfield schemes of 19 or less dwellings and 25% for schemes of 20 or more. On greenfield schemes with 10 or more dwellings a 40% requirement is proposed with no minimum requirements for schemes of 9 or less dwellings.
- 326 The current 2015 Local Plan sets a minimum density for housing developments of 40dph (dwellings per hectare) in sustainable locations (including town centres) and 30dph elsewhere in the Borough (Policy H1: Housing Density). In certain circumstances, different densities may be justified. The draft new Local Plan seeks to increase densities in line with the density assessment in the SHELAA and Draft National Design Code (MHCLG, 2021).
- 327 Until the new Local Plan 2019-2039 is adopted the Council has to assess planning applications against policies in the existing Local Plan. Regard will also be had to the draft Local Plan before adoption. The weight being given to draft policies will increase the closer the draft plan has moved to final adoption.

¹⁰ Strategic Housing & Economic Land Availability Assessment, October 2020

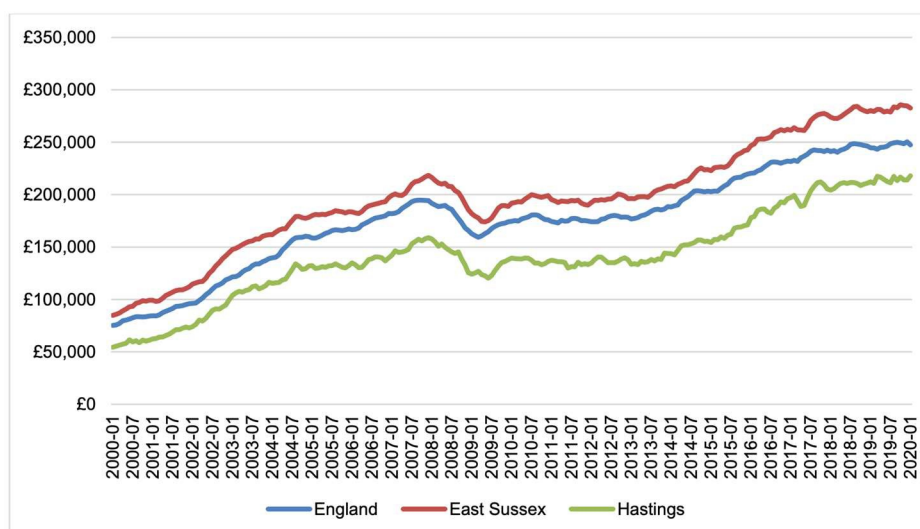
¹¹ Hastings Whole Plan and CIL Viability Study, January 2021, Aspinall Verdi

¹² First Homes are not yet reflected in the emerging policy.

Housing Delivery - Local Context

- 328 Hastings is an urban coastal town in East Sussex with a population of just over 90,000. The town has a 180-degree catchment due to the presence of the English Channel on the south coast and is surrounded by the High Weald Area of Outstanding Natural Beauty (AONB) to the North and East and the Combe Valley Countryside Park and Site of Special Scientific Interest (SSSI) to the west of the Borough.
- 329 In contrast to the relatively affluent rural areas that surround the borough Hastings contains significant pockets of deprivation. Hastings ranks 13th out of all 326 local authorities for proportion of Lower Super Output Areas (LSOAs) among the most deprived 10% nationally (IMD 2015). While the skills base of the resident population is gradually improving, 20% of the working age population have no qualifications. Unemployment hovers at around 4.8% and job density (jobs per person) is just 0.66 which is well below the 0.88 average in the South East. Linked to the lack of employment opportunity and poverty, there are significant health inequalities with Hastings having the worst life expectancy at birth and at age 65 of all the districts and boroughs in East Sussex.
- 330 Major infrastructure challenges exist in Hastings. A high-speed rail connection is still awaited and investment is needed in public transport, walking and cycling infrastructure. Digital connections are improving with 99% 'superfast' coverage across the Borough. However, full fibre 'ultra-fast' connectivity is needed but as yet Hastings has not been selected for commercial investment.
- 331 Despite these challenges Hastings has much to offer. It has an enviable built and natural heritage. The seafront is a key feature with a magnificent coastline. Hastings is rich in diverse landscapes too, with numerous wildlife sites, including several Sites of Special Scientific Interest and nature reserves. The Borough also has a special historic townscape with many high status heritage assets, including over 900 nationally listed buildings recognised for their special architectural or historic interest, 6 scheduled monument sites, 18 Conservation Areas, two registered historic parks and gardens and numerous sites of archaeological interest. The social, heritage and environmental fabric of Hastings does have an important bearing on the housing market. Lower than average income levels lead to lower than average house prices. There is particularly high demand for affordable homes and especially those that are socially rented. Heritage features and environmental assets have a challenging impact on the development potential of certain sites. Average property prices in Hastings are below the national average for England and well below the average for East Sussex, as highlighted in Figure 3.2 below, which is based on data to January 2020.

Figure 3.2: Hastings - Average Property Prices



Source: Land Registry, accessed March 2020

3.32 Data is not currently available to update the chart for 2020/21 using the months of January and July. However, comparable data is available for May 2020 and May 2021 and this shows that house prices in Hastings have increased during the pandemic by 15.2%, which is a faster rate than both England (9.7%) and East Sussex (10%). The position is set out at Table 3.13 below.

Table 3.13: Average Property Price Increase - 2020-2021

	May-20	May-21	% Increase
England	£251,973	£271,434	9.70%
East Sussex	£280,177	£308,088	10%
Hastings	£215,600	£248,282	15.20%

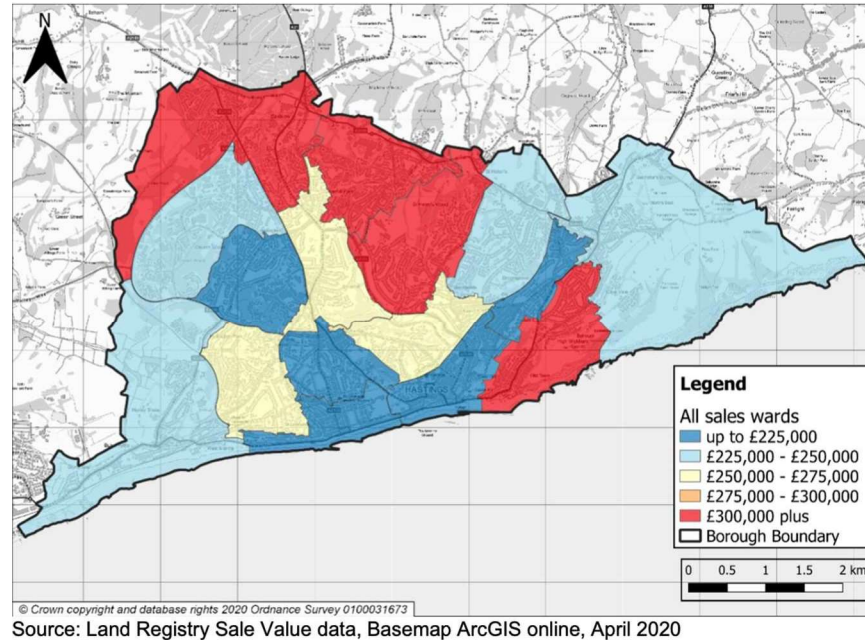
Source: GOV.UK Land Registry

3.33 This shows that in May 2021 average property prices in Hastings remain below those for England and East Sussex but the gap is closing. The strong house price rise in Hastings may reflect the current trend among homeowners to relocate from urban areas to more rural locations during the pandemic as home working becomes a longer term possibility. A [recent survey by Zoopla Research](#)¹³ indicates that 62% of properties in Hastings have increased by more than the average £25,800 salary of house buyers in the town. As such Hastings has topped the ranking of the top ten areas where homes have 'earned' more than the average salary. If this momentum continues it could have a positive impact on development viability and future housing delivery.

¹³ Is your home earning more than you? 15 July 2021, Zoopla Research

- 334 The map at Figure 3.3 below is reproduced from the recent Viability Study and shows property prices grouped in value bands analysed against ward boundaries. The analysis shows higher property values around the outerwards and the east seafront/Old Town area. The majority of past new build has occurred around the urban fringe and property prices are reflected in this.

Figure 3.3: Hastings Values by Ward – April 2018-April



Brownfield Land

- 335 There are limited greenfield development opportunities in the Borough and, as the Local Plan monitoring information shows, most new housing development currently takes place on brownfield land, often with associated high remediation costs. The lower house prices in the Borough, therefore, are an important factor on the speed at which sites are brought forward for development. With some sites there are extra costs arising from site preparation due to dereliction and/or demolition of existing structures. The topography and geology of Hastings (greensand and clay) can cause land stability issues adding to the cost of foundations. It can also result in flooding and the need for extensive surface water drainage as well as the need to protect aquifers. Where land is contaminated this will increase costs significantly, e.g., the Ore power station site. All of these issues add to surveying and design costs in addition to the costs of waste removal and the actual remediation works.
- 336 There are no large scale brownfield, or indeed greenfield, sites in the Borough. Those that are available for housing development tend to be smaller infill sites. The challenges presented by brownfield land and the relatively small size of all housing sites may explain the limited interest from national housebuilders in Hastings as a development destination, as they are unable to roll out their standard designs and layouts. Notably, one local housebuilder, Park Lane Group, has been responsible for much of the recent new build housing

development in the Borough. More recently, interest is showing from a handful of regional housebuilders such as Gem Select and Foreman Homes and one major housebuilder, Bellway. This is largely a result of pro-active engagement by HBC officers with housing developers and registered providers and work to secure infrastructure funding.

- 337 Some examples of allocated housing sites where development has stalled due to remediation and other issues are set out in Table 3.14 below. The Council is giving further consideration to alternative approaches that may help to address these issues and bring forward these types of challenging sites for development.

Site	Comment
12-19 Braybrooke Terrace	Limited recent engagement from landlord. Site remains inactive.
Gambier House and West House	Previous NHS hospital site. Some constraints to development.

Source: HBC Planning Policy

Local Development Orders

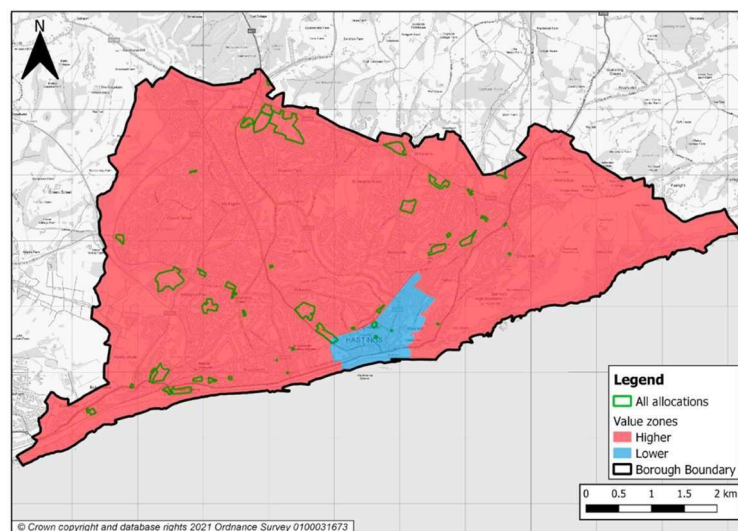
- 338 The NPPF encourages local planning authorities (LPAs) to use Local Development Orders (LDOs) to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area. Initially LDOs were mainly used in respect of land zoned for commercial/employment activity. However, increasingly LPAs are using LDOs to bring forward residential land and the Government is promoting this approach as a way of helping to boost housing delivery.
- 339 LDOs provide permitted development rights for specified types of development in defined locations. They are flexible and locally determined tools that can play an important role in incentivising development by simplifying the planning process and making investment more attractive. Several LPAs are using LDOs on residential schemes ranging from small sites, e.g., 5-6 bungalows to large sites delivering in excess of 200 homes. Often the larger sites are brownfield with complex issues associated.
- 340 Guidance from the Planning Advisory Service (PAS) recommends the [use of LDOs](#) as a positive and pro-active planning tool. It sets out a variety of benefits, including the enhanced reputation of the Borough as an attractive place to do business and encouraging landowners and developers to seize the opportunity to develop on challenging sites. LDOs can help to create great places as well and enable faster more flexible delivery for developers allowing them to meet their own development priorities and achieve a competitive return.
- 341 Establishing an LDO is resource intensive with a significant lead in time but this has to be weighed against the potential for a positive outcome on a challenging

site. The Council intends scoping how to deal with challenging sites and will include consideration of the role that LDOs could play as part of this process.

Development Costs and Viability

- 342 The Local Plan Viability Study¹⁴ was commissioned as part of the evidence base underpinning the draft new Local Plan. More work will be done on the study to inform the development of the Regulation 19 Local Plan. However, the interim version of the study completed in January 2021 indicates that the Council's proposed residential policies are viable on all greenfield sites and the majority of brownfield sites. The study assessed viability on the basis of two value zones; a higher value zone covering most of the Borough and a lower value zone covering central Hastings (see Figure 3.4 below).

Figure 3.4: Local Plan Viability Study Zones



Source: AspinallVerdi, Hastings Borough Council, QGIS, Ordnance Survey, 2020

- 343 In the higher value zone the analysis shows that greenfield development of houses on sites with typologies of more than 10 units is viable with 40% affordable housing, including policies on biodiversity, net zero carbon and electric charging points. Affordable housing contributions were not considered viable on brownfield sites with 19 or less houses in the higher value zone. Building flats in the higher value zone is considered viable with certain typologies but for others is on the margins of viability. Analysis of brownfield flattened development in the lower value zone shows that it is unviable with 25% affordable housing. Density is a key input impacting on viability for all housing types but particularly in respect of brownfield sites.
- 344 Whilst the Viability Study concludes that the Council's housing delivery policies are viable on all greenfield sites and the majority of brownfield sites it suggests the small number of brownfield sites that are currently unviable are still likely to be delivered over the planned period for two reasons. First, existing use values

¹⁴ Hastings Whole Plan and CIL Viability Study, January 2021, Aspinall Verdi

could fall in Hastings town centre, improving viability, because some sites are office and retail uses and occupier demand for poor quality space is likely to continue to weaken which in turn will have a negative impact on these capital values. Second, the Council has a track record of assisting with the delivery of sites with challenging viability while achieving current planning policy obligations such as the Coastal Space Project and Homes England infrastructure funding.

- 345 Where current market values and build costs result in a significant viability gap the Council will negotiate an appropriate and independently verified quantum of affordable housing.
- 346 An important issue highlighted by the study is that there are no sites able to deliver more than 300 homes, which could improve delivery through economies of scale. It also highlights the importance of using available land more effectively and maximising density, where appropriate, to improve viability and also to increase housing supply. The draft new Local Plan embraces the need to increase density in order to do so.

Affordable Housing

- 347 There is a pressing need for more affordable homes in Hastings. Around 1,400 households are registered on the housing list. There are around 6,000 social rented homes across the Borough, owned mainly by Optivo and Orbit Homes but turnover of dwellings is just under 1% a year. This means a long wait for those fortunate enough to be a priority for rehousing.
- 348 Although Hastings has a large private rented sector (38% of the housing stock) it is becoming increasingly unaffordable for low income households, as the Local Housing Allowance has not kept pace with rents and there is a growing affordability gap, especially for those with larger families. Consequently, there has been a significant increase in the number of homeless households living in emergency accommodation. At present there are over 200 households placed in temporary housing with a significant and growing cost to the Council's General Fund.
- 349 Increasing the supply of affordable homes is a key strategic priority for the Council in order to address this need. This can be delivered either by registered providers (housing associations) acquiring sites to develop or through s.106 agreements for parts of sites that then get passed over to a registered provider. Current experience of the Council's Housing Options team is that registered providers are generally only interested in larger sites delivering more than 50 dwellings. They prefer to acquire whole sites and are less interested in taking on small sites or small numbers of dwellings from s.106 agreements given their wider development programme commitments, changing business models and a tougher Government grant regime via Homes England.
- 350 In response to this the Council has agreed an innovative programme to deliver 500 affordable homes over five years using a matrix management approach with a multi-disciplinary team from relevant Council services. Through a

combination of working with registered providers and direct delivery by the Council or via its own 100% owned housing company, together with utilising appropriate publicly owned and private land, the programme has identified sites with the potential to deliver nearly 1,500 new dwellings. Just over 500 would be affordable and the Council anticipates acquiring 200 of these directly.

Council Owned land

- 351 The Council owns sites throughout the Borough, some of which are brownfield land with complicated redevelopment issues such as remediation work or underground flood protection measures, e.g., Seaside Road, West St Leonards. This can often mean long lead in times to getting schemes off the ground, even when a potential purchaser and funding package is in place. Historically it has disposed of sites as part of the asset management strategy, to help support the Council's finances. Generally, for residential sites this has been based on achieving market value for the land in order to maximise the capital receipt. For non-housing sites the priority has been to maximise rental income. On the whole, once marketed, housing sites that are straight forward tend to sell reasonably quickly, as the purchaser will need to deal with any affordable housing/s.106 obligations and a detailed planning application.
- 352 Given the current shortage of affordable homes and lack of schemes being brought forward by registered providers, the Council is considering disposals that will help maximise affordable housing delivery. Any disposals, however, will need to take into account requirements for obtaining best consideration.
- 353 From a strategic perspective, in the current situation where the Council is bearing a significant and growing cost of providing temporary housing for homeless households, it makes sense to consider using Council land in a way that helps reduce these revenue costs. The proposed 500 homes programme approach has the potential not only to increase the supply of affordable homes but also to help improve overall housing delivery and at the same time potentially generate an income stream through acquisition of homes for affordable and/or social rent. The financial implications are complex and not straight forward as adopting this approach will have an impact on the Council's capital programme and overall financial strategy. To succeed the approach will need to be embraced both corporately and politically, assuming it is possible to overcome the financial implications and challenge.
- 354 East Sussex County Council (ESCC) also owns land in the Borough with residential potential, e.g., former educational or adult social care sites and HBC officers work in partnership with ESCC with regards to their landholdings and potential opportunities to bring schemes forward. There is strategic collaboration between ESCC, emergency services and the district and borough councils in East Sussex on land disposals through the SPACES group. However, currently the approach at County level is to dispose of land at market value. There is potential to improve joint working with ESCC to help support HBC's strategic housing and planning priorities and this is worthy of further consideration.

Partnership Working and Investment

- 355 HBC has a good track record of working in partnership with a wide range of stakeholders and accessing funding for housing and regeneration. The Borough is currently working on the Government's Town Deal programme and is one of a small number of Councils invited to bid for up to £25m from the Town Fund. The Government has recently approved a six year [town investment plan](#) for Hastings with a value of £24.3m to support an overall programme of around £100m. Over the next 12 months the [Town Deal](#) board will develop the detailed investment plan with partners. This wide ranging regeneration programme provides the opportunity to match fund housing developments at a number of town centre locations with potential delivery of up to 200 new homes, many in mixed use settings. Hastings' Town Deal programme is an ambitious response to the social and economic challenges posed for coastal towns, especially post Covid. It provides a real and lasting 'placemaking' opportunity and a vehicle for marketing and promoting the town to encourage further investment in the local economy and potentially lead to increased housing delivery.
- 356 As previously stated in paragraph 3.9, the Council's Planning team provide several services to support new developments, including a pre-application process for developers, which includes the option to have a Developer Forum and planning performance agreements. Landowners of larger developments are also given opportunities to present schemes to the Council more widely.
- 357 HBC co-chairs the Hastings, Rother & Wealden Registered Provider Forum with counterparts in Rother and Wealden. This is also attended by Homes England with whom HBC works closely. With support from the Homes England leads, HBC has submitted bids via their Housing Infrastructure Fund, Local Authority Accelerated Construction (LAAC) programme and Small Sites grant. This has led to HBC being awarded up to £6.9m through Homes England's LAAC programme to take forward the development of 192 new homes on Council owned land at Bulverhythe. HBC has submitted a planning application and are considering a joint venture company approach with a local registered provider. HBC also engages with housebuilders, developers and other property professionals through meetings of [Developers East Sussex](#) which brings together public sector and private sector representatives with the aim of delivering quality sustainable development across East Sussex.
- 358 HBC has commissioned master planning exercises to help bring forward complex brownfield sites in its ownership, e.g., Seaside Road, West Marina. This has resulted in interest from a regional developer who is currently in the process of acquiring the site to provide a mixed use scheme including market for sale housing and affordable homes. In June 2021 the Council also submitted a bid to the Brownfield Land Release Fund to develop out a Council owned site using modular construction which would act as a pilot for future schemes.

4. Actions Identified

- 4.1 The Council is already following Government guidance on housing delivery in undertaking a range of activities recommended in the NPPF, as indicated in section 2 above. This section summarises the key actions and initiatives identified through the housing delivery analysis that will contribute to taking forward housing delivery over the next five years. Several key issues and themes have emerged and these form the framework within which future actions will be progressed. These are as follows:
- Prepare and adopt new Local Plan 2019-39
 - Corporate ownership and prioritisation of housing delivery
 - Improved planning application processes and planning decision making
 - Supporting the market to deliver on brownfield land
 - Effective placemaking, marketing and promotion
 - Working with stakeholders, e.g., MHCLG, Homes England to secure infrastructure funding
 - Effective monitoring arrangements
- 4.2 The action plan is set out in the table below. It is organised by the key themes identified in the analysis and for each action provides an indication of the priority in relation to housing delivery (High, Medium or Low), together with a timescale over the immediate (underway), short (0-18 months), and long term (18-60 months). Some actions will require more staff time than others. The Resource Input column provides an indication of the likely level of resources needed to progress the action.
- 4.3 To summarise, in the short term the Council is giving priority to updating the Local Plan and currently is revising the draft Local Plan following the Regulation 18 consultation in early 2021. Decision making arrangements are being strengthened with a cross cutting team approach to increase the supply of affordable housing and to support housing delivery on Council and privately owned land over the next five years. Planning processes are generally sound but it is important to ensure that councillors, especially those on Planning Committee are briefed on the implications of the Housing Delivery Test and the detail of the action plan. The Council has successfully bid for a Towns Fund allocation that will help deliver additional homes on town centre opportunity sites and for Homes England infrastructure funding to support housing development on brownfield land, both of which are being progressed. Engagement with key stakeholders, including funding agencies, at the local and regional level remains a priority within the action plan, to ensure that funding opportunities and opportunities for bringing forward housing schemes are not overlooked. Effective monitoring of the action plan is key to achieving successful outcomes and the plan includes putting in place robust monitoring arrangements.

Housing Delivery Test - Action Plan - July 2021

Key Issue/Theme	Actions	Success measure	Timescale Immediate: underway Short: 0-18 mths Long: 18-60 mths	Priority	Status	Resource Input	Lead Dept [Key at end]
Prepare and adopt new Local Plan 2019-39	1. Evidence base – SHELAA and Whole Plan Viability study - complete 2020/21	Local Plan drafted based on latest evidence	Immediate	High	Complete	N/A	PP
	2. Draft local plan published for consultation (Regulation 18)	Consultation complete – March 2021	Immediate	High	Complete	N/A	PP
	3. Revised draft local plan formally published for representations (Regulation 19)	Local plan and representations submitted to Planning Inspectorate	Short	High	Underway	High	PP
	4. Examination in public and inspector's report	Local Plan approved	Short	High	Not started	High	PP
	5. Local Plan recommended for Council adoption	Local Plan 2019-2039 adopted – Q4 2023	Long	High	Not started	High	PP
Corporate ownership and prioritisation of housing delivery	6. Adopt housing delivery as a key crosscutting theme in the Corporate Plan	Improved decision making across the Council to support housing delivery	Immediate	High	Underway	Low	PPar
	7. Progress development of the 500 homes programme to increase supply of affordable homes	Increase in housing delivery and the proportion of affordable homes built	Immediate	High	Underway	High	HD & HO
	8. Conclude a cost benefit analysis of supporting housing development on HBC and private land through the Council's own housing company or a joint venture approach	Approach agreed leading to increase in housing delivery and the proportion of affordable homes built	Immediate	High	Underway	Medium	HD
Improved planning application processes and	9. Work with public authorities and utilities to reduce statutory consultation response times by discussing the impact on housing delivery	Significant reduction in time taken to issue planning approval on large housing sites	Short	Medium	Not started	Medium	DM

Key Issue/Theme	Actions	Success measure	Timescale Immediate: underway Short: 0-18 mths Long: 18-60 mths	Priority	Status	Resource Input	Lead Dept [Key at end]
planning decision making	10. Provide training for Planning Committee and brief all councillors on the housing delivery test action plan and implications of 'presumption'	Improved decision making at Planning Committee based on current planning policies	Immediate	High	Rolling, annual	Medium	PP & DM
	11. Explore ways to reduce invalid planning applications	Number of valid planning applications increased with less administrative input	Short	Medium	Not started	Medium	DM
	12. Explore introduction of a 'cooling off' policy when Planning Committee is unable to support officer recommendations	'Cooling off' policy implemented	Short	Low	Not started	Low	PP
Supporting the market to deliver on brownfield land	13. Continue to work with developers of large sites using the current Developer Forum approach to facilitate pre-application discussion between planning applicants, key stakeholders, ward councillors and the local community	Number of large schemes brought forward more swiftly to planning approval contributing to the five year housing land supply	Immediate	High	Rolling/continuous	Medium	DM
	14. Scope methods to encourage the development of key sites, including consideration of the possible role that Local Development Orders might play, where resources permit	Issues scoped and action progressed to identify and bring forward potentially viable options	Long	Medium	Not started	High	PP/DM
	15. Maintain and update the Brownfield Land Register annually	Brownfield Land Register up to date and available on HBC website	Immediate	Medium	Underway	Medium	PP
Effective placemaking,	16. Promote Hastings to regional and national housebuilders through publicising the approved Town Deal investment plan	Demand from regional and national housebuilders stimulated with more interest in investing in Hastings	Short	Medium	Not started	Medium	RM

Key Issue/Theme	Actions	Success measure	Timescale Immediate: underway Short: 0-18 mths Long: 18-60 mths	Priority	Status	Resource Input	Lead Dept [Key at end]
marketing and promotion	17. Continue to attend Developers East Sussex Forum	Successful engagement with developers and better understanding of constraints to housing delivery	Immediate	Medium	Underway	Low	HD
Working with stakeholders, e.g., MHCLG, Homes England to secure infrastructure funding	18. Secure match funding for the delivery of 12-15 new homes over the next 6 years from the approved Town Deal Investment plan and investigate other opportunities for town centre development.	Bids developed for approval by Town Deal Board during the next 12 months	Short	High	Not started	Medium	HD
	19. Work with East Sussex County Council (ESCC) to bring forward land in their ownership allocated for residential use to meet local housing need	Disposal of ESCC housing sites contribute to delivery of 5 year housing land supply and affordable homes	Long	Medium	Ongoing	Low	HD/DM
Effective monitoring arrangements	20. Regularly monitor the Housing Delivery Test (HDT) action plan throughout the year and review the action plan annually following release of the HDT results	Progress on HDT action plan updated annually	Short	High	Not started	Medium	PPar
	21. Ensure the annual Local Plan Monitoring Report (LPMR) data informs progress on the HDT action plan	Annual review of progress on HDT action plan informed by latest LPMR data	Short	High	Underway	High	PP
Lead Dept Key	Planning Policy PP Development Management DM Housing Options HO Housing Development HD Regeneration & Marketing RM Policy and Partnerships PPar						

5. Monitoring & Reporting

- 5.1 An officer working group with representation from planning, housing, regeneration and support services has overseen the preparation of this HDT action plan. Given the strategic importance of housing delivery the Council's Managing Director has also had an input to the working group and development of the action plan. Progress on implementing the action plan will be monitored by the housing delivery working group and will be reviewed annually following the release of the latest Housing Delivery Test results.
- 5.2 The current HDT action plan has received the approval of the Council's Corporate Management Group and has the endorsement of Lead Councillors with responsibility for housing and regeneration.
- 5.3 Any suggestions on ways of improving housing delivery and housebuilding in the Borough are welcomed. These can be directed to the Planning Policy team via the following contact details:

email: fplanning@hastings.gov.uk

post: Planning Policy Team, Hastings Borough Council, Muriel Matters House,
Breeds Place, Hastings, TN34 3UY

6. Conclusions

- 6.1 Hastings faces a significant challenge in delivering sufficient new homes to meet current levels of housing need for a variety of reasons, most of which are outside the Council's control. It is constrained by its coastline and surrounded by environmentally sensitive hinterland. Despite having a wealth of heritage assets and architecture, house prices are lower than the average for East Sussex. A high speed rail connection is still awaited and although digital connections are improving full fibre 'ultra-fast' connectivity is needed given the town's location and current road and rail infrastructure. The Borough has a low wage economy with pockets of significant deprivation and consequently there is a very high demand for low cost social housing. Development opportunities are quite limited. There are very few large sites allocated for housing available to enable economies of scale and even fewer greenfield sites. Most new housing delivery, therefore, is dependent on the availability of brownfield or previously developed land. For all these reasons historically there has been limited interest from large national and regional housebuilders in developing new homes in Hastings on the scale required. However, the recently reported house price increases in Hastings could have a positive impact on future housing delivery if the momentum continues.
- 6.2 Nonetheless, the Council is committed to addressing these issues, where it can, at a corporate and strategic level and improving housing delivery and affordable housing is an important priority. The analysis contained in this report indicates that the Council is focusing on addressing the key issues and is not the cause of the problem. Likewise, planning application processes are not a major cause for concern. The Council is following National Planning Policy guidance on housing supply and delivery and in respect of the housing delivery test action plan. Good progress is being made on updating the Local Plan and the Council has sought independent professional help where necessary to inform the Local Plan. Best practice advice and guidance from the Planning Advisory Service on the housing delivery test is informing the action planning process.
- 6.3 The Council is being pro-active in taking the issues forward, including setting up its own housing company and working corporately to increase the supply of affordable homes and improve housing delivery overall. It is engaging with local and regional developers, as well as working collaboratively with Rother District Council and East Sussex County Council and there is a corporate push to increase the supply of affordable social housing and housing delivery.
- 6.4 The bottom line is that there is insufficient land supply available to meet the nationally determined level of housing need. There are some things the Council may be able to do to improve the situation marginally and the action plan aims to address these. Progressing the next stages of the Local Plan update swiftly so that the Local Plan can be adopted at the earliest opportunity is a key priority for the Council to help manage expectations of key stakeholders, developers and the community in relation to housing delivery.

Appendices

1: Background Papers

National Planning Policy Framework – July 2021, Ministry of Housing Communities and Local Government (MHCLG)

Planning Practice Guidance - Housing Supply and Delivery, July 2019, MHCLG

Housing Delivery Test Measurement Rule Book – July 2018, (MHCLG)

Housing Delivery Test 2020: Measurement Technical Note – January 2021, MHCLG

Housing Delivery Test: Preparing Effective Action Plans – June 2020, Planning Advisory Service

Hastings Whole Plan and CIL Viability Study, January 2021, Aspinall Verdi

Strategic Housing and Employment Land Availability Assessment, October 2020, Hastings BC

Hastings Local Plan – Consultation Draft (Regulation 18), Winter 2020/21, Hastings BC

Hastings Local Plan – The Hastings Planning Strategy 2011-2028, February 2014, Hastings BC