

The Hastings Planning Strategy – Main Modifications consultation 20 May – 1 July 2013

Copies of representations made in accordance with Regulation
20 of The Town and Country Planning (Local Planning)
(England) Regulations 2012.

46 representations made online or via paper submission.

10 July 2013

This document contains copies of all the representations received during the six week consultation into the Main Modifications of the Hasting Local Plan – Planning Strategy. It also contains all the representations received about its accompanying Sustainability Appraisal; the issue of the Revocation of the South East Plan and its specific impact on the Planning Strategy, and also all comment received about the latest demographic projections for Hastings Borough.

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Hastings Planning Strategy Main Modifications Consultation May 2013

5710 Object

2. Proposed Main Modifications

Omission from the plan

Respondent: Falaise Bowls Association Ltd (Mr Dennis Moon) **Agent:** N/A
[383]

Summary: In order to sustain the Sport of Bowls in Hastings there is an urgent, long overdue essential need for an acceptable Indoor Bowling Centre as recognised in the Hastings Plan 2004-2011. To date not materialised.

May we please request that Paragraph 10.17 from the Sports & Leisure Section of the Hastings Plan 2004-2011 be included in the New Strategic Hastings Plan at the relevant point in the plan?

Full Text: At various times during consultations we have requested part of the Hastings Plan 2004-2011 to be included in the New Strategic Plan 2011-2028, Paragraph 10.17 Sports & Leisure Section, Hastings Plan 2004-2011.

As we understand the situation the final consultation period ends on 1st July 2013 Main Modifications Consultation, despite our efforts to date we have seen nothing to include this section of the Hastings Plan 2004-2011 in the New Strategic Plan 2011-2028.

In order to sustain the Sport of Bowls in Hastings there is an urgent, long overdue essential need for an acceptable Indoor Bowling Centre as recognised in the Hastings Plan 2004-2011. To date not materialised.

May we please request that Paragraph 10.17 from the Sports & Leisure Section of the Hastings Plan 2004-2011 be included in the New Strategic Hastings Plan at the relevant point in the plan?

Change To Plan: Include Paragraph 10.17 from the Sports & Leisure Section of the Hastings Plan 2004-2011 at the relevant point new Strategic Plan.

Appear at exam? Not Specified

Soundness Tests None

Hastings Planning Strategy Main Modifications Consultation May 2013

5564 Support

2. Proposed Main Modifications

Main Modification 1 Chapter 4: The Development Strategy - new paragraph

Respondent: MRS PATRICIA STEPHENSON [272]

Agent: N/A

Summary: The main concerns with this section are the words "work together and look for shared solutions....." clearly this has yet to be seen to be happening...shared solutions could save Robsack "A" and the surrounding ancient woodlands from a guaranteed death sentence. There is sufficient building land due to the new Bexhill by pass which could easily accommodate the few flats which this council wishes to concrete onto Robsack "A". Some forward thinking is required here. And an explanation why officers steadfastly REFUSE to consider an alternative to the obvious destruction of ancient woodland and wildlife.

Full Text: The main concerns with this section are the words "work together and look for shared solutions....." clearly this has yet to be seen to be happening...shared solutions could save Robsack "A" and the surrounding ancient woodlands from a guaranteed death sentence. There is sufficient building land due to the new Bexhill by pass which could easily accommodate the few flats which this council wishes to concrete onto Robsack "A". Some forward thinking is required here. And an explanation why officers steadfastly REFUSE to consider an alternative to the obvious destruction of ancient woodland and wildlife.

Change To Plan: N/A

Appear at exam? Not Specified

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5684 Object

2. Proposed Main Modifications

Main Modification 1 Chapter 4: The
Development Strategy - new paragraph

Respondent: Mr Ade Cirket [2148]

Agent: N/A

Summary: The paragraph should include the statement that support does not extend to transfer of assets or funds at lower than market value to prevent this clause being used to transfer land or such like.

Full Text: The paragraph should include the statement that support does not extend to transfer of assets or funds at lower than market value to prevent this clause being used to transfer land or such like.

Change To Plan: Simple sentence to capture the point.

Appear at exam? No

Soundness Tests iii

Hastings Planning Strategy Main Modifications Consultation May 2013

5687 Object

2. Proposed Main Modifications

Main Modification 1 Chapter 4: The Development Strategy - new paragraph

Respondent: Mr Colin Simmons [194]

Agent: Kember Loudon Williams LLP (Mr David Bedford) [2098]

Summary: We do not consider adequate evidence has been provided, since the duty was introduced and the South East Plan abolished, to show that Rother and Hastings Councils have reasonably consider the potential for new housing at Breadsell Lane.

Full Text: We welcome acknowledgement of the 'duty to co-operate' and a specific reference within the Local Planning Strategy. However, we do not consider adequate evidence has been provided, since the duty was introduced and the South East Plan abolished, to show that Rother and Hastings Councils have done enough to consider the potential for new housing at Breadsell Lane.

The Rother Local Planning Strategy is yet to be adopted because of uncertainty regarding the overall housing provision. Similarly, the Hastings Strategy is yet to fully justify its low housing requirement in light of recently published figures that suggest it should be increased. Meanwhile, Mr Simmons' land provides an exceptional opportunity for both authorities to deliver much needed additional housing, yet the site remains excluded only on the basis of a 'holding objection' from Natural England.

The decision to exclude land at Breadsell Lane was taken prior to the introduction of the duty to cooperate and the revocation of the South East Plan. Therefore, we consider that there is a requirement for both Hastings and Rother Council's to further explore Mr Simmons' site in order to deliver much needed new housing. Failure to do so would be entirely contrary to the Government's agenda for a proactive and positive planning system.

Change To Plan: We consider that there is a requirement for both Hastings and Rother Council's to further explore Mr Simmons' site in order to deliver much needed new housing. Failure to do so would be entirely contrary to the Government's agenda for a proactive and positive planning system.

Appear at exam? Yes

Soundness Tests iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5692 Support

2. Proposed Main Modifications

Main Modification 1 Chapter 4: The Development Strategy - new paragraph

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council welcomes the inclusion of the additional text within the Strategy acknowledging the importance of, and on-going commitment to, the Duty to Co-operate, particularly with Rother District Council and East Sussex County Council.

Full Text: Rother District Council welcomes the inclusion of the additional text within the Strategy acknowledging the importance of, and on-going commitment to, the Duty to Co-operate, particularly with Rother District Council and East Sussex County Council.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5688 Object

2. Proposed Main Modifications

Main Modification 2 Chapter 4: The Development Strategy - new paragraph

Respondent: Mr Colin Simmons [194]

Agent: Kember Loudon Williams LLP (Mr David Bedford) [2098]

Summary: We object to the exclusion of land at Breadsell Lane as a housing allocation, which is entirely contrary to the presumption in favour of sustainable development and the principle of 'positive' planning.

Full Text: We object to the exclusion of land at Breadsell Lane as a housing allocation, which is entirely contrary to the presumption in favour of sustainable development and the principle of 'positive' planning.

The Core Strategy 'Preferred Approaches' Document (2008) identified Mr Simmons' land at Breadsell Lane as part of a major Greenfield site that had genuine prospects to provide new homes during the Local Plan period. Within this Preferred Approaches Consultation there was an unambiguous acknowledgement by the Council that a development of this land would provide the very best opportunities for providing essential infrastructure, such as improved transport, community and recreational facilities. It was also acknowledged that a large site would provide opportunities for higher standards of sustainable design and construction, which would assist in combating climate change during the plan period. Essentially, the strategy that included Breadsell Lane was the most sustainable.

However, as a result of a Natural England objection, the Council abandoned its stance, deleted Breadsell Lane as a potential allocation and reduced the overall housing provision to compensate for the loss. This action was taken despite Mr Simmons' commitment to undertaking the monitoring requirements requested by Natural England and Natural England's letter of 10/04/12 that clearly states it should be possible to produce a strategy that does not change the current hydrological and hydrogeological regime of the site.

Taking this into consideration, we maintain our view that the removal of the site due to Natural England's objection has not been justified in evidence. Neither has a balancing exercise been undertaken to compare the undoubted benefits of a new residential development against the unknown risk facing the bryophyte population. This renders the emerging DPD 'unjustified' and therefore unsound.

Land at Breadsell Lane is the only large greenfield opportunity that is not located within a protected Area of Outstanding Natural Beauty. In this respect, paragraph 110 of the NPPF is clear that in preparing to meet development needs, plans should allocate land with the least environmental or amenity value. The prudent use of land at Breadsell Lane will be consistent with this aspect of the NPPF and will reduce the pressure to develop smaller urban sites that offer more to the local community. This matter is not in dispute, as documented by the fact that the site was well supported by the Council prior to the objection from Natural England.

In conclusion, we consider that the Council's decision to exclude land at Breadsell Lane without robust evidence has rendered the Plan unsound, as it no longer follows the most appropriate approach compared with the reasonable alternative. This, along with further failures in respect of not addressing the objectively assessed housing need for the area and a speculative housing land supply, results in a strategy that is neither positively prepared or in accordance with national planning policy.

Notwithstanding the above, we consider that the plan could be made sound through the reintroduction of land at Breadsell Lane as a housing allocation, or at the very least as a future reserve site. The inclusion of such an allocation will provide flexibility and ensure that the DPD is effective.

Change To Plan: We consider that the plan could be made sound through the reintroduction of land at Breadsell Lane as a housing allocation, or at the very least as a future reserve site. The inclusion of such an allocation will provide flexibility and ensure that the DPD is effective.

Appear at exam? Yes

Soundness Tests i, iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5694 Support

2. Proposed Main Modifications

Main Modification 2 Chapter 4: The
Development Strategy - new paragraph

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council welcomes the inclusion of the additional text within the Strategy reflecting the model policy relating to the presumption in favour of sustainable development.

Full Text: Rother District Council welcomes the inclusion of the additional text within the Strategy reflecting the model policy relating to the presumption in favour of sustainable development.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5711 Object

2. Proposed Main Modifications

Main Modification 2 Chapter 4: The
Development Strategy - new paragraph

Respondent: Seniors Forum (Mr Aubrey Ingleton) [2151]

Agent: N/A

Summary: Planning applications will be assessed in accordance with the Local Plan and National Planning Policy Framework.

Full Text: See attached.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests i, ii, iv

Part B Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of (Remember to use a separate form for each representation you are making).

Proposed Main Modifications

Name or organisation:

4. Please choose the nature of your representation:

Support Object

5. Does this representation relate to a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

Or does it relate to the Sustainability Appraisal of a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

6. If you are objecting to a Main Modification to the Planning Strategy, please give details of why you think this main modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments. (Please note: a separate guidance note is available to help you make your representation).

Planning application will be assessed in accordance with the
Local Plan AND THE NATIONAL PLANNING POLICY FRAMEWORK

7. Please set out what changes you consider are necessary to the Main Modification in order to make the Planning Strategy legally compliant or sound. Your response should have regard to the Tests of Soundness where the changes you propose relate to soundness. You need to say why this change will make the Planning Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

8. If you are supporting or objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be:

i) Legally compliant Yes No

ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being “Sound” are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered “No” to 8 above, please continue to question 9. In all other circumstances, please go to question 10.

9. If you are objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be unsound because it is not:

(i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development

(ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence

(iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

(iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Hastings Planning Strategy Main Modifications Consultation May 2013

5689 Object

2. Proposed Main Modifications

Main Modification 3 Chapter 4: The
Development Strategy - amend paragraph 4.22

Respondent: Mr Colin Simmons [194]

Agent: Kember Loudon Williams LLP (Mr David Bedford)
[2098]

Summary: We object to the inclusion of a sentence that states 'this target (200 new dwellings per annum) will be achieved through the delivery of identifiable development sites, when there is such a heavy reliance on non identified windfall sites.

An over reliance on windfall sites renders the plan unjustified because it is not the most appropriate strategy when considered against the reasonable alternatives.

Land at Breadsell Lane should be allocated for housing development instead of the over reliance on unknown sites.

Full Text: We object to the inclusion of a sentence that states 'this target (200 new dwellings per annum) will be achieved through the delivery of identifiable development sites, when there is such a heavy reliance on non identified windfall sites.

An over reliance on windfall sites renders the plan unjustified because it is not the most appropriate strategy when considered against the reasonable alternatives.

Land at Breadsell Lane should be allocated for housing development instead of the over reliance on unknown sites.

Change To Plan: Land at Breadsell Lane should be allocated for housing development instead of the over reliance on unknown sites.

Appear at exam? Yes

Soundness Tests ii

Hastings Planning Strategy Main Modifications Consultation May 2013

5695 Support

2. Proposed Main Modifications

Main Modification 3 Chapter 4: The
Development Strategy - amend paragraph 4.22

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council supports the level of housing likely to come forward over the plan period. It is noted that this modification has to be read in conjunction with the minor modifications which introduce the words 'at least' in Policy DS1, and which allows for further, currently unidentified sites, to come forward. This is also supported.

Full Text: Rother District Council supports the level of housing likely to come forward over the plan period. It is noted that this modification has to be read in conjunction with the minor modifications which introduce the words 'at least' in Policy DS1, and which allows for further, currently unidentified sites, to come forward. This is also supported.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5700 Object

2. Proposed Main Modifications

Main Modification 3 Chapter 4: The Development Strategy - amend paragraph 4.22

Respondent: MR ANDREW LAWSON [2149]

Agent: Mr Keith Hollidge [693]

Summary: The target for Annual Housing Completions should be between 363 (Howmanyhomes) and 440 (East Sussex County Council)not the pitiful 200 proposed by the Council.

This is a deliberate strategy to circumvent 'The presumption in favour of development' contained within the National Planning Policy Framework by restricting the number of Allocations of Housing Development Sites required thus enabling future Planning Applications on other land to be refused as being a material deviation from the Local Plan.

As such, perfectly suitable housing development sites are currently being excluded by the Council citing generalised but non-existent boundary and environmental constraints.

Full Text: The target for Annual Housing Completions should be between 363 (Howmanyhomes) and 440 (East Sussex County Council)not the pitiful 200 proposed by the Council.

This is a deliberate strategy to circumvent 'The presumption in favour of development' contained within the National Planning Policy Framework by restricting the number of Allocations of Housing Development Sites required thus enabling future Planning Applications on other land to be refused as being a material deviation from the Local Plan.

As such, perfectly suitable housing development sites are currently being excluded by the Council citing generalised but non-existent boundary and environmental constraints.

Change To Plan: Target for Housing Completions should be between 363 and 440 and not the 200 proposed.

Appear at exam? Yes

Soundness Tests i, ii, iii, iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5702 Object

2. Proposed Main Modifications

Main Modification 3 Chapter 4: The
Development Strategy - amend paragraph 4.22

Respondent: MR MICHAEL CONN [2150]

Agent: Mr Keith Hollidge [693]

Summary: The target for Annual Housing Completions should be between 363 (Howmanyhomes) and 440 (East Sussex County Council) not the pitiful 200 proposed by the Council.

This is a deliberate strategy to circumvent 'The presumption in favour of development' contained within the National Planning Policy Framework by restricting the number of Allocations of Housing Development Sites required thus enabling future Planning Applications on other land to be Refused as being a material deviation from the Adopted Local Plan.

As such, perfectly suitable housing development sites are currently being excluded by the Council citing generalised but non-existent boundary and environmental constraints.

Full Text: The target for Annual Housing Completions should be between 363 (Howmanyhomes) and 440 (East Sussex County Council) not the pitiful 200 proposed by the Council.

This is a deliberate strategy to circumvent 'The presumption in favour of development' contained within the National Planning Policy Framework by restricting the number of Allocations of Housing Development Sites required thus enabling future Planning Applications on other land to be Refused as being a material deviation from the Adopted Local Plan.

As such, perfectly suitable housing development sites are currently being excluded by the Council citing generalised but non-existent boundary and environmental constraints.

Change To Plan: Target for Annual Housing Completions should be between 363 and 440 and not the 200 currently proposed.

Appear at exam? Yes

Soundness Tests i, ii, iii, iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5690 Object

2. Proposed Main Modifications

Main Modification 4 Chapter 4: The Development Strategy - amend paragraph 4.23 and replace

Respondent: Mr Colin Simmons [194]

Agent: Kember Loudon Williams LLP (Mr David Bedford) [2098]

Summary: We object to the inclusion of windfall allowance of 35 dwellings per year over a twelve-year period, which is contrary to the advice of the NPPF.

Full Text: We object to the inclusion of windfall allowance of 35 dwellings per year over a twelve-year period, which is contrary to the advice of the NPPF.

Paragraph 48 of the NPPF states that 'local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available. It does NOT state that local planning authorities may make an allowance for windfalls throughout the whole of the plan period.

We believe that windfall allowance should be capped to 35 units a year for 5 years. 175 units in total.

In respect of the tests of soundness, an over reliance on windfall sites renders the plan unjustified because it is not the most appropriate strategy when considered against the reasonable alternatives. i.e. choosing speculative 'windfall' housing over the identification of 'deliverable' housing at Breadsell Lane.

The test of being 'effective' also requires the plan to be deliverable over its period. We consider that 175 units would be deliverable over the plan period, even if they didn't come forward strictly in the first five years. However, a figure of 420 units provide too much burden on the 'unknown' and too wider degree of uncertainty to be able to be deemed a positively prepared plan.

Change To Plan: We believe that windfall allowance should be capped to 35 units a year for 5 years (175 units in total) and land at Breadsell Lane should be allocated for housing to provide more certainty about the delivery of housing.

Appear at exam? Yes

Soundness Tests i, ii, iii, iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5712 Object

2. Proposed Main Modifications

Main Modification 4 Chapter 4: The Development Strategy - amend paragraph 4.23 and replace

Respondent: Seniors Forum (Mr Aubrey Ingleton) [2151]

Agent: N/A

Summary: 35 windfall dwellings per year has been assumed. Overall calculations for the 200 dwellings per annum not yet approved.

Full Text: See attached.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests ii, iii, iv

Part B Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of (Remember to use a separate form for each representation you are making).

Proposed Main Modifications

Name or organisation:

4. Please choose the nature of your representation:

Support Object

5. Does this representation relate to a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

Or does it relate to the Sustainability Appraisal of a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

6. If you are objecting to a Main Modification to the Planning Strategy, please give details of why you think this main modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments. (Please note: a separate guidance note is available to help you make your representation).

35 Windfall dwellings per year has been assumed.

Overall calculations for the 200 dwellings per annum not yet approved.

7. Please set out what changes you consider are necessary to the Main Modification in order to make the Planning Strategy legally compliant or sound. Your response should have regard to the Tests of Soundness where the changes you propose relate to soundness. You need to say why this change will make the Planning Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

8. If you are supporting or objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be:

- i) Legally compliant Yes No
- ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being "Sound" are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered "No" to 8 above, please continue to question 9. In all other circumstances, please go to question 10.

9. If you are objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be unsound because it is not:

- (i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- (ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- (iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- (iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Hastings Planning Strategy Main Modifications Consultation May 2013

5696 Support

2. Proposed Main Modifications

Main Modification 5 Chapter 4: The Development Strategy amend paragraph 2.24 and table 1

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council supports the level of housing likely to come forward over the plan period. It is noted that this modification has to be read in conjunction with the minor modifications which introduce the words 'at least' in Policy DS1, and which allows for further, currently unidentified sites, to come forward. This is also supported.

Full Text: Rother District Council supports the level of housing likely to come forward over the plan period. It is noted that this modification has to be read in conjunction with the minor modifications which introduce the words 'at least' in Policy DS1, and which allows for further, currently unidentified sites, to come forward. This is also supported.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5713 Object

2. Proposed Main Modifications

Main Modification 5 Chapter 4: The Development Strategy amend paragraph 2.24 and table 1

Respondent: Seniors Forum (Mr Aubrey Ingleton) [2151]

Agent: N/A

Summary: Sources of supply table does not add up to 3,400 - this should be maximum provision. Many of the sites identified may not come forward, so the target should be reduced.

Full Text: See attached.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests i, ii, iii, iv

Part B Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of 3 (Remember to use a separate form for each representation you are making).

Proposed Main Modifications

Name or organisation: A. INGLETON H & S L & F

4. Please choose the nature of your representation:

Support Object

5. Does this representation relate to a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

MM .5.

Or does it relate to the Sustainability Appraisal of a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

MM

6. If you are objecting to a Main Modification to the Planning Strategy, please give details of why you think this main modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments. (Please note: a separate guidance note is available to help you make your representation).

JG Target is 200 homes per annum over ¹⁷ years - 3400 homes
'NOT AT LEAST' Set schedule on 4.27 Page 33 This needs
 Breakdown of all JG new chart should add up FULL CLARIFICATION.
 to 3400

SOURCES OF NEW HOMES TO COME FORWARD BY 2020

	1	2	3	4	5	6	7	
1	Units completed 2011 to when in 2013.	Sites numbers	prop	prop	schedule	Totals		
2	Sites under construction	"	"	"	"	"		
3	Sites with current planning permission	"	"	"	"	"		
4	Sites with planning permission out of line	"	"	"	"	"		
5	Other sites - no planning status, D.M.P. consultation	"	"	"	"	"		
6	Small sites	"	"	"	"	"		
7	" " windfall	"	"	"	"	"		
								3400

SHL & A and Developer Management Document
 Many of these sites may not be taken forward with number of dwellings
 seriously reduced as a result of consultation on D.M.P. etc.

7. Please set out what changes you consider are necessary to the Main Modification in order to make the Planning Strategy legally compliant or sound. Your response should have regard to the Tests of Soundness where the changes you propose relate to soundness. You need to say why this change will make the Planning Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

8. If you are supporting or objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be:

- i) Legally compliant Yes No
- ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being "Sound" are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered "No" to 8 above, please continue to question 9. In all other circumstances, please go to question 10.

9. If you are objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be unsound because it is not:

- (i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- (ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- (iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- (iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Hastings Planning Strategy Main Modifications Consultation May 2013

5714 Object

2. Proposed Main Modifications

Main Modification 5 Chapter 4: The Development Strategy amend paragraph 2.24 and table 1

Respondent: Seniors Forum (Mr Aubrey Ingleton) [2151]

Agent: N/A

Summary: Page 30, 4.8 - delete the following: "These adjustments will still be acceptable however provided they do not diminish the overall total of housing to be delivered."
We were not consulted on the planning focus areas. The Play Department is out of order trying to impose the clause. The number of dwellings for each area on the overall numbers must be based on the figures after consultation.

Full Text: See attached.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests ii, iii, iv

Part B Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of (Remember to use a separate form for each representation you are making).

Proposed Main Modifications

Name or organisation:

4. Please choose the nature of your representation:

Support Object

5. Does this representation relate to a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

Or does it relate to the Sustainability Appraisal of a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

6. If you are objecting to a Main Modification to the Planning Strategy, please give details of why you think this main modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments. (Please note: a separate guidance note is available to help you make your representation).

Page 30. 4.8.

Delete the following.

"These adjustments will still be acceptable however provided they do not diminish the overall total of housing to be delivered"

We were not consulted on the playing fields areas

The Planning Department is out of order trying to impose the clause.

The number of dwellings for each area on the overall numbers must be based on the figures of the Consultation

7. Please set out what changes you consider are necessary to the Main Modification in order to make the Planning Strategy legally compliant or sound. Your response should have regard to the Tests of Soundness where the changes you propose relate to soundness. You need to say why this change will make the Planning Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

8. If you are supporting or objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be:

- i) Legally compliant Yes No
- ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being “Sound” are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered “No” to 8 above, please continue to question 9. In all other circumstances, please go to question 10.

9. If you are objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be unsound because it is not:

- (i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- (ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- (iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- (iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Hastings Planning Strategy Main Modifications Consultation May 2013

5697 Support

2. Proposed Main Modifications

Main Modification 6 Chapter 5: Spatial Areas
- new paragraph 5.19

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council supports the revised text to clarify the potential for wind energy within the Borough. The District Council supports the removal of the reference to areas outside of their administrative area, the clarification relating to if and when sites come forward within the Combe Valley Countryside Park, clear consideration will be given to the Parks objectives and the purpose of its designation, and the commitment to working in partnership with Rother District Council in considering sites in the urban fringe areas.

Full Text: Rother District Council supports the revised text to clarify the potential for wind energy within the Borough. The District Council supports the removal of the reference to areas outside of their administrative area, the clarification relating to if and when sites come forward within the Combe Valley Countryside Park, clear consideration will be given to the Parks objectives and the purpose of its designation, and the commitment to working in partnership with Rother District Council in considering sites in the urban fringe areas.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5698 Support

2. Proposed Main Modifications

Main Modification 7 Chapter 6: Sustainable Communities - new paragraph 6.17

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council supports the revised text to clarify the potential for wind energy within the Borough. The District Council supports the removal of the reference to areas outside of their administrative area, the clarification relating to if and when sites come forward within the Combe Valley Countryside Park, clear consideration will be given to the Parks objectives and the purpose of its designation, and the commitment to working in partnership with Rother District Council in considering sites in the urban fringe areas.

Full Text: Rother District Council supports the revised text to clarify the potential for wind energy within the Borough. The District Council supports the removal of the reference to areas outside of their administrative area, the clarification relating to if and when sites come forward within the Combe Valley Countryside Park, clear consideration will be given to the Parks objectives and the purpose of its designation, and the commitment to working in partnership with Rother District Council in considering sites in the urban fringe areas.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Main Modifications Consultation May 2013

5706 Object

2. Proposed Main Modifications

Main Modification 7 Chapter 6:
Sustainable Communities - new paragraph
6.17

Respondent: Natural England (Mr John Lister) [637]

Agent: N/A

Summary: HBC/MM/7 - It may be helpful to include a cross-reference to the fifth bullet point in paragraph 118 of the National Planning Policy Framework (NPPF) (eg planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss).

Full Text: HBC/MM/7 - it may be helpful to include a cross-reference to the fifth bullet point in paragraph 118 of the National Planning Policy Framework (NPPF) (eg planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss).

Given the inclusion of new text and policy relating to LNRs and LWS (HBC/MM/9), consideration should be given to text noting national policy relating to nationally important site. Reference to the second bullet point under paragraph 118 of NPPF would be helpful, in respect of SSSIs.

Similarly, for internationally important sites, it would be helpful to make reference to national guidance and regulation in respect of the importance of these sites and the need for projects likely to have a significant effect on them to be subject to appropriate assessment to inform development management decisions.

Change To Plan: N/A

Appear at exam? Not Specified

Soundness Tests None

Hastings Planning Strategy Main Modifications Consultation May 2013

5484 Object

2. Proposed Main Modifications

Main Modification 8 Chapter 7: Protecting Our Environment - new paragraphs 7.20, 7.21 and new Policy EN4

Respondent: MRS PATRICIA STEPHENSON [272]

Agent: N/A

Summary: There is little evidence or assurances of any commitment to honour the pledge to protect our ancient woodlands and wildlife in this town. If this council truly intends to preserve the ancient woodlands here in Hollington they will WITHDRAW the Robsack "A" site from the proposed development sites. It is unanimously agreed that to build so close to woodlands results in the degradation and erosion of woodlands and the wildlife. There is evidence that this piece of land was brought forward as a development site on flawed, incomplete evidence.

Full Text: There is little evidence or assurances of any commitment to honour the pledge to protect our ancient woodlands and wildlife in this town. If this council truly intends to preserve the ancient woodlands here in Hollington they will WITHDRAW the Robsack "A" site from the proposed development sites. It is unanimously agreed that to build so close to woodlands results in the degradation and erosion of woodlands and the wildlife. There is evidence that this piece of land was brought forward as a development site on flawed, incomplete evidence.

Change To Plan: This site at Robsack "A" has received many objections from residents. When the site was first put forward as a development site, there was little information offered on the biodiversity of this small piece of land. Over the years it has become apparent that this special site is home to a plethora of protected wildlife and flora and the planner only response to this is that they will remove the wildlife from the site!!!! This is an outrageous decision considering that these creatures live in the woodlands and the site using the entire area for foraging and nesting.....these woodlands are recorded as far back as the 1600's and it is beyond belief that any ethical or honourable council would consider destroying this area with tons of concrete. This site sits directly in the centre of the ancient woodlands of Robsack Wood and Churchwood local nature reserve and there are many reports which illustrate the devastation which would result with any development. The proposal to build multi storey flats on this site beggars belief. The benefits do not outweigh the resultant damage to the woodlands and wildlife and local nature reserve. This site must be withdrawn from the development site proposals. These woodlands and wildlife would not survive such disruption and loss of habitat. Robsack Wood will become nothing more than an island woodland and access would be deprived to the public. It is incredible that any planner or ecologist would consider putting a vehicular roadway into an ancient woodland and local nature reserve. Something is wrong here. This entire plan requires further investigation.

Appear at exam? Yes

Soundness Tests i, ii, iii

Hastings Planning Strategy Main Modifications Consultation May 2013

5563 Object

2. Proposed Main Modifications

Main Modification 8 Chapter 7: Protecting Our Environment - new paragraphs 7.20, 7.21 and new Policy EN4

Respondent: MRS PATRICIA STEPHENSON [272]

Agent: N/A

Summary: I object because it is patently clear that this dedication to protecting our ancient woodland is meaningless when one considers the proposals to build multi storey flats on the site at Robsack "A". A document released this week by the Press Association categorically states that the UK wildlife is in serious trouble with almost 2000 species of birds, animals, insects and plants in serious decline. This is due among other issues to a decline in suitable habitats. This council needs to listen to these ecologists and heed this serious warning. Build, but do not build on important habitats.

Full Text: I object because it is patently clear that this dedication to protecting our ancient woodland is meaningless when one considers the proposals to build multi storey flats on the site at Robsack "A". A document released this week by the Press Association categorically states that the UK wildlife is in serious trouble with almost 2000 species of birds, animals, insects and plants in serious decline. This is due among other issues to a decline in suitable habitats. This council needs to listen to these ecologists and heed this serious warning. Build, but do not build on important habitats.

Change To Plan: Remove Robsack "A" from the development sites programme. Multi storey flats do not compensate for the loss of wildlife, ancient woodland and important flora which will be lost forever if any development proceeds on this special bio diverse site. Hundreds of residents have made their concerns clear to this council - why is nobody listening to these valid concerns? This is an appalling lack of democracy and an appalling lack of vision for the future and the future of our children and grandchildren. These special sites must be preserved for future generations. REMOVE THIS SITE FROM THE DEVELOPMENT SITES REGISTER.

Appear at exam? Yes

Soundness Tests i, ii, iii

Hastings Planning Strategy Main Modifications Consultation May 2013

5685 Object

2. Proposed Main Modifications

Main Modification 9 Chapter 7: Protecting Our Environment new paragraphs 7.22, 7.23, 7.24

Respondent: Mr Ade Cirket [2148]

Agent: N/A

Summary: Remove the commitment to allow planning permission in LNR sites.

Full Text: Remove the commitment to allow planning permission in LNR sites.

Change To Plan: Delete paragraph (a) leaving only (b) as the guide line.

Appear at exam? No

Soundness Tests i, ii, iii, iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5686 Object

2. Proposed Main Modifications

Main Modification 9 Chapter 7: Protecting Our Environment new paragraphs 7.22, 7.23, 7.24

Respondent: MRS PATRICIA STEPHENSON [272]

Agent: N/A

Summary: Why does this council always place a caveat on their commitment to protect wildlife and nature reserves? Never a straightforward 'we will not allow development on these important sites'...always a clause which says development may be permitted....it is patently clear that if development is permitted on these fragile and important sites, the wildlife will be lost.Robsack "A" is a particularly worrying development site proposal. This site is situated directly in the centre of a local nature reserve and two ancient woodlands.This modification is meaningless.No development should ever be permitted on these biodiverse sites.

Full Text: Why does this council always place a caveat on their commitment to protect wildlife and nature reserves? Never a straightforward 'we will not allow development on these important sites'...always a clause which says development may be permitted....it is patently clear that if development is permitted on these fragile and important sites, the wildlife will be lost.Robsack "A" is a particularly worrying development site proposal. This site is situated directly in the centre of a local nature reserve and two ancient woodlands.This modification is meaningless.No development should ever be permitted on these biodiverse sites.

Change To Plan: Remove all development sites which are within local nature reserves, ancient woodland or alongside these sites. It is already acknowledged that wildlife is in serious decline so why would this council wish to contribute further to this critical situation? It is important that this council re words this section so that development on these sites is NEVER PERMITTED. It can never be justified.

Appear at exam? Yes

Soundness Tests i, iii, iv

Hastings Planning Strategy Main Modifications Consultation May 2013

5704 Object

2. Proposed Main Modifications

Main Modification 9 Chapter 7: Protecting Our Environment new paragraphs 7.22, 7.23, 7.24

Respondent: Bourne Leisure Ltd. [292]

Agent: Nathaniel Lichfield and Partners (Mrs Margaret Baddeley) [2146]

Summary: Policy EN5 and its supporting text should be redrafted to recognise the need to balance environmental matters with the economic and social benefits of development proposals. It should also be revised to allow for developments to proceed on sites adjacent to/in the vicinity of local nature reserves and local wildlife sites (such as Combe Haven), provided that commensurate mitigation measures are included.

Full Text: See attached.

Change To Plan: Add at end: The Council recognises the need for account to be taken of the economic and social benefits of the proposed development, such as tourism development, as well as environmental issues. Moreover, appropriate development will be permitted on sites adjacent to/in the vicinity of local nature reserves and local wildlife sites, provided that commensurate mitigation measures (such as a buffer zone of appropriate landscaping) are included as part of the proposed development and can be implemented to mitigate both direct and indirect impacts.

Appear at exam? Not Specified

Soundness Tests ii

Part B Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of (Remember to use a separate form for each representation you are making).

Proposed Main Modifications

Name or organisation:

4. Please choose the nature of your representation:

Support Object

5. Does this representation relate to a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

Or does it relate to the Sustainability Appraisal of a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

6. If you are objecting to a Main Modification to the Planning Strategy, please give details of why you think this main modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments. (Please note: a separate guidance note is available to help you make your representation).

Proposed Modification HBC/MM/9

Proposed modification HBC/MM/9 introduces a new policy- Policy EN5: Local Nature Reserves.

Bourne Leisure considers that Policy EN5: Local Nature Reserves and its supporting text should be redrafted, so as to recognise explicitly the need to balance environmental matters (and the protection of local nature reserves and local wildlife sites) with the economic and social benefits of development proposals and to better recognise other policies within the Planning Strategy which encourage growth.

Policy EN5 should also be revised to allow for developments to proceed on sites adjacent to/ in the vicinity of local nature reserves and local wildlife sites (such as Combe Haven), provided that commensurate mitigation measures (such as a buffer zone or appropriate landscaping) are included as part of the proposed development and can be implemented to mitigate both direct and indirect impacts.

This revised approach would be consistent with, and would support other policies in the Hastings Planning Strategy, such as Policy E4: Tourism and Visitors, which seeks to encourage a more diverse and high quality tourism offer and a longer tourism season. If Policy EN5 were revised in this way, it would also be consistent with paragraph 6 of Policy E4 of the Hastings Planning Strategy, which states "proposals for upgrading caravan and camping facilities will be encouraged where it increases the range and/or quality available to the tourist".

7. Please set out what changes you consider are necessary to the Main Modification in order to make the Planning Strategy legally compliant or sound. Your response should have regard to the Tests of Soundness where the changes you propose relate to soundness. You need to say why this change will make the Planning Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

Proposed Change

New Policy EN5 currently states that:

"Areas designated or proposed as Local Nature Reserves (LNR) will be safeguarded and protected. Proposals for development within Local Nature Reserves, or likely to have an adverse effect on them directly or indirectly, will only be permitted if:

- (a) The need for development outweighs the importance of the site for nature conservation; and
- (b) Any harm to the nature conservation interest of the site is clearly and demonstrably kept to a minimum.

Where development is permitted the Council may attach planning conditions and/or may seek to enter into agreement(s) to minimise the harm and/or secure the protection, enhancement and management of the nature conservation interest".

Bourne Leisure then considers that the following supporting text should be added immediately below Policy EN5.

"The Council recognises the need for account to be taken of the economic and social benefits of the proposed development, such as tourism development, as well as environmental issues. Moreover, appropriate development will be permitted on sites adjacent to/ in the vicinity of local nature reserves and local wildlife sites, provided that commensurate mitigation measures (such as a buffer zone or appropriate landscaping) are included as part of the proposed development and can be implemented to mitigate both direct and indirect impacts."

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

8. If you are supporting or objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be:

- i) Legally compliant Yes No
- ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being "Sound" are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered "No" to 8 above, please continue to question 9. In all other circumstances, please go to question 10.

9. If you are objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be unsound because it is not:

- (i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- (ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- (iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- (iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Hastings Planning Strategy Main Modifications Consultation May 2013

5707 Object

2. Proposed Main Modifications

Main Modification 9 Chapter 7: Protecting Our Environment new paragraphs 7.22, 7.23, 7.24

Respondent: Natural England (Mr John Lister) [637]

Agent: N/A

Summary:

Given the inclusion of new text and policy relating to LNRs and LWS (HBC/MM/9), consideration should be given to text noting national policy relating to nationally important site. Reference to the second bullet point under paragraph 118 of NPPF would be helpful, in respect of SSSIs.

Similarly, for internationally important sites, it would be helpful to make reference to national guidance and regulation in respect of the importance of these sites and the need for projects likely to have a significant effect on them to be subject to appropriate assessment to inform development management decisions.

Full Text:

HBC/MM/7 - it may be helpful to include a cross-reference to the fifth bullet point in paragraph 118 of the National Planning Policy Framework (NPPF) (eg planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss).

Given the inclusion of new text and policy relating to LNRs and LWS (HBC/MM/9), consideration should be given to text noting national policy relating to nationally important site. Reference to the second bullet point under paragraph 118 of NPPF would be helpful, in respect of SSSIs.

Similarly, for internationally important sites, it would be helpful to make reference to national guidance and regulation in respect of the importance of these sites and the need for projects likely to have a significant effect on them to be subject to appropriate assessment to inform development management decisions.

Change To Plan: N/A

Appear at exam? Not Specified

Soundness Tests None

Hastings Planning Strategy Main Modifications Consultation May 2013

5708 Object

2. Proposed Main Modifications

Main Modification 9 Chapter 7: Protecting Our Environment new paragraphs 7.22, 7.23, 7.24

Respondent: Mr Don Wise [683]

Agent: N/A

Summary: Policies should be more strict and ensure no loss of wildlife or harm to the environment.

Full Text: See attached.

Change To Plan: Revise policies to make them stricter

Appear at exam? Yes

Soundness Tests iii

Part B Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of 2 sides (Remember to use a separate form for each representation you are making).
 Pages

Proposed Main Modifications

Name or organisation: Wildlife Welfare Consultants

4. Please choose the nature of your representation:

Support Object

all

5. Does this representation relate to ~~the~~ proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

MM all

Or does it relate to the Sustainability Appraisal of a proposed main modification?

(please specify the main modification number which relates to the change you wish to comment on)

MM yes

6. If you are objecting to a Main Modification to the Planning Strategy, please give details of why you think this main modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments. (Please note: a separate guidance note is available to help you make your representation).

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Mr Cookson's Team of mainly out of TOWN Planners have so far proved that they are not capable of Squaring a CUBE. LEAVING THE WHOLE CONTEXT OF THE PROPOSED NEW BOROUGH PLAN COMPLETELY UNSOUND AND DANGEROUS.

THE VAST OVERSTRETCHED PROPOSED HOUSE BUILDING PROGRAMME THAT EMCOMPASSES THE UNIQUE ANCIENT BOROUGH OF HASTINGS IS A RECIPE FOR SERIOUS FLAWS; LEADING TO THE LOSS OF MANY OF THE TOWN'S SPECIAL FEATURES IN ADDITION, HERITAGE ATTRACTIONS.

NO REAL CONSIDERATION FOR SUSTAINABLE WILDLIFE HABITAT. WHERE ARE THE LONG TERM PLANS FOR THE CONSERVATION OF OUR WOODLAND RESOURCES. IN 1983, THE BOROUGH ENJOYED MORE THAN 600 ACRES OF WOODLAND WITH AREAS GOING BACK IN TIME TO THE NORMAN CONQUEST OUR WOODLANDS GROW IN VALUE AT AN EXTRA-ORDINARY RATE IN OUR CHANGING CLIMATE

TOURISM HASTINGS ENJOYS VERY SPECIAL AND UNIQUE ATTRACTIONS, THE COUNTRY PARK AT FAIRLIGHT. THE COMBE HAVEN VALLEY COUNTRYSIDE PARK THAT EMCOMPASSES THE WHOLE COMBE VALLEY TRIPLE SLIFTE THE NORMAN INVASION GROUNDS INCLUDING THE EXERCISE FACILITIES FOR MEN AND HORSES IN THE LANDING AREA IN ADDITION, THE TRUE BATTLE GROUNDS, PEOPLE FROM ALL OVER KENT VISIT OUR COUNTRYSIDE WALKS AND SEASIDE ATTRACTIONS, WHERE AS KENT IS VIRTUALLY ALL PRIVATELY OWNED, THE FISHING INDUSTRY AND THE SEASIDE AREAS REQUIRE IMMEDIATE ATTENTION AND RECTIFICATION FOR THE SERIOUSLY FAILING SEWAGE SYSTEM.

THE SERIOUSLY FAILING VICTORIAN INFRASTRUCTURE

ROADS AND PUBLIC PATHWAYS BUILT TO CATER FOR VEHICLES SUCH AS CARRIAGES AND LORRIES WITH A GROSS WEIGHT OF FIVE TONS (STEAM DRIVEN), THE PUBLIC SERVICES: WATER, ELECTRICITY AND THE SEWAGE NETWORK ACROSS THE BOROUGH DESIGNED FOR A POPULATION OF 50,000 PEOPLE (ALREADY FAILING SERIOUSLY ESPECIALLY IN PERIODS OF INCLEMENT WEATHER).

THE SERIOUSLY FAILING VICTORIAN INFRASTRUCTURE

ROADS AND PUBLIC PATHWAYS BUILT TO CATER FOR VEHICLES SUCH AS CARRIAGES AND LORRIES WITH A GROSS WEIGHT OF FIVE TONS (STEAM DRIVEN), THE PUBLIC SERVICES: WATER, ELECTRICITY AND THE SEWAGE NETWORK ACROSS THE BOROUGH DESIGNED FOR A POPULATION OF 50,000 PEOPLE (ALREADY FAILING SERIOUSLY ESPECIALLY IN PERIODS OF INCLEMENT WEATHER).

7. Please set out what changes you consider are necessary to the Main Modification in order to make the Planning Strategy legally compliant or sound. Your response should have regard to the Tests of Soundness where the changes you propose relate to soundness. You need to say why this change will make the Planning Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

EXAMPLE 1 New Polices EN5 and EN6.

These Polices look good on paper until you readWill only be permitted: if

- (a) the need for development outweighs the importance for NATURE CONSERVATION: and
- (b) Any harm to nature conservation interest is clearly and demonstrably kept to a minimum.
- (c) A complete get out clause that runs through the complete documentation. There are unfortunately numbers of examples where Developers have already practiced coherence.

With Councillors and Planners across the Borough.

- (d) Starvation of Wildlife by illegal and cruel practices by developers are being ignored by Planners now.
EITHER WE MAKE DETERMINED EFFORTS TO SAVE OUR DIMINISHING WILDLIFE AND WOODLAND RESOURCES BY EXACT STATEMENTS OR STATE CLEARLY THAT WILDLIFE HAS NO PLACE IN THIS BOROUGH AND CUT DOWN OUR HERITAGE WOODLANDS WILLY NILLY.

*** WE ARE SLOWLY LOOSING THE QUIET COUNTRYSIDE AND WOODLAND WALKS ENJOYED BY LOCAL RATEPAYERS AND THE VISITORS ALIKE, THEY ARE SUPPRISED HOW PLEASANT AND PEACEFUL THE MANY WALKS ON OUR URBAN FRINGES ARE.**

THEREFORE

Legislation must be put in place to ensure that Wildlife has a guaranteed sustainable future across the Borough; OR THAT WILDLIFE HAS NO FUTURE HERE. (FORAGING HABITAT IS DISAPPEARING AT A VERY FAST RATE. It is vital to be very clear and exact right throughout the Details for THE NEW BOROUGH PLAN. THE PRESENT Wordage IS NOT CLEAR WHICH MAKES THE DOCUMENT UNSOUND AND DANGEROUS IN ITS PRESENT FORM.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

8. If you are supporting or objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be:

- i) Legally compliant Yes No
- ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being "Sound" are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered "No" to 8 above, please continue to question 9. In all other circumstances, please go to question 10.

9. If you are objecting to a Main Modification, do you consider that if this main modification is made to the Planning Strategy it will be unsound because it is not:

- (i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- (ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- (iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- (iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

15. Do you consider that in view of the revocation of the South East Plan, the Planning Strategy is:

- i) Legally compliant Yes No
ii) Sound* Yes No

*The considerations in relation to the Planning Strategy being "Sound" are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered "No" to 15 above, please continue to question 16. In all other circumstances, please go to question 17.

16. As a result of the revocation of the South East Plan, do you consider that the Planning Strategy will be unsound because it is not:

- (i) Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
(ii) Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
(iii) Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
(iv) Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

17. If your representation is seeking a change, do you consider it necessary to speak at the examination? The Inspector may wish to hold a further hearing. (Written and verbal representations carry exactly the same weight and will be given equal consideration in the examination process).

Yes No

18. If you consider it necessary to speak at a potential further examination hearing, please outline why: Please note the Inspector will determine the most appropriate procedure to hear those who have indicated they would like to speak at examination.

Superseded Policies: Page 124 in 2004 Local Plan

Ref: Nature Conservation:

The "New Development Plan" the Glossary in the statement clearly comments that it forms part of the New Hastings the Paragraph clearly illustrates and the last line states and provides site allocations for residential and employment development up to 2028.

To date The Mandatory obligations missing from Planning Applications and the fact that Developers Ecologists only work round the central issues of Wildlife Conservation with misinformation and plays with one idea in mind money. The New Borough Plan should allow an independent Surveyor to check all future Development Sites. The serious situation across the borough at this time needs urgent correction. The Implied statement that planning details can override Biodiversity by contrived mitigation in Mr Cookson's and Developers views "There is only one definition for Mitigation"

(GET RID AT ANY COST) in any event.

Clearly, The New Development Plan is far too open to Abuse and the continued destruction of Habitat and the covert eradication by starvation that Cookson and his Team have followed recently. ALL PLANNING APPLICATIONS START AT THE PLANNING DEPARTMENT and Case Officers are responsible for follow up Procedures and Strict adherence to 106 agreements. This is not happening at this time. Therefore, the soundness of the above present procedures must be brought into focus with much clearer meaning and adherence to laws and legislation dealing with Wildlife Conservation.

Signature:

D S Wise

Date:

21/06/2013

Hastings Planning Strategy Main Modifications Consultation May 2013

5699 Support

2. Proposed Main Modifications

Main Modification 10 Chapter 9: Local Economy
- amend Policy E4: Tourism and Visitors

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: Rother District Council supports the amendment to the key diagram to clarify the potential for wind energy within the Borough Councils own administrative boundary.

Full Text: Rother District Council supports the amendment to the key diagram to clarify the potential for wind energy within the Borough Councils own administrative boundary.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests N/A

Hastings Planning Strategy Revocation of the South East Plan Consultation May 2013

5705 Object

3.5

3.5

Respondent: Bourne Leisure Ltd. [292]

Agent: Nathaniel Lichfield and Partners (Mrs Margaret Baddeley) [2146]

Summary: The policy should be amended to specifically acknowledge that due to changing visitor expectations, there may be a need for significant expansion of existing caravan and camping sites and holiday parks in order to facilitate the provision of new facilities and meet higher amenity standards. This will be consistent with former requirements of the South East Plan.

Full Text: See attached.

Change To Plan: Bourne Leisure considers that following the text in Policy E4 which states "Proposals for upgrading caravan and camping facilities will be encouraged where it increases the range and/or quality available to the tourist; the following text should be added:
"Due to changing visitor expectations, there may be a need for significant expansion of existing caravan and camping sites and holiday parks in order to facilitate the provision of new facilities and meet higher amenity standards and this will be supported by Hastings Borough Council, subject to environmental policies."

Appear at exam? Not Specified

Soundness Tests ii

Hastings Planning Strategy Revocation of the South East Plan Consultation May 2013

5715 Support

3.5

3.5

Respondent: Seniors Forum (Mr Aubrey Ingleton) [2151]

Agent: N/A

Summary: Support the revocation of the South East Plan which was 210 dwellings per annum. Hastings Borough Council Planning Strategy is for 200 dwellings per annum. The Seniors Forum think because the sites in the Development Management Plan have not been finally formalised after consultation the numbers of dwellings should be 150 per annum upwards to a maximum of 200 dwellings.

Full Text: See attached.

Change To Plan: See Main Modification objections Part Bs. It is clear that from the Development Management Plan and the areas of Hastings and St Leonards already developed that huge overdevelopment has occurred. See New Household Projections part D.

Appear at exam? Yes

Soundness Tests N/A

Part C Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of

Impact of the revocation of the South East Plan

Name or organisation:

12. Please choose the nature of your representation:

Support Object

13. If you are **objecting** a result of the revocation of the South East Plan, please give details of why you think the Planning Strategy, taken together with the Main Modifications is not legally compliant or sound. If you think that there are no implications for the Planning Strategy as a result of the revocation of the South East Plan, please detail your support below.

(Please note: a separate guidance note is available to help you make your representation).

Support to revocation of the South East Plan which was 210 dwellings per annum.
Hastings Borough Council Planning Strategy is for 200 dwellings per annum.
Seniors Forum think because of the site in the Development Management Plan have not been fully funded after consultation the number of dwellings should be 150 per annum upwards to a maximum of 200 dwellings.

14. Please set out what changes you consider are necessary to the Main Modification to reflect the impact of the revocation of the South East Plan. Your response should have regard to the Tests of Soundness and legal compliance.

See Main Modification objection on Part B.
It is clear that from the Development Management Plan and the area of Hastings and St Leonards already developed that high overdevelopment has occurred.
See New Household Projections Part D.

10. If your representation is seeking a change, do you consider it necessary to speak at the examination? The Inspector may wish to hold a further hearing. (Written and verbal representations carry exactly the same weight and will be given equal consideration in the examination process).

Yes No

11. If you consider it necessary to speak at a potential further examination hearing, please outline why: Please note the Inspector will determine the most appropriate procedure to hear those who have indicated they would like to speak at examination.

See overleaf.

Signature:

Date:

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5573 Object

4. New Government demographic household projections 4.5

Respondent: David Lambourne [273]

Agent: N/A

Summary: The DCLG indicates the need for 289 new households per annum, whilst the ONS/DCLG made an earlier estimate of 363. The Council's target is 200. Clearly there is a mismatch here. The Council in stating that the Government's figures 'do not take account of factors such as physical limits to outward growth and environmental constraints' is implying that Hastings cannot expand beyond the existing built-up margin. Yet some encroachment of housing into the AONB to the east and north-east of the town could easily be made just as the Council's Development Plan already proposes at the Ivyhouse Lane Industrial Estate.

Full Text: The DCLG indicates the need for 289 new households per annum, whilst the ONS/DCLG made an earlier estimate of 363. The Council's target is 200. Clearly there is a mismatch here. The Council in stating that the Government's figures 'do not take account of factors such as physical limits to outward growth and environmental constraints' is implying that Hastings cannot expand beyond the existing built-up margin. Yet some encroachment of housing into the AONB to the east and north-east of the town could easily be made just as the Council's Development Plan already proposes at the Ivyhouse Lane Industrial Estate.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests None

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5691 Object

4. New Government demographic household projections 4.5

Respondent: Mr Colin Simmons [194]

Agent: Kember Loudon Williams LLP (Mr David Bedford)
[2098]

Summary: We stand by our original objection that the proposed housing provision seeks to deliver the quantum of housing most easily achieved and that suitable, albeit difficult, sites such as Breadsell Lane have been disregarded unjustly. This is contrary to the tests of soundness and the Government's aspiration for a positive plan led system.

Full Text: We note with interest paragraphs 4.1 and 4.3 of the Main Modifications consultation and the three named sources that predict housing requirements of 440, 425 and 363 units per annum respectively.

All of these sources suggest that there is an 'objectively assessed' need far greater than the Council's planned 200 units per annum.

Notwithstanding this, paragraph 4.4 advises that the Council are wedded to its view that 200 units is appropriate, without providing any robust explanation or response.

We stand by our original objection that the proposed housing provision seeks to deliver the quantum of housing most easily achieved and that suitable, albeit difficult, sites such as Breadsell Lane have been disregarded unjustly. This is contrary to the tests of soundness and the Government's aspiration for a positive plan led system.

Both Hastings and Rother District's need to identify suitable land for additional new dwellings, over and above what was originally identified. Land at Breadsell Lane is the least environmentally constrained large-scale site that can deliver this much needed housing.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests None

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5693 Object

4. New Government demographic household projections 4.5

Respondent: MR ANDREW LAWSON [2149]

Agent: Mr Keith Hollidge [693]

Summary:

The Council are seeking to circumvent 'The presumption in favour of development' contained in the National Planning Policy Framework.

The strategy being to set an extremely low target as regards annual housing completions required during the Local Plan period, in stark contrast to Government statistical data, by citing non-existent boundary and environmental constraints to the Allocation of Housing Development Sites.

If approved, this then allows the LPA to refuse subsequent Planning Applications on unallocated housing sites on the basis of a material deviation from the Local Plan.

The annual housing requirement is between 363 (Howmanyhomes)and 440 (ESCC) not 200 as proposed.

Full Text:

The Council are seeking to circumvent 'The presumption in favour of development' contained in the National Planning Policy Framework.

The strategy being to set an extremely low target as regards annual housing completions required during the Local Plan period, in stark contrast to Government statistical data, by citing non-existent boundary and environmental constraints to the Allocation of Housing Development Sites.

If approved, this then allows the LPA to refuse subsequent Planning Applications on unallocated housing sites on the basis of a material deviation from the Local Plan.

The annual housing requirement is between 363 (Howmanyhomes)and 440 (ESCC) not 200 as proposed.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests None

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5701 Support

4. New Government demographic household projections 4.5

Respondent: Rother District Council (Mrs Nichola Watters) [467] **Agent:** N/A

Summary: It is noted that the Government's demographic household projections for the Borough are higher than the targets proposed within the Strategy. However, it is accepted that the Borough is limited in its scope for outwards expansion, not least by its physical area. Hence, based on current information, the Borough's housing target of "at least 3,400 net new homes" is supported. (Cross reference is made to the specific comments made to the Main Modifications consultation, specifically MM3 & MM5.) In terms of the unmet need, Rother District Council has advised of the significant limitations it faces, while also noting that other towns in the region, especially Ashford, are planned to grow at a rate exceeding historic levels.

Full Text: It is noted that the Government's demographic household projections for the Borough are higher than the targets proposed within the Strategy. However, it is accepted that the Borough is limited in its scope for outwards expansion, not least by its physical area. Hence, based on current information, the Borough's housing target of "at least 3,400 net new homes" is supported. (Cross reference is made to the specific comments made to the Main Modifications consultation, specifically MM3 & MM5.) In terms of the unmet need, Rother District Council has advised of the significant limitations it faces, while also noting that other towns in the region, especially Ashford, are planned to grow at a rate exceeding historic levels.

Change To Plan: N/A

Appear at exam? Not Specified **Soundness Tests** N/A

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5703 Object

4. New Government demographic household projections 4.5

Respondent: MR MICHAEL CONN [2150]

Agent: Mr Keith Hollidge [693]

Summary: The Council are seeking to circumvent 'The presumption in favour of development' contained in the National Planning Policy Framework.

The strategy being to set an extremely low target as regards annual housing completions required during the Local Plan period, in stark contrast to Government statistical data, by citing non-existent boundary and environmental constraints to the Allocation of Housing Development Sites.

If approved, this then allows the LPA to Refuse subsequent Planning Applications on unallocated housing sites on the basis of a material deviation from the Local Plan.

The annual housing requirement is between 363 (Howmanyhomes) and 440 (ESCC) not 200 as proposed.

Full Text: The Council are seeking to circumvent 'The presumption in favour of development' contained in the National Planning Policy Framework.

The strategy being to set an extremely low target as regards annual housing completions required during the Local Plan period, in stark contrast to Government statistical data, by citing non-existent boundary and environmental constraints to the Allocation of Housing Development Sites.

If approved, this then allows the LPA to Refuse subsequent Planning Applications on unallocated housing sites on the basis of a material deviation from the Local Plan.

The annual housing requirement is between 363 (Howmanyhomes) and 440 (ESCC) not 200 as proposed.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests None

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5709 Object

4. New Government demographic household projections 4.5

Respondent: Mr Don Wise [683]

Agent: N/A

Summary: The document title Shaping Hastings is a misnomer. The boundaries of the Borough were set many decades ago. People were attracted here for the coastal attractions, real tourist attractions are seriously under-exploited and abandoned in favour of maximising low-cost housing. There is no real economic pay back to the housing targets for Hastings as set out. The Conquest Hospital is already overwhelmed. Jobs with decent salaries/real industry are only available inland and everybody of working age must be prepared to travel. Hastings was noted for its shopping, but now affected by parking charges and specialist small shops are shutting down.

Full Text: See attached.

Change To Plan: N/A

Appear at exam? Yes

Soundness Tests None

Part D Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of

Page

New Household Projections

Name or organisation:

19. You are invited to give your views on the latest household projections and their possible implications for the housing needs of the Borough and the prospect of accommodating them.

THE DOCUMENTATION TITLE SHAPING HASTINGS IS A COMPLETE MISSNOMMER

THE BOUNDARIES of the Borough were set many decades ago covering an area of around **SIX SQUARE MILES**.

People were attracted here for the areas coastal attractions, "Fishing" an industry that thrives today, products are auctioned off in the early hours every morning. The Towns Smuggling past can still to be seen, the Graveyards at local Churches show Grave Stones of local Buccaneers heroes in their time. The caves underneath the East Hill demonstrate their activities where the high quality quartz sand was excavated for ballast for the boats running the smuggling routes to France bringing back illegal alcohol and fine Silk materials to Hastings.

Real Tourist Attractions are seriously under exploited or abandoned in favour of Targets for maximising low cost over development Housing. The ageing Population who have wealth and spending powers are moving to quieter areas of the country.

There is no real economic pay back to the housing targets for Hastings as set out in the Documentation. The Conquest Hospital is already overwhelmed for its capacity to cater for the fast increasing population across the catchment area.

Jobs with decent salaries and real industry for local people are only available in prosperous industrial estates inland everybody of working age must have suitable transport to avail themselves of properly paid work and be prepared to travel at least 60 miles daily.

Hastings was noted for its shopping facilities now the Parking charges force everyone to check their watches all the time instead of enjoying a shopping experience. Even Marks and Spencer's are building a Super Store at Ravensdale Retail Centre where people are able to browse and shop free.

While in Hastings, the little important specialist shops are shutting down en mass.

20. If your representation is seeking a change, do you consider it necessary to speak at the examination? The Inspector may wish to hold a further hearing. (Written and verbal representations carry exactly the same weight and will be given equal consideration in the examination process).

Yes No

21. If you consider it necessary to speak at a potential further examination hearing, please outline why: Please note the Inspector will determine the most appropriate procedure to hear those who have indicated they would like to speak at examination.

Mr Peter Cavanagh clearly demonstrated to me when we last spoke He said "you have got to build the houses first." this remark is a clear example of Mr Cookson's teams approach to the real needs of Hastings Borough. Tunnel vision to copy the National ill-defined Housing programme whatever the consequences. Nobody is disputing that more houses are required but real paid jobs and employment lead by real sustainable Industrial Development must come first. Then people will look for a suit home site and have it built. The infrastructure across the Borough will not support Mr Cookson's Teams Housing plans. If you study, the Water reserves in the Underground Tanks across the Borough You will notice that they were built for a population nearly half the size of what is proposed, pipe sizes can only copy with the quantities of water flow the pipes were designed for. All the Utility Services are affected with overload problems during each year now.

Any new housing must show a valid reason for erection, i.e. shortage of Employees at a nearby Sustainable Industrial Site. Hastings is not like other localities half of our assets lay in the shoreline and sea. The A259 running east to west across the seafront is not helpful for tourists or Bed and Breakfast establishments. There are positive ways forward, but positive ways forward are of no interest to our Tunnel Vision Planners, economic pay back is not in their remit.

Signature:

Date:

21/06/2013.

Hastings Planning Strategy New Government Household Projections Consultation May 2013

5716 Object

4. New Government demographic household projections 4.5

Respondent: Seniors Forum (Mr Aubrey Ingleton) [2151] **Agent:** N/A

Summary: Projections and housing target too high. The town is overpopulated already.

Full Text: See attached.

Change To Plan: N/A

Appear at exam? Yes **Soundness Tests** None

Part D Please fill in a separate sheet for each representation you wish to make. Representations must be made on this form or online to be valid.

Sheet 1 of

1

New Household Projections

Name or organisation:

A. INGLETON HASTINGS, ST LEONARD'S SENIORS FORUM

19. You are invited to give your views on the latest household projections and their possible implications for the housing needs of the Borough and the prospect of accommodating them.

FACTS. England is the most overcrowded country in Europe

JD forecast for England in 2011 is 405 people per square kilometre

PLACE	POPULATION	LAND AREA in sq miles	Population per sq mile	Population per sq kilometre
HASTING	81400	12	7033	2713
RETARE	91400	197	464	179
LEWES.	85900	113	764	294
SEVENOAKS	111700	142	787	304
TUNBRIDGE WOODS	102700	128	802	309.

Note HESC already has 2713 against the National Average of 405.

JD population growth estimates show little increase.

4.1. ES & C. 440 new homes per annum

4.2 Dept of Communities 289 - -

4.3 How many Homes 363 - -

} These figures cannot be factually based and contain many assumptions.

Policy DS1 H.B.C. figures of 200 per annum has not been finalised yet and is subject to consultation via Development Management Plan etc

Anyone who knows the area will know the Borough has reached saturation point and little land will be available after 2028

QUEST INTO PINT POT

20. If your representation is seeking a change, do you consider it necessary to speak at the examination? The Inspector may wish to hold a further hearing. (Written and verbal representations carry exactly the same weight and will be given equal consideration in the examination process).

Yes

No

15. Do you consider that in view of the revocation of the South East Plan, the Planning Strategy is:

- i) Legally compliant Yes No
ii) Sound* Yes No

} see Revocation of South East Plan

*The considerations in relation to the Planning Strategy being "Sound" are explained in paragraph 182 of the National Planning Policy Framework (March 2012). Further details on soundness and legal compliance are also in our own guidance note.

If you have entered "No" to 15 above, please continue to question 16. In all other circumstances, please go to question 17.

16. As a result of the revocation of the South East Plan, do you consider that the Planning Strategy will be unsound because it is not:

- (i) **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
(ii) **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
(iii) **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
(iv) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

17. If your representation is seeking a change, do you consider it necessary to speak at the examination? The Inspector may wish to hold a further hearing. (Written and verbal representations carry exactly the same weight and will be given equal consideration in the examination process).

Yes No

18. If you consider it necessary to speak at a potential further examination hearing, please outline why: Please note the Inspector will determine the most appropriate procedure to hear those who have indicated they would like to speak at examination.

For the ~~next~~ reasons overleaf

Signature:

Date:

1st July 2013