

# SHAPING HASTINGS



## HASTINGS LOCAL PLAN

The Hastings Planning Strategy  
Proposed Main Modifications

**20 May - 1 July 2013**

Large Print versions can be made available by request.  
Please call 01424 451098

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## 1. Introduction

- 1.1 The Hastings Planning Strategy is the first of the two main documents that will make up the new Local Plan for Hastings. The Planning Strategy sets the strategic framework for land use and development in the town up to 2028, from which the Development Management Plan, which includes site allocations, will follow. Please note that this consultation relates to the Planning Strategy only. To view progress on the Development Management Plan, please see:  
[http://www.hastings.gov.uk/environment\\_planning/planning/localplan/ldf\\_explained/#ssa](http://www.hastings.gov.uk/environment_planning/planning/localplan/ldf_explained/#ssa)
- 1.2 The Hastings Planning Strategy was submitted to the Secretary of State on 31 October 2012. During February 2013 the Government appointed Planning Inspector; Mr Richard E Hollox BA(Hons) BSc(Econ) MPhil FRTPI FRICS, examined the Planning Strategy at 6 public hearings. Full details of the examination and both the Council's and Inspector's documents are available on our examination pages at  
[http://www.hastings.gov.uk/environment\\_planning/planning/localplan/planning\\_strategy\\_examination/](http://www.hastings.gov.uk/environment_planning/planning/localplan/planning_strategy_examination/)
- 1.3 As a result of the hearings and other issues arising, the Council is undertaking a further consultation that concentrates on the following 3 elements known collectively as the "Main Modifications Consultation":
- a) Significant changes to the Planning Strategy (also referred to as Main Modifications) needed to help ensure the Plan is found "Sound" and "Legally Compliant" by the Inspector
  - b) The revocation of the South East Plan, and how this affects the Planning Strategy
  - c) New Government demographic household projections
- 1.4 You are now invited to submit formal representations on these 3 key elements, which are explained further below. Consultation will be undertaken in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

### The Consultation

- 1.5 This is a formal stage of consultation running for a period of 6 weeks, from 9am on 20 May until 4.30pm on 1 July 2013. Representations can be submitted at any point during this period but must be made using the official response form or through our online consultation system. Comments made in any other format cannot be accepted.

**Online:** The easiest way to view the consultation document, guidance notes and submit representations is online. Visit our website at:  
[http://www.hastings.gov.uk/environment\\_planning/planning/localplan/consultation](http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation) and follow the links provided.

**Paper:** Paper copies of this consultation document, guidance notes and the response form are available from the Hastings Information Centre in the Town Hall, or can be downloaded and printed from our website using the address above.

- 1.6 Responses on the official form, can be submitted by hand or post, or attached to an e-mail, using the following contact details:

Hastings Borough Council  
Planning Policy  
FREEPOST RSCG-BSTS-GBRZ  
Aquila House,  
Hastings  
East Sussex, TN34 3UY

E-mail: [fplanning@hastings.gov.uk](mailto:fplanning@hastings.gov.uk)

- 1.7 Representations cannot be accepted that are not on the official response form, are received after the closing date and time, are not related to the proposed Main Modifications, the impact of the revocation of the South East Plan or the new government demographic household projections. Please do not repeat earlier representations as these are already being considered by the Inspector.
- 1.8 All representations submitted will be made public. This will include the publication of your name but not your address or contact details.
- 1.9 Further information and updates will be posted on Twitter and Facebook to help ensure you stay up to date with the process. Please note however, comments posted in this way will not be taken forward as formal representations.

Twitter: [www.twitter.com/ShappingHastings](http://www.twitter.com/ShappingHastings)

Facebook: [www.facebook.com/shapinghastings](http://www.facebook.com/shapinghastings)

### **What happens next?**

- 1.10 Following the close of this consultation, your formal representations will be passed to the Inspector, who will consider all the valid responses in the writing of his final report. The Inspector may also decide to hold a further examination hearing to discuss any issues raised before he completes his report. If he does, the date of this hearing will be publicised on the Council's website, via the Local Plan newsletter and advertised in the local press. Those who have submitted formal representations will also be contacted directly.
- 1.11 Once the Inspector's final report is received, it will be considered by the Council. If the Inspector finds the Planning Strategy legally compliant and sound, the Council will progress to the adoption of the Hastings Planning Strategy.

### **Confused by the process?**

- 1.12 We have done our best to keep jargon and technical terms to a minimum. If you would like further clarification on the terms used however, please contact us on 01424 451098 and we will try to help.

- 1.13 You can also find further information about the Hastings Planning Strategy, the wider Local Plan process and specific guidance notes for this consultation by looking on our website:  
[http://www.hastings.gov.uk/environment\\_planning/planning/localplan/](http://www.hastings.gov.uk/environment_planning/planning/localplan/)

## Structure of this document

- 1.14 This document is set out in several distinct sections, together with an appendix that sets out what the proposed Main Modifications will look like in the final Planning Strategy, should they be taken forward. You are invited to submit comments on sections 2, 3 and 4 of this document relating to the following:

### Section 2: Proposed Main Modifications

- 1.15 This section presents a table of the Main Modifications (or significant changes to the Planning Strategy) resulting from the Examination hearings. They appear in chapter order according to the Planning Strategy, and each has a unique reference number, which must be marked on the hard copy response form. Text that is proposed to be deleted is preceded by **[Delete]** and shown in *red italic*. New text is preceded by **[Insert]** and shown in *green text*.

### Section 3: The revocation of the South East Plan

- 1.16 The revocation of Regional Spatial Strategies (RSS) was an early commitment by the current UK Government. The South East Plan was one such RSS that has now been revoked. The Council is seeking your opinion of the impact that the revocation may have on the Hastings Planning Strategy.

### Section 4: New Government demographic household projections

- 1.17 Since publishing the Proposed Submission version of the Planning Strategy, the Department for Communities and Local Government (DCLG) has published revised interim trend-based population figures that have been used in the assessment of future housing provision. The Inspector has also referred the Council to further data on the HowManyHomes.org website<sup>1</sup> that again, provides separate projections in terms of new households. Whilst we are not proposing to amend our housing target in response to these (as trend based projections do not take account of factors such as physical limits to outward growth and environmental constraints), it is still important that the community and stakeholders are made aware of them and given the opportunity to comment as necessary.

## Filling out the form

- 1.18 Guidance notes are available that give step by step instructions about how to fill out the hard copy response form, and help understand this complex stage of consultation. These are available via our consultation pages (see web details above) or can be picked up from Hastings Information Centre. Alternatively, you can respond to each individual section of the consultation document online.

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<sup>1</sup> [www.howmanyhomes.org](http://www.howmanyhomes.org)

- 1.19 All representations need to be focused on the issues and changes proposed in this document only, and not the wider Planning Strategy. Please do not duplicate any representations that you have already made because they will not be considered by the Inspector again.

### **Sustainability Appraisal**

- 1.20 A Sustainability Appraisal Report has been prepared that assesses the social, environmental and economic implications of the proposed Main Modifications. The Sustainability Appraisal Report should be read in conjunction with this consultation document, and comments are invited on its contents in the same way as the Main Modifications themselves. You can view, and make comments on, the sustainability appraisal at: [http://www.hastings.gov.uk/environment\\_planning/planning/localplan/consultation](http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation) or view a paper copy of it at the Town Hall Information Centre.

## 2. Proposed Main Modifications

### Background

- 2.1 Main modifications are significant changes that are needed to help ensure the Planning Strategy is found sound by the Inspector in his final report. Main modifications are changes that are considered to go to the “heart” of the Plan, and are fundamental to the Strategy.
- 2.2 The proposed Main Modifications are set out in a schedule on the following pages. They should be read in conjunction with the submitted Planning Strategy available at [http://www.planvu.co.uk/hbc/contents\\_written.htm](http://www.planvu.co.uk/hbc/contents_written.htm), but have also been set in context in an extract at Appendix A.

### What can I comment on?

- 2.3 You are invited to submit formal representations on any of the Main Modifications set out in the schedule that follows. Please remember to quote the relevant reference number on your form (HBC/MM/ ). Specifically:

**Do you agree that the Proposed Main Modifications are Legally Compliant or Sound? Do any changes need to be made? If so, what are they?**

- 2.4 Further information on the Soundness and Legal Compliance tests is set out in the guidance notes. Please confine your responses to the implications of the modification, not the wider policy to which they relate or the Planning Strategy in general. We are unable to accept comments that raise other matters that either were, or could have been part of the earlier representations or hearings on the submitted Planning Strategy.



Schedule of Main Modifications for consultation following Examination in Public

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MM/1	28	Chapter 4: The Development Strategy	New paragraph 4.2	<p>Insert additional text regarding the Duty to Co-operate [Insert:] <b>Complying with the Duty to Co-operate</b></p> <p>4.2 The Council acknowledges the importance of ongoing co-operation with relevant bodies, particularly Rother District Council and East Sussex County Council<sup>2</sup>. Co-operation will therefore continue with these authorities and with other bodies as appropriate, especially with regard to housing and employment development. This will take place as the Planning Strategy is monitored and reviewed in the light of such considerations as subsequent survey material, national planning policies and their implications for planning policies and proposals for the Borough, District and County. Of special relevance in this regard are likely to be the full, objectively assessed needs for market and affordable housing, explored further on in this chapter, and the implications for them of the completion of the Bexhill – Hastings Link Road.</p>
<p><b>Reason for Main Modification HBC/MM/1:</b> The Duty to Co-operate was introduced by the Localism Act of 2011. It obliges neighbouring councils and other organisations to work together to understand shared issues and look for shared solutions. Following discussions at the Examination hearing sessions, it was agreed that specific text should be incorporated into the final version of the Planning Strategy to demonstrate our ongoing commitment to co-operation in line with the Duty to Co-operate.</p>				
HBC/MM/2	28	Chapter 4: The Development Strategy	New paragraph 4.3	<p>Insert additional text regarding the presumption in favour of sustainable development [Insert:] <b>The presumption in favour of sustainable development</b></p> <p>4.3 When considering development proposals, we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will continue to work proactively with applicants jointly to find solutions which mean that proposals can be approved</p>

<sup>2</sup> The Duty to Co-operate is required by Section 33A (1) of the Planning & Compulsory Purchase Act 2004 (introduced through the Localism Act 2011)

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
				<p>wherever possible, and to secure development that improves the economic, social and environmental conditions in the area and the wider objectives of this Plan.</p> <p>Planning applications will be assessed in accordance with the policies in the Local Plan as a whole and will be dealt with promptly and approved unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> <li>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</li> <li>Specific policies in that Framework indicate that development should be restricted</li> </ul>
<p><b>Reason for Main Modification HBC/MM/2:</b></p>	<p>Chapter 4: The Development Strategy</p>	<p>Amend paragraph 4.22</p>		<p>The model policy proposed by the Planning Inspectorate is considered to summarise the sustainability credentials of the Planning Strategy, in line with the requirements of the National Planning Policy Framework. This issue was discussed at the Examination hearing sessions and to further demonstrate the Council's commitment to the presumption in favour of sustainable development, we are proposing to include this in the final version of the Planning Strategy</p> <p>Amend paragraph 4.22: The target is equivalent to 200 net new homes per annum <del>[Delete:] (as compared to the 210 per annum target contained in the South East Plan)</del>. This target will be achieved through the delivery of identifiable development sites between 2011 and <del>[Delete:] 2022</del> <ins>[Insert:] 2028</ins>. <del>[Delete:] after this period some reliance on windfall development will be necessary. In addition, in line with the Council's Empty Homes Strategy, it is planned that the targeted return of long term empty homes back into residential use by this Council will occur across all years of the Strategy and that the re-use of these homes will contribute to meeting the overall housing target.</del></p> <p>(NB. Because of other amendments this paragraph will be renumbered to 4.25 – please see the appendix for details)</p>
<p><b>Reason for Main Modification HBC/MM/3:</b></p>				<p>Given the revocation of the South East Plan in March 2013, all references to it in the Plan should be</p>

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
	HBC/MM/4	32	Chapter 4: The Development Strategy	<p>removed. In terms of housing delivery over the Plan period, discussions at the Examination hearing sessions pointed to how it was inappropriate to use the return to use of Empty Homes as a source of housing supply. Hastings Borough Council does however; remain committed to bringing empty homes back into use.</p> <p>Delete paragraph 4.23 and replace with amended text:</p> <p><del>[Delete:]</del>  <b>4.23</b> <i>On the basis of the current Empty Homes Strategy (2009 – 2013), it is anticipated that approximately 255 long-term empty homes will be returned to use up to 2028</i></p> <p><del>4.2</del><del>[Delete:]</del><del>8</del><del>[Insert:]</del><del>3</del>  Windfall development has made a significant contribution to housing delivery in the past. Small site windfalls (less than 6 dwellings) will continue to come forward over all years <del>[Insert:]</del> of the Plan up to 2028. <del>[Delete:]</del>  <i>although it is not necessary to rely on windfall delivery in the first 10 years of the Planning Strategy period. Between 2023 and 2028, an [Insert:] An average of [Delete:] 40 [Insert:] 35 windfall dwellings per year has been assumed [Insert:] between 2016/17 and 2027/28, this potential supply can be seen as providing the necessary flexibility around meeting the housing target which is a minimum, by either increasing the total amount of house building, or as a contingency if allocated sites do not come forward as planned for any reason.</i></p> <p><i>(NB. Because of other amendments this paragraph will be renumbered to 4.26 – please see the appendix for details)</i></p>
	HBC/MM/5	32	Chapter 4: The Development Strategy	<p><b>Reason for Main Modification HBC/MM/4:</b> Discussions at the Examination hearing sessions pointed to the potential to allow for an increase in the allowance for windfall, and the need to remove the reliance on Empty Homes as a source of housing supply. This is reflected in the amendments to text above. Hastings Borough Council does however; remain committed to bringing empty homes back into use.</p> <p>Amend paragraph 4.24 and replace the contents of table 1 as shown:</p> <p>4.24 The new homes will be delivered primarily through private development, but there will be considerable partnership working with Registered Providers (RPs) in the delivery of affordable housing.</p>

Ref:	Page	Chapter	Policy/ paragraph number	Change needed	Net number of units
				Sources of new homes likely to come forward by 2028	
				<del>Units completed 2011/12</del>	<del>195</del>
				<del>Units completed 2011/12 - 2012/13</del>	<del>343</del>
				<del>Sites under construction and/or with unimplemented planning permission as at 1 April 2012</del>	<del>1,379</del>
				<del>Commitments – sites under construction, with planning permission or resolution to grant planning permission</del>	<del>1,209</del>
				<del>Small site (5 or less net dwellings) commitments 2013/14 – 2015/16</del>	<del>157</del>
				<del>Additional dwellings indicated by the Strategic Housing Land Availability Assessment (not included in the above)</del>	<del>1,378</del>
				<del>Existing Local Plan allocations (excluding those without an extant permission)</del>	<del>747</del>
				<del>Other sites potentially developable sites - no planning status (informed by the SHLAA and the merging Development Management Plan document)</del>	<del>771</del>
				<del>Small site (less than 6) windfall allowance 2023/24 to 2027/28</del>	<del>200</del>
				<del>Long term empty homes brought back into residential use, 2011/12 to 2027/28</del>	<del>255</del>
				<del>Small site (less than 6 dwellings) windfall allowance 2016/17 – 2027/28 (12 years x 35dwellings)</del>	<del>420</del>
				<b>TOTAL</b>	<b><del>3,407</del></b>
				<b>TOTAL</b>	<b><del>3,647</del></b>

Table 1: Housing Delivery as at 1April 2013

(NB. Because of other amendments this paragraph will be renumbered to 4.27 – please see the appendix for details)

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
	42	Chapter 5: Spatial Areas	New paragraph 5.19	<p>Replace paragraph 5.19 with new text:</p> <p><del>5.19 The Hastings Renewable and Low Carbon Energy Study (2009) has shown some potential for wind energy at Combe Valley Countryside Park (in both the Hastings and Rother areas). We will work with Rother District Council to explore this opportunity further, and identify the potential for renewable energy provision to offset the town's carbon emissions resulting from implementation of the whole development strategy for the town.</del></p> <p><i>[Insert:]</i></p> <p><i>5.19 The Hastings Renewable and Low Carbon Energy Study (2009) has shown that there may be some potential for wind energy along the urban fringe areas, which may include Combe Valley Countryside Park. We intend to take a positive approach to delivering renewable energy development in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.</i></p>
	59	Chapter 6: Sustainable Communities	New paragraph 6.17	<p><b>Reason for Main Modification HBC/MM/6:</b> This modification is intended to give clarity to the consideration of the use of wind energy at the edges of Hastings' Borough boundary and that if and when it is considered in the Combe Valley Countryside Park, the objectives of the Park will be considered. This also reinforces the Duty to Co-operate cited in HBC/MM/1</p> <p>Replace paragraph 6.17 with new text:</p> <p><del>6.17 The Council will therefore take a positive approach to delivering renewable energy developments within the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas.</del></p> <p><i>[Insert:]</i></p> <p><i>6.17 The Council will therefore take a positive approach to delivering renewable energy developments in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that</i></p>

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
				do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.
<b>Reason for Main Modification HBC/MM/7:</b>				This modification reflects HBC/MM/6 and will give clarity to the consideration of the use of wind energy at the edges of the borough boundary and that the objectives of Combe Valley Countryside Park will be considered if such provision is taken forward in that location. This also reinforces the Duty to Co-operate cited in HBC/MM/1
HBC/MM/8	66	Chapter 7: Protecting our Environment	New paragraphs 7.20, 7.21 and new policy EN4	<p>Insert the following text and policy:</p> <p>[Insert:]</p> <p>7.20 Ancient Woodland is a nationally important and threatened habitat which is irreplaceable. Most ancient woodlands have been in existence since the end of the last Ice Age. They are of special cultural, heritage and biodiversity value. National guidance and legislation protects Ancient Woodland from development. Development in the vicinity of such woodland, however, may also impact upon it and these impacts will be considered.</p> <p>7.21 Across Hastings Borough there are many areas of Ancient Woodland. These are an important wildlife habitat, have great amenity value for the community and are an asset to the wider heritage landscape. Further information on Ancient Woodland is also set out in background document “Ancient Woodland Inventory of Hastings” (2010), available on our website at <a href="https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/supportingdocs_evidencebase/evidencebasedocuments/">https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/supportingdocs_evidencebase/evidencebasedocuments/</a>. These areas of Ancient Woodland, as shown on the Polices Map, are therefore, protected from the adverse impact of development by policy EN3 and also as described in policy EN4.</p> <p><b>POLICY EN4: Ancient Woodland</b></p> <p><b>Planning permission will only be granted for development near or adjacent to an area of ancient woodland, shown on the Policies Map, if it can be convincingly demonstrated that the proposals will not adversely affect that ancient woodland and the need for development outweighs the importance of them. The layout of any development encroaching into, or close to, such woodland must take account of the designation and</b></p>

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
				<p><b>be designed so as to minimise the impact upon it.</b></p> <p><b>The Council may impose conditions on any planning permission and/or seek to enter into legal agreement(s) to secure the protection, enhancement and management of ancient woodland affected, directly or indirectly, by development proposals</b></p>
<b>Reason for Main Modification</b>		<b>HBC/MM/7:</b>		<p>This modification gives clarity to the protection of Ancient Woodland as required by Policy EN3 of the Planning Strategy and it will give guidance for the consideration of applications that may have an impact upon them</p>
HBC/MM/9	67	Chapter 7: Protecting our Environment	New paragraphs 7.22, 7.23, 7.24 and New Policies EN5 and EN6	<p>Insert the following text and policies:</p> <p>[Insert:]</p> <p><b>7.22</b> Some areas of the Borough that are particularly important for their contribution to wildlife habitat should be protected. Local Nature Reserves (LNR) protect wildlife habitats and the natural heritage, but they also have a broader community role:</p> <ul style="list-style-type: none"> <li>• To forge partnerships between the local authority, local nature conservation organisations and local people.</li> <li>• To provide an ideal environment for children to learn about nature.</li> <li>• To increase people’s awareness and enjoyment of wild plants and animals.</li> </ul> <p><b>7.23</b> Local Wildlife Site (LWS) is a non-statutory designation applying to a site of Borough-wide importance. The designation seeks to provide recognition of the wildlife value of these sites to the local community and, where possible, to prevent significant damage arising from development.</p> <p><b>7.24</b> Both LNR and LWS, as displayed on the policies map, will be protected managed and enhanced as described in policies EN5 and EN6.</p> <p><b>POLICY EN5: Local Nature Reserves (LNR)</b></p> <p><b>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:</b></p>

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
				<p>(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.</p> <p>Where development is permitted, the Council may attach planning conditions and/or may seek to enter into legal agreement(s) to ensure the continuing protection and enhancement of the nature conservation interest and to provide compensatory measures and/or site management.</p> <p><b>POLICY EN6: Local wildlife Sites (LWS)</b>                      Development proposals within or adjacent to Local Wildlife Sites (LWS) will only be permitted where there is a local need which outweighs any harm to the nature conservation interest.</p> <p>The Council may attach conditions to any planning permission 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.</p>
Reason for Main Modification required by HBC/MM/10	79	Chapter 9: Local Economy	Amendment to E4: Tourism and Visitors	<p>This modification gives clarity to the protection of Local Nature Reserves and Local Wildlife Sites as required by Policy EN3 of the Planning Strategy and it will give guidance for the consideration of applications that may have an impact upon them</p> <p>Amendment to Policy:</p> <p><b>POLICY E4: Tourism and Visitors</b></p> <p>The Council will work to promote and secure sustainable tourism development in the town. A more diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number of visitors, provide job opportunities and sustain the tourism economy.</p> <p>Visitor Attractions:</p> <p>New visitor attractions will be encouraged and those that already exist will be protected, unless it can be demonstrated they are no longer economically viable either in existing or adapted form. The upgrading of provision will be encouraged where it increases the range and/or quality of tourist facilities.</p>



Ref:	Page	Chapter	Policy/ paragraph number	Change needed
				<p>Proposals for new visitor attractions will be considered sympathetically anywhere within the Borough subject to other policies. The seafront is seen as the core resort area and particular support will be given to measures and proposals which are well related to the seafront.</p> <p><b>Visitor Accommodation:</b></p> <p>New visitor accommodation will be directed to the Seafront, the main arterial routes, and close to other generators of demand. Extension to existing visitor accommodation will also be supported, subject to design and location policies.</p> <p>The priority areas for retention of <b>[insert:] serviced</b> visitor accommodation are the Seafront (including Warrior Square), the Old Town and the Town Centre. In these areas, there will be a presumption against a change of use away from existing facilities unless the facility is no longer viable or is incapable of improvement to a good standard. <b>[Insert:] Outside these areas, change of use away from visitor accommodation (including camping, caravan and chalet sites) will be resisted, unless the criteria of the Visitor Accommodation Supplementary Planning Document (SPD) are adhered to, and the unviable nature of the business can be demonstrated. The SPD contains guidance in support of this policy approach.</b></p> <p>Proposals for upgrading caravan and camping facilities will be encouraged where it increases the range and/or quality available to the tourist.</p> <p><b>Language Schools:</b></p> <p>In recognition of their importance to the local economy, the Council will also support proposals that improve, protect or make new provision for language schools in suitable locations. Proposals for changes of use of language schools to other uses will be resisted unless it can be demonstrated that the use is no longer economically viable.</p>
Reason for Main Modification HBC/MM/9:				<p>This modification will provide some clarity for the use of the Visitor Accommodation SPD outside of the core zone defined in the policy, and reinforces Hastings Borough Council's commitment to retaining visitor accommodation across the town as a whole.</p>
HBC/MM/11	90	Key Diagram	Amend Key	Move western Renewable Energy opportunity area to a site within Hastings borough boundary

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
			Diagram	
<p><b>Reason for Main Modification HBC/MM/10:</b> The original draft of the Planning Strategy contained a production error showing the Renewable Energy opportunity area the wrong side of the western boundary of Hastings' Borough boundary. This modification will put right that error</p>				
HBC/MM/12	92	Part Six – Monitoring and Implementation	New paragraphs 12.3, 12.4 and 12.5	<p>Insert additional text about a monitoring group:</p> <p>[Insert:]</p> <p>12.3 Continuing monitoring will be essential if the policies of the Local Plan are to be effective and its proposals delivered in a timely manner. Frequent re-assessment of the Infrastructure Delivery Plan and its Schedule will take place, and will assist in securing these objectives. The Council will establish a working group to monitor the progress of the Local Plan, working with infrastructure providers and developers as appropriate. This working relationship will thereby ensure that the Local Plan keeps on target, and its progress is reported through regular Local Plan Monitoring reports. Recommendations will be made where necessary to the Council's Cabinet should there be any significant failures in performance and/or delivery.</p> <p>12.4 These arrangements demonstrate the Council's commitment to the delivery of infrastructure at such time as is practicable in current circumstances. Some infrastructure will continue to be provided by developers through, for example, S106 Agreements, in accordance with the NPPF, and the working group will also want to be assured that developers (of major schemes) adhere to S106 Agreements and planning conditions.</p> <p>12.5 In these ways, the Council will continue to co-operate with its partners and the private sector in ensuring that the Local Plan is effective, and that the development which it promotes is carried out as agreed.</p>
<p><b>Reason for Main Modification HBC/MM/11:</b> This modification will provide for a working group in the Council to monitor the progress of the Local Plan; its delivery and effectiveness. This will allow the monitoring that is described in Part Six of the Planning Strategy to be efficient and its reporting to be transparent and accessible for all interested parties</p>				

### 3. Revocation of the South East Plan

#### Background

- 3.1 The South East Plan was the Regional Spatial Strategy that set the framework for growth and development across the South East of England. Individual Local Plans in the South East region (including Hastings) were required to be in general conformity with the South East Plan. This meant that in the case of housing growth for example, levels of development proposed in the emerging Hastings Local Plan needed to be consistent with the overall housing target for Hastings set out in the South East Plan.
- 3.2 The South East Plan provided the regional policy framework for various other issues aside from housing, including (but not exclusive to) the economy, communications and transport, sustainability, green infrastructure, historic environment and tourism.
- 3.3 On 25 March 2013, the Order from the Government to revoke the South East Plan (with the exception of Policy NRM6, Thames Basin Heaths Special Protection Area and the Oxfordshire saved Structure Plan Policy H2 on the former RAF base at Upper Heyford) came into effect. You can view this order at <http://www.legislation.gov.uk/ukSI/2013/427/contents/made>.

#### What can I comment on?

- 3.4 Whilst the Hastings Planning Strategy was prepared in the knowledge that the South East Plan was to be abolished, the revocation represents a substantial change in planning circumstances. It is important therefore, that the community and other stakeholders are given the opportunity to comment on the effect this revocation may have on Planning Strategy policies.

- 3.5 This consultation is therefore asking you to consider:

**Are there any implications for the Planning Strategy (as published) as a result of the recent revocation of the South East Plan?**

- 3.6 You should consider how your comments relate to the Soundness and Legal Compliance tests as set out in the guidance notes. Please remember to confine your response to the implications of revocation, rather than the Planning Strategy in general. This is not an opportunity to raise other matters which either were or could have been part of the earlier representations or hearings on the submitted Planning Strategy.
- 3.7 To help you with your response, the South East Plan can be viewed on the UK Government's National Archives website:  
<http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalPlanning/815640/>

## 4. New Government demographic household projections

### Background

- 4.1 At the time of preparing the Planning Strategy, the latest available trend-based demographic projections (produced by East Sussex County Council using 2010 based Office of National Statistics data) indicated a requirement for some 7,493 (or 440 per annum) new homes in Hastings up to 2028. Policy DS1 of the Planning Strategy - New Housing Provision however, sets a lower target of a minimum of 3,400 new homes to be provided between 2011 and 2028 (equating to 200 per annum).
- 4.2 Since publishing the Planning Strategy, new 2011-based interim household projections have been published by the Department of Communities and Local Government (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections> follow the link to live table no. 425). These provide household projections up to 2021, which indicate that provision for 289 households per annum will be required in Hastings. Please note that the number of households will equate to a higher number of new homes or dwellings.
- 4.3 The Planning Inspector has also drawn the Council's attention to the [www.howmanyhomes.org](http://www.howmanyhomes.org) website, which uses 2008 trend-based demographic projections produced by Office for National Statistics (ONS) and Department of Communities and Local Government, which imply that provision for 363 households per annum will be needed in Hastings
- 4.4 The Council remains of the view that the lower housing target as set in Policy DS1 represents the most appropriate strategy for housing growth in the town. This is because relying on trend-based population figures alone does not take into account factors as the physical limits to outward growth and the environmental constraints that apply in the town.

### What can I comment on?

- 4.5 Whilst the Council is not intending to amend the overall housing target, it is still important that people are given the opportunity to comment on the revised projections. We are specifically asking you to consider:

**What are your views on the latest household projections and their possible implications for the housing needs of the borough, as well as the prospects for accommodating them?**

- 4.6 Your comments on this section **do not** need to relate to the Tests of Soundness or Legal Compliance. All relevant comments are welcome, which will be passed on to the Inspector following the close of this consultation.

**Appendix A – Extract from Planning Strategy incorporating proposed Main Modifications.**

## Chapter 4: The Development Strategy

- 4.1 This chapter sets out the overall strategy for Hastings. It deals with the big issues, setting out how much development we need, where it will take place, and by when. It explains the three spatial areas that have been identified within the town, and then concentrates on housing, employment and shopping.



As well as the policies on Housing, Employment and Shopping in this chapter, each is dealt with further in part 4 of this document - Theme Based Policies:

Housing within Chapter 7: Housing

Employment in Chapter 8: Local Economy (i) Employment

Shopping in Chapter 8: Local Economy (ii) Town Centres

### i) Complying with the Duty to Co-operate

- 4.2 The Council acknowledges the importance of ongoing co-operation with relevant bodies, particularly Rother District Council and East Sussex County Council<sup>2</sup>. Co-operation will therefore continue with these authorities and with other bodies as appropriate, especially with regard to housing and employment development. This will take place as the Planning Strategy is monitored and reviewed in the light of such considerations as subsequent survey material, national planning policies and their implications for planning policies and proposals for the Borough, District and County. Of special relevance in this regard are likely to be the full, objectively assessed needs for market and affordable housing, explored further on in this chapter, and the implications for them of the completion of the Bexhill – Hastings Link Road.

### ii) The presumption in favour of sustainable development

- 4.3 When considering development proposals, we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will continue to work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area and the wider objectives of this Plan. Planning applications will be assessed in accordance with the policies in the Local Plan as a whole and will be dealt with promptly and approved unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise –taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - Specific policies in that Framework indicate that development should be restricted.

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<sup>2</sup> The Duty to Co-operate is required by Section 33A (1) of the Planning & Compulsory Purchase Act 2004 (introduced through the Localism Act 2011)

### iii) Planning Focus Areas

#### Locations for development

- 4.4 The extent of the built up area boundary will be reviewed through the Development Management Plan.
- 4.5 Hastings is a small and urban area, and the pattern of future development will be spread around the town. In order to give a picture of what is planned where, we have divided the town into three spatial areas – Western Area, Central Area and Eastern Area. The Seafront has also been identified as a broad area of change, although levels of development will be set out in the respective spatial areas.

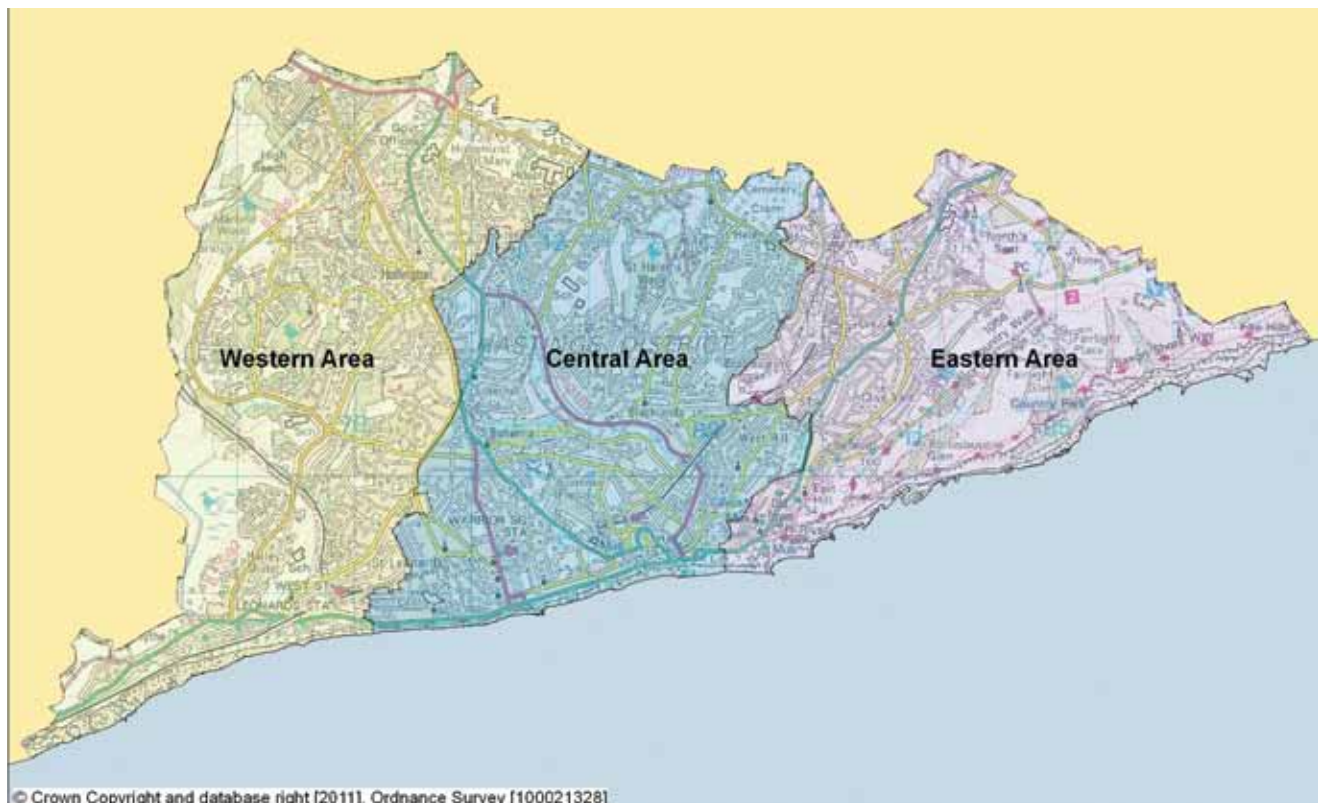


Figure 4: map showing the Western, Central & Eastern areas

#### The Planning Focus Areas

- 4.6 To provide a more local perspective and sense of place, the town has been divided further into a number of Planning Focus Areas. These are areas where there is an identifiable community or geography, or where landscape or function means that they make a logical area for spatial planning. In some cases they are areas that have common problems or issues. Boundaries have been drawn as close as possible to Super Output Area (SOA) boundaries, as this is the geography used for the presentation of important statistics such as the Indices of Multiple Deprivation (IMD) and Census data.

# Chapter 4: Development Strategy

4.7 The planning focus areas will provide a useful framework setting the scene for the preparation of the more detailed Development Management Plan, and any Neighbourhood Plans that may be produced by the community. The 13 planning focus areas are:

1. Little Ridge and Ashdown
2. Greater Hollington
3. Filsham Valley and Bulverhythe
4. St Helens
5. Silverhill and Alexandra Park
6. Maze Hill and Burtons' St Leonards
7. Central St Leonards and Bohemia
8. Hastings Town Centre
9. Old Town
10. West Hill
11. Hillcrest and Ore Valley
12. Clive Vale and Ore Village
13. Hastings Country Park

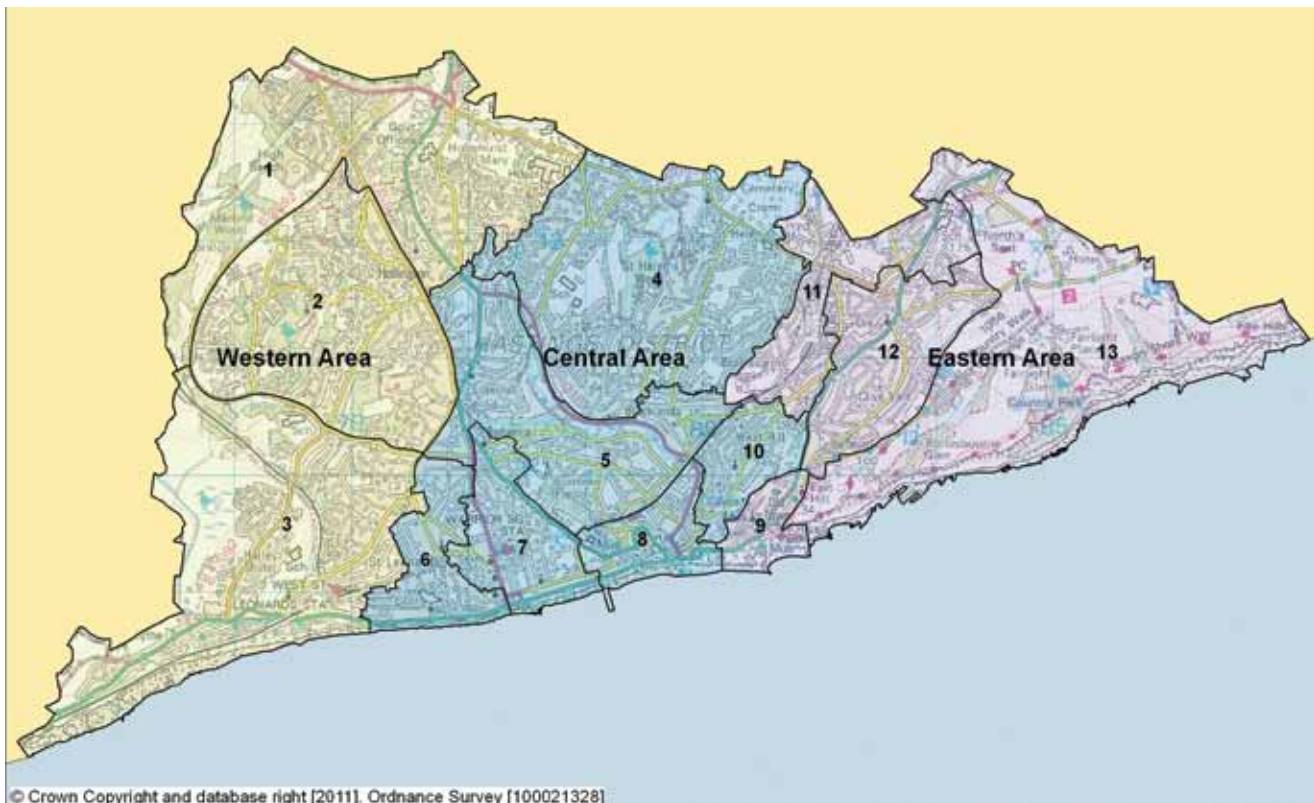


Figure 5: map showing the Planning Focus Areas within Western, Central & Eastern areas

4.8 Strategies for each of the 3 broad spatial areas, including a range of housing development in these areas are set out in the sections that follow. Individual sites to meet the overall housing target (see Policy DS1) will be allocated in the Development Management Plan, although it is important to note that the detailed level of work required for this may result in some adjustments to the numbers and proportions set out in each of the 3 spatial areas. These adjustments will still be acceptable however, provided that they do not diminish the overall total of housing to be delivered.



## iv) Housing

### Why do we need more homes?

- 4.9 Access to a decent home for everyone is the foundation for a decent quality of life. A priority of the Council and the Local Strategic Partnership is to increase the availability, affordability and quality of housing and to ensure all sections of our community, in all housing tenures, enjoy safe, desirable, affordable and accessible housing that is appropriate for their needs and aspirations.
- 4.10 We know that the area of Hastings Borough and Rother District operates largely as a single housing and labour market. We also know that there are some key features of our housing market which distinguish it from other parts of the south-east. These include comparatively low house prices; declining affordability for local people, a bias to smaller dwellings; imbalanced in-migration; a large private rented sector and high levels of deprivation. Left unchecked, some of these processes will continue to act as drivers of change making housing less affordable for local residents, and doing nothing to improve the prospects for economic development and regeneration. Instead, diversifying and renewing our housing stock through new development has an important role to play in fostering much needed economic regeneration and countering the processes that can lead to blighted neighbourhoods.
- 4.11 Providing the right mix of well designed, good quality housing in conjunction with employment opportunities, has the potential to offer a real and lasting opportunity to promote the town as a thriving, desirable place to live, work and enjoy quality recreation time.
- 4.12 In determining the number of new homes we need to plan for up to 2028, we have therefore considered the role new houses can play in assisting growth and regeneration. We have also taken into account current demographic projections; the number of people in housing need, and critically, the town's capacity to accommodate new housing development. Though new housing may form an important part of regeneration efforts, we have to reconcile this with the fact that Hastings is a tightly constrained urban area, surrounded by areas of high environmental and landscape importance.

### Supporting regeneration

- 4.13 The Council's preferred way forward is a housing target that allows us to support the following objectives without increasing the pressure to build in the town's most environmentally sensitive areas:
- Employment-led growth – a scale of housing growth that is proportionate to the town's ability to attract new jobs, retain existing ones and help facilitate sustainable travel to work patterns
  - Meet the needs of those of working age, including promoting the right mix of housing that encourages higher skilled people to move to the town and to create opportunities for younger people to remain in Hastings. This includes providing more family homes and larger dwellings
  - Maximise the provision of affordable housing
  - Meet the needs of those residents currently living in unsuitable accommodation – such as overcrowded properties or those in disrepair
  - Provide for the needs of the growing number of people of retirement age

### Capacity to accommodate housing growth

- 4.14 The demand for new housing arising from trend-based population and household change and growth would result in a need to build many more new homes than previously thought possible – some 7,840 new homes by 2028 or 461 per year. Taking trend-based population projections in isolation ignores factors such the physical limits to outward growth, therefore it would not be sensible to use trend-based projections alone to determine a future housing target. It is clear from the Council's Strategic Housing Land Availability Assessment (SHLAA)<sup>7</sup> that attempting to meet the level of housing growth implied by the trend-based demographic projections would require substantial release of greenfield land beyond the current built-up area of the town. However, choices with regard to the location of new housing and the outward expansion of Hastings are very limited.

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<sup>7</sup> [http://www.hastings.gov.uk/strategic\\_housing](http://www.hastings.gov.uk/strategic_housing)

# Chapter 4: Development Strategy

The town's environmental assets, including the nationally important High Weald Area of Outstanding Natural Beauty (AONB) to the north and east of the existing built-up area; the Marline Valley Woods Site of Special Scientific Interest (SSSI) to the north-west, the internationally important Hastings Cliffs Special Area of Conservation (SAC) on the eastern boundary, and the network of important green spaces across the town including Hastings Country Park to the east and Combe Valley Countryside Park to the west, all act as restraints to major outward growth.

- 4.15 The potential to bring forward greenfield land in the north-west of town, with a view to making a strategic land allocation, has been investigated. This is the only major remaining area of the Borough which is free from nationally important landscape and wildlife designations. The land in question (Breadsell) abuts the nationally important Marline Valley Woods SSSI. Housing potential at Breadsell has been carefully assessed with advice from Natural England and the conclusion reached is that, based on current research, a site could not be allocated. This is because its delivery would be highly uncertain due to the degree to which development might impact adversely on the nationally important Marline Valley SSSI is unknown.
- 4.16 Instead, if we are to comply with sustainable development objectives, future housing requirements will need to be met essentially through the identification of development opportunities in the urban area; by including an allowance for windfall development; and by making more efficient use of the existing residential stock by bringing back into residential use long term empty homes.

## Higher density development

- 4.17 The potential for higher density<sup>8</sup> residential development and the contribution this can make to meeting housing requirements has been explored. Higher density development, provided it is associated with good design, is considered appropriate for many areas of the town, particularly locations in or close to the town and district centres, or in other areas well served by public transport. Higher density development can help improve affordability and address the housing needs of younger people such as first time buyers or, at the other end of the spectrum, people looking to down size and/or those whose children have left home.
- 4.18 The potential for a mix of higher density development is already reflected in the Council's estimates of housing capacity through the inclusion of sites that have planning approval or potential sites where high density development may be appropriate, (this will be subject to further examination through the Development Management Plan). Requiring all or the majority of new development to be built at high densities, as a result of adopting an unrealistically high housing target, is considered to run counter to the planning objectives for the town and national planning guidance.

## Making the best use of urban and brownfield land

- 4.19 Future housing requirements will, instead, be met through the identification of a mix of development opportunities which will provide for a range of types and sizes of new dwellings in the urban area and by making more efficient use of the existing residential stock – by bringing back into residential use long term empty homes.
- 4.20 We will look to develop brownfield housing sites first, wherever possible, although a mix of both brownfield and greenfield may be needed to meet the 5 year supply. (see paragraph 4.26 for an explanation of the five year supply)
- 4.21 Empty homes are a wasted asset, and a good deal of progress has been made by the Council in tackling empty homes in recent years. However, whilst bringing empty homes back into use does not increase the overall housing stock, it does increase the efficient use of the existing stock. In 2010 there was estimated to be approximately 400 long term empty homes in the town. By long term, we mean homes that have been empty for 2 or more years.

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<sup>8</sup> high, medium & low density development are >50/ha, 30-50/ha and <30/ha respectively)

## Balancing homes and jobs

4.22 Our housing target figure aims to support urban renaissance, and to accommodate further development in a way that respected environmental constraints. In particular, it is important not to use demographic forecasts alone as a driver for housing development. This is because the relationship with the economic growth and regeneration, and environmental constraints is much more important in Hastings. The scale of housing development has been determined on the basis that housing growth should not outstrip the ability of the local economy to provide jobs at a corresponding rate. Otherwise we would simply be adding to unsustainable out-commuting. A degree of net out-commuting is not necessarily detrimental to local prosperity, but the trend of an increasing reliance on this, much by car, does have adverse consequences in terms of sustainable development. It is also a sign of an inherent weakness in the local economy.

## Working with Rother District Council

4.23 In accordance with national guidance and as part of the duty to cooperate required by the Localism Act 2011, together with Rother District Council, the Council has jointly explored housing needs across the whole housing market area. This is documented in the background paper “Assessment of Housing Need in the Hastings & Rother Housing Market Area”, which draws together information contained in the evidence base for the two authorities planning strategies. Notably, the Hastings & Rother Strategic Housing Market Assessment (SHMA)<sup>9</sup> shows that development at North Bexhill is as important to the housing and employment growth for Hastings as it is to Bexhill.

## The New Homes target

4.24 Between 2011 and 2028 the net new homes target will be for at least 3,400 homes, based on the rationale set out in paragraph 4.10.

4.25 The target is equivalent to 200 net new homes per annum. This target will be achieved through the delivery of identifiable development sites between 2011 and 2028.

4.26 Windfall development has made a significant contribution to housing delivery in the past. Small site windfalls (less than 6 dwellings) will continue to come forward over all years of the Plan up to 2028. An average of 35 windfall dwellings per year has been assumed between 2016/17 and 2027/28, this potential supply can be seen as providing the necessary flexibility around meeting the housing target which is a minimum, by either increasing the total amount of house building, or as a contingency if allocated sites do not come forward as planned for any reason.

4.27 The new homes will be delivered primarily through private development, but there will be considerable partnership working with Registered Providers (RPs) in the delivery of affordable housing.

Sources of new homes likely to come forward by 2028	Net number of units
Units completed 2011/12 - 2012/13	343
Commitments – sites under construction, with planning permission or resolution to grant planning permission	1,209
Small site (5 or less net dwellings) commitments 2013/14 – 2015/16	157
Existing Local Plan allocations (excluding those without an extant permission)	747
Other sites potentially developable sites - no planning status (informed by the SHLAA and the merging Development Management Plan document)	771
Small site (less than 6 dwellings) windfall allowance 2016/17 – 2027/28 (12 years x 35 dwellings)	420
<b>TOTAL</b>	<b>3,647</b>

Table 1: Delivering the housing allocation 2011 - 2028

<sup>9</sup> <https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/>

# Chapter 4: Development Strategy

- 4.28 Strategic Policies FA1, FA2 and FA5 show a broad distribution of the proposed housing land supply. Individual sites to meet the overall housing target will be identified in the Development Management Plan.
- 4.29 The Council is required to demonstrate and maintain a continuous rolling supply of specific deliverable sites sufficient to provide five years worth of housing against the overall housing target. National guidance requires the 5-year supply to include an additional allowance of 20%, which in effect, will equate to a 6 year supply. The latest position is set out in the Annual Monitoring Report. This will track the progress of housing completions against Policy DS1 and make an annual reassessment about the adequacy of the supply of deliverable and developable housing land. The Council will use the annual monitoring process to manage land supply. Action will be triggered to increase supply if monitoring reveals that housing completions have fallen below the expected rate of delivery set out in the trajectory and a review of site deliverability indicates that the trajectory is unlikely to be recovered over the next five years without action.
- 4.30 The latest monitoring update (2011-12) concludes that there are sufficient housing sites to deliver 1,225 housing units from 2013/14 to 2017/18. This is equivalent 6.2 years supply. The housing trajectory is shown in Appendix 2.
- 4.31 Windfall development has made a significant contribution to housing delivery in the past. Small site windfalls (less than 6 dwellings) will continue to come forward over all years up to 2028, although it is not necessary to rely on windfall delivery in the first 10 years of the Planning Strategy period. Between 2023 and 2028, an average of 40 windfall dwellings per year has been assumed.
- 4.32 The Development Management Plan and future reviews of the SHLAA may identify new sites, thereby reducing the reliance on windfall. This will be reported on in the Annual Monitoring Report.

## **POLICY DS1: New Housing Development**

**The target for housing development will be at least 3,400 net new homes for the period 2011 – 2028. Sites will be allocated in the Development Management Plan to meet this target.**

**In order to maintain and make effective use of the existing housing stock, the Council will bring back into residential use empty housing in line with its Empty Homes Strategy.**

**In order to protect the existing stock of family size housing, existing homes should remain as dwellings unless they are unsuitable for residential uses, or would be replaced with new residential development.**

**A 'plan, monitor and manage' approach will be adopted based upon the Annual Monitoring Report and updates of the Strategic Housing Land Availability Assessment, through which progress on housing delivery and the continuous maintenance of a five-year rolling supply plus 20% will be tracked.**

**Housing Implementation Strategy:**

**Housing land supply will be managed in the following way:**

**If the Annual Monitoring Report reveals that the five-year housing land supply plus 20% cannot be met, the Council will take action to increase the supply of deliverable housing sites by:**

- Working with land owners, public bodies and developers to bring sites forward;
- Promoting Hastings and particular sites to investors;
- Investigating reasons for the delay in sites coming forward and consider using Compulsory Purchase powers if necessary in order to progress development;
- Using its own land to stimulate development/interest.

## v) Employment

- 4.33 National policy indicates that local authorities need to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.
- 4.34 Hastings is a major employment centre not just for residents of Hastings but also in the wider Hastings labour market or travel-to-work-area (TTWA) which embraces most of Rother (over 90% of its population) and is bordered by Eastbourne, Tunbridge Wells and Ashford. Yet in economic terms Hastings is weak, ranked amongst the 20 most deprived boroughs in the Country, with low levels of educational achievement and skills levels, lower average earnings compared to the rest of the South East and in recent years falling job density, (that is the ratio of total jobs to people of working age population). Until very recently, in common with other south coast towns, Hastings has not developed as a location for inward investment, relying on local business growth and the public sector as economic drivers.

**Part Two, Chapter 4 extract - END**

## Part Three, Chapter 5 extract - START

5.18 A Development Strategy and Implementation Plan 2011 - 2014 for the park has been approved by Hastings, Rother and East Sussex Councils. This will be regularly updated and revised to guide how the park changes and develops up to 2028.

### Environmental opportunities

- 5.19 The Hastings Renewable and Low Carbon Energy Study (2009) has shown that there may be some potential for wind energy along the urban fringe areas, which may include Combe Valley Countryside Park. We intend to take a positive approach to delivering renewable energy development in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.
- 5.20 Through heat mapping, the Conquest Hospital has been identified as an area of high heat demand. This presents potential for the introduction of Combined Heat and Power (CHP) systems and district heating networks into the existing building stock.
- 5.21 Some of the most significant wildlife habitats in the town are located within Western Area; the ancient woodland SSSI of the Marline Valley, Filsham Reedbeds LNR and the Combe Haven SSSI and the ancient woodland LNR of Churchwood. These lie adjacent to the wider countryside and the High Weald AONB, providing links to the wider countryside and habitat and species diversity.
- 5.22 It is important for us to continue to work with key partners to improve the quality of current wildlife sites by better habitat management; increasing the size of existing wildlife habitats; enhancing connections between sites and creating new sites where we can, using the green infrastructure network and therefore reducing the pressure on wildlife by improving the wider environment.
- 5.23 Flooding is a key issue within parts of Western Area, although the area does benefit from sea defences to protect against tidal flooding. Flood zones 2 and 3 encompass areas at Glyne Gap, Bulverhythe Recreation Grounds, along Combe Haven between Pebsham and the Combe Haven Holiday Park, the Combe Haven Valley, to the South of Bulverhythe Road to Cinque Ports Way and along parts of the Hollington Stream, particularly at Harley Shute playing fields. Development in these areas will need to demonstrate how flood risk has been addressed in accordance with Policy SC7, through the application of the sequential and exception tests where necessary, and the submission of detailed flood risk assessments.

#### **POLICY FA1: Strategic Policy for Western Area**

The following table sets out the overall indicative quantity of development for Western Area, which will be explored in further detail in the Development Management Plan.

Planning Focus Area	Housing – range of dwellings by area up to 2028	Employment – m <sup>2</sup> of additional (net) employment land up to 2028	Retail - m <sup>2</sup> of additional (net) retail comparison floorspace up to 2028
1. Little Ridge and Ashdown	220 - 280	Mixed B1, B2, B8 – c.23,400m <sup>2</sup> (at Queensway & Whitworth Road)	0m <sup>2</sup>
2. Greater Hollington	250 - 310	Mixed B1, B2, B8 c.13,300m <sup>2</sup> (at Churchfields, Castleham & Ponswood Industrial Estates)	0m <sup>2</sup>
3. Filsham Valley and Bulverhythe	630 - 700	0m <sup>2</sup>	0m <sup>2</sup>
<b>Total</b>	<b>1,100 - 1,290</b>	<b>36,700m<sup>2</sup></b>	<b>0m<sup>2</sup></b>

Table 3: The indicative quantity of development for Western Area

# Chapter 5: Spatial Areas

In Western Area, we will also:

- a) ensure development along the Queensway Employment Corridor meets high standards of environmental sustainability within what is practical and economically viable
- b) support the development of land at West Marina for a mix of housing and leisure uses
- c) encourage the retention of existing, and provision of more high quality visitor accommodation along the Seafront, the main arterial routes, and close to other generators of demand
- d) be less strict in retaining premises in their existing land use (as defined by the relevant Land Use Classes Order) providing a sound employment based case can be made to secure employment development at Ponswood, Churchfields, Castleham and West Ridge
- e) support research and development facilities aligned to the needs of local industries as well as further improvements to the town's educational infrastructure
- f) support the delivery of the proposed Bexhill-Hastings Link Road and A21 Baldslow Link improvements, and work to secure their timely provision.
- g) work with Rother District Council and East Sussex County Council to establish and manage Combe Valley Countryside Park as a sustainable multi-functional countryside area with recreation, biodiversity conservation and regeneration opportunities, and support its development in line with the Park Development Strategy and Implementation Plan
- h) The Hastings Renewable and Low Carbon Energy Study (2009) has shown that there may be some potential for wind energy along the urban fringe areas, which may include Combe Valley Countryside Park. We intend to take a positive approach to delivering renewable energy development in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.
- i) protect, manage and enhance the green spaces network, in particular, the Marline Valley Woods and Combe Haven Sites of Special Scientific Interest, the Filsham Reedbeds, Marline Valley Woods and Churchwood Local Nature Reserves and significant open spaces at Church Wood, Ponds Wood, Bexhill Recreation Ground and the Seafront
- j) support the implementation of the strategic network of cycle routes to link communities and facilities, particularly from the Conquest Hospital down towards Hastings Town Centre and out to Combe Valley Countryside Park
- k) direct development to areas at the lowest risk of flooding, and require site specific Flood Risk Assessments to be provided for development in areas at a higher risk as identified in the Strategic Flood Risk Assessment - in the vicinity of Bulverhythe and West Marina and the Combe Haven River, Stonehouse Drive, Upper Glen Road Hollington Old Lane and Gillsmans Hill
- l) explore opportunities for combined heat and power (CHP) connected to district heating systems or combined cooling, heat and power (CCHP) for development proposals within the vicinity of the Conquest Hospital
- m) support the opening and development of the St Leonards Academy at Filsham Valley school site

Part Three, Chapter 5 extract - END

# Chapter 6: Sustainable Communities

Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable. Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.

## Heat density opportunity areas

- 6.9 Although it is intended that zero carbon homes and carbon reduction in other non-residential buildings will be delivered through national building regulations, it is critical that the local planning system helps to direct the shift needed towards low carbon development and communities.
- 6.10 Through heat mapping, the Hastings Renewable and Low Carbon Energy Study (2009) identified two high heat demand areas of the town:
- Conquest Hospital
  - Summerfields Sports Centre
- 6.11 Development in these areas could present opportunities for the introduction and expansion of Combined Heat and Power (CHP) systems and district heating networks into the existing build stock.
- 6.12 There may also be a further opportunity to support the introduction of district heating in the town centre. We will continue to explore options for further heat density opportunity areas, and these will be identified in the Development Management Plan.

### **POLICY SC5 – District Heating Networks and Combined Heat and Power Systems**

To facilitate compliance with the Government’s timetable to deliver zero carbon homes and buildings, Hastings Borough Council will explore opportunities for Combined Heat and Power systems connected to district heating networks in the vicinity of the Conquest Hospital, Summerfields Sports Centre, and Hastings town centre. Opportunity areas will be identified in the Development Management Plan.

## Renewable energy schemes

- 6.13 The Hastings Renewable and Low Carbon Energy Study (2009) assessed the town’s potential to provide large scale renewable energy.
- 6.14 The study concluded that approximately 4-5MWe (Megawatts electricity) of large scale wind power will be required to offset the carbon emissions resulting from planned development in the town, taking account of the strengthening of the government’s sustainable building standards.
- 6.15 In response to this, the study identified potential for wind energy in both Combe Valley Countryside Park (within both the Hastings and Rother areas) and at Hastings Country Park. This is in addition to the planned 2MW (megawatt) turbine at the Queensway Employment Corridor.
- 6.16 Reliability on the local biomass resource (conifer, non-coniferous, mixed and coppice woodland resources) is limited due to inaccessibility within the borough boundary, and competition in the surrounding area, for example, surrounding rural areas have much more available woodland.
- 6.17 The Council will therefore take a positive approach to delivering renewable energy developments in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.



### **POLICY SC6: Renewable Energy Developments**

Proposals for renewable energy developments, including any ancillary infrastructure or building will be supported unless:

- a) their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment; and
- b) they would adversely impact on the local community, economy, biodiversity or historic interests
- c) the scale and impact of developments in nationally recognised designations, such as the High Weald Area of Outstanding Natural Beauty, Sites of Special Scientific Interest, Scheduled Monuments, Conservation Areas, Listed Buildings or Registered Parks and Gardens, is not compatible with the purpose of their designation

The Council will investigate the town's potential for accommodating renewable and low carbon energy sources and supporting infrastructure. Suitable sites will be identified through the Development Management Plan.

### **Flood risk and water quality**

- 6.18 The 2008 Strategic Flood Risk Assessment (SFRA)<sup>21</sup> identifies that flood risk in Hastings is attributed to several sources. These include tidal and river flooding, groundwater and sewer flooding, and surface water run off. The most significant flood risk problem exists towards the west of the town around the Bulverhythe area, where groundwater, surface water run-off and tide locking combine to create high levels of flood risk. Higher flood risk areas are also mostly apparent along the Seafront, and around the Hollington Stream and Combe Haven River.
- 6.19 The SFRA identifies the areas that are affected by groundwater flooding risk, and the extent of the minor aquifers. As this covers a significant area of the town, it is important that these resources are protected from the risks posed by any new large scale commercial development, particularly in West St Leonards and central parts of the town. The Development Management Plan will set out potential development sites in vulnerable areas that could impact on water quality, and consider the measures that need to be taken.
- 6.20 The Cuckmere and Sussex Havens Catchment Flood Management Plan (2009) and the Hastings Surface Water Management Plan (2011) both highlight that surface water flooding is likely to increase, with further action in the future required to reduce the impacts of climate change. Without future reductions in the amount of surface water generated, the economic and physical development of the town could be compromised. Sustainable Drainage Systems should therefore be designed to provide additional capacity to store run off.

### **POLICY SC7: Flood Risk**

The Council will support development proposals that avoid areas of current or future flood risk, and those that do not increase the risk of flooding elsewhere.

The Council will adopt a risk-based sequential approach to determining the suitability of land for development, in accordance with the principles set out in national planning policy relating to Flood Risk and the Hastings Strategic Flood Risk Assessment 2008.

Following application of the sequential and exception tests where necessary, development proposals will need to:

- be of flood resistant or resilient design
- ensure the most vulnerable land uses are directed away from the areas at highest flood risk on a site where there is more than one flood zone.
- manage surface water run-off appropriately, particularly in the Combe Haven Catchment Area, in accordance with the Council's adopted Surface Water Management Plan and its standing advice

<sup>21</sup> [www.hastings.gov.uk/evidencebase](http://www.hastings.gov.uk/evidencebase)

# Chapter 7: Protecting our Environment

7.11 The green infrastructure network will be delivered through:

- financial contributions from developers (eventually as part of the proposed Community Infrastructure Levy should this be the approach adopted by the Council)
- how the Council manages its own land
- working with East Sussex County Council to provide footpaths and cycle ways across the town.

## Biodiversity and the natural environment

7.12 The town boasts a European designated Special Area of Conservation (SAC) at Hastings Cliffs, 3 nationally designated Sites of Special Scientific Interest (SSSI) at Combe Haven Valley, Marline Valley and Hastings Cliffs to Pett Beach, 7 Local Nature Reserves (LNR) and 25 Local Wildlife Sites. These are the priority natural areas, and together with the coast, rivers, woods, streams, fields, parks and open spaces, are the assets that make up the natural fabric of the town.

7.13 We have a statutory duty to ensure biodiversity is not lost and that the green infrastructure network is protected from development and, where possible, strengthened to provide the widest range of linked environmental and social benefits for the town, its wildlife and its citizens. In line with Government policy, we will move from net biodiversity loss to net gain, by supporting healthy, functioning ecosystems and coherent ecological networks.

7.14 All the wildlife sites and key open spaces in the town support a healthy functioning ecosystem that contributes to a better quality of life and to people's sense of well-being. It is important this ecosystem is protected from development and where possible, strengthened as part of the wider green infrastructure network.

7.15 The Hastings Local Biodiversity Action Plan (BAP) identifies all of the town's national priority habitats, including a description of the habitat and its location along with national targets and objectives relating to the habitat. The BAP shows that the majority of areas of high biodiversity importance in the town occur in the designated sites mentioned above. The Council's BAP strategy is to enhance biodiversity by focusing on the management and protection of this green network of designated sites, which are in themselves ecologically diverse and contain priority species and habitats.

7.16 Biodiversity Opportunity Areas (BOAs) have been identified by Sussex Local Nature Partnership at Combe Haven and Marline Valley, Hastings Fringe and Romney Marsh (includes Hastings Country Park). These are part of a Sussex wide network of BOAs and identify where the greatest opportunities for habitat creation and restoration lie.

7.17 Further information on these BOAs is available from the Sussex Local Nature Partnership website at: <http://sussexlnp.org.uk/support-services>

### **POLICY EN3: Nature Conservation and Improvement of Biodiversity**

The town's biodiversity and geological resources will be protected and enhanced. Priority will be given to:

- a) protecting, managing and enhancing the Hastings Cliffs Special Area of Conservation, and other protected biodiversity and geodiversity sites and features including Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites around the town
- b) ensuring development contribute to the national objective of no net loss of biodiversity by requiring developers to show how their proposals will contribute positively to the natural environment, avoid harm to biodiversity, adequately mitigate for unavoidable damage, or as a last resort, compensate for unavoidable damage.
- c) ensuring proposals for development comply with national and local planning policies relating to biodiversity, and with national Standing Advice published by Natural England.
- d) improving the integrity and biodiversity of the green infrastructure network,
- e) minimising potential negative impacts of new development on the Hastings Cliffs Special Area of Conservation through the delivery of new greenspace across the Borough and through appropriate recreation management of Hastings Country Park and other key natural green spaces around the town

# Chapter 7: Protecting our Environment

- f) meet our obligations to halting the loss of biodiversity and work with our partners to create opportunities for enhancing biodiversity both in and outside the town
- g) protecting woodland, particularly ancient woodland and veteran trees
- h) strengthening populations of protected and target species
- i) improving site management and increasing public access to areas of nature conservation importance
- j) influencing and applying agri-environment schemes, woodland grant schemes, flood defence and other land management practices to deliver biodiversity targets

Potential adverse effects on the Hastings Cliffs Special Area of Conservation arising from levels of new development set out in the Planning Strategy will be mitigated through improvements to the existing Broomgrove Local Wildlife Site, Combe Valley Countryside Park and the green spaces network as a whole.

- 7.18 Recreational activity within the Hastings Country Park will continue to be managed to avoid adverse effects on the Special Area of Conservation as a result of any increased recreational demand. Enhanced measures will be introduced if and when necessary, to ensure continued avoidance of adverse effects. Collectively, these measures will spread the recreational load and ensure adverse effects on the Special Area of Conservation will be avoided.
- 7.19 The details of these measures are set out in the Appropriate Assessment of The Hastings Planning Strategy (May 2010), and Update in March 2012 available at <https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/>
- 7.20 Ancient Woodland is a nationally important and threatened habitat which is irreplaceable. Most ancient woodlands have been in existence since the end of the last Ice Age. They are of special cultural, heritage and biodiversity value. National guidance and legislation protects Ancient Woodland from development. Development in the vicinity of such woodland, however, may also impact upon it and these impacts will be considered.
- 7.21 Across Hastings Borough there are many areas of Ancient Woodland. These are an important wildlife habitat, have great amenity value for the community and are an asset to the wider heritage landscape. Further information on Ancient Woodland is also set out in background document "Ancient Woodland Inventory of Hastings" (2010), available on our website at [http://www.hastings.gov.uk/environment\\_planning/planning/local\\_development\\_framework/evidence\\_base/](http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/evidence_base/). These areas of Ancient Woodland, as shown on the Policies Map, are therefore, protected from the adverse impact of development by policy EN3 and also as described in policy EN4.

## **POLICY EN4: Ancient Woodland**

Planning permission will only be granted for development near or adjacent to an area of ancient woodland, shown on the Policies Map, if it can be convincingly demonstrated that the proposals will not adversely affect that ancient woodland and the need for development outweighs the importance of them. The layout of any development encroaching into, or close to, such woodland must take account of the designation and be designed so as to minimise the impact upon it. The Council may impose conditions on any planning permission and/or seek to enter into legal agreement(s) to secure the protection, enhancement and management of ancient woodland affected, directly or indirectly, by development proposals.

# Chapter 7: Protecting our Environment

- 7.22 Some areas of the Borough that are particularly important for their contribution to wildlife habitat should be protected. Local Nature Reserves (LNR) protect wildlife habitats and the natural heritage, but they also have a broader community role:
- To forge partnerships between the local authority, local nature conservation organisations and local people.
  - To provide an ideal environment for children to learn about nature.
  - To increase people's awareness and enjoyment of wild plants and animals.
- 7.23 Local Wildlife Site (LWS) is a non-statutory designation applying to a site of Borough-wide importance. The designation seeks to provide recognition of the wildlife value of these sites to the local community and, where possible, to prevent significant damage arising from development.
- 7.24 Both LNR and LWS, as displayed on the policies map, will be protected managed and enhanced as described in policies EN5 and EN6.

## **POLICY EN5: Local Nature Reserves (LNR)**

**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 legal agreement(s) to ensure the continuing protection and enhancement of the nature conservation interest and to provide compensatory measures and/or site management.**

## **POLICY EN6: Local wildlife Sites (LWS)**

**Development proposals within or adjacent to Local Wildlife Sites (LWS) will only be permitted where there is a local need which outweighs any harm to the nature conservation interest. The Council may attach conditions to any planning permission 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.**

## **Conservation and enhancement of landscape**

- 7.25 The overall strategic approach to landscape protection will support the action priorities as far as possible, for the Come Haven Valley and High Weald Coast Landscape Character Areas, as set out in East Sussex County Council's Landscape Character Assessment. Of particular significance to the town, is the High Weald Area of Outstanding Natural Beauty (AONB), which is a key asset of Hastings' landscape and the surrounding areas. It runs from East Grinstead and Tunbridge Wells in the north, down to Hastings and Rye on the Coast.
- 7.26 The AONB is designated for its rolling hills, small, irregular fields, abundant woods and hedges, scattered farmsteads and sunken lanes. The protection of these special quality landscapes is becoming increasingly important, particularly given increasing pressure for development to support the town's regeneration.

# Chapter 9: Local Economy

9.25 This will lead towards the provision of more permanent good quality jobs in the tourism sector.

## **POLICY E4: Tourism and Visitors**

The Council will work to promote and secure sustainable tourism development in the town. A more diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number of visitors, provide job opportunities and sustain the tourism economy.

### **Visitor Attractions:**

New visitor attractions will be encouraged and those that already exist will be protected, unless it can be demonstrated they are no longer economically viable either in existing or adapted form. The upgrading of provision will be encouraged where it increases the range and/or quality of tourist facilities.

Proposals for new visitor attractions will be considered sympathetically anywhere within the Borough subject to other policies. The seafront is seen as the core resort area and particular support will be given to measures and proposals which are well related to the seafront.

### **Visitor Accommodation:**

New visitor accommodation will be directed to the Seafront, the main arterial routes, and close to other generators of demand. Extension to existing visitor accommodation will also be supported, subject to design and location policies.

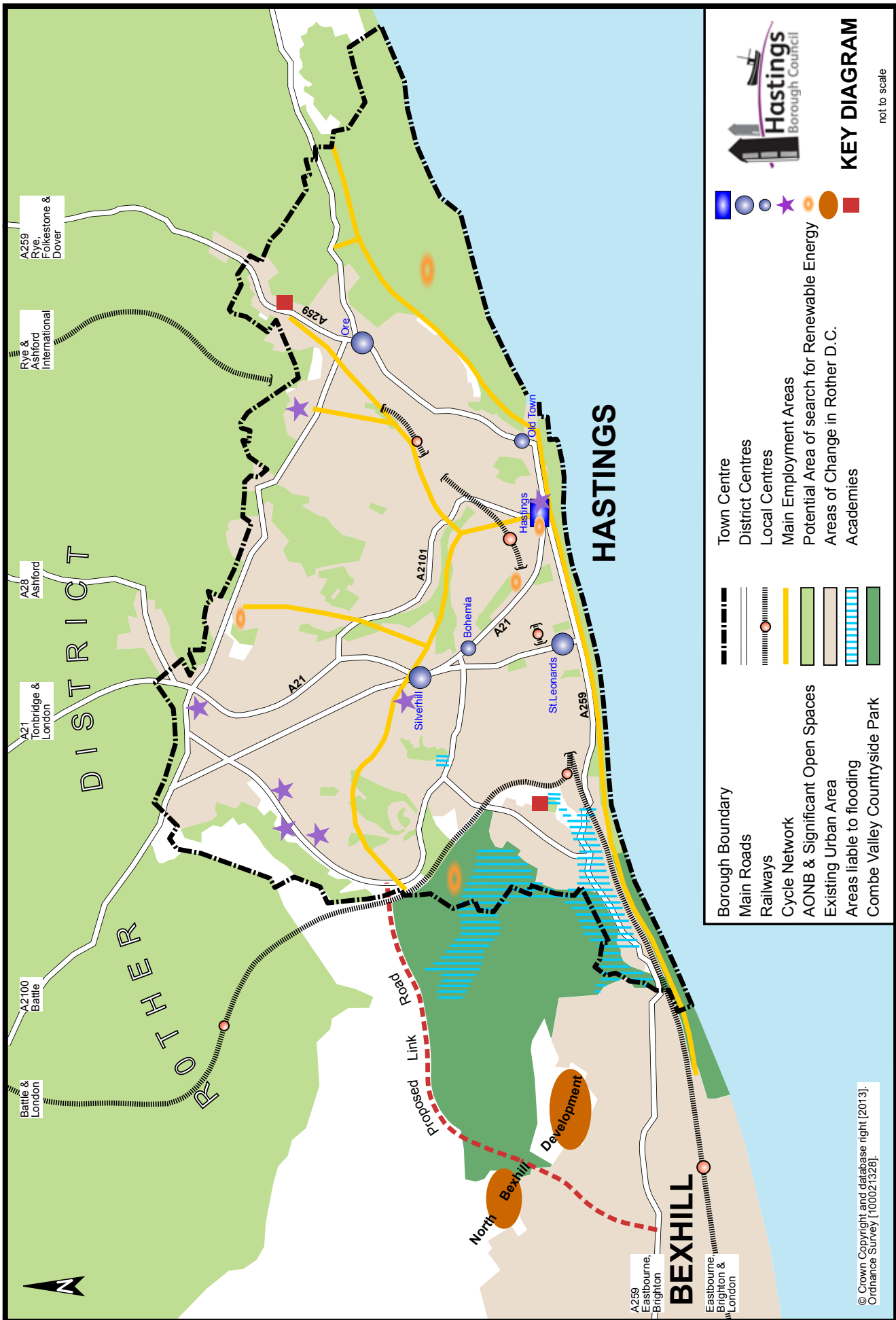
The priority areas for retention of serviced visitor accommodation are the Seafront (including Warrior Square), the Old Town and the Town Centre. In these areas, there will be a presumption against a change of use away from existing facilities unless the facility is no longer viable or is incapable of improvement to a good standard. Outside these areas, change of use away from visitor accommodation (including camping, caravan and chalet sites) will be resisted, unless the criteria of the Visitor Accommodation Supplementary Planning Document (SPD) are adhered to, and the unviable nature of the business can be demonstrated. The SPD contains guidance in support of this policy approach.

Proposals for upgrading caravan and camping facilities will be encouraged where it increases the range and/or quality available to the tourist.

### **Language Schools:**

In recognition of their importance to the local economy, the Council will also support proposals that improve, protect or make new provision for language schools in suitable locations. Proposals for changes of use of language schools to other uses will be resisted unless it can be demonstrated that the use is no longer economically viable.

Part Four, Chapter 9 extract - END



# The Monitoring & Implementation Framework

- 12.1 Preparation of any plan should never be seen as a once and for all activity. It is essential to check that the plan is being implemented correctly, assess the outcomes that result, and check if these still remain as intended, and as currently desired. This requires a process of continual monitoring, and the potential to review the plan's policies and proposals as and when necessary.
- 12.2 The Planning Strategy must respond to changing needs and circumstances, nationally, regionally and at the local level. Monitoring will assess the effectiveness in delivering the vision and spatial objectives, and in implementing the Planning Strategy.
- 12.3 Continuing monitoring will be essential if the policies of the Local Plan are to be effective and its proposals delivered in a timely manner. Frequent re-assessment of the Infrastructure Delivery Plan and its Schedule will take place, and will assist in securing these objectives. The Council will establish a working group to monitor the progress of the Local Plan, working with infrastructure providers and developers as appropriate. This working relationship will thereby ensure that the Local Plan keeps on target, and its progress is reported through regular Local Plan Monitoring reports. Recommendations will be made where necessary to the Council's Cabinet should there be any significant failures in performance and/or delivery.
- 12.4 These arrangements demonstrate the Council's commitment to the delivery of infrastructure at such time as is practicable in current circumstances. Some infrastructure will continue to be provided by developers through, for example, S106 Agreements, in accordance with the NPPF, and the working group will also want to be assured that developers (of major schemes) adhere to S106 Agreements and planning conditions.
- 12.5 In these ways, the Council will continue to co-operate with its partners and the private sector in ensuring that the Local Plan is effective, and that the development which it promotes is carried out as agreed
- 12.6 Each year, as part of the Local Plan process, the Council prepares an Annual Monitoring Report (AMR). The principal function of the AMR is to monitor policies and report on their respective performances. It reports progress on the policies and related targets in the Planning Strategy and includes progress against any relevant national and regional targets, and highlights any unintended significant effects of the implementation of the policies on social, environmental and economic objectives. Should annual monitoring reveal any significant failure(s) to meet targets, the Council will take action to rectify the situation as soon as possible
- 12.7 This monitoring framework has been prepared to assess the performance of the Planning Strategy over its course up to 2028, and will be used in the preparation of the AMR. It will provide the key mechanism for ensuring that the Council's Vision, Strategic Objectives and Policies are successfully delivered. The monitoring framework sets out a series of key indicators, which will be used to measure the Planning Strategies performance. These comprise a series of indicators set by the Council. They have related targets in order to assess whether policies are working effectively or whether they need to be reviewed or replaced. Where it becomes evident that policies are not performing as initially envisaged or intended, the AMR will suggest the actions that need to be taken to address the issues.
- 12.8 Not all the indicators will be influenced solely by the implementation of the Planning Strategy and some will also depend on external events. However, given the sustainable development principles embodied in the vision and objectives for the Borough, the indicators provide the basis for identifying where the Planning Strategy needs to be strengthened, maintained or changed in some way.
- 12.9 The following table sets out the Hastings Monitoring Framework.