

Hastings Local Plan, Planning Strategy Examination

Matter 1: Requirements, Vision, Strategy, Objectives and Sustainability

Feb 2013

Matter 1: Requirements, Vision, Strategy, Objectives and Sustainability

Issue 1: Has the Council complied with all the legal requirements, and in particular the duty to co-operate, and are the Local Plan's proposals for sustainable growth deliverable, clear, sufficiently justified, effective and consistent with all relevant national policy?

1.1 What measures has the Council taken to comply with the duty to co-operate, with whom has that co-operation taken place and what has been the outcome of that co-operation?

1.1.1 Measures taken to comply with the Duty to Cooperate are set out in the submitted document Statement of Compliance with the Duty to Cooperate (HBC/PS/10). This issue was discussed in detail during the Exploratory Meeting, particularly in terms of how we have worked with Rother District Council, East Sussex County Council and other key organisations to address the most significant issues affecting the town and its neighbours. This includes the strategic issues of housing, employment, transport and the potential for a strategic housing site to the north west of the town.

1.1.2 A supplementary document has since been prepared that sets out in further detail the schedule of meetings undertaken as part of the Plan preparation process, and provides additional information on how these meetings have influenced the development of the Planning Strategy (HBC/PS/139).

1.2 Does the Local Plan adequately set out the main characteristics of the Borough, its main assets, problems (including various aspects of deprivation), its attractions, challenges and opportunities? Is St Leonards given the attention which it deserves, particularly Burtons' St Leonards?

1.2.1 Chapter 2: About Hastings within the Planning Strategy is dedicated to describing the main characteristics of the Borough, including its assets, challenges and opportunities, as well as the shared approach to achieving future prosperity with Rother District Council. This includes a specific section on deprivation at paragraphs 2.13 and 2.14. The Strategic Objectives and Planning Strategy policies address these challenges and support the opportunities for development in the town up to 2028.

1.2.2 St Leonards is considered in detail in the Planning Strategy, from descriptions of its origins in paragraph 2.2 (Chapter 2: About Hastings), through to specific objectives in respect of the need for job creation in that area (1k), developing St Leonards town centre (1l) and ensuring appropriate housing mix (2e). Policies DS3 and FA2 specifically refer to the potential for retail development in St Leonards and Policy FA4 (Strategy for Central St Leonards) provides a framework for the development, management and protection of the area over the Plan period.

1.2.3 Burtons' St Leonards forms part of the Maze Hill and Burtons' St Leonards Planning Focus Area referred to in Chapters 4 and 5 of the Planning

Strategy. Further detail including a spatial portrait and vision for the area will be provided in the emerging Development Management Plan, which will be published for a formal 12 week period of consultation commencing 21 January 2013.

- 1.2.4 Paragraphs 7.1 to 7.5 specifically recognise the town's assets in terms of the historic environment. This section aims to preserve and enhance the historic environment, even in areas that are not protected by Conservation Areas or Listed Building designations. Policy EN1: Built and Historic Environment reinforces this aim, and also refers to the preparation of a Historic Environment Strategy, to ensure that areas such as Burtons' St Leonards and the wider historic environment are maintained and enhanced, and that opportunities are identified where a positive contribution to the character of a place can be made.
- 1.2.5 For these reasons it is considered that St Leonards, including Burtons' St Leonards, is given the attention it deserves throughout the Planning Strategy.

1.3 Is the vision for the Borough and the 7 Strategic Objectives realistic and achievable? Is the plan period 2011-2028 appropriate and is it consistently adopted throughout the Local Plan? Will the implementation of the policies in the Local Plan realise the vision?

- 1.3.1 The Planning Strategy's strategic vision was developed in close consultation with the community, including the Local Strategic Partnership, during the early stages of Plan preparation and bearing in mind the need to ensure the Planning Strategy represents the delivery arm of the Sustainable Community Strategy. In addition, it is consistent with the objectives of the Corporate Plan.
- 1.3.2 The 7 strategic objectives have been carefully developed to reflect this vision and the challenges the town faces. These objectives are based on what we consider can be realistically achieved over a 15 year period, taking account of the need to deliver the objectives and priorities of the Sustainable Community Strategy and the Corporate Plan. The 15 year time period is primarily driven by the housing target requirements set in the National Planning Policy Framework, although it has also been sensible to look longer term in respect of retail and employment provision.
- 1.3.3 The Monitoring and Implementation chapter (Part 6 of the Planning Strategy) provides detail on how these objectives will be monitored and how we will measure the implementation of policies. Progress in delivery will be reported through the Annual Monitoring Report.

1.4 In general terms, and subject to later discussions, does the Local Plan adequately take account of the National Planning Policy Framework (the Framework)? Has the timescale for the preparation of the Local Plan through its various stages allowed sufficient regard to be had to the Framework and, if not, what are the likely consequences?

- 1.4.1 The Planning Strategy accords with, and seeks to implement, the core planning principles within the Framework, particularly in terms of the drive to support sustainable economic development, securing a high standard of development and supporting the transition to a low carbon future. Exactly how the Planning Strategy complies with the Framework as a whole is set out in the document “Local Plans and the National Planning Policy Framework - Compatibility Self Assessment Checklist” (HBC/PS/18).
- 1.4.2 We consider the timescale for the preparation of the document has had sufficient regard to the Framework, and there are no likely consequences.

1.5 Has the Local Plan been positively prepared and does it fully meet the objectively assessed development needs of the area? And does it do so with sufficient flexibility to adapt to change? And what might be the consequences of any insufficient flexibility?

- 1.5.1 The Planning Strategy has been positively prepared in that it is aspirational but realistic. It is based on objectively assessed development needs as demonstrated in the evidence base and background papers including (but not exclusive to):
- The Hastings and Rother Employment Strategy and Land Review (HBC/PS/19)
 - Hastings Town Centre – Retail Floorspace Needs Assessment Update (HBC/PS/37)
 - Assessment of Housing Need in Hastings and Rother (HBC/PS/30)
- 1.5.2 The Planning Strategy has been prepared with sufficient flexibility to adapt to change, planning for now, as well as the future, given the potential for change in the economic climate. This is particularly relevant in terms of retail floorspace provision, as explained in Policy DS3 and supporting text.

1.6 What are the environmental constraints to development in the Borough?

- 1.6.1 Hastings is now getting close to its limits in terms of further outward growth and development. The town’s environmental assets, the nationally important High Weald Area of Outstanding Beauty to the north and east of the existing built-up area, the internationally important Hastings Cliffs Special Area of Conservation on the eastern boundary, Hastings Country Park to the east, Combe Valley Countryside Park to the west and the Sea to the south, act as restraints to major outward growth.
- 1.6.2 Within Hastings itself there are also many more green spaces that act as constraints to development. In addition to Combe Valley Countryside Park and Hastings Country Park, we also have Alexandra Park located centrally, together with a network of other smaller green spaces and ecological sites throughout the town. Together, the Annual Monitoring Report shows a total 704.87 hectares of designated sites within the Borough.

1.7 Have any reasonable alternative options been assessed to achieve the economic, social and environmental objectives in a sustainable way? Has the correct balance been achieved between these 3 dimensions? Does the Local Plan set out the most appropriate strategy against reasonable alternatives?

1.7.1 Chapter 7 of the Final Sustainability Appraisal Report (HBC/PS/11) sets out clearly the reasonable alternative options assessed in terms of the key strategic issues of housing growth and distribution, employment growth and retail provision. It also looked at the appraisal of sustainable design and renewable energy, as well as other policy issues. The Final Sustainability Appraisal Report demonstrates how the economic, environmental and social (sustainability) objectives were developed through the Scoping Report (HS/PS/12), and used to ensure the most appropriate strategy was taken forward.

1.7.2 It is considered that the correct balance has been achieved between the economic, social, and environmental effects of the Plan, taking account of the Council's focus on regeneration for the town as a whole as demonstrated in the Hastings Sustainable Community Strategy, the Corporate Plan, and the need to reduce deprivation.

1.8 How relevant to the Local Plan is survey material which informed the Regional Strategy? Is the Local Plan in general conformity with this Strategy?

1.8.1 The Planning Strategy is considered to be in general conformity with the South East Plan (The Regional Spatial Strategy).

1.8.2 Survey material prepared for the South East Plan has been updated based on most recent guidance and best practice, as set out in our evidence base documents. It is important to note that East Sussex County Council contributed significantly to South East Plan survey material, and has also been closely involved with our own evidence preparation, particularly in terms of providing forecasts and projections, as well as in terms of infrastructure delivery.

1.9 Does the Local Plan seek to meet any unmet requirements of neighbouring authorities and to what extent do neighbouring authorities meet the Borough's unmet needs, particularly in terms of housing?

1.9.1 This issue was discussed at the Inspector's Exploratory Meeting. In developing joint evidence base documents such as the "Assessment of Housing Need in the Hastings and Rother Housing Market Area" (HBS/PS/30) both Hastings Borough Council and Rother District Council believe that there is no unmet need in either local authority area. However, the development of the Bexhill-Hastings Link Road is essential to the release of land at North East Bexhill. Though this land is within Rother district the delivery of 50,000m² of employment land at this location is of strategic importance to both authorities in terms of meeting future employment requirements.

- 1.9.2 The Statement of Compliance with the Duty to Cooperate HBC/PS/10), together with its supplementary document HBC/PS/139) also set out clearly how we have worked with Rother District Council (as the only neighbouring authority) in developing the Planning Strategy. Joint evidence base documents, as well as discussions had at meetings, contribute to demonstrating that there is no unmet need within either authority that needs to be accommodated.

1.10 Should the model policy concerning sustainable development be incorporated into the Local Plan? If not, why not?

- 1.10.1 We do not consider it necessary to include the 'Model Policy' in the Planning Strategy. The presumption in favour of sustainable development underpins the entire Strategy and the policies within have been written in a positive manner that will ensure that the sustainable development is considered at all stages. The Council has also adopted a Statement Of Positive Engagement that reads: *"In dealing with this application Hastings Borough Council has actively sought to work with the applicant in a positive and proactive manner, in accordance with paragraphs 186 and 187 of the National Planning Policy Framework."* This appears on all decision notices published by the Council.
- 1.10.2 Chapter of the Planning Strategy (Developing Sustainable Communities) in particular, contains the Council's strategic view of sustainable development and its aims and expectations for achieving it, therefore reacting to the presumption in favour of favour development as presented in the Framework. This will be expanded upon in the Development Management Plan, much of which has already included community and other stakeholder involvement in its creation.
- 1.10.3 The policies of the Planning Strategy and those of the emerging Development Management Plan have been written in a way that identifies solutions to issues raised, but allows enough flexibility for changing demands and innovative solutions to be explored as and when they are suggested or required. Again, this conforms to the principles of the model policy, suggesting that the information is presented throughout, although not precisely replicated in a single policy.

1.11 Is there a clear vision for the future pattern of development with particular regard to housing, employment and transport proposals? Does the pattern of development promote the use of sustainable modes of transport? To what extent can the Council implement the various transport proposals and expectations?

- 1.11.1 Policies FA1, FA2 and FA5 set out how the Planning Strategy vision will be delivered and provide an indication of the minimum amount of dwellings, employment and retail development to be provided in the area (split down further by Focus Area). This is brought together with other spatial elements of the Strategy, such as green infrastructure provision, management of shopping centres and strategic transport improvements, to give a clear and well defined strategy for the pattern of development in each area.

- 1.11.2 Sustainable development is embedded within the strategy, as represented in the Strategic Vision and Policy SC1: Overall Strategy for Managing Change in a Sustainable Way.
- 1.11.3 The County Council's Local Transport Plan 2011 – 2026 (LTP) was adopted in May 2011. This followed an extensive consultation process, and district and borough council comments together with those received from other stakeholders helped shape the final strategy.
- 1.11.4 The LTP comprises a high level strategy document with five objectives - improve economic competitiveness and growth; improve safety, health and security; tackle climate change; improve accessibility and enhance social inclusion, and improve quality of life. These high level objectives have been embedded within the Planning Strategy.
- 1.11.5 The LTP Strategy identifies that the County Council will need to: “continue to work with the Borough and District Councils on the identification of transport infrastructure for inclusion in the Infrastructure Delivery Plan (IDP) element of their Local Development Frameworks, which also needs to be reflected in our LTP long term strategies for the priority areas of the county (which includes Hastings) and shorter term LTP Implementation Plans. The levels of housing growth will be a key driver of the demand for infrastructure and increases in land values will provide the means for development to make its contribution to infrastructure provision. The development industry will need to assume responsibility for delivery of the necessary infrastructure in a timely fashion”
- 1.11.6 The approach set out in the LTP Strategy for Hastings clearly identifies the most effective package of measures to deliver housing and sustainable economic growth in the area. This closely aligns with the policies set out in chapter 11 of the Planning Strategy, in particular Policy T3: Sustainable Transport.
- 1.11.7 The LTP Strategy is complemented by a series of shorter term Implementation Plans. The first LTP Implementation Plan covers the period 2011/12 – 2015/16 and gives greater clarity on the infrastructure identified in the approach for Hastings that will be delivered during that period. The delivery of this infrastructure will be influenced by the levels of funding that will be available over the duration of the plan, and as appropriate, has been aligned with the Infrastructure Delivery Plans of constituent Districts and Boroughs.
- 1.11.8 Implementation of road and rail schemes is set out in the Infrastructure Delivery Plan- in particular, rows T - A1 of the Infrastructure Delivery Schedule. The Bexhill Hastings Link Road, programmed for completion by the end of 2014, has been given provisional funding approval by DfT and the full funding approval bid has been submitted, and the County Council has identified its funding allocation in its Corporate Capital Programme.
- 1.11.9 In addition, the transport capacity assessment undertaken to determine the impact of development on the transport network has identified a number of junctions that will be at or near capacity. These junctions have been identified in the IDP as critical or important infrastructure required to support the delivery of the Planning Strategy. Further detailed capacity assessment and junction designs, including indicative costs, will need to be undertaken

during 2013/14 to determine the most appropriate interventions to address congestion at these locations.

- 1.11.10 The County Council will simultaneously be developing a package of walking, cycling and public transport measures as identified in the Local Transport Plan Implementation Plan 2011/12 – 2015/16 which will benefit housing and employment development in the Planning Strategy as well as existing development.
- 1.11.11 The County Council is confident that the necessary identified infrastructure can be funded and delivered within the timeframe of the Planning Strategy and in a timely fashion to support the growth identified within the Strategy.

<p>1.12 Are the Local Plan’s proposals to deliver sustainable growth clearly articulated and adequately justified? Does it adequately set out how much development is intended to happen where, when and by what means it will be delivered?</p>

- 1.12.1 The Planning Strategy is considered to be clearly articulated and adequately justified. In terms of housing growth in particular, this is further supported by the supporting and evidence base documents in the Local Plan Library, particularly the Strategic Housing Land Availability Assessment (HBS/PS/25) and Assessment of Housing Need in Hastings and Rother (HBS/PS/30).
- 1.12.2 Spatial Policies FA1, FA2 and FA5 have been developed to demonstrate how the different needs and opportunities of these areas have been taken into account in developing proposals for growth. They identify how much development is intended to happen where and by when, and indicate the other spatial elements of the strategy relevant in those particular locations. Means of delivery is referenced in the supporting text to these policies, but is fully referenced at a strategic level in the Infrastructure Delivery Plan and Schedule (HBS/PS/17).
- 1.12.3 The Development Management Plan will also be a key tool in showing how the targets in the Planning Strategy will be delivered. This is due for publication under Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

<p>1.13 Is there enough emphasis on good design, bearing in mind that it is indivisible from good planning. Are the references to design sufficient to promote or reinforce local distinctiveness and integrate new development into the natural, built and historic environment?</p>
--

- 1.13.1 Policy SC1: Managing Change in a Sustainable Way will be applied to all new development to ensure that the principles of sustainability and sustainable design and considered from the outset - from inception of a scheme through to the point of decision making. This policy has been developed to reflect the specific priorities for sustainable design in Hastings. Policies SC2: Design and Access Statements and SC3: Promoting Sustainable and Green Design will also help to ensure that new development has good design embedded within the scheme, and therefore well integrates new development into the built environment.

1.13.2 In addition, theme based policies in the Protecting our Environment chapter relating to both the natural and historic environment have been developed in light of the specific characteristics and assets the town has, and will contribute to ensuring that the natural and historic environment is protected and enhanced. We therefore consider that on this basis, the references to design and the built and historic environment are sufficient to promote and reinforce local distinctiveness and ensure new development is well integrated with its surroundings. Policies in the emerging Development Management Plan also specifically relate to design and the management of all new development proposals.

1.14 Are the proposed measures to tackle climate change justified, effective and adequately in line with the policy in the Framework of meeting the challenge of climate change, flooding and coastal change? In particular:

- a) Does the Local Plan set enough and sufficiently specific targets, for example in respect of sustainable building requirements?**
- b) Are its climate change measures clear, effective and adequately justified?**

1.14.1 The Sustainable Communities chapter as a whole seeks to ensure that all new development is designed and delivered in the most sustainable way, taking account of future energy demands and the changing climate in the future. The chapter has been developed using evidence in the Renewable and Low Carbon Energy Study (2009), the Strategic Flood Risk Assessment (2008), and the South Foreland to Beachy Head Shoreline Management Plan (2006) and the Surface Water Management Plan (2012), as well as other government guidance, and policies in the Framework. As such, the climate change measures within are considered to be effective and adequately justified. It is however important to recognise the contribution the Local Plan as a whole will make to the overall reduction in greenhouse gas reductions, an indicator reported on both nationally and corporately. This is measured using per capita reduction in CO₂ emissions across the borough.

1.14.2 Policy SC4: Working towards Zero Carbon Development sets the most appropriate strategy for achieving national CO₂ reduction targets, taking account of the level of new development proposed, viability and cost effectiveness. This is based on the results of the Renewable and Low Carbon Energy Study, which recommends a hierarchical approach to achieving low carbon development. Assessments as part of this study were not able to identify areas where standards of sustainable building could be accommodated or will be viable, higher than those already required nationally through the Code for Sustainable Homes and the Building Regulations.

1.14.3 The Planning Strategy does not therefore, set its own specific targets for sustainable building requirements, but provides the most appropriate and cost effective way of achieving those set nationally.

- 1.14.4 The approach to flood risk and coastal change is also supported by evidence within the SFRA and the Shoreline Management Plan. We have worked with the Environment Agency in developing a flood risk policy that is spatially specific where required and in conformity with policies in the Framework. Coastal change is considered in paragraphs 6.22 - 6.24 of the Planning Strategy and, as indicated, evidence does not suggest that the designation of a Coastal Change Management Area is necessary at this time, although will be something that will be kept under review.

1.15 Does the Local Plan provide a basis for the delivery of a sustainable future that balances economic, social and environmental interests (including a radical reduction in greenhouse gas emissions and air pollution, minimising vulnerability and providing resilience to the impacts of climate change) and does it support the delivery of renewable and low carbon energy and associated infrastructure (Framework paras 6, 8, 17 & 93)?

- 1.15.1 Yes. The Planning Strategy has been well tested against economic, social and environmental objectives through the Sustainability Appraisal process. The delivery of a sustainable future is central to the overall Vision of the Planning Strategy, and policies in the Sustainable Communities chapter have been developed using an evidence base to show how best to meet national targets for reducing green house gas emissions (in particular, Policy SC4), as well as mitigating, and adapting to, climate change. Policy SC3: Promoting Sustainable and Green Design shows how suitable adaptation measures such as green roofs, SUDs, orientation of buildings etc, will be implemented. These will also help provide resilience and contribute to minimising the towns' vulnerability in terms of issues such as flood risk and overheating, in accordance with policies in the Framework.
- 1.15.2 The delivery of renewable and low carbon energy infrastructure is further facilitated by Policies SC5 and SC6 which seek to encourage the installation of District Heating Networks in the most appropriate locations, as well as Combined Heat and Power systems and large scale renewable energy generation. The emerging Development Management Plan is currently drafted to reinforce this approach by identifying an area of search for wind energy generation and taking account of opportunities for district heating and combined heat and power scheme as part of individual site allocations.