

Matter 3: Housing

Supplementary Note 2 – Suggested Amendment to Policy DS1

Prepared by

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**On behalf of
Mr C Simmons (Respondent ID 194)**

**Examination of the
Hastings Borough Council Planning Strategy**

February 2013

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- 1 This note has been prepared on behalf of Mr Colin Simmons, at the request of the Inspector, in respect of suggested changes to Policy DS1.
 - 2 It is our position that the inclusion of Mr Simmons' land at Breadsell Lane is required in order to provide Policy DS1 with the ability to 'adapt to rapid change', as required by paragraph 14 of the National Planning Policy Statement. In this respect, we consider the following amendments should be made to the plan.
 - 3 Policy DS1 should be amended to read as suggested below. For the avoidance of doubt, proposed changes are underlined and provided in red font.

Policy DS1 to read as follows:

POLICY DS1: New Housing Development

The target for housing development will be 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.

In the event that the Annual Monitoring Report reveals a deficit against the five-year housing requirement, the Council will allow the early release of land at Breadsell Lane, in accordance with Policy SA1, in order to rapidly respond to the deficit and ensure a continuous supply of housing land.

- 4 In essence, the above wording indicates that if the Council's housing land supply drops below the five year requirement i.e. with no buffer (equal to a 200 unit deficit against what the NPPF requires), Breadsell Lane should be released to provide the strategic flexibility that the 'buffer' should usually cover and, therefore, to facilitate the certainty of at least two years further supply of housing land.
- 5 We consider that the suggested amendment also requires the insertion of a separate strategic allocation policy, as detailed below. Please note that this strategic policy was included within Mr Simmons' Matter 7 Statement and does not, therefore, constitute introduction of new evidence. Notwithstanding this, some minor amendments have been made to the policy wording, in order to ensure consistency with the suggested wording to policy DS1 above.

PROPOSED *POLICY SA1*

'Land at Breadsell Lane is allocated as a strategic housing site to meet the long term residential needs of the Borough. The land shall be brought forward for housing after 2018, unless the land is required earlier to maintain a robust supply of housing land in the Borough'

Prior to *the site being released for development*, a hydrological baseline position should be established for the adjacent SSSI site. Development shall not come forward until sufficient hydrological monitoring has been undertaken that demonstrates that development of the site can be completed without adverse impact upon the adjacent SSSI'.

Delivery Mechanisms

The Allocations and Development Management Plan DPD should allocate the site boundary and define an indicative capacity for the site.

The land should not be considered for development until after 2018 unless there is an identified shortfall of housing. *The test for its release prior to 2018 should be whether the Annual Monitoring Report shows a deficit against the 5 year supply of deliverable sites, as set out in Policy DS1.*

The hydrological study of the site should be managed in consultation with Natural England in order to preserve the existing features of the adjacent SSSI.

- 5 There may be some criticism that the need for hydrological baseline studies would prohibit the quick release of the site. However, this criticism would be unjustified as inclusion within the Local Planning Strategy as a strategic allocation would provide the applicant with sufficient certainty to be able to undertake immediate hydrology monitoring.

David Bedford MRTPI

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