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Date: 12 February 2013



Services Directorate  
**Anthony Leonard MBA, MA**  
Director

Town Hall  
Bexhill-on-Sea  
TN39 3JX

**BY EMAIL ONLY** ||

Lynette Duncan  
C/o Hastings Borough Council  
Aquila House  
Breeds Place,  
Hastings, TN34 3UY.

Dear Mrs Duncan

**Matter 3: Housing – Rother District Council response to Mr Bedford’s (Kember Loudon Williams) “Hastings Housing Numbers 5 Year Supply Land Scenarios” paper submitted during Hearing session, Thursday 7 February 2013**

During the Matter 3: Housing session on 7<sup>th</sup> February 2013, Mr Bedford produced a short paper presenting a number of different scenarios relating to Hastings Borough Council’s 5-year housing land supply position. Rather than the District Council presenting a further set of figures for the Inspector’s consideration, it is considered more useful to reply in relation to the Borough Council’s response to Mr Bedford’s figures.

**Base date for land supply calculations**

Although the District Council has not verified the calculations contained within the Borough Council’s new statement dated 12 February 2013, it is considered appropriate that in presenting the relevant scenarios that Hastings have shown the relevant figures from a 2011 base (i.e. the start of the plan period). The District Council concur with this approach.

**Land supply over the plan period (2011-2028) – updated Table 3.12.1**

It is clear from the Hastings revised figures that over the plan period - based on their best estimation of housing capacity from their Strategic Housing Land Availability Assessment (SHLAA), having due regard to small site windfalls over the plan period, and the removal of an allowance for long-term empty homes being brought into use - that they are likely to achieve the outstanding Regional Strategy requirements (South East Plan) over the plan period including the deficit of 91 dwellings relating to an undersupply from 2006-2011.

Whilst we note that Mr Bedford had highlighted some question marks over the timing of some of the SHLAA sites coming forward over the plan period, it should be noted that the SHLAA is not a policy commitment to sites coming forward but is an indication of the overall Strategy being considered deliverable. The relevant figures from the updated Hastings

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Matter 3 submission (table which updates 3.12.1 of the Matter 3 statement) shows that from an outstanding South East Plan requirement of 3,661 (2011-2028), 3,707 new homes are likely to come forward over the plan period from various sources. It is also noted that in addition, large site windfalls may come forward over the plan period, although no allowance is made for them in the submitted calculations.

It is also noted from the Borough Council's further submission that the inclusion of a small site windfall allowance only accounts for 13% of the overall supply from 2011-2028.

### **5-year housing supply position**

In terms of the 5-year supply position, it is noted that the Borough Council has provided for a 20% buffer.

Whilst the figures presented in the updated statement from the Borough Council differ to those presented by Mr Bedford, principally due to their difference in base date, they reflect a relatively similar position. Against the submitted Planning Strategy targets, it is concluded that there is a 5-year supply (+22% buffer) – Scenario 1 – paragraph 8. Under Scenario 2 – paragraph 8 (against the South East Plan requirements), it can be shown that there is a 5-year supply (+13.2% buffer).

Whilst the Borough Council has shown through their current best estimates that they do not have a 5-year supply (+20% buffer) when measured against the South East Plan requirements as at 01/04/2013, the deficit is marginal. As the Inspector will appreciate, current economic circumstances and a weak local housing market can be challenging for developers in bringing sites forward. However, as the economy improves so will the expected build out rates of housing developments in the local area, therefore yielding an improved 5-year supply position.

Overall, the District Council supports the approach set out in Hastings' additional Matter 3 Statement dated 12 February 2013.

Yours Sincerely



David Marlow  
Planning Strategy and Environment Manager

