

Please quote: HBC/28
Your reference:
Date: 27 August 2013
Please ask for: Tim Cookson
Telephone direct: 01424 783201
E-mail: tcookson@hastings.gov.uk
Web: www.hastings.gov.uk/localplan



Regeneration and Planning Policy
Aquila House, Breeds Place
Hastings, East Sussex TN34 3UY

Mr R Hollox
c/o Lynette Duncan, Programme officer

Dear Mr Hollox

Resumed hearing session – additional information

Further to your letters of 16 July 2013 and 6 August 2013 (Reference ID/14 and ID/15), please now find enclosed the additional information you required on the following issues, combined into a single report.

- Latest position on Hastings Pier
- Restoration of Pelham Place
- Sites for gypsies and travellers
- Annual target for affordable homes
- Latest unemployment figures
- Further compliance with the Duty to Co-operate, particularly joint working with Rother District Council

The Programme Officer circulated an advice note regarding the updated Strategic Housing Market Assessment on 9 August 2013. This is available at https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/supportingdocs_evidencebase/evidencebasedocuments/

This letter and the accompanying report will be published on our website on Tuesday 27 August.

Yours sincerely

T Cookson

Tim Cookson
Strategic Planning Manager
Regeneration and Planning Policy



Hastings Local Plan Planning Strategy Examination

Additional Examination Hearing –
Matters update

August 2013

www.hastings.gov.uk/localplan

Follow Shaping Hastings on Facebook & Twitter

Tel: 01424 451098 Email: fplanning@hastings.gov.uk



Contents

1. INTRODUCTION	3
2. HASTINGS PIER AND THE RESTORATION OF PELHAM PLACE.....	3
Hastings Pier.....	3
Restoration of Pelham Place	3
3. REQUIREMENTS AND SITES FOR GYPSIES AND TRAVELLERS	4
4. TARGET FOR AFFORDABLE HOMES	4
5. UNEMPLOYMENT FIGURES FOR THE BOROUGH.....	4
6. EVIDENCE OF COMPLIANCE WITH THE DUTY TO CO-OPERATE.....	5
Strategic Housing Market Assessment Update	6
Working with other authorities in East Sussex.....	8
APPENDIX A – LETTER TO LOCAL AUTHORITIES	9

1. Introduction

1.1 In his letters of 16 July 2013 and 6 August 2013 (Reference ID/14 & ID/15) the Inspector, Mr Richard E Hollox BA(Hons) BSc(Econ) MPhil FRTPI FRICS, requested that Hastings Borough Council give an update on several matters during the additional examination hearing.

1.2 These matters are:

- The latest position concerning Hastings Pier and the restoration of Pelham Place
- The latest position on identifying requirements and sites for gypsies and travellers
- The Council's recent annual target for affordable homes
- The latest unemployment figures for the Borough
- Evidence regarding compliance with the Duty to Co-operate in respect of joint working with Rother District Council

1.3 These issues are dealt with in sections 2 – 6 below.

2. Hastings Pier and the restoration of Pelham Place

Hastings Pier

2.1 The compulsory purchase of Hastings Pier reached a successful conclusion on 14 August 2013 and ownership of the structure is now in the hands of the Hastings Pier Charity. Works to repair and rebuild the substructure, decking and the remaining pavilion on the apron of the Pier will commence shortly and are due to be completed in spring 2015.

Restoration of Pelham Place

2.2 **Pelham Place** - The pedestrian footway in front of Pelham Crescent has been widened to improve the pedestrian environment of the street. This was part of a joint scheme by East Sussex County Council and Hastings Borough Council, undertaken during 2009.

2.3 **Pelham Crescent** - The restoration of the exterior of the Crescent has been carried out from 2008 to 2011 using Borough Council grants and powers under Section 215 of the Town and Country Planning Act 1990 to require the improvement of properties with a poor external appearance. The scheme has resulted in the front elevation of the exterior of properties being restored.

2.4 **Pelham Arcade** - A scheme to restore the exterior of Pelham Arcade and its roof lantern has been on-going from 2012. The scheme currently has benefitted from grant funding from English Heritage and the Borough Council. To date two schemes of restoration have been approved and commenced at 12 Pelham Arcade and 6, 7 & 8 Pelham Arcade. Others are the subject of discussion. The Council will continue to offer grants for restoration of the exterior of the buildings and lantern lights above. English Heritage is also willing to offer grants on a scheme by scheme basis.

2.5 **St Mary in the Castle** - This property had been the subject of earlier restoration schemes in the 1990s and further works are being carried out currently to repaint

the pilasters, columns and their bases on the front elevation of St Mary. The entrance through 6 to 8 Pelham Arcade is also under restoration with work to the lantern roof and front façade. A lease by the Borough Council to a charitable trust formed by Buckswood School is in the process of being completed. The Trustees are eleven local people. The building will be used as a venue for cultural and community activities and bodies such as for performing arts, concerts, exhibitions, training workshops and other events.

3. Requirements and Sites for Gypsies and Travellers

- 3.1 The Council is proposing to allocate a site for two permanent pitches for Gypsies and Travellers in the Hastings Development Management Plan Proposed Submission Version 2013, site reference number FB10. The site is located on land to the south of Crowhurst Road, St Leonards-on-Sea. The submission version of Development Management Plan was subject to public consultation between 21st January 2013 and the 15 April 2013, but has not yet been submitted to the Secretary of State for examination.
- 3.2 On 26 February 2013 Hasting Borough Council's Planning Committee considered and approved an outline planning application by the Council for the change of use of land for the development of two permanent residential pitches for gypsies and travellers on the land identified in the proposed submission version of Development Management Plan (Jan 2013). The site in question is currently in the ownership of the Council.
- 3.3 In identifying a permanent site and in securing an outline planning permission, the Council is meeting identified needs to 2016. The paper "Provision of Permanent sites for Gypsies, Travellers and Travelling Showpeople", October 2012 (HBC/PS/48) provides evidence to support proposals for a 2 pitch requirement. Post 2016, the Council will work with the East Sussex authorities to identify requirements for additional permanent pitches and transit sites, as part of continuing requirements under the duty to co-operate.

4. Target for affordable homes

- 4.1 The Council's Housing Strategy covers the period 2009-2013/14, and includes a target to deliver on average 70 affordable dwellings per year. The Hastings Planning Strategy has not sought to incorporate an annual target, in view of the high level of need, but instead, to adopt a policy approach which seeks to maximise the number of new affordable homes that can be delivered through the planning system whilst having regard to site viability and in the knowledge that the future availability of grant aid will clearly have an impact on delivery.
- 4.2 In recent months housing completions figures have included a number of schemes that have included 100% affordable housing and an increasing number of schemes at the planning application stage which are likely to include a higher proportion of affordable dwellings than would normally be required under Local Plan policy. This is reflective of the national picture and Government efforts to boost housing delivery.

5. Unemployment figures for the Borough

- 5.1 The number of people in Hastings claiming Job Seekers Allowance by age duration for July 2013 is shown in the table below.

	Hastings (level)	Hastings (%)
Aged 16-64		
Total	2,745	4.7
Up to 6 months	1,260	2.2
Over 6 and up to 12 months	550	1.0
Over 12 months	935	1.6
Aged 18 to 24		
Total	635	7.8
Up to 6 months	355	4.4
Over 6 and up to 12 months	125	1.5
Over 12 months	155	1.9
Aged 25 to 49		
Total	1,565	5.2
Up to 6 months	660	2.2
Over 6 and up to 12 months	330	1.1
Over 12 months	575	1.9
Aged 50 to 64		
Total	525	3.0
Up to 6 months	225	1.3
Over 6 and up to 12 months	95	0.6
Over 12 months	205	1.2

Source: ONS claimant count – age duration with proportions

% is number of persons claiming JSA as a proportion of resident population of the same age

- 5.2 Using the International Labour Organisation (ILO) definition of unemployment, the percentage level of unemployment for Hastings in the period April 2012 – March 2013 was 10.3%. The ILO definition of unemployment is the number of all those aged 16 and over who are available for and actively seeking work. The ILO rate is the proportion of all economically active people who are over 16 (note that this will include people who are economically active and who are of pensionable age - that is those over 64 who are still in employment).

6. Evidence of compliance with the Duty to Co-operate

- 6.1 Two papers have already been submitted with regard to compliance with the Duty to Co-operate as part of the Planning Strategy Examination. These are:
- Hastings Planning Strategy: Statement of Compliance with the Duty to Co-operate, August 2012 (HBC/PS/10)
 - Duty to Co-operate Supplementary Information, January 2013 (HBC/PS/139)
- 6.2 With regard to the potential for large scale development at Breadsell, neither Hastings nor Rother Councils believe there is a fundamental difference in terms of the respective approaches taken by each authority. For Hastings, the net new homes target is for “at least” 3,400 new homes over the Plan period. Rother’s approach is somewhat different because the draft Core Strategy sets a range of housing numbers for each of their identified geographies. It also relies on the definition of development boundaries to identify areas of development potential.
- 6.3 Any possibility of housing development at Breadsell coming forward within Rother would have been excluded without the Main Modifications now being put forward by Rother (Rother District Council Local Plan Core Strategy Schedule of Main

Modifications August 2013, MOD numbers - 7.10, 7.14, 9.1, 9.2 & 9.3 (<http://www.rother.gov.uk/corestrategy>). This is not the case for Hastings

- 6.4 The key point is that both authorities agree that the potential for development at Breadsell cannot be relied upon in the light of the evidence already presented to the Hastings (and Rother) Planning Strategy Examination; that is, the objections raised by Natural England and the other issues raised to ensure overall sustainable development.
- 6.5 Hence, it can be seen that there is a consistent approach, based on co-operation between the Councils, in that neither Authority is reliant on the development potential at Breadsell, but the possibility of development at this location has not been ruled out.

Strategic Housing Market Assessment Update

- 6.6 As a result of the revocation of the South East Plan and advice from both Hastings and Rother Planning Inspectors, Hastings and Rother Council officers agreed in April 2013, that several actions would be required to determine and test housing needs and provision in line with the requirements of the National Planning Policy Framework. These actions were to:
- i) work jointly with East Sussex County Council's Research and Information Team to merge the ONS projections with the local understanding of household formation rates, migration trends, etc.;
 - ii) extend the previous work on the Strategic Housing Market Assessment to give further consideration of the findings of i) above, together with additional work on the housing market potential of Bexhill and Hastings
 - iii) engage a specialist consultant to work with both Councils in order to ensure robustness;
 - iv) consult nearby authorities on their ability to accommodate any unmet need, having due regard to their own assessed need and plan-making timetables
- 6.7 The Hastings and Rother Strategic Housing Market Assessment Update: Housing Needs Assessment, June 2013 (HBC/PS/156), and Housing Delivery in Bexhill and Hastings, June 2013 (HBC/PS/157) documents are available on our website at http://www.hastings.gov.uk/environment_planning/planning/localplan/evidence_base/shma/
- 6.8 Following completion of this work, Hastings and Rother Council's jointly contacted 10 authorities in June 2013 to determine their ability to accommodate unmet need. The authorities were selected following an analysis of proximity to the Hastings & Rother Housing Market Area and the level of in-commuting and out-commuting to Hastings and Rother. The letter sent is appended at A.
- 6.9 The ability to determine whether there is capacity for other authorities accommodate unmet need is largely dependent on where these authorities are in terms of plan preparation and identifying their own objectively assessed housing target. A summary of the information collected so far is set out in the table below:

Authority	Response received	Stage in plan preparation	Objective assessment of housing need?	Comments
Ashford	Interim	Adopted Core Strategy 2008	SHMA update underway	Identified 5 year supply, although unimplemented permissions
Tunbridge Wells	Yes	Adopted Core Strategy 2010	No	Welcome continued working
Wealden	Yes	Adopted Core Strategy 2013	No – planned as part of review	Cannot assist with unmet housing need. Current under provision against South East Plan
Brighton & Hove	Yes	Submitted City Plan (June 2013)	Yes	Cannot assist with unmet housing need. Current under provision
Eastbourne	Yes	Adopted Core Strategy 2013	Yes - above and beyond what can be delivered	Cannot commit to assisting with unmet housing need
Maidstone	No	Draft Plan	Unknown	N/A
Tonbridge & Malling	Yes	Adopted Core Strategy 2007. Currently under review	No	Too early in plan preparation but indicate cannot assist with housing need
Croydon	Yes	Adopted Strategic Policies 2013	No	Cannot assist with unmet housing need. Recent Inspector's report recognises future capacity constraints
Bromley	Yes	Draft Plan	No	N/A
Shepway	Yes	Core Strategy found Sound and due for adoption Sept 2013	No intention to review given recent adoption	Lack of scope in any event for the issue to be addressed by Shepway for the foreseeable future

6.10 The responses received so far demonstrate clear commitment to future co-operation in terms of strategic issues. More specifically:

- Most of the Local Planning Authorities contacted have recently adopted Local Plans based on South East Plan/London Plan
- Evidence, often through examination, is cited as limiting potential for higher growth
- The evidence gathered means that we must advise that we have not identified a clear prospect of help in meeting our unmet housing needs
- This may be explored further, but Local Plan reviews are either not programmed or at least some time off
- However, there is a willingness to engage on future reviews in light of the National Planning Policy Framework (see paras (6.11-6.12) below
- All but 2 of the Local Planning Authorities that have replied have at least a 5-year housing land supply, suggesting that there are not obvious pressing

housing demand pressures in the areas from which most in-migration to Hastings and Rother has previously come

Working with other authorities in East Sussex

- 6.11 In addition to the work outlined above, we have continued dialogue on a County-wide basis through Local Plan officer meetings as well as the East Sussex Member Group of respective Portfolio Holders for strategic planning and Chief Executives Group.
- 6.12 Of significance is a report that was prepared for the Chief Executives Group in July 2013, which identified issues to be addressed under the Duty on strategic planning matters. This report proposed the establishment of a Member group (with a Memorandum of Understanding), which would set a clear framework for operation, and an evidence base for Member communication, co-operation and collaboration around the strategic priorities and issues, affecting the development and delivery of plans.

Appendix A – Letter to Local Authorities

Please quote:
Your reference:
Date: 19 July 2013
Please ask for: Monica Adams-Acton
Telephone: 01424 451749
E-mail: Adams-acton@hastings.gov.uk
Web: www.hastings.gov.uk/regeneratio



Regeneration and Community Services

Aquila House, Breeds Place
Hastings, East Sussex TN34 3UY

Dear

Duty to Co-Operate - Housing Provision for Hastings Borough and Rother District

Both Hastings Borough Council and Rother District Council are currently at Examination in relation to their respective Local Plan Strategies. Following the partial revocation of the South East Plan, the Councils have undertaken further work in relation to the objectively assessed need for market and affordable housing, as required by the National Planning Policy Framework. The outcome of this work has been the assessment that both Districts' housing needs are in excess of the housing requirements contained in the former South East Plan.

Both Councils have further reviewed their potential to accommodate additional development. However, Hastings is physically constrained, having virtually built up to its administrative boundary and is therefore only able to accommodate some 3,400 additional dwellings, this being about half of its assessed need. Rother has increased its housing provisions by approximately 25% to be very close to its assessed housing need, but is heavily constrained by virtually all of the District outside of Bexhill and Rye being within the High Weald Area of Outstanding Natural Beauty. Significant growth is proposed at Bexhill, as much as market conditions are expected to allow. Rye is proposed to grow as much as possible consistent with its enveloping international nature conservation designations and significant flood risk issues. In summary, up to 3,463 additional dwellings cannot be accommodated in Hastings and up to 480 in Rother, making a combined under provision of 3943 additional dwellings over the period to 2028.

Therefore, our purpose in writing, on behalf of both Councils, is to ascertain the housing position of neighbouring local planning authorities and others for which Hastings and Rother have, in recent years, provided homes for out-migrants.

In order for us, and our Inspectors, to determine the respective implications of not providing more housing locally, I would be grateful if you could advise of the following:

- (i) Is your current housing target as set out in the most recent adopted Local Plan likely to deliver less than / same as / more than the annualised housing target of the South East Plan? Can you please confirm the relevant figures?
- (ii) Has there been an objective assessment of housing need subsequent to publication of the NPPF? (If so, please can you provide a link to your assessment)
- (iii) Does your authority have a 5-year supply, including an appropriate buffer, of deliverable housing land within your District and what level of supply is this?
- (iv) If there has not been a recent objective assessment of housing need, when is this expected to be undertaken and when do you expect a review of your current Local Plan housing targets? Please confirm when the assessment of housing need was last undertaken?
- (v) If there has been a recent objective assessment of housing need, is this more or less than currently being planned for?

Finally and most importantly, in the light of paragraph 182 of the Framework, can you let me know to what extent your Authority's plans could assist in meeting our Councils' unmet housing requirements?

I would appreciate a response by 12 August.

If you wish to discuss the matter please contact David Marlow, Planning Strategy and Environment Manager, (David.Marlow@rother.gov.uk 01424 787635) or Tim Cookson, Strategic Planning Manager at Hastings Borough Council (tcookson@hastings.gov.uk 01424 783201).

Yours sincerely,

Monica Adams-Acton
Head of Regeneration and Planning Policy
Hastings Borough Council

Tim Hickling
Head of Planning
Rother District Council