

Hastings Local Plan Planning Strategy Examination

Hastings Borough Council response to
outstanding issues and queries raised during
Examination Hearings incorporating Minor
Amendments

Feb 2013

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Section One: Proposed additions/minor amendments to the Planning Strategy

1. Hearing 1- issues arising

- 1.1 There were no additions/minor amendments arising from the matter discussed in Hearing 1.

2. Hearing 2 - issues arising

2.1 Sustainable Transport Link

- 2.1.1 Mrs Brown suggests the inclusion of the following text in the sustainable transport chapter of the Planning Strategy (Rep 341/2):

“The Council will continue to encourage sustainable forms of transport, particularly walking, cycling and public transport. One possible measure could be the provision of a sustainable link along the promenade between Rock-a-Nore and West St Leonards. This could provide a convenient link, with stops, between the Borough’s tourist attractions including the Jerwood Gallery, the Fish Market, the restored Pier, Burtons St Leonards and West St Leonards.”

- 2.1.2 The Council do not accept the need to insert the proposed text as suggested here as this scheme is currently only an idea and until it is fully investigated we do not know whether it would be viable, physically deliverable and/or desirable. We do however, propose to amend the text at paragraph 11.15 to acknowledge the potential for a sustainable transport link along the seafront and this is reflected in the proposed Minor Amendment shown in Appendix 2, reference: HBC/MA/77.

2.2 Park and Ride

- 2.2.1 Mrs Brown also suggested alternative wording in respect of Park and Ride at paragraph 11.28 of the Planning Strategy (Rep 341/1):

"Park and Ride has proved beneficial to visitors, businesses and tourism in many towns e.g. Brighton and Maidstone. Whilst circumstances may not favour such a scheme locally at present, it may be that during the lifetime of the Local Plan, there are calls for the introduction of Park and Ride, if proved financially viable and a site is available, it may well be prudent to proceed"

- 2.2.2 The Council would like to keep the focus of the existing text, which identifies criteria for future proposals, whilst also recognising Mrs Brown’s wish to make the text more positive. We therefore propose the text in 11.28 be replaced as shown in Appendix 2, reference: HBC/MA/82.

2.3 General Monitoring and Implementation

- 2.3 The Planning Inspector suggested the following text be added to the Planning Strategy, which was submitted as an examination document (ID/8).

“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 therefore set up a Project Board (Working Party) of Chief Officers and elected members with attendance by infrastructure providers and developers as appropriate, to ensure that there is a focal point that supports the Local Plan and ensures the delivery of the infrastructure on which it relies. The Working Party will thereby ensure that the Local Plan keeps on target, and it will make recommendations to the Council’s Cabinet should there be any significant failures in performance and/or delivery.

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.

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.”

- 2.4 The Council accepts this additional text as a main modification, although suggest the following amendments to ensure local circumstances and procedures are adequately reflected:

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.

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.

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.

3. Hearing 3 - issues arising

3.1 Small Site Windfall information

- 3.1.1 The Council was requested by the Planning Inspector to provide small site windfall completions data. The following table provides small site windfall data over a period of 14 years:

Table 1: Small windfall completions 1998-2012

Year	Units completed Small Sites (<6 units)
1998/99	29
1999/00	32
2000/01	55
2001/02	25
2002/03	35
2003/04	59
2004/05	98
2005/06	76
2006/07	76
2007/08	91
2008/09	83
2009/10	62
2010/11	44
2011/12	65
TOTAL 1998-2012	830
Average completions per year	59

Source: Hastings Borough Council Planning Policy Annual Monitoring

3.2 Housing Monitoring Explanation

- 3.2.1 This information has been produced in response to a request from the Planning Inspector to set out the Council monitoring procedures in respect of housing development. The requirement to produce and maintain a rolling 5-year housing land supply means the Council must maintain a clear understanding of the timing of development, most especially to comply with the “available, suitable and achievable” criteria for inclusion within the 5-year supply period. The Council believes its monitoring procedures in respect of housing development and future housing supply are robust.
- 3.2.2 The following table sets out the weekly, monthly, and annual tasks which are undertaken in order to maintain up-to-date records on housing land supply potential. The information builds on, and adds to, that already gathered through the Strategic Housing Land Availability Assessment (SHLAA) 2010 process. The data obtained through SHLAA process provides confirmation of developers’ intentions to proceed with housing schemes and landowners’ intentions to make sites available for housing development, including timescales and build out rates. In addition to maintaining contact with owners and developers’, the following monitoring procedures assists us in verifying and tracking site information and ensures that we have a very clear understanding of sites coming forward and their progress.

Table 2: Monitoring tasks & timescales

Task	Timescale
(A) Monitoring of planning applications	<p>On a weekly basis all newly approved planning applications (including those with a resolution to approve subject to s106 legal agreement) involving the loss or gain of (C3) residential development are recorded by the Planning Policy team. This also includes applications for the discharging of planning conditions prior to the commencement of development.</p> <p>(All newly received residential development applications are also noted)</p> <p>The outcome/progress of applications which are subject to appeal or legal agreements are monitored on a monthly basis.</p>
(B) Commencement of development	<p>On a monthly basis Building Control records are checked and cross referenced with approved housing schemes for building control applications and notification of commencements.</p> <p>Progress on privately inspected schemes are also monitored via this route (involving “initial notices” & “submissions list”, and NHBC completions).</p> <p>Building Control applications involving the demolition of residential properties are also monitored through this process.</p>
(C) Housing completions	<p>Completions are monitored on a monthly basis via Building Control records. However, because there can be a significant time difference between the issuing of a building completion notice and completions recording for planning policy purposes, quarterly site visits are undertaken by Planning Policy in order to monitor both housing completions and progress on sites under construction.</p>
(D) Pre-application consultations	<p>Planning Policy attends a weekly Development Management casework meeting. Feedback on any pre-application consultations, or advanced notice of the likelihood of large site (6+ units) residential applications being submitted are recorded by Planning Policy.</p>
(E) Development Management (DM) Meeting – site development progress meeting	<p>During the 3rd quarter of the year, as part of the updating of the 5-year housing land supply and housing trajectory, a meeting is held with DM officers in order ensure that site level information collected over the preceding months is as up to date as possible and to discuss those sites which can realistically be included in the 5-year supply.</p>

Task	Timescale
(F) Affordable housing – site development progress meeting	A bi-monthly meeting with Development Management and Housing officers is held in order to record progress on both approved and pending schemes involving the provision of affordable housing (AH). The information recorded from this meeting includes that received from our preferred partners and includes confirmation of Registered Provider partners on approved schemes, likely timing on starts and completions, any revisions to AH tenure mix, the availability of funding and any information about land acquisitions, disposals or auctions.
(G) Empty homes	Data on long term (2 or more years) empty homes that have been brought back into use during the monitoring year is supplied by the Empty Homes officer at or around the (monitoring) year end. Because of the potential for double counting, addresses are checked by Planning Policy to ensure no planning permission has been involved. For example a single dwelling brought back into use as a single dwelling, is unlikely to involve planning permission in order to do so, whereas the conversion of a single large dwelling into flats will require planning permission and will be recorded via the monitoring procedures described in this note.
(H) Marketing activity	On quarterly basis, the Planning Policy team via the internet, check for marketing or auction information on sites and potential development schemes.
(I) Lapsed planning permissions	An annual check of sites which have planning permission that may have lapsed during the monitoring year or will lapse before the monitoring year is out is made during the 3 rd quarter of the year. The timing of this recheck coincides with the updating of the 5-year housing land supply and housing trajectory. Subject to information gathered under A and B above, small site (net of 5 or less units) planning permissions which have lapsed or are about to lapse (will do so by the 31 st March) are removed from the supply figures. Again, subject to information gathered under A-F above, where a planning permission is due to lapse on a large site (6 or more units) this provides a trigger to contact the owner/developer for an update on their plans. Only in those cases where there is a firm intention from the owner/developer to actively progress are those sites retained.

3.2.3 New regulatory requirements now require Councils to make monitoring information available as soon as possible after it has been collected. In view of this, the Council will be exploring the potential for producing a twice yearly monitoring report to replace the current Annual Monitoring Report (AMR). Much of the information outlined here will be reported in any successor document to the AMR.

3.3 Non-implementation rate

3.3.1 This response has been prepared in relation to Mr Bedford's (Kember Loudon Williams acting for Mr Simmons) supplementary note 1 (Rep 194 Appendix 6). Mr Bedford suggests that non-implementation rates are current practice

when producing Strategic Housing Land Availability Assessment (SHLAA) evidence and raises concerns regarding the Council's "reliance on uncertain previous Local Plan allocation sites".

3.3.2 Because the National Planning Policy Framework (NPPF) includes a requirement to produce and maintain a rolling 5-year housing land supply together with an additional buffer of, in Hastings case, 20%, the Council believes it is not necessary to apply a non-implementation rate for the following reasons:

- (i) The requirement to produce and maintain a rolling 5-year housing land supply means the Council must maintain a clear understanding of the timing of development, most especially to comply with the "available, suitable and achievable" criteria for inclusion within the 5-year supply period.
- (ii) The criteria for including existing local Plan allocation within the SHLAA has been no less rigorous than for other sites, a number of existing allocations have been found not to meet the criteria for inclusion as evidenced at appendix 5 of the SHLAA, 2010 (HBC/PS/26G sites A34-A47). In addition, the Council monitors all housing commitments (including those which have started, those with planning permissions and on current allocations) on at least an annual basis in order to understand which sites will be coming forward as expected and which may be subject to delay. The various monitoring procedures the Council undertakes to keep housing data up-to-date is set out in section 3.2 above.
- (iii) As set out in the Council's statement under Matter 3 – 3.6 (HBC/4) the Council has included a buffer of 20% on its 5-year housing land supply in order to ensure a realistic prospect of achieving the planned supply.
- (iv) The SHLAA is intended to be a living document. The Council will update the document regularly because the circumstances of individual sites may change over time, with new sites being added and the status of those already included, changing.
- (v) Finally, the Council would draw the Inspector's attention to the findings of the Inspector's Report into representations to the Revised Deposit Rother District Local Plan – December 2005. In relation to the issue of lapse rates, the Inspector concluded that:

"I accept that some form of discounting is sometimes a feature of other Plans elsewhere. However, I do not consider that this is necessary where a rigorous monitoring regime, following the principles of Plan Monitor Manage (PMM) process, is in place and it committed in the Plan. The practice of introducing a non-implementation allowance should be redundant where a PMM approach to managing the release of housing land is followed meticulously".¹

¹ Paragraph 4.58, Report of Mr Robert P E Mellor BSc DipTRP DipDBE DMS MRICS MRTPI into the representations to the Revised Deposit Rother District Local Plan – December 2005, an extract from his report is shown in Appendix 1.

3.4 Policy DS1 – New Housing Development

- 3.4.1 This response has been produced in relation to Mr Bedford's of Kember Loudon Williams (acting for Mr Simmons) suggested changes to Policy DS1, (Rep 194 Appendix 7, supplementary note 2).
- 3.4.2 The Council does not support the suggested changes to DS1. This is because until the necessary monitoring has been undertaken, which provides a detailed hydrological understanding of the site, there can be no certainty that the site is developable. Natural England has stated that at least 3 years of such monitoring will be required. The Council believes that without a reasonable level of certainty that the site could come forward within the Plan period (NPPF paragraph 47), it is not possible or appropriate to identify this site as a strategic site (proposed Policy SA1), i.e. a site that is critical to the delivery of the housing strategy during the Plan period. Neither, therefore will it be possible to identify the site for early release in the event of a shortfall in housing delivery as indicated by Mr Bedford in his proposed modifications to DS1.
- 3.4.3 To date, the landowner has undertaken additional work and presented a surface water strategy which shows the potential to protect the Site of Special Scientific Interest (SSSI) from pollution. This is not the same as having a full understanding of the complex hydrology of the site. Our advice from Natural England is that any development will need to maintain the current pattern (spatial and temporal variation) of surface water and groundwater flows across the SSSI boundary in terms of both water quality and quantity, in order to maintain the hydrological status quo.
- 3.4.4 Until there is a better understanding of the current hydrological regime within the site, Natural England will be unable to remove their objection to the "in principle" development of the site. The requirement to protect bio-diversity is very strongly set out in the NPPF, without the appropriate evidence the Council believes the allocation of this site would be contrary to national planning policy and paragraph 118 of the NPPF in particular.

3.5 Policy H1 – Housing Density

- 3.5.1 In response to the query made at Hearing 3 as to whether the wording of the policy should be changed to substitute "about" 40 dwellings per hectare and "about" 30 dwellings per hectare instead of "at least" 40/30 dwellings per hectare, the Council does not consider that a change should be made to the wording of the policy.
- 3.5.2 The intention of the policy is to give clear guidance on densities appropriate for new development in the Borough, which can be clearly understood. Introducing "about" or "normally at least" would not help.
- 3.5.3 The existing proposed policy (H1) already includes flexibility because of the following sentences in the policy: "Different densities may be justified where there are particular site circumstances which require consideration. Further individual site assessment work to be carried out through the Development Management Plan, will explore in more detail where it will be appropriate to vary minimum density requirements."

- 3.5.4 Guidance on density of proposed housing sites is now contained in the proposed submission version of the Development Management Plan, dated January 2013.

4. Hearing 4 - issues arising

4.1 Affordable housing schemes

4.1.1 The following information on completed affordable housing schemes has been prepared at the request the Inspector.

4.1.2 The following table shows the number of affordable housing units which have been built in recent years, the final column shows the number of completed affordable homes which have arisen from schemes which have been developed solely for affordable housing. The text below the table shows the breakdown of these 100% affordable schemes, by year, together with a breakdown of the affordable tenure type.

Table 3: Affordable housing completions by monitoring year

Year	Total number of dwellings completed (net)	Total number of affordable dwellings completed (gross)	Total number of units arising from 100% affordable housing schemes (gross)
2006/07	203	72	60
2007/08	283	45	0
2008/09	241	68	34
2009/10	155	44	44
2010/11	96 ² 77	32	32
2011/12	209 ³	71	17

Source: Planning Policy Annual Monitoring

2006/2007

- 1) "Lovat Mead" 178-183 Bexhill Road: gross 48 units - 32 affordable rent and 16 shared ownership units
- 2) 73 Filsham Road: gross 12 units - all move-on accommodation for social rent

2007/2008

No schemes where completed involving 100% affordable units

2008/2009

- 1) Evesham & Land fronting: gross 18 units - 10 affordable rent and 8 part shared equity
- 2) 43 Earl Street: total gross 16 units all shared ownership

2009/2010

- 1) 200-204 The Ridge: gross 25 units built out over 2 years under construction in 2009/10 with 8 units completed

² Net completions for 2010/11 should be 77 and not 96 as shown in the original version of this table which appeared in appendix 4.2 of the Council's statement on Matter 4 – HBC/5. The correct completion figure for that year is referenced in table 8 of the Annual Monitoring Report 2011/12, but unfortunately is reported wrongly at table 14.

³ Net completions here include 14 empty homes brought back into use.

- 2) 10 Chapel Park Road: gross 36 units - all social rent

2010/2011

- 1) 200-204 The Ridge: gross 25 units built out over 2 years remaining 17 units completed in 2010/11
- 2) Former ATC Centre, School Rd: gross 15 units - all social rent

2011/2012

- 1) 341 London Road: gross 3 units - all learning/disability units
- 2) (2) 109-115 Queens Road: gross 12 units - all learning/disability units
- 3) Land adj.73 Filsham Rd: gross 21 units - scheme under construction in 2011/12 with 2 completions

4.2 Policy H3 – Affordable Housing

- 4.2.1 The Council does not support Mr Keeley's alternative wording of policy H3 (Rep 340/1), which states:

"With 3400 people on the housing waiting list this policy should be revised, there should not be any market housing built on this proposed sites, has it stands the market houses will attract more families to move in to an already over crowded area and create more mental depression and lack of well-being for the people of Hastings. Real affordable housing does not exist at this time, we need to introduce a new system, that's to say build homes and sell at cost with controls on any resale, and some could be rented. To purchase at cost would be cheaper then renting, and occupants usually look after there own better than renting. May I suggest a referendum on the housing crises in Hastings."

- 4.2.2 The housing delivery model proposed by Mr Keeley is not an established method of delivering affordable housing and is unlikely to maximise the delivery of affordable housing without the availability of additional capital. The Council does not consider that having a referendum on the "housing crises in Hastings" would aid the delivery of affordable housing.

5. Hearing 5 - issues arising

5.1 Retail and Internet Shopping

- 5.1.1 The Inspector suggested that the Council might like to consider the introduction of some text into the Planning Strategy that considered the potential impact of special forms of retail on the high street. These special forms of retail (on the internet, mail order and from the television) were considered in the Doncaster Core Strategy and their words were cited by the Inspector as a potentially useful example.

- 5.1.2 The Doncaster Core Strategy has the following text:

"The council acknowledges the potential threat of special forms of trading to its own town centres (online, mail order and telesshopping). Their effect is hard to judge, especially during a 17 year plan period. Nevertheless, the council considers that for this reason alone it is important to emphasise its policies of town centre regeneration and enhancement and to promote their centres as

attractive destinations for shopping, leisure and cultural purposes. A visit to a town centre should be a fulfilling experience. It is in this context that pedestrian priority schemes, the enhancement of Conservation Areas and investment in Listed Buildings are given the highest priority funding consistent with available funding.”

- 5.1.3 Hastings Borough Council has considered this paragraph and made a minor change to its Planning Strategy based upon it, but made changes to reflect local circumstances. This amendment can be found in Appendix 2 reference: HBC/MA/32.

6. Hearing 6 - issues arising

6.1 Historic Environment Strategy timing

- 6.1.1 In response to a query concerning the timing of the proposed historic environment strategy referred to in Policy EN1 from Mr Ingleton the Council has decided to undertake the strategy within three years from the adoption of the Development Management Plan. Hence a minor amendment is to be made to that effect and can be found in Appendix 2, reference: HBC/MA/59.

7. Hearing 7 - issues arising

7.1 CI3: Children’s Play Provision

- 7.1.1 A question was asked about the policy CI3: Children’s Play Provision. It was asked whether there should be better clarity in the policy and supporting text that explained what the expectations of the Council would be.
- 7.1.2 At the hearing it was explained that the Council’s Policy is that for developments of 25 or more new dwellings a Local Equipped Area of Play (LEAP) would be required. Whilst this is Hastings Borough Council’s current policy, the result of the latest work; Hastings & St Leonards Play Space Strategy “*A new way to play*” – August 2011 – suggests a slightly different approach. This new approach is to manage and where appropriate improve existing facilities, before seeking new. In larger developments, of 25 units or more, however, the Council will still expect equipped play facilities if there are none within the prescribed distance of 600m.
- 7.1.3 Hastings Borough Council has made a minor change to its Planning Strategy based upon the above questions to clarify the future requirements for children’s play. This amendment can be found in Appendix 2, reference: HBC/MA/73.
- 7.1.4 To aid the understanding of what is required in terms of “equipped play areas” and “neighbourhood play areas” these terms will also be added to the Planning Strategy glossary, as shown in appendix 2, references: HBC/MA/89 & HBC/MA/90.

Section Two: Other queries

8. Consultation mechanisms and procedures

8.1 It was argued during Hearing 2 that consultation and engagement in preparing the Planning Strategy had been heavily web-based and did not cater for everyone who may be interested. A response to this is set out below.

8.2 The Planning Strategy

8.2.1 The Council published a Consultation Statement as required by Regulation 22 of the Town & Country Planning (Local Planning) (England) Regulations 2012, which sets out in detail who was invited to make comments at each stage of Plan preparation (going back to 2006), how they were invited (the methods used) and the main issues that were raised, as well as the Council's response where appropriate. This document is available to view or download from our website at https://www.hastings.gov.uk/content/planning/planning_policy/local_plan/pdfs/planning_strategy_submission/Consultation_Report_October_2012.pdf. Hard copies can also be viewed at the Hastings Information Centre, Hastings Reference Library in Claremont, or the Planning Policy Examination Library (via the Programme Officer), or can be sent out on request (charges apply).

8.2.2 Taking account of the information set out in the above Statement, the Council argues that adequate consultation has taken place using a range of web based and traditional consultation mechanisms. In summary, these include:

- Advertisements in local newspapers, About Magazine, Hastings & St Leonards Directories, Seafront posters
- Advertising through the HVA newsletter, posters and flyers in Priory Meadow and other community venues, Town Centre Management, BME and younger/older people contacts (though dedicated HBC officer)
- Consultation events where hard copies of documents and consultation material were available to take away
- The Local Plan Newsletter sent both electronically and by post to over 2,000 contacts on the Local Plan database
- Copies of the documents and consultation material available to take away from both HBC offices at Aquila House and the Hastings Information Centre
- Copies of documents and consultation material available to view at Hastings Reference Library and neighbourhood libraries where appropriate.
- Continuous advertising and engagement through website updates, Planning News, Facebook and Twitter

8.2.3 The Council also reports consultations through their internal committee procedures where appropriate. This includes Cabinet (where all documents are publically available) in the case of approving documents for publication.

8.3 All other Local Plan documents

8.3.1 In addition to documents and information specific to the preparation of the Planning Strategy, all documents prepared as part of the Local Plan process (including but not exclusive to: monitoring reports, the Statement of

Community Involvement , the Local Development Scheme and evidence base documents) are available to view at the Council Offices and Hastings Information Centre, or copies can be sent out on request (for a charge that has been set in accordance with Regulation 36 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

- 8.3.2 All documents are available to download or view free of charge via the Local Plan pages on the Hastings Borough Council website at http://www.hastings.gov.uk/environment_planning/planning/localplan/ as well as being accessible through corporate consultation pages, Planning News, Facebook and Twitter.
- 8.3.3 The Local Plan newsletter provides information of how to contact the team for any queries and provides updates on these documents as and when they are prepared. This is sent out at various intervals throughout the year, depending on progress being made in terms of plan preparation.

9. Foul Sewerage and Surface Water

- 9.1 A concern was also raised during Hearing 2 regarding the Council's procedures in terms of foul sewerage and surface water, and the implementation of conditions.
- 9.2 The Council consult Southern Water on planning applications to (amongst other things) determine whether there are capacity issues with the existing foul drainage system if the proposed development were approved. In such cases where the new development could result in a problem or exacerbate an existing problem a standard planning condition is applied to a planning consent. It is worded as follows:
- i. Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal/management have been submitted to and approved in writing by the Local Planning Authority
 - ii. Development shall be carried out in accordance with the details approved under i) and no occupation of any of the dwellings or flats hereby approved shall occur until those works have been completed.
 - iii. No occupation of any of the dwellings or flats hereby approved shall occur until the Local Planning Authority has confirmed in writing that it is satisfied that the necessary drainage infrastructure capacity is now available to adequately service the development
- 9.3 The effect of the planning policy is that no development can proceed unless the condition is satisfactorily met. Prior to development commencing the means of dealing with foul sewerage and surface water needs to be approved by the Council having consulted Southern Water. The implementation of the approved works needs to be undertaken prior to any occupation of the development.
- 9.4 The Council enforce the condition and is not aware of development proceeding without complying with the currently worded condition. Prior to the current wording of the condition in 2008 the Council is aware of one

development on Harold Road which did not implement the approved designs and this resulted in the redrafting of the condition.

Section Three: Appendices

Appendix 1 – Extract from Rother District Council 2005 Inspectors report

Appendix 2 – Proposed Minor Modifications to the Planning Strategy

Appendix 2 of this document is the latest schedule of minor amendments - published 21 February 2013 - the reference numbers listed in this document refer only to the schedule of minor amendments that are appended here and are not intended as a cross reference to any past or future versions.

possible scale of increased provision as a consequence of higher densities. In my view, these considerations introduce an important element of flexibility to the supply picture. Consequently, I do not consider that this picture is so gloomy as to require radical action at this stage. Nevertheless, various objections have argued that adjustments to the policy approach are necessary and I now turn to examine these suggested responses.

Alternative approaches to housing land provision

- 4.57 A clear theme running through many objections is the need to incorporate some further ‘headroom’ into the level of supply in order to accommodate the possibility that monitoring demonstrates a shortfall situation. Of the various options available to address this possibility, objections focus on three approaches:-
- (i) building into the supply figures some element of flexibility through a non-implementation allowance as a form of ‘discounting’;
 - (ii) the addition of further housing allocations; and
 - (iii) amending Policy DS6, as proposed to be changed, by altering the reserve site status of the Policy sites; or adding further reserve sites.
- 4.58 I accept that some form of discounting is sometimes a feature of other Plans elsewhere. However, I do not consider that this is necessary where a rigorous monitoring regime, following the principles of a Plan Monitor Manage (PMM) process, is in place and is committed in the Plan. The practice of introducing a non-implementation allowance should be redundant where a PMM approach to managing the release of housing land is followed meticulously.
- 4.59 I am not convinced that the uncertainties surrounding the potential housing supply are so pressing at this stage as to demand the definition of significant new allocations. My recommendations on objections relating to allocated sites would result in a limited decrease in supply from this source but the likely scale of the supply, taking account of density considerations, in my judgement, will provide some limited flexibility in terms of housing provision. I am further conscious that in a District with such stringent environmental constraints, bringing forward new allocations would require the most careful consideration, particularly as the most obvious candidates would be on greenfield sites beyond the present defined development boundaries. Consequently, this is likely to be a highly sensitive issue which should be addressed more appropriately as part of the work on the Local Development Scheme. Work has already commenced on this and the timetable indicates that the Council recognise the importance of proceeding expeditiously (CD1.36).
- 4.60 The issue of Reserve Sites is more complex. As it relates specifically to the issue of managing land release for housing, it is inextricably linked to Policy DS6. Consequently, I discuss that matter later in this Section.

The Ministerial Statement of July 2003

- 4.61 The Ministerial Statement of July 2003, among other things, stresses that plans should make provision for at least 10 years supply of housing. This is to ensure that there is continuity of supply. The calculations made by the Council suggest that the Plan would meet that requirement on the basis of an extrapolation of the housing requirement in the Structure Plan. This conclusion is supported by the scale of the major allocation at N.E. Bexhill, which would extend development substantially

Appendix 2 – Proposed Minor Modifications to the Planning Strategy

Proposed Submission Planning Strategy – Minor Amendments

**Schedule of Amendments following publication of printed version in May 2012, including full analysis of representations
Version 6** (in Chapter order, therefore reference numbers may be different in each successive version)

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/1	Front cover	N/A	N/A	Amend front cover to confirm plan period and date of adoption
HBC/MA/2	Wording consistency	Throughout document	As appropriate	Check all references to Bexhill-Hastings Link Road and Land at Breadsell Lane are consistent. Replace “Proposals Map” with “Policies Map”
HBC/MA/3	Various	Throughout document	Various – see right	Check all web addresses and links are correct and amend as necessary (diverted weblinks) - 1.8, 7.20. Footnotes at 1.9, 4.11, 4.20, 5.55, SC2, 6.18, 6.22, 7.7, 8.14 pages 10, 17, 34, 58
HBC/MA/4	5	Foreword	Penultimate paragraph	Delete paragraph – will be out of date
HBC/MA/5	9	1: Introduction	Diagram in Figure 1	Replace “Proposals Map” with “Policies Map”
HBC/MA/6	9	1: Introduction	1.3	Change tense of 2 nd sentence to “It has informed other plan documents by setting an overall framework for the future of the town.”
HBC/MA/7	9	1: Introduction	1.4	Change part of final sentence to read “with adoption due from December 2013”
HBC/MA/8	10	1: Introduction	1.10	Review paragraph with the abolition of S.E. Plan
HBC/MA/9	10	1: Introduction	1.12 & footnote	Update with progress to adoption of Waste and Minerals Plan & check website link remains current
HBC/MA/10	10	1: Introduction	1.13	Change start of 3 rd sentence delete” The next document “ to “the other key Local Plan document”
HBC/MA/11	11	1: Introduction	1.14	Amend mid point of the Plan to 2019/20

Appendix 2 – Proposed Minor Modifications to the Planning Strategy

Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/12	11	1: Introduction	1.18	Amend Introductory text prior to publication of adopted version. “The final version was submitted to the Government in October 2012 and was the subject of an Examination In Public in February 2013. An Inspector’s report was received which contained recommendations and these have been considered by the Council in producing this final adopted version. It took on board comments received on all the stages in the production of the Strategy.”
HBC/MA/13	11	1: Introduction	1.19-1.29	Remove references to consultation under Regulation 19, delete paragraphs referring to Making your representations, How to respond, What happens next? Confused by the process? Spreading the word and insert adoption date
HBC/MA/14	13	2: About Hastings	2.2, 2 nd bullet	Change “t” in town to a capital : Town Development Area
HBC/MA/15	15	2: About Hastings	2.15	Update text as follows “Hastings has an economically active rate of 71.7% , well below the South East average at 79.3% (ONS Census 2011, data for July 2011 – June 2012)”
HBC/MA/16	16	2: About Hastings	2.18	Amend text as follows “With the abolition of the Regional Development Agency, SEEDA, Sea Space and the local mechanisms for taking regeneration forward are being recast but local partners, now in the form of Hastings and Rother Task Force are determined to continue and build on the progress achieved to date.”
HBC/MA/17	16	2: About Hastings	2.19	2 nd sentence, amend “south- east” to “South East”
HBC/MA/18	17	2: About Hastings	2.25	3 lines from the bottom, change ”south east” to “South East”
HBC/MA/19	18	2: About Hastings	2.27	Amend text to read “Our seaside location, wooded valleys, varied wildlife and surrounding countryside, together with the many distinctive conservation areas and attractive Victorian housing stock all contribute...”
HBC/MA/20	18	2: About Hastings	2.33	Amend second sentence to read “Construction commenced in January 2013 and is programmed for completion by December 2014”
HBC/MA/21	20	2: About Hastings	2.49, bullet 5	Reference Local Transport Plan 2011-2026 instead of Local Area Transport Strategy (Transport strategies have now been superseded).

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/22	21	2: About Hastings	2.56	Replace “newly refurbished library” with “ new library, registration service and wedding venue. ”
HBC/MA/23	22	2: About Hastings	2.60	Replace “Burton St Leonards” with “ Burtons’ St Leonards ”
HBC/MA/24	22	2: About Hastings	2.61	Amend text - change “Country parks” to “ the Combe Valley Countryside Park and Hastings Country Park ”
HBC/MA/25	28	4: Development Strategy	New paragraph 4.2	Insert the following text into a new paragraph - “ The extent of the built up area boundary will be reviewed through the Development Management Plan ”.
HBC/MA/26	30	4: Development Strategy	4.7	change ”south east” to “ South East ”
HBC/MA/27	32	4: Development Strategy	4.21	Amend text as follows “Between 2011 and 2028 the net new homes target will be for at least 3,400 new homes...”
HBC/MA/28	33	4: Development Strategy	DS1, first sentence	Add “ at least 3,400 net new homes...”
HBC/MA/29	35	4: Development Strategy	DS2, 3 rd bullet	Amend text as follows: “the development of circa 32,800m of floorspace opportunities on existing employment areas across the Borough by 2028, primarily at the following locations: Churchfields, Castleham, Ponswood, West Ridge and also Ivyhouse Lane”
HBC/MA/30	36	4: Development Strategy	4.43	Change to “ Bexhill-Hastings Link Road”.
HBC/MA/31	37	4: Development Strategy	4.47, 4.48	Insert a space between these paragraphs
HBC/MA/32	37	4: Development Strategy	New 4.49	Insert new paragraph: “ The Council also recognises the potential impact of special forms of trading to its town centres, particularly online, mail order and tele-shopping. The impact is hard to predict, especially during a long plan period up to 2028. Notwithstanding this, the Council considers that for this reason alone it is important to emphasise its policies of regeneration and enhancement and to promote the centres as attractive destinations for shopping, tourism, leisure and cultural activities. A visit to a town centre should be a fulfilling experience ”

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/33	40	5: Spatial Areas	5.6	Update text about progress with Academies “Building works on the new St Leonards Academy will then be undertaken on the Filsham Valley sites and will be completed by September 2013 ”.
HBC/MA/34	41	5: Spatial Areas	5.8	Delete reference to Bulverhythe
HBC/MA/35	42	6: Sustainable Communities	5.19	Replace whole paragraph with new text: “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.”
HBC/MA/36	43	5: Spatial Areas	FA1, criterion h)	Replace criterion h) with “Work with Rother District Council to explore renewable energy opportunities on the Fringes, including Combe Valley Countryside Park, subject to compatibility with Policy SC6: Renewable Energy Developments”
HBC/MA/37	44	5: Spatial Areas	5.25	Amend text as follows “Each area has its own unique identity, ranging from the active Hastings Town Centre
HBC/MA/38	44	5: Spatial Areas	5.28	Amend paragraph as follows “...in terms of improving the education offer at the University of Brighton Hastings Campus and the new Sussex Coast College Hastings”
HBC/MA/39	46	5: Spatial Areas	FA2, table 4	Insert numbers of planning focus areas into table
HBC/MA/40	46	5: Spatial Areas	FA2, criterion a)	Amend to clarify “support further delivery of regeneration and change in Hastings Town Centre by 2028”

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/41	46	5: Spatial Areas	FA2, criterion g)	Amend g) to read " encourage the building of a range of different sized housing units, including conversions and change of use, to provide a mix of dwelling unit sizes within single developments (rather than being limited to a mix of 1 and 2 bed units). "
HBC/MA/42	46	5: Spatial Areas	FA2, criterion j)	Spelling error – include additional "e" within the word "routs".
HBC/MA/43	47	5: Spatial Areas	FA3, criterion a)	Remove word "approximately"
HBC/MA/44	47	5: Spatial Areas	FA3, criterion i)	"redevelopment of the library" should be replaced with " a new library, registration service and wedding venue "
HBC/MA/45	48	5: Spatial Areas	5.43	Replace paragraph with the following text <p>"The area was declared a Housing Renewal Area in 2003 and a range of investment and enforcement programmes have resulted in significant improvement. Nevertheless the area is still significantly deprived and the Borough Council has established a further 3 year housing- led regeneration programme called the Coastal Space Project St Leonards to build upon earlier work. This is a joint funded initiative between Hastings Borough Council, Local Space and AmicusHorizon Housing Association with the support of the Homes and Communities Agency. It is aligned with a proactive enforcement programme, empty property action and the extension of private sector licensing of higher risk HMO properties. Accompanying the housing renewal is a range of supporting action linked to the economic and social regeneration of the area."</p>
HBC/MA/46	48	5: Spatial Areas	FA4, criterion a)	Delete reference to Crystal Square
HBC/MA/47	50	5: Spatial Areas	5.49	Amend text as follows " The new Hastings and St Leonards Academies opened in existing school buildings in September 2011, with students moving into the new building on the Hillcrest site in February 2013. "

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/48	50	5: Spatial Areas	5.56	Add additional text to end of paragraph that states " In assessing the appropriate balance of land uses, and their management, further consideration will be given to the scale of future employment development at Ivyhouse Lane, as well as the potential for housing and for securing environmental, amenity and access improvements. "
HBC/MA/49	51	5: Spatial Areas	FA5 (table)	Insert numbers of planning focus areas into table

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed																								
HBC/MA/50	51	5: Spatial Areas	FA5 (table)	Amend additional employment land up to 2028 column as follows: <table border="1" data-bbox="1041 343 2029 1252"> <thead> <tr> <th>Planning Focus Area</th> <th>Housing – range of dwellings by area up to 2028</th> <th>Employment – m² of additional (net) employment land up to 2028</th> <th>Retail - m² of additional (net) retail floorspace up to 2028</th> </tr> </thead> <tbody> <tr> <td>Old Town</td> <td>50 - 70</td> <td>0m²</td> <td>0m²</td> </tr> <tr> <td>Hillcrest and Ore Valley</td> <td>440 - 540</td> <td>Mixed B1, B2, B8 – approx 11,400m² (at Ivyhouse Lane Industrial Estate) Further study required through Development Management Plan to determine</td> <td>0m²</td> </tr> <tr> <td>Clive Vale and Ore Village</td> <td>250 - 310</td> <td>0m²</td> <td>0m²</td> </tr> <tr> <td>Hastings Country Park</td> <td>0</td> <td>0m²</td> <td>0m²</td> </tr> <tr> <td>Total</td> <td>740 - 920</td> <td>11,400m² Potential for mixed B1, B2, B8 – at Ivyhouse Lane Industrial Estate – subject to further study</td> <td>0m²</td> </tr> </tbody> </table>	Planning Focus Area	Housing – range of dwellings by area up to 2028	Employment – m ² of additional (net) employment land up to 2028	Retail - m ² of additional (net) retail floorspace up to 2028	Old Town	50 - 70	0m ²	0m ²	Hillcrest and Ore Valley	440 - 540	Mixed B1, B2, B8 – approx 11,400m ² (at Ivyhouse Lane Industrial Estate) Further study required through Development Management Plan to determine	0m ²	Clive Vale and Ore Village	250 - 310	0m ²	0m ²	Hastings Country Park	0	0m ²	0m ²	Total	740 - 920	11,400m ² Potential for mixed B1, B2, B8 – at Ivyhouse Lane Industrial Estate – subject to further study	0m²
Planning Focus Area	Housing – range of dwellings by area up to 2028	Employment – m ² of additional (net) employment land up to 2028	Retail - m ² of additional (net) retail floorspace up to 2028																									
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Total	740 - 920	11,400m ² Potential for mixed B1, B2, B8 – at Ivyhouse Lane Industrial Estate – subject to further study	0m²																									
HBC/MA/51	51	5: Spatial Areas	FA5, criterion g)	Policy refers to Hastings Cemetery – This needs to be removed and re-inserted in Policy FA2																								
HBC/MA/52	52	5: Spatial Areas	Figure 9, Map	Replace the Seafront Spatial Strategy Map with updated version																								

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/53	54	5: Spatial Areas	FA6, criterion e)	Change to “ Bexhill-Hastings Link Road ”.
HBC/MA/54	56	6: Sustainable Communities	SC1	Insert new criterion o) ensuring that the amenity of development proposals in proximity to existing wastewater facilities is protected
HBC/MA/55	57	6: Sustainable Communities	6.5	Amend text as follows: “In Hastings, we intend to take a proactive approach to reducing the town’s carbon emissions, and ensuring sustainable development and high quality design are at the heart of our approach to plan making and development management. It may be appropriate in the longer term to look beyond the borough boundary to meet our energy requirements and consider the potential for water based energy from the sea such as wave and tidal power ”
HBC/MA/56	58	6: Sustainable Communities	6.8, table 6	Remove words “mandatory” from table
HBC/MA/57	59	6: Sustainable Communities	6.17	Replace paragraph 6.17 with: “ 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 ”.
HBC/MA/58	62	7: Protecting our Environment	7.1	Amend the number of Archaeological Notification Areas in the town from 17 to 24
HBC/MA/59	62	7: Protecting our Environment	EN1	Amend the first paragraph of EN1 as follows “To promote understanding and appreciation of the historic environment the Council will, during the course of the Plan period within three years from the adoption of the Development Management Plan , develop a historic environment strategy for the conservation of the historic environment, including those heritage assets identified as being most at risk through neglect, decay or other threats. This will reinforce the historic environment record for the borough, a key information source in assessing the impact of future development on the historic environment.

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/60	65	7: Protecting our Environment	EN3, criterion b)	Spelling error - include additional “s” – to the word “contribute”
HBC/MA/61	65	7: Protecting our Environment	7.16 – 7.17	Amend paragraphs as follows: “Biodiversity Opportunity Areas (BOAs) have been identified by the 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”. Further information on these BOAs is available from the Sussex Local Nature Partnership website at http://sussexlnp.org.uk/support-services
HBC/MA/62	67	7: Protecting our Environment	EN5, criterion a)	Include the text following text to criterion – “The progressive enhancement of existing open space provision (as identified on the Local Plan Policies Map)”
HBC/MA/63	68	8: Housing	H1	Amend text as follows “Residential developments should make the best full and effective use of land by achieving...”
HBC/MA/64	70	8: Housing	8.13	Delete last sentence
HBC/MA/65	70	8: Housing	H3, criterion a) and b)	Replace “should” with “ will be expected ”
HBC/MA/66	71	8: Housing	H3, criterion j)	Remove this criterion
HBC/MA/67	72	8: Housing	8.23	Add in additional text - “we will allocate sites to meet the identified need through the Development Management Plan”
HBC/MA/68	73	8: Housing	H5, criterion d)	Remove this criterion
HBC/MA/69	77/78	9: Local Economy	E3, footnotes 30 & 31	Move the footnotes from page 78 to appear at the bottom of page 77.
HBC/MA/70	77/78	9: Local Economy	9.18	Insert text “...supporting events such as Jack-in-the-Green (Mayday), the Seafood and Wine and Coastal Currents Festivals (September) and Hastings Day...”

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/71	80	10: Community Infrastructure	10.7	Amend text as follows “Community facilities and essential infrastructure can be provided as a result of the Council seeking to enter into legal agreements with developers under Section 106 of the Town and Country Planning Act 1991 (planning obligations), to meet the needs arising from their development.”
HBC/MA/72	81	10: Community Infrastructure	C11	Delete criterion c) and amend criterion b) to read “Mitigating inadequacies in infrastructure arising from proposed development through appropriate provision or development contributions, either a Section 106 contribution or an area wide Community Infrastructure Levy or any other appropriate mechanisms that will provide towards....”

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/73	82	10: Community Infrastructure	Various paragraphs	<p>Insert the text in bold for clarity:</p> <p>“10.14 The Open Spaces Audit, undertaken in 2006, found that the Council's policy to require equipped formal children's play areas within every housing development was not working as well as it should. Smaller play areas with minimal equipment were often underused and expensive to maintain and manage. Local or wider neighbourhood provision, with a range of equipment, proved more popular even if located a bit further away.</p> <p>10.15 As the principle providers of publicly accessibly equipped play sites in Hastings, AmicusHorizon Ltd and Hastings Borough Council have prepared a Play Space Strategy (August 2011) for future play space provision. The Play Space Strategy identifies and maps the coverage provided by existing good quality, good value play spaces, using national guidance encouraging provision of neighbourhood playgrounds within 600 metres of housing. This provision map also highlights the areas where play provision either would benefit from improvement or does not exist within an acceptable distance.</p> <p>10.16 Our Play Strategy favours the improvement or expansion of existing play facilities in the local area of any new development, using off-site developer contributions, complemented by informal play space at the site. However, if the area surrounding a new development of more than 25 units does not contain a neighbourhood playground within our distance guidelines, as outlined in policy C13, we will require equipped play facilities within the development.”</p>

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/74	82	10: Community Infrastructure	CI3	<p>Insert the text in bold for clarity:</p> <p>“POLICY CI3: Children's Play Provision</p> <p>The Council will require developers to design housing environments in which children have space to play informally and safely and where they have priority over vehicles, and where such spaces contribute to the provision of open space.</p> <p>Developer contributions will be sought to improve existing equipped play provision in proximity to the proposed development. Where no good neighbourhood playgrounds exist within 600 metres or a 15-20 minute walking distance, new play facilities will be required. If the area surrounding a new development of more than 25 units does not contain a neighbourhood playground within these distance guidelines the Council will require equipped play facilities within that development.</p> <p>In some neighbourhoods where it is not appropriate or viable to provide further equipped play areas, developers may be required to enhance Community green spaces as an alternative.”</p>
HBC/MA/75	83	11: Transport and Accessibility	11.6	Amend final sentence “ Construction commenced in January 2013 and is expected to be completed by December 2014. ”
HBC/MA/76	84	11: Transport and Accessibility	T1, 4 th bullet point	Amend to read “Hastings to Tonbridge line – capacity” (to ensure consistency with previous bullet point)

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/77	85	11: Transport and Accessibility	11.15	Add sentence about potential sustainable transport link on the seafront: “Making the most of the existing transport network requires a number of measures to encourage sustainable travel. To support this, the delivery of complementary sustainable transport infrastructure improvements, including improvements to public transport, walking and cycling routes will be required. Consideration will be given to a sustainable transport link along the seafront. We recognise the impact that this could have in the town by offering more travel choices for local people to access the services that the town provides.”
HBC/MA/78	85	11: Transport and Accessibility	11.20, 11.21	Delete both paragraphs – information now out of date and funding not received.
HBC/MA/79	86	11: Transport and Accessibility	T3 2 nd bullet point	Add words “ and the Policies Map, ” after the words “key diagram”
HBC/MA/80	86	11: Transport and Accessibility	T3	Add additional sentence at end of policy “ Transport Assessments may be required for development schemes depending on the potential impact on the road network ”
HBC/MA/81	87	11: Transport and Accessibility	11.26, 11.27	Update the information in the paragraphs to reflect the change in guidance from ESCC – replace the paragraphs with the following: <p>“11.26 East Sussex County Council, as the highways authority, advises Hastings Borough Council on the matters of off street parking provision (amongst other things) when it is required within new development.</p> <p>11.27 Guidance is produced and reviewed in partnership between East Sussex County Council and the Districts and Borough councils across East Sussex. The Development Management Plan will include a provision that supports the application of these standards for new developments.”</p>

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/82	87	11: Transport and Accessibility	11.28	<p>Replace paragraph 11.28 with:</p> <p>“11.28 To be successful, Park and Ride schemes need to be able to generate a significant cost and/or time advantage to users and generally work well where there is limited town centre parking and where car parking pricing discourages accessing town centres by car.</p> <p>11.29 We do not consider that these criteria apply in the case of Hastings, and are keen to ensure the effective management of car parking in the first instance. However if circumstances changed during the lifetime of the Local Plan and it was proved there was an identified need, it was financially viable, and a suitable site was available, then proposals for Park and Ride could be considered. Any future proposals would be dependent on:</p> <ul style="list-style-type: none"> • the capacity and use of parking in the town centre • the cost of parking in the town centre • site location • whether setting up a Park and Ride would be financially viable • an assessment on the capacity of the road network • demand management <p>11.30 It will be important to weigh the wider environmental benefits of such a scheme against the potential loss of amenity caused by the impact of a large car park.”</p>
HBC/MA/83	90	Key Diagram	Key Diagram	Change “Proposed Pebsham Countryside Park” on key to “Combe Valley Countryside Park”
HBC/MA/84	90	Key Diagram	Key Diagram	Move Renewable Energy opportunity area to a site within Hastings boundary

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Ref:	Page	Chapter	Policy/ paragraph number	Change needed
HBC/MA/85	92	Part 6 – Monitoring and Implementation	N/A	Insert new heading “ The Monitoring and Implementation Framework ”
HBC/MA/86	117	Appendix 1 - Superseded Policies	TC7	Include Policy T3
HBC/MA/87	120	Appendix 2 - Housing trajectory	N/A	Insert paragraph numbers to this appendix
HBC/MA/88	124	Glossary	N/A	Add explanation of AONB (referenced in page 42, at 5.21) Areas of high visual quality designated by the Countryside Commission as being of national importance. Hastings is bordered by the High Weald AONB.
HBC/MA/89	125	Glossary	N/A	Add explanation of equipped play area (referenced in page 82, policy CI3): A local play area that is fenced and contains a mix of play equipment such as slides, swings, tunnels or climbing features.
HBC/MA/90	127	Glossary	N/A	Add explanation of neighbourhood play area (referenced in page 82, policy CI3): A large, equipped and accessible play area at a key location within the borough. The lower Alexandra Park play area is a good example.