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Date: 11 July 2013
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Regeneration and Planning Policy
Aquila House, Breeds Place
Hastings, East Sussex TN34 3UY

Mr R Hollox
C/o Lynette Duncan, LJD Associates

Dear Mr Hollox

**Hastings Planning Strategy - Proposed Main Modifications Consultation
20 May – 1 July 2013**

Further to our recent consultation on the Proposed Main Modifications, please now find enclosed a copy of all the representations received. A total of 46 representations were received from 11 individual respondents, only 1 of which had not participated previously.

As you are aware, the consultation centred on 3 key elements:

1. Significant changes to the Planning Strategy (Main Modifications)
2. The revocation of the South East Plan
3. New Government demographic household projections

The enclosed report lists the representations received in the order set out above. The banner at the top of the page will indicate which of the 3 sections the comments relate to. Representations relating to the Main Modifications themselves are in numerical order by modification, although please note that some modifications have not attracted any representations.

A summary table outlining the main issues raised is also enclosed

I would be grateful for your initial thoughts on these representations, and specifically, whether a further hearing session might be required. If you also require an updated consultation report (Regulation 22 (c)) at this stage, please let me know.

I look forward to hearing from you.

Yours sincerely

S Roots

Stephanie Roots
Senior Planning Officer – Project Lead



Main Modifications Consultation – Main Issues raised

Section	Subject	Issue
Proposed Main Modifications to Planning Strategy	MM1 - Duty to Co-operate statement	<p>Should be amended to ensure assets or funds are not transferred lower than market value</p> <p>Do not consider adequate evidence has been provided to demonstrate fulfilled requirements under the Duty to Co-operate between Hasting and Rother Councils with regard to development at Breadsell Lane (since abolition of South East Plan)</p> <p>Comment recorded as support, but consider to respondent to be objecting. Building land should be provided around Bexhill instead of Robsack A</p>
Proposed Main Modifications to Planning Strategy	MM2 – Presumption in Favour of Sustainable Development	<p>Exclusion of Breadsell Lane is contrary to “positive planning” and the presumption in favour of sustainable development. Removal of the site has not been justified by evidence, or a balancing exercise to compare benefits against unknown risks facing bryophytes.</p> <p>Should include that planning applications will be assessed in accordance with the NPPF as well as the Local Plan</p>
Proposed Main Modifications to Planning Strategy	MM3 – Development Strategy	<p>Object to housing target being lower than projected housing need. Constraints not appropriate argument to lower housing target. Target should be between 363 and 440.</p> <p>Object to statement saying 200 dwellings will be achieved through the delivery of identifiable development sites – there is a heavy reliance on windfall, which is unjustified when considered against alternatives (Breadsell)</p> <p>Argue we should remove the clause (new para 4.5) which states that adjustments to the overall housing figure for each planning focus area will be acceptable providing they do not diminish the overall level of housing proposed for that area.</p>
Proposed Main Modifications to Planning Strategy	MM4 - Development Strategy	<p>Object to windfall allowance of 35dpa over 12-year period as it is contrary to NPPF. Suggest it should be capped at 5 years</p> <p>Windfall allowance has been assumed and 200 dwellings per year is not yet approved</p>
Proposed Main Modifications to Planning Strategy	MM5 - Development Strategy	<p>Should be a maximum target. Considers further clarification is needed regarding the table and breakdown of sources of supply. Argues some of sites will not come forward so figure should be reduced.</p>
Proposed Main	MM7 – Sustainable	<p>Cross reference NPPF to say that permission will only be granted if benefits outweigh the</p>

Modifications to Planning Strategy	Communities Policy/ renewable energy developments	loss.
Proposed Main Modifications to Planning Strategy	MM8 – Policy EN4 Ancient Woodland and supporting text	No evidence of commitment to honour policy. Withdraw Robsack A.
Proposed Main Modifications to Planning Strategy	MM9 – New environmental protection policies EN5/EN6 and supporting text	LWS policy and text to be redrafted – needs to recognise need to balance environmental matters with economic and social benefits of development proposals. Allow developments to proceed on sites adjacent to/in vicinity of LNRS and LWS subject to mitigation. Argue needed to be consistent with Policy E4 Policies need to be stricter (objects to all MM, although this is most relevant) Suggest amendments to policy text relating to nationally and internationally important sites, to cross references requirements of NPPF Request clause (b) be removed. Shouldn't allow any development in LNRs. Should not place a caveat on policy. Development should not be permitted
Proposed Main Modifications to Planning Strategy	Omission	Requires replacement bowls facility – or acknowledgement of the need.
Revocation of the South East Plan	Tourism accommodation	Consider that Policy E4: Tourism and Visitors needs to be more explicit to reference changing visitor expectations and the potential need for significant expansion of existing caravan and camping sites and holiday parks, subject to environmental policies.
Proposed Main Modifications to Planning Strategy	Housing numbers	Support revocation, DM Plan site not approved so overall target should be 150 per annum, maximum 200.
Government household projections		Object to housing target being lower than projected housing need. Constraints not appropriate argument to lower housing target Object to Breadsell being disregarded – unjustifiably Cannot accommodate high levels of new housing.