

Dear Mr Cookson

Hastings Planning Strategy – Follow up from Hearing Sessions and Proposed main Modifications

Thank you for your prompt reply to my letter of 19 February 2013. I have also received your response to outstanding issues and queries (HBC/17) and the Schedule of Main Modifications. I respond to your letter in the order of your bullet points.

- a) I note your agreement to my suggested addition to HBC/MM/1 and, as you say, this should refer to the Bexhill-Hastings Link Road.
- b) I would ask you to have another look at the model policy. HBC/MM/2 appears to stop short of its last paragraph. There might be cases where there were no relevant policies or, bearing in mind the length of the plan period, one of its particular policies might become out of date. I would urge you to include the model policy in its entirety.
- c) I note HBC/MM/5 which I think would demonstrate the Council's commitment to effective monitoring and delivery. There is probably no need for the brackets in the second paragraph and, rather than *as agreed*, I would suggest *as it intends* or *as it proposes*.
- d) I am pleased that you agree to the inclusion of policies to give further protection to Ancient Woodland and Local Nature Reserves. I also welcome your consideration of the possible inclusion of a policy to protect Local Wildlife Sites. These should, I consider, be Main Modifications and should serve to protect vital assets of the Borough.
- e) I note, and welcome, your agreement to remove vacant homes from the housing land supply table at paragraph 4.24 of the Planning Strategy and see that you are re-calculating the small site windfall provision. This should result in a realistic assessment of housing land supply.
- f) It makes sense to coincide consultation on the Main Modifications with the consultation on the impending revocation of the South East Plan. As you say, this should be for a 6 week period. I shall, of course, have to take account of any representations on these matters in my examination of the Planning Strategy and a further Hearing may be appropriate to consider them.
- g) My main concern is to be convinced that the Planning Strategy has been *positively prepared* and that the Council has fully complied with the Duty to Co-operate. Paragraph 4.11 of the Planning Strategy refers to the prospect of 7,840 new homes by

2028 or 461 annually. As you say, and as explained in the Assessment of Housing Need in the Hastings and Rother Housing Market Area (May 2012), this is now estimated to be 7,493. The scale of growth proposed in the Planning Strategy of 200 dwellings annually is in general conformity with the requirement of 210 in South East Plan. In my view, however, the imminent revocation of that Plan constitutes a substantial change in planning circumstances which has taken place since the Hearings and implies that even greater weight should be attached to meeting, the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the National Planning Policy Framework (the Framework).

It would appear that the best estimate of housing demand is the one set out in your housing demand implied from trend-based household projections which, using the latest (2010 based) household projections and the County Council's estimates for dwelling requirements that relate to them, shows a requirement of 7,493 dwellings during 2011-2028. This implied average annual requirement of 440 or so dwellings is well above the provisions of the Planning Strategy. I note what you say about the urgent need for regeneration and I appreciate that the important environmental constraints around the mainly built up parts of the Borough are substantial constraints to development. The capacity of the Borough to accommodate the housing need should not, however, be a determinant of the provision for the need. I therefore think it is vital that, to assist in ensuring the soundness of the Planning Strategy and to demonstrate full compliance with the Duty to Co-operate, you should explore the option of this trend based projection to its logical conclusion.

It is therefore the difference between the housing land supply as proposed in the Planning Strategy and the supply envisaged in the trend based projection which should be the subject of discussions between your Council and Rother District Council. East Sussex County Council may also have a view on it. Those discussions should be accompanied by a formal request to Rother District Council to see if it can assist by accommodating part or all of your Borough's unmet needs, as indicated by the trend based projection. Maybe, in the longer term, the unlocking of land for 1,200-2,000 dwellings following the construction of the Bexhill-Hastings Link Road may provide opportunities for meeting unmet needs in the housing market area.

If Rother District Council is unable to assist, I would expect some compelling reasons for its decision. That evidence would be part of my examination of the Planning Strategy, and particularly whether it has been *positively prepared*. I am not suggesting any need at present to revisit the SHMA or SHLAA

work, and there is little more that I can add to paragraph 13 of my letter to you of 19 February 2013.

- h) I note your points about the Council's informal ongoing engagement with Rother District Council, but I remain of the view that the points set out at g) are now so important that they should be the subject of a formal request. I regret that this may cause some delay in the progress towards adoption, although it may be possible to have come to a conclusion about it by the close of the 6 week period of consultation.
- i) I agree that the Planning Strategy should be modified to reflect the updated 2010 trend based projection of 7,493 dwellings. As an update, it could be dealt with as an Additional Modification.

Following my reading of the proposed Additional Modifications, I think it could be argued that HBC/MA/35 and HBC/MA/57 could be construed as Main Modifications, particularly as you have rightly treated HBC/MM/3 as a Main Modification. These 3 proposed modifications relate closely together in that they all apply to renewable energy, and I think it would be prudent to treat them all the same as Main Modifications.

I hope that all this helps. I have dealt with your points as soon as possible, because it is in everybody's interest to get your plan adopted sooner rather than later. I may, of course, have to raise other points as I give closer attention to all the evidence, including the Examination documents.

Yours sincerely

Richard E Hollox

Inspector

28 February 2013