

Dear Mr Cookson

### **Hastings Planning Strategy**

1. Thank you for your e-mail of 15 April 2013 to the Programme Officer which she has sent to me.
2. I note the contents of the letter of 9 April from the Chief Executive of Rother District Council. Although the decision will presumably be that of his Council's cabinet, it would appear that despite your efforts in writing and meetings there is little chance of the District Council accommodating any of the Borough's unmet housing needs.
3. I have considered your proposed Main Modifications. They appear to have regard to the relevant points made in the representations so far and my own suggestions. I will, of course, have regard to further representations which may be made on them following the 6 week period of consultation. As I said in my e-mail of 2 April 2013 to the Programme Officer, I think that you should ensure that representations can be made on them by the public at large, rather than by just those who made representations on the submitted plan. This is to anticipate a situation where somebody might have been content with the submitted plan, but not with the plan as proposed to be modified and therefore made no representations at that stage. I cannot, of course, guarantee that there will be no further Main Modifications as the Examination proceeds.
4. As you say, you have revised the trend based household projections from 7,840 new homes at paragraph 4.11 in the Planning Strategy to 7,493 in the Assessment of Housing Need (HBC/PS/30A-B) and in the suggested Main Modification HBC/MM/3. I agree that this figure has the potential to change again in the light of your planned joint work with Rother District Council and East Sussex County Council, and I thank you for your agreement to undertake this further work. As Mrs Graham has advised Rother District Council, it would be useful to take account of guidance at [www.HowManyHomes.org](http://www.HowManyHomes.org). This should ensure that projections for the housing market area and for both the Borough and District are based on current and future demographic trends, as the National Planning Policy Framework (the Framework) requires. As previously mentioned, I consider that the revocation of the South East Plan is a substantial change in planning circumstances which means that even greater emphasis must be placed upon the Framework's requirements.
5. Bearing in mind the scale of need indicated by the projections so far, it would seem unlikely that further projections will show a housing need for the Borough during the plan period which could be accommodated within its boundary. As the Planning Strategy maintains and Rother District Council acknowledges, this is due to such considerations as the extent of the existing mainly built up area and the environmental constraints which apply within and outside it. Indeed, I note from your letter to me of 17 April 2013 that you consider that the overall level of

housing provision for the Borough should remain unchanged at about 3,400 (3,647 in HBC/MM/7) during the plan period (200/214 per annum), as does your Council's position with regard to resisting development at Breadsell. Nevertheless, I think it important to have as good an idea as possible of the Borough's housing needs during the plan period and to assess comprehensively the extent to which they can be met. For these reasons, you may take the view that there is no need to await the outcome of this further work before you consult on the proposed Main Modifications. Everything reasonable should be done to get the Planning Framework adopted as soon as possible.

6. On your third point, I can advise that the latest national statistics on the projected number of households in England and its local authority areas were published on 9 April 2013. Main points are summarised at <https://www.gov.uk/government/publications/household-interim-projections-2011-to-2021-in-england>, along with a detailed report and tables. I would recommend that you to take this latest information into account. Working with the District Council, the objective should be to update the evidence base, using all relevant sources and taking into account local circumstances, to ascertain the full, objectively assessed needs for market and affordable housing in both the Borough and the housing market area.
7. As you know, it continues to be essential for the Planning Strategy to identify a 5 year supply of housing land which can be updated annually. Owing to the persistent under-delivery of housing during recent years, the Planning Strategy should continue to accept the need for a 20% buffer (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. Maybe that is the minimum needed to make the plan sound from the standpoint of housing land supply. As it is now clear, however, that the Council will not be able to meet all its housing needs within the Borough, I would ask you to examine the possibility of identifying a deliverable supply of housing land during the first, say, 10 years of the plan period. This, in a way, could provide some compensation for the inability to provide for all housing needs.
8. Following the consultation period on Main Modifications, the revocation of the South East Plan and the latest ONS figures, it would be useful to have another Hearing to consider all these matters. This can be arranged nearer the time.
9. I hope this helps. It is unfortunate that the South East Plan has been revoked at such a critical time in the examination of the Planning Strategy, but I consider that the additional work is necessary in that it should serve the production of a robust plan providing the context for your Development Management Plan DPD and against which planning applications can be determined.

Yours sincerely

*Richard E Hollox* 22 April 2013