

Hastings Local Plan, Development Management Plan Examination

Matter 5: The Proposed Allocations by Focus Area

**Introduction & background to Matter 5
Focus Area 1 – Little Ridge & Ashdown
Focus Area 2 – Greater Hollington**

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA

Issue 5: Whether each and every proposed allocation has a realistic prospect of contributing as envisaged to the Borough's assessed housing and employment needs, consistent with environmental and other considerations, including proposed transport schemes eg the proposed link road between Queensway and the A21 road as reported in the Hastings and St Leonards Observer October 3 2014.

Introduction & Background

- 5i. As an integral part of identifying suitable land sufficient to meet the housing and employment needs of each identified Focus Area as well as for each Site Allocation the Council developed and consulted widely upon its Strategic Housing Land Availability Assessment (SHLAA) (Library reference HBC/DMP/35 & 37a-i respectively) methodology prior to inviting interest from any landowner who wished their land to be considered for development. The SHLAA itself which is published on the Council's website as part of our evidence base was a comprehensive and Borough wide exercise to ensure that there was an adequate pool of potentially available land from which to test, assess and ultimately choose site locations for the Plan purposes.
- 5ii. Each of the parcels of land put forward was subject to a rigorous appraisal, including consultation with Hastings Borough Council Building Control officers to assess the suitability of ground conditions, and where appropriate to ecological surveys and a landscape assessment/appraisal process by external specialists. The sites were then assessed for capacity (numbers of housing units that might be delivered) by planning officers and from further discussions with housing and development management colleagues.
- 5iii. The whole Plan together with its site allocations were also subject of viability testing by NCS consultants to ensure deliverability/viability of any sites selected (Library reference HBC/DMP/164). In tandem with this exercise the Plan, its Policies and site allocations were also subject of detailed Sustainability Appraisal work (Library reference HBC/DMP/03 & HBC/DMP/20), as required of the Local Planning Authority. This assessed the whole Plan and its individual elements against a number of adopted sustainability indicators (social, economic and environmental) to ensure that the most appropriate and sustainable locations and solutions could be found to meet existing and future needs. This was also done to ensure alignment with the adopted Planning Strategy (Library reference HBC/DMP/22) and the core principles of sustainable development enshrined within the Framework (Library reference HBC/DMP/67). The development and consultation upon our Infrastructure Delivery Plan (IDP) (Library reference HBC/DMP/13) has also maintained a clear focus upon the need for and mechanisms for the provision of necessary infrastructure – particularly transport improvements – to underpin the levels of growth proposed.
- 5iv. In conclusion the Council considers that all of the proposed allocations have a realistic prospect of contributing as envisaged to the Borough's assessed and agreed housing and employment needs whilst protecting environmental and heritage assets

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and ensuring timely delivery of infrastructure. We consider the Plan to be positive, justified, effective and in line with National Policy.

- 5v. Against this general approach of assessment and rigorous testing described above we now set out our response in respect of each of the proposed allocations and where additional site specific detail is considered of relevance to the response.

5.1 Focus Area 1 – Little Ridge and Ashdown; all proposed allocations, including Holmhurst St Mary and Harrow Lane Playing Fields

Introduction

- 5.1.1. Focus Area 1 – Little Ridge and Ashdown covers the parts of the Borough to the north of Silverhill and west of the Conquest Hospital, including semi-rural area to the west of Queensway. Policy FA1 in the Hastings Planning Strategy (Library reference HBC/DMP/22) allows for 220 - 280 new homes over the lifetime of the Plan (2011-2028) for this Focus Area. Justification of housing distribution for different focus areas is set down in paragraph 12-13 in the Explanation of Housing Evidence, 2012 (Library reference HBC/DMP/45). This allowance is based on a positively prepared plan as concluded by the Inspector in his report (Library reference HBC/DMP/25) and consistent with paragraph 182 of the National Planning Policy Framework (NPPF) (Library reference HBC/DMP/67). The allocated sites in the submitted Development Management Plan (DMP) would deliver some 352 homes. Additionally, new sites are expected to come forward through windfall development, of which the redevelopment and reuse of existing buildings will be an important part.
- 5.1.2. Allocations in Focus Area 1 are effective because they are deliverable over the plan period. The whole Plan together with its site allocations was also subject to viability testing by NCS consultants to ensure deliverability/viability of all sites and policies (Library reference HBC/DMP/164). The site allocations themselves reflect the latest position with the developers and landowners.

Site Allocation & Policy LRA1 Holmhurst St Mary

- 5.1.3. This is a large greenfield site previously allocated for residential development in the Hastings 2004 Local Plan (197 units). As an undeveloped site in principle and subject to meeting the requirements of Policy LRA1 the site is capable of coming forward in the short to term. The site is in private ownership but with a housing developer actively working to acquire and develop the site. Although the site is currently without planning consent pre-application discussions and a Planning Forum have taken place such that the Council believes there is reasonable prospect that build-out and delivery of new dwellings could begin at the end of the current 5-year supply period. The indicative capacity for the site reflects and takes into account issues around ecology, topography, the character of the surrounding area, the setting of the listed statue and tree cover. Early discussions with Development Management colleagues suggest that this site is capable of delivering in excess of the 165 units indicated by the Development Management Plan (DMP).

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5.1.4. Harrow Lane playing fields is an elevated but essentially level greenfield site situated above the Harrow Lane, and office and residential development to the east. This is a Council owned site and in view of its proposed allocation is not yet formally included in the Council's land disposal programme and is without planning permission. The DMP suggests an indicative potential capacity of 140 units on this 4.75Ha site. Consistent with Policy DS1 of the Hastings Planning Strategy (Library reference HBC/DMP/22) as Council owned land the early delivery of this site could be instrumental in providing sufficient flexibility in meeting and maintaining a 5-year housing land supply. Otherwise, in order to prioritise and encourage the redevelopment of brownfield land in advance of greenfield sites and in accordance with paragraph 4.19 of the Hastings Planning Strategy, this site could come forward in the later part of the Plan period. This is also in alignment with the overall objectives of the Framework (paragraph 17, bullet point 8).

Site Allocation & Policy LRA3 land adjacent to 777 The Ridge

5.1.5. This is a greenfield site occupying an elevated position at the junction of Harrow Lane with The Ridge. The site is without planning permission but its allocation for housing development is supported by the site owner. The site is shown as having a potential capacity of delivering 10 units although as the site area is 1.86Ha it is considered that the overall numbers of units on this site could significantly exceed this number subject to obtaining necessary consents.

Site Allocation & Policy LRA4 Old Roar House, Old Roar Road

5.1.6. This site is now under construction, development having commenced in March 2014 (Planning application reference HS/FA/14/00052). This is reflected in the latest Local Plan Monitoring Report (Library reference HBC/DMP/27). In view of its imminent completion it is considered that this site could be removed from the DMP. The Council will propose a minor modification to cover this. The site has yielded 14 units in line with the indicative yield of 14 set down in the DMP.

Site Allocation & Policy LRA5 Former Workplace Health & Fitness Centre, The Ridge West

5.1.7. This is a vacant site following the demolition of the former health and fitness centre in 2008. The site has an extant planning permission (Planning application reference HA/FA/10/00005) granted in May 2012 for 11 units. It is understood that ownership of the site has recently changed hands and an application to vary condition 6 (approved plans) to amend the external appearance and internal layout of the units, of Planning Permission HS/FA/10/00005 was approved April 2014 (Planning application reference HS/FA/14/00006).

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- 5.1.8. This site has an extant outline planning permission for 7 residential units which was granted in December 2012 (Planning application reference HA/OA/12/00616). In June 2013 the site was being marketed for development purposes.

Site Allocation & Policy LRA6 Queensway North, Queensway**Site Allocation & Policy LRA7 land at junction of The Ridge West and Queensway****Site Allocation & Policy LRA8 land in Whitworth Road, The Ridge West****Site Allocation & Policy LRA9 Marline fields, Enviro21 Business Park, land west of Queensway**

- 5.1.9. Taken together these four proposed employment allocations are part of a wider employment corridor (Appendix 1 of the Council's Matter 3 provides more information).
- 5.1.10. LRA6 is proposed to deliver some 9,700m² of employment space. Planning permission for the construction of an estate road and associated infrastructure works (including drainage and utilities) to facilitate future development of the site as a business park was granted in March 2013 with site clearance works commencing the same year. The site is being marketed for by Sea Change Sussex - the Economic Regeneration Company for East Sussex, for B1 and B2 uses. In bringing forward this site, the approach taken by Sea Change is to market the site as an opportunity for units to be developed to companies' bespoke specifications.
- 5.1.11. LRA7 and LRA8 taken together have the potential to create a high quality employment estate with some 12,000m² of floorspace (the DMP showing each site having the potential to accommodate some 6000m² each). Road infrastructure is required to release these sites and a significant stage in this process is now under way with the submission of a planning application to the Borough Council by Sea Change Sussex to develop what will be called the Queensway Gateway Road. The Queensway Gateway Road will provide a convenient link between Queensway and the A21 south of The Ridge, directly unlocking the employment space on sites LRA7 and LRA8. Subject to securing planning permission, the scheme will commence construction in 2015. The construction of the road and the importance of the wider growth corridor is also set out in the Council's response to the Inspector's Matter 3 (Appendix 1 of Matter 3) and in the County Council's statement in relation to Matter 6 (Rep 2144 – East Sussex County Council).
- 5.1.12. LRA9 is proposed to deliver some 5,600m² of employment space and has been partially built-out (planning application reference: HS/FA/07/00966) and was a speculative build developed by Sea Space the then development arm of the Hastings & Bexhill Task Force. In response to concern raised by Natural England regarding the potential environmental impact of the proposed development the Council can confirm that the development of LRA6 and LRA9 has already been explored as part of the development management process and this is confirmed in the background document (Library reference HBC/DMP/165) 'Potential Impact of Development on Combe Haven and Marline Valley Woods SSSI' paragraphs 1.11-1.17.

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Conclusion on site allocations in Focus Area 1

- 5.1.13. Overall it is considered that the allocations within Focus Area 1 are consistent with the Borough's assessed housing and employment needs, consistent with environmental and other considerations. The allocations themselves and the delivery of growth that they allow for provide a positive contribution towards the objectives set within the Council's adopted Planning Strategy.

5.2 Focus Area 2 – Greater Hollington; all proposed allocations, including Robsack A (Church Wood Drive) and Mayfield E (Bodiam Drive)

Introduction

- 5.2.1. Focus Area 2 - Greater Hollington includes a broad mix of uses including housing and industrial estates and protected open space. The 3 major industrial estates; Castleham, Churchfields and Pondswood, are well used and provide a significant contribution to local employment. The area also contains important ecological habitats, as well as smaller open spaces such as allotments and playing fields.
- 5.2.2. Policy FA1 in the Hastings Planning Strategy (Library reference HBC/DMP/22) allows for 250 - 310 new homes over the lifetime of the Plan (2011-2028) for this Focus Area. Justification of housing distribution for different focus areas is set down in paragraph 12-13 in the Explanation of Housing Evidence, 2012 (Library reference HBC/DMP/45). This allowance is based on a positively prepared plan as concluded by the Inspector in his report (Library reference HBC/DMP/25) and consistent with paragraph 182 of the National Planning Policy Framework (NPPF) (Library reference HBC/DMP/67). The allocated sites in the submitted Development Management Plan (DMP) would deliver some 194 homes. Additionally, new sites are expected to come forward through windfall development, of which the redevelopment and reuse of existing buildings will be an important part.
- 5.2.3. Allocations in Focus Area 2 are effective because they are deliverable over the plan period. The whole Plan together with its site allocations was also subject to viability testing by NCS consultants to ensure deliverability/viability of all sites and policies (Library reference HBC/DMP/164). The site allocations themselves reflect the latest position with the developers and landowners.

Site Allocation & Policy GH1 Robsack A, Church Wood Drive

- 5.2.4. This is a Council owned greenfield site previously allocated for housing development in the Hastings 2004 Local Plan. It is situated off Robsack Avenue and adjoins existing residential development to the north. This is the last parcel of land in a wider residential allocation which was first identified for residential development in the 1993 Local Plan. A significant part of that original allocation has now been developed for residential purposes and this allocation is a natural extension of that development.
- 5.2.5. The proposed 1.24Ha site has no statutory nature conservation designations and is shown with a potential to deliver some 32 units which is thus considered to be a reasonably conservative estimate of yield. The allocation is however bounded on

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three sides by the Church Wood and Robsack Wood Local Nature Reserve (LNR), which is also ancient woodland and where Planning Strategy Policies EN4 and EN5 will be of relevance. A narrow finger of ancient woodland occurs within the site beyond the LNR boundary along a steep earth bank in the south of the site. It is envisaged that vehicular access to the proposed site would be through the existing field access at the southern end of the site, which forms a narrow gap in the Ancient Woodland.

- 5.2.6. Two reports have been commissioned by the Council into the potential impact of development upon trees and wildlife on this site (Library reference HBC/DMP/160 & 161). The ecology report commissioned by the Council in 2012 (Library reference HBC/DMP/161) concludes that: *“...although there are no over-riding ecological constraints to future development of the site, a range of mitigation measures will be required to avoid/minimise potential impacts upon reptiles and dormice during site clearance and construction. In addition, potential negative impacts on the adjoining woodland during the development’s construction and operational phases would be avoided by sensitive development design, including maintaining a native woodland buffer around the development and retaining arboreal connectivity across the proposed access road... Compensation for semi-natural habitat loss impacts within the development site would be provided by a financial contribution made towards future management of the adjoining woodland LNR”* (paragraph 1.1.5).
- 5.2.7. The Arboriculture Implications Report (Library reference HBC/DMP/160) states that subject to the recommendations of that report being implemented as part of a development scheme, then *“the landscape and important trees will not be adversely affected either directly or indirectly by or resulting from construction”*. Critically paragraph 2.5.1 of that report states that the principal implications of developing this site will be the removal of eight trees to allow the widening of the exiting access route to adequately serve the development and that: *“Those trees to be lost are either of a low quality and value or within the ‘Remove’ category in accordance with BS5837 (Trees in Relation to Construction). Owing to their quality and limited life expectancy, these 8 trees should not constitute a constraint on development at the site. Mitigation shall be provided through landscaping proposals associated with the scheme”*.
- 5.2.8. On the basis of the Council’s detailed assessment of the impact of development on the natural environment, via these 2 reports, and subject to meeting the requirements of Policies EN4 and EN5 of the Planning Strategy and Policy GH1 of the DMP, the relevant policies within the National Planning Policy Framework and the requirements of British Standard BS42020, Biodiversity, A code of Practice for Planning and Development Control, the Council considers that this site is capable of being delivered.

Site Allocation & Policy GH2 Mayfield E, Bodiam Drive

- 5.2.9. This is a Council owned greenfield site of some 1.1Ha and with an indicated potential yield of 37 units. It is in the Council land disposal programme and scheduled to be released during 2014/15. The site’s indicative capacity reflects an earlier approved outline scheme now expired (Planning application number HS/OA/03/00949) for 33 houses and 4 flats. It is the Council’s intention to market the site once planning permission has been obtained.

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- 5.2.10. A resolution to approve a scheme for this site for 33 units was made in 2007 (Planning application number HS/FA/07/00486) subject to the completion of a legal agreement. As part of the 2014 SHLAA update work (Library reference HBC/DMP/35) it is understood that there is developer interest in the site with an intention to bring forward a revised scheme for the site. The potential capacity shown in the DMP reflects the previously submitted scheme density. On this basis the Council considers that the site is capable of being delivered.

Site Allocation & Policy GH4 Mayfield J, Mayfield Lane

- 5.2.11. This site has outline planning permission for 36 units (Planning application number HS/OA/07/00895) and its ownership has recently passed to that of a local housing developer – Park Lane.

Site Allocation & Policy GH5 land at Redgeland Rise, (former Wishing Tree Nursery)

- 5.2.12. This site was recently sold by the Council with outline planning permission for 28 units to a local housing developer – Gemselect. A reserved matters application (Planning application number HS/DS/14/00561) has now been approved.

Site Allocation & Policy GH6 Mayfield Farm

- 5.2.13. This site includes a Grade II listed farmhouse. Compliance with Planning Strategy Policy EN1 together with the additional built heritage policies proposed in the Development Management Plan (DMP) will therefore be critical in bringing forward an acceptable scheme on this site. The 2014 SHLAA update process confirmed the landowner is willing to release the site for development purposes. An earlier scheme for 3 dwellings including a separate approval for listed building consent was approved in 2005.

Site Allocation & Policy GH12 63 Wishing Tree Road North (former Wishing Tree Public House)

- 5.2.14. This site is now under construction, development having commenced in October 2013 (Planning application number HS/DS/13/00523) and when complete will deliver 6 net new units. This is reflected in the latest Local Plan Monitoring Report (Library reference HBC/DMP/27). In view of its imminent completion it is considered that this site could be removed from the DMP. The Council will propose a minor modification to cover this.

Site Allocation & Policy GH13 133 Battle Road (former Tivoli Tavern)

- 5.2.15. This site is now under construction, development having commenced in March & August 2014 (Planning application number HS/FA/13/00157 & HS/FA/12/00003) and will deliver 14 units. This is reflected in the latest Local Plan Monitoring Report (Library reference HBC/DMP/27). In view of its imminent completion it is considered that this site could be removed from the DMP. The Council will propose a minor modification to cover this.

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5.2.16. This is the largest single site opportunity for employment related development on the Churchfields Employment Estate and is shown in the DMP with potential to deliver some 6,900m² of employment space. Its location in a key growth corridor area where developer interest in the area is high as are occupancy rates within this Estate, offers a realistic prospect of the site being developed during the Plan period.

Site Allocation & Policy GH9 site NX2 Sidney Little Road, Churchfields

5.2.17. This site offers a small scale opportunity for employment related development and is shown in the DMP with potential to deliver some 770m² of employment space. Its location in a key growth corridor area where developer interest in the area is high as are occupancy rates within this Estate, offers a realistic prospect of the site being developed during the Plan period.

Site Allocation & Policy GH10 site RX2, Sidney Little Road, Churchfields

5.2.18. This site offers a small scale opportunity for employment related development and is shown in the DMP with potential to deliver some 910m² of employment space. Its location in a key growth corridor area where developer interest in the area is high as are occupancy rates within this Estate, offers a realistic prospect of the site being developed during the Plan period.

Site Allocation & Policy GH11 Site NX3 Sidney Little Road, Churchfields

5.2.19. This site offers a small scale opportunity for employment related development and is shown in the DMP with potential to deliver some 920m² of employment space. Its location in a key growth corridor area where developer interest in the area is high as are occupancy rates within this Estate, offers a realistic prospect of the site being developed during the Plan period.

Conclusion on site allocations in Focus Area 2

5.2.20. Overall it is considered that the allocations within Focus area 2 are consistent with the Borough's assessed housing and employment needs, consistent with environmental and other considerations. The allocations themselves and the delivery of growth that they allow for provide a positive contribution towards the objectives set within the Council's adopted Planning Strategy.