

Hastings Local Plan, Development Management Plan Examination

Matter 5: The Proposed Allocations by Focus Area

**Focus Area 11 – Hillcrest & Ore Valley
Focus Area 12 – Clive Vale & Ore Village
Focus Area 13 – Hastings Country Park
and Focus Areas Conclusion**

Prepared November 2014

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 e.g. the proposed link road between the Queensway and the A21 road as reported in the Hastings and St. Leonards Observer 3 2014.

Introduction to Focus Areas 11, 12 & 13

- i. The Council considers that over the entire plan period the proposed allocations have a realistic prospect of contributing as envisaged to the Boroughs assessed and agreed housing and employment needs whilst protecting environmental and heritage assets and ensuring timely delivery of infrastructure. We consider the Plan to be positive, justified, effective and in line with National Policy.
- ii. This is endorsed by the conclusions of the 2014 Sustainability Appraisal (SA) compiled by consultants URS which reviewed the sustainability implications of the changes or revisions between the Proposed and Submission versions of the Development Management Plan as follows:

“The significant changes to the Development Management Plan as proposed have improved the Plan in sustainability terms.... The inclusion of a site policy for each development allocation in particular, has made much clearer what site specific issues need to be addressed from the outset and specifically addresses potential sustainability effects such as protecting greenspace, provision of new open space, addressing traffic impacts and heritage implications. The changes to the natural environment policies (SA references RSD19-22) also result in additional positive impacts that enhance the sustainability of the Development Management Plan in terms of the environmental objectives.” (paragraphs 5.1 & 5.2, page 28, Library reference HBC/DMP/03)
- iii. As part of identifying suitable developable and achievable land sufficient to meet the housing and employment needs of each identified Focus Area, the Council developed and consulted widely upon its Strategic Housing Land Availability Assessment (SHLAA) methodology including landowners who wished their land to be considered for development. The SHLAA was published on the Council's website as part of the Council's evidence base, 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 (Library reference HBC/DMP/03).
- iv. Each of the parcels of land put forward were also appraised by Hastings Borough Council Building Control officers to assess the suitability of ground conditions, and the subject of a landscape assessment/ appraisal process by external specialists, as well as ecological surveys and flood risk where appropriate.
- v. 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

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Plan, its Policies and site allocations were also subject of detailed Sustainability Appraisal work.

- vi. The Policies Map illustrates proposals for new cycle routes set out in the Hastings Walking and Cycling Strategy which have recently been awarded £6million from the Government's Local Growth Fund. East Sussex County Council are now actively working up a scheme of phased works for these vital connections over the plan period.
- vii. 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.

5.11 Focus Area 11 – Hillcrest and Ore Valley; all proposed allocations, including the former Stills Factory and the former Mount Pleasant Hospital

- 5.11.1. These development allocations offer a significant opportunity for Hillcrest and the Ore Valley to secure a sustainable future for the area. Paragraph 5.48 [page 52] of the Planning Strategy for the Eastern Area explains that Data from the 2010 Index of Multiple Deprivation (released in 2011) shows that Hillcrest and Ore Valley Focus Area as the most deprived in Hastings overall. The Development Management Plan (DMP), paragraph 6.251 [page 182] continues that over 60% of children live in a household below the official UK poverty line (ONS). Roughly one fifth of working age population is on Job Seekers Allowance (Department of Work & Pensions Nomis statistics.) One of the biggest challenges in the Focus Area is the lack of employment opportunities and alienation of its young people “*so young people can get jobs locally, go to work, and get paid.*” The Revised Proposed Development Management Plan paragraph 6.253 (page182).
- 5.11.2. The Green Infrastructure Study (Library reference HBC/DMP/155) published in December 2012 corroborates this analysis about Focus Area 11. “*This Focus Area stretches from West Hill in the south right up and beyond the Ridge. It is an area of severe deprivation and has a concentration of social housing. It is also the Focus Area with the second highest percentage of green space deficiency. The majority of the existing and proposed green space in the Focus Area is concentrated in the southern, most highly populated part of the area. It is here that opportunities will arise to enhance the Green Infrastructure Network particularly with the development of sites HOV1, 2 & 3*” [paragraphs 5.20 – 5.21 page18].
- 5.11.3. Planning Strategy Policy FA5 indicates a range of 440 - 540 new homes will be created in the Focus Area over the plan period to 2028. The Development Management Plan illustrates where at least 312 of these will come forward i.e. on the identified Site Allocations.

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- 5.11.4. The new development allocations provide an opportunity to create a better choice and mix of housing as well as greater access to Local Wildlife Sites. Taking into account the economic circumstances in the area new social housing will need to be retained, but the development sites provide opportunities for more choices and a more integrated mix. This is an ideal area for 'garden city style' low cost 'starter' homes and gives tenants a possibility of a new home in the area that more adequately meets their needs.
- 5.11.5. The Planning Focus and Vision for Hillcrest and Ore Valley are set out on paragraphs 6.248 – 6.54 of the DMP [page 182]. The Site Allocations to meet the Vision for Hillcrest and Ore Valley area and the benefit for the whole town are then also set out in Tables 12 & 13 [page 183] of the Development Management Plan.
- 5.11.6. Appendix A of this matter statement provides site specific details, regarding the environmental and other considerations as well as the deliverability (including the findings from the recent Viability Assessment by NCS) of the site allocations in Focus Area 11 Hillcrest and Ore Valley sites as listed in Tables 12 and 13 of the DMP.
- 5.11.7. Many of the sites in this focus area were included in the 'Broomgrove Millenium Community' regeneration area identified in the previous 2004 Hastings Local Plan. During the intervening time, regulatory 'Design Codes' were prepared for the Ore Valley which envisaged providing a holistic and prescriptive master plan to ensure the highest possible standards of sustainability and design (Library reference HBC/DMP/174).
- 5.11.8. However the 'Codes' were prepared at a very particular point in time, i.e. before the 'credit crunch'. The scale and density of the 'Ore Valley Design Code' proposals are now considered to have been overambitious in terms of its density, and reliance on new road links to connect up the sites. Latterly the 'Codes' were also seen to be too inflexible and stifling the consideration of new development proposals coming forward within the 'Regeneration area. Subsequently, following a local consultation and a report, Council members agreed on 5th March 2012 to 'rescind the design codes' (Library reference HBC/DMP/175).
- 5.11.9. An outline planning permission for the whole 'Broomgrove Regeneration area' (including HOV1, HOV2, and HOV3) was however granted in 2008 which included 650 dwellings, commercial, retail, education and supporting services & infrastructure in 2008. And despite the first phase of this scheme has now been completed, the remainder of the outline permission has now lapsed. Through the SHLAA and as part of the new Local Plan process, the Council has reviewed what are locally usually referred to as the remainder of the 'Millennium sites' and has retained a number of the original sites for residential development and open space designation as part its ongoing commitment to the wider Ore Valley Regeneration area – all be it at more reduced densities, and infrastructure requirements. The accompanying statement by Alan Blackwell (Appendix C) confirms that many of these sites

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passed into the ownership of Sea Space and the marketing programme for their release.

- 5.11.10. The Outline permission has not been used to determine future capacities as the densities related to the Urban Design Code. Any future applications will be stand alone and will need to negotiate a separate section 106 Agreement with Hastings Borough Council. [Phase 1 of the development was dealt with as details pursuant to the outline as a way of moving the application through quickly but it involved negotiating an amended section 106 agreement to delay the triggers starting the remainder of the original agreement.]
- 5.11.11. Viability Information provided by NCS borne out by recent planning history, confirms that by addressing some of the abnormal site costs and making the development parcels smaller and less dense some of the larger Ore Valley sites will become viable in the longer term, towards the end of the plan period. A number of other wider national regeneration initiatives such as the Government renewed commitment to supporting Brownfield Regeneration as well as investments in the railway network to reduce the journey times to London via HS1, could also help bring back to life these large vacant brownfield sites to help meet housing and community needs within the plan period.
- 5.11.12. The Hastings and Bexhill Task Force have been exploring the possibility of upgrading the mainline to Ashford which runs just south of the HOV 2 sites into a High Speed 1 line in order to improve Journey Times to London and connections to Europe which if successful could enhance the land values for this and many others sites across the Town. Appendix D provides a statement in relation to possible improvements to journey times to London. In addition Appendix E also provides a study brief for the economic case for an extension of High Speed 1 (HS1) from London into Hastings.
- 5.11.13. The allocations in this Focus Area have attracted only a handful of representations - most of which support e.g. the Ivyhouse Lane employment allocations which seek to improve the Urban fringes of the AONB, and are appended in full to the Council's Matter 3 Statement (HBC/5). Altogether the sizeable allocations in Focus Area 11 are starting to offer up a real and significant opportunity to meet the Town's as well as the focus area's housing and employment needs in a way that balances the economic, social and environmental objectives in the Planning Strategy.

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5.12 Focus Area 12 - Clive Vale and Ore Village; all proposed allocations including Victoria Avenue, land west of Frederick Road, land at the rear of Old London Road and at Church Street

- 5.12.1. The DMP site allocations to meet the needs identified in Planning Strategy are listed (page 203) as being CV01 - Victoria Avenue, CV02 – Land west of Frederick Road, CV03 Rear of London Road, CV04 Church Street and CV05 - 309–311 Harold Road. Three of these allocations relate to parcels of land in the same area which have been referred to by local objectors as ‘Land at Speckled Wood’. The Council and the DMP also has a designated Local Greenspace at the centre of Upper Ore Valley/Speckled Wood and where Policies HN8 and HN10 apply.
- 5.12.2. The site allocations in this Focus area help create opportunities for more sustainable and balanced communities by protecting the majority of the wooded valley as a valued Local Green Amenity space, whilst also supporting access to the Local Greenspace area, and meeting housing needs and local services at Ore Village. There are a number of physical constraints in the area particularly the undulating nature of the landscape and highways access which significantly restrict the development choices of other sites being promoted in this Focus Area.
- 5.12.3. Focus Area 12 (FA12) - Clive Vale and Ore Village - form a central part of the Eastern Spatial area of Hastings (Planning Strategy page 51). The strategic policy for this part of Hastings is set out in Planning Strategy Policy FA5: Strategic Policy for Eastern Area (page 53). In particular criteria (c) sets out the overarching strategy for the area as being to “*maintain and enhance Ore Village as a District Centre and improve accessibility as far as possible*”. Policy FA5 Criteria (k) supports the encouragement of “*local communities to access open space*” and criteria (m) supports densities “*of at least 40 dwellings per ha in Old Town and Ore Village*”. Policy FA5: also outlines a potential capacity range of 250-310 net new homes to be provided here over the plan period.
- 5.12.4. FA12 is one of Hastings more densely populated Focus Areas. The character and Spatial Vision for Ore Village and Clive Vale are set out in the Development Management Plan (DMP, page 202). The DMP vision (paragraphs 6.290 – 6.293) recognises that: “*we cannot set any areas in cultural aspic, we need to recognise and preserve what is best about Clive Vale & Ore Village, both their architecture and their rare open spaces. But we need to encourage economic development too, especially in Ore Village centre, where regeneration investment is still much needed.*” DMP (page 202).
- 5.12.5. In previous Development Plans, a much larger wooded area to the west of Ore Village – (3.17ha) was identified for housing in the 2004 Hastings Local Plan (Ref 6) for 166 units and (Ref 64) for 10 units. However much of this area is difficult to develop, not least because of Highways access onto Old London Road. Following targeted consultation in 2012 the Council as part of developing the DMP resolved to designate the majority of the central area as a ‘Local Greenspace’ to adequately reflect its importance to the Green Infrastructure network, and the nature of local concerns that this area should be protected whilst retaining some more limited areas of development to help achieve its Planning Strategy objectives.

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- 5.12.6. The Focus Area (including the three proposed allocations) was assessed as part of a Green Infrastructure Study prepared for the Council in December 2012 which advised as follows: *“Focus Area 12 extends up to the Old London Road from the Old Town to Ore Village. 88.8% of area and 86.56% of homes are within 300m of a green space. On its eastern edge the area is bounded by Hastings Country Park. The western part is more densely populated and has few open spaces. It is here that the Council is working towards a sustainable future for an area of heavily wooded valley in the Upper Ore Valley that is multiple ownership. This is potentially an important part of the Green Infrastructure Network, linking with Green Spaces in the ore Valley to the South. It is important that this area retains its natural form, both to provide green space for the local community and to provide a wildlife corridor. The development of sites CV03 and 4 can also contribute to this aim. These opportunities should be identified in a design brief in the DMP.”* Hastings Green Infrastructure Study 2012 (pages 18-19, Library reference HBC/DMP/155).
- 5.12.7. The area known locally as ‘Speckled Wood’ is in multiple private ownerships, but the public currently enjoy unrestricted public access to the whole site and have used it extensively for leisure and educational purposes. It is understood that only one of the landowners in the area for proposed protection has objected to the green space proposals. The representation received from the Ore Community Land Trust (OCLT) confirms that whilst opposing any development in the area is their preferred stance, they do support for the Borough Council proposals which they consider will ensure a large part of the valley is saved from development (representation 9623).
- 5.12.8. The parcels of land at the fringes of the ‘wooded area’ which are proposed for allocation reflect an existing planning permission as well as informal developer discussions to meet local housing needs. One of the larger allocations CV01 – has outline Planning permission (34 homes) (Planning application number HS/OA/13/0600) subject to a Section 106 and approval of detailed matters, before works can commence. A separate application has also recently been submitted by the Homes and Communities Agency for CV04 Church Street.
- 5.12.9. The Council’s consultation statement (June 2014, Library reference HBC/DMP/06) explains that CVO1, CV03 & CV04, have attracted the most representations out of the plan as a whole (page 16, paragraph 6.11).

Sustainability Appraisal

- 5.12.10. Many of the objectors refer to ‘consultation options’. These originate from the 2012 Sustainability Appraisal (SA) work (undertaken by URS, Library reference HBC/DMP/20) (page 30, paragraphs 11.22.1 – 11.22.4). Three SA options formed the basis of the Council’s discussions with local groups during the Regulation 18 ‘Focused Consultation’ (pages 10-11 and Appendix D of the Consultation Statement, Library Reference HBC/DMP/06).
- 5.12.11. The latest SA by URS (2014) supports the site allocations policies approach to protecting access to open spaces and wildlife by way of designations and ecological constraints and opportunities plans. However some concerns remain about the cumulative impacts of parcels of multiple development allocations (page 27, paragraph 4.9 page 27 of the Sustainability Appraisal by URS, 2014, Library reference HBC/DMP/03).

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5.12.12. Currently the site specific policies for the Upper Ore Valley Sites (Policies CVO1, O3 & O4) seek an Ecological Opportunities and Constraints Plan (ECOP) for each of the individual sites, but not an overarching one for the whole area (including the Local Greenspace). A minor modification could be introduced to ensure that the individual site based Ecological Opportunities and Constraints plans refer to the overarching ECOP for the wider area presented in the Ecology Study 2014. This work builds upon the of the Cabinet resolution of 5th November 2012 to enter into discussions with the landowner following the DMP examination to discuss possible future proposals for the area concerned.

Ore Valley Ecology Study 2014

5.12.13. The Ore Valley Ecology report was recently commissioned by Hastings Borough Council (September 2014) to update a previous habitat assessment and provides a better the understanding of the ecological value of the area. The Study also provides an independent appraisal of the potential constraints to development at all three site allocations including the central 'Local Greenspace Designation' in between. Meetings were held with the three active community groups with an interest in the area to discuss the survey findings as well as to hear their views on a proposed Ecological Constraints and Opportunities plan (Library Reference No HBC/DMP/177). The study concluded that in addition to the Local Greenspace Designation the 'Speckled Wood' area is also worthy of being designated as an Site of Nature Conservation Importance (SNCI)/Local Wildlife Site in accordance with the Policies set out in the Planning Strategy. There was also support for an overarching management plan for the whole area. Options should therefore be explored with the local community groups to realise their future management plans as well as the options for realising a delivery vehicle to oversee it.

Housing Needs

5.12.14. Statements submitted by the Council in response to Matter 2 have highlighted the housing needs in the Borough. Planning Strategy Policy DS1 explains why the Council's housing requirement has been reduced down to a target of at least 3,400 new homes. Paragraph 4.13 of the Planning Strategy explains that there are a number of nationally important environmental assets such as the High Weald Area of Outstanding Natural Beauty, the Marline Woods Site of Special Scientific Interest to the north west and the Hastings Cliffs Special Area of Conservation (SAC) on the eastern boundary, as well as Hastings Country park and the new Combe Valley Countryside Park to the west, that all act as a restraint to outward growth. The choices for remaining sites to meet the demographic projections are therefore very limited and the selections difficult. The key objectives for identifying sites to provide new homes across the Borough are set out in the Planning Strategy (page 31, paragraph 4.12, Library reference HBC/DMP/22). One of the most important objectives of the plan is to support the town's urban regeneration and renaissance, in a way that balances its environmental constraints with its opportunities which is consistent with the NPPF.

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- 5.12.15. The site allocations for this Focus area will create for more sustainable and balanced communities by protecting, conserving and potentially enhancing the majority of the wooded valley as a Local Greenspace/Local Wildlife Site as a valued Green Amenity space, whilst also supporting housing needs, improved access to the area, and local services at Ore Village. This approach is considered consistent with objectives the Planning Strategy as well as the NPPF.
- 5.12.16. There are a number of physical constraints in the area particularly the undulating landscape and restricted highways access onto Old London Road which significantly constrain the development choices of alternative sites bring promoted (such as the extension to CV03 by Mrs Valliammai) in this Focus Area. This representation is commented upon in more detail later in this submission but in essence seeks to allocate a significant amount more of the land in this area for residential development.
- 5.12.17. Appendix B of this statement provides more site specific information regarding the environmental and other considerations as well as the deliverability (including the findings from the recent Viability Assessment by NCS, Library reference HBC/DMP/164) of each the site allocations proposed in DMP in Focus Area 12 Clive Vale and Ore Village listed in Table 14 (page 203).

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- 5.13.1. Up until the year 2000, Hastings Country Park and Fairlight Place Farm were two adjacent areas of council land with very different management objectives. The farmland was tenanted and run as a commercial dairy unit, whilst the Country Park was managed as a public amenity resource. Both areas of land included parts of the nationally designated Hastings Cliffs Site of Special Scientific Interest and internationally designated Special Area of Conservation.
- 5.13.2. Competing land use issues and a recognition of the unique landscape and biodiversity value of the entire area resulted in a radical rethink as to how the council wished to manage this strategic resource. In 2000 the Hastings Country Park Restoration Project was established to bring all the council's land under one sustainable management for the benefit of people and wildlife.
- 5.13.3. Hastings Country Park Nature Reserve is one of a number of nature reserves that have been declared around the town since 2006. Ranging in size and diversity, all are situated within easy access for the majority of residents and visitors to the town. Hastings Country Park Nature Reserve, at 345 hectares, is the largest and most ecologically diverse area in the Borough.
- 5.13.4. Since 2004 the majority of our annual funding to implement the Management Plan has come from our 10 year Countryside Stewardship Agreement with Natural England/DEFRA, the Department of Food and Rural Affairs. In 2013 Natural England encouraged the council to move to a new 10 year Higher Level Stewardship agreement. The Higher Level Stewardship (HLS) agreement identifies a coherent annual programme of work which covers the entire Reserve as opposed to the focusing on the farmland only. The key objective is to ensure the council fulfils its statutory obligations to biodiversity and Site of Special Scientific Interest/Special Area Conservation management.
- 5.13.5. The original management plan for the site covered the period 2005-2010. The subsequent Plan covers the site from 2010-2015. Due to moving to a new legal agreement, the council is currently re-assessing the management plan and intends to refresh the plan in light of the HLS agreement in order to incorporate the HLS management prescriptions. The new management plan will be aligned to HLS and cover a period 2014 – 2024.
- 5.13.6. The management of Hastings Country Park is being driven by national and international priorities for conserving and safeguarding biodiversity. It further recognises it is one of the council's greatest community assets.
- 5.13.7. The management of the site fully accords with the principles in the Planning Strategy and Development management plan. There are no allocations proposed for this Focus Area in view of its significant biodiversity, community and recreational importance to the Borough.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**5.14 In conclusion, are all the estimated capacities in all the Focus Areas realistic and deliverable?**

- 5.14.1. Yes, the Council considers that the estimated capacities within each of the identified Focus Areas are reasonable and realistic. The justification of housing distribution for the 13 focus areas is set down in paragraphs 12-13 in the Explanation of Housing Evidence, 2012 (Library reference HBC/DMP/45). In preparing the Planning Strategy the breakdown of housing numbers was derived from development already in the pipeline (i.e. sites under construction, with planning permission or already completed), potential new sites, and a modest projection for small site windfall development which was argued at and subsequently endorsed by the Inspector as part of the Planning Strategy examination. The potential distribution of housing development was not intended to pre-empt the Development Management Plan and the intention of the capacity ranges included in the now adopted Planning Strategy was that some adjustment in numbers at the individual focus area level would be acceptable provided it did not diminish the overall planned level of housing growth of “at least” 3,400 net new homes over the Plan period. Thus the upper end of the range for each focus area is not intended to act as a cap on housing development within that focus area and where only the minimum end of the range is being met within a focus area, this can be shown to be off-set by providing more in other focus areas.
- 5.14.2. The following table sets out the latest supply position for each focus area. The table shows that when housing completions and sites under construction data is added to those sites proposed for housing development in the DMP, a number of focus areas are already comfortably exceeding the capacity range for residential development as set out in the Planning Strategy. In some instances this is as high an uplift as 40%. When small site windfall projections are added in delivery within most focus areas are within the Planning Strategy anticipated range or comfortably exceeding it. The table shows the small site windfall projection occurring uniformly across all focus areas (with the exception of FA13 Hastings Country Park). Historic completions data shows that small site windfalls are more prevalent in certain areas of the Borough in part reflecting the character of those areas and the capacity of the existing built housing stock to expect further change. Small site windfall develop is expected to be stronger in focus areas 5, 6, 7 and 8 for example in comparison to other focus areas. The Council will continue to monitor housing supply and delivery at focus area level, but for the present remains confident that the proposed allocations contained within the DMP are broadly in line with the estimated capacities set out in the Planning Strategy and are both realistic and deliverable over the Plan period.

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FOCUS AREA	Net completions 2011 – 2014	Identified sites under construction (not including in the DMP)	Small site windfalls currently under construction	DMP proposed allocations	Newly identified sites (large site windfalls) not in the DMP	Approved small site windfalls	Projected small site windfalls (2017-2028)	Planning Strategy housing range 2011-2028	CURRENT ESTIMATED SUPPLY
1	7	7	7	352	14	9	32	220 – 280	428
2	55	9	2	194	51	4	32	250 – 310	347
3	43	0	5	781	0	11	32	630 – 700	872
4	58	20	6	194	0	2	32	210 – 250	312
5	28	9	1	237	0	15	32	300 – 360	322
6	17	16	5	178	0	7	32	220 – 280	255
7	42	11	11	78	40	3	32	240 – 300	217
8	30	18	7	88	12	12	32	200 – 240	199
9	7	14	0	0	0	9	32	50 – 70	62
10	31	7	4	0	11	4	32	60 – 80	89
11	123	20	0	312	0	0	32	440 – 540	487
12	35	13	17	86	12	4	32	250 – 310	199
13	0	0	2	0	0	2	0	0	4

Table 1: housing land supply as at 01 April 2014 by Planning Focus Area

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- 5.15.1. Representations have been made by the landowner proposing the inclusion of land at Breadsell. This is area of land, which straddles the boundary between Hastings and Rother, was previously been considered for housing development during the early stages of developing the now adopted Hastings Planning Strategy. This would have been a major, strategic level greenfield site in the northwest part of the Borough. Natural England (NE) raised objections to development in this location because of concerns about the impact on the Marline Valley Woods SSSI and in particular potential risks to the site hydrology. The Council consequently removed the area of the site within the Borough from the Hastings Planning Strategy. This decision was taken on the basis that Natural England would not be in a position to withdraw their objection without the results of a further 1 to 3 years of monitoring work. The omission of the Breadsell site from the Planning Strategy formed an important discussion matter at the subsequent Planning Strategy Examination. The Inspector in his report (Library reference HBC/DMP/25) concluded at length in his report, that the site should not be identified for development. Though he attached considerable weight to Natural England's objections, he concluded that irrespective of NE concerns the land was not in a sustainable location and that "*The sustainable credentials of the Planning Strategy are better served with its omission*".
- 5.15.2. However no further work has been undertaken to overcome the concerns raised by Natural England. In the absence of any new evidence which might support an allocation the Council in compliance with National Planning Guidance has not included the site in the DMP.

Land at My Way Lodge (Rep 0105)

- 5.15.3. The representation received from Mr J. Jones proposes the inclusion of land for residential development at My Way Lodge shown on his submitted Plan as lying between the (then) Highways Agency (HA) proposed Option 1B alignment for the A21 Baldslow Junction Improvements and the Ridge Road West.
- 5.15.4. The HA is no longer promoting or intending to proceed with its Option 1B as shown and indeed an application is now submitted for a possible alternative Queensway Link Road as referred to at Matter 3 submissions (HBC/5). It is noted that all of the land referred to in this representation lies within the formally designated High Weald Area of Outstanding Natural Beauty (AONB) and where Policy EN7 of the Strategy and Policies HN8 and HN9 of the DMP apply. Paragraph 115 of the Framework confirms that "great weight should be given to conserving landscape beauty in AONB's which have the highest status of protection in relation to landscape and scenic beauty".

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- 5.15.5. Paragraph 116 of the Framework further confirms that permission for major developments in AONBs should be refused except in exceptional circumstances. In the Council's submission these exceptional circumstances and there are 3 tests set down in the Framework, are clearly not met in this case. This stance is further strengthened by the fact that the Highways Agency proposal shown as 1B is not now intended.
- 5.15.6. Earlier proposal of a more modest scale at "My Way Lodge" – for 14 residential units have also been refused on Appeal (ref. APP/B1415/A/07/2046342) which reaffirms the importance of the AONB designation.

Focus Area 4 – St Helens**Proposed extension SH1 Land adjacent to Sandrock Park, The Ridge (Rep 1611)**

- 5.15.7. Further details regarding this site are also set out in the Council's Matter 5 Statement (HBC/8(b)). An objection from an adjoining landowner to has been made to SH1 (Ref 1611) to the proposed boundary of this allocation with a change to both the Plan and Policies Map being sought in order to include land at 309 The Ridge and to the west of the existing veterinary's practice. This change would result in larger development site with part of the southern area of the site being extended. Subject to the addition of new criteria to be included in Policy SH1 the Council would not oppose the enlargement of the proposed residential allocation at Policy SH1. The new criteria are set out in the statement of common ground between the Council and Mr M. Pickup on behalf of Mr Cooper (HBC/9).
- 5.15.8. This degree of change to the Plan would represent a Main Modification rather than a minor one. Should the Inspector be minded to agree to this change it will be necessary for the Council to consult on this and any other Main Modifications the Inspector proposes.

Focus Area 5 – Silverhill & Alexandra Park**Summerfields Business Centre (Rep 2451)**

- 5.15.9. An objection to the omission of this site from the DMP process and to the lack of consultation on the site's future. This is a Council owned site currently providing office space. The site has been considered for development through the Strategic Housing Land Availability Assessment (SHLAA, Library reference HBC/DMP/37a-i) process but was ruled out on the basis of the strong policy presumption in favour of the retention of employment land. The site has been recently marketed for employment use (between 1 May 2013 and 30 April 2014). This exercise elicited no meaningful offers for the site for the continuation of the current employment use. The lack of market interest is attributed to the poor quality of the building and perceived high maintenance costs. The Council is currently assessing different options for disposal given that the continued use of the buildings for employment purposes is appears unviable.

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5.15.10. Should the site come forward for development, any proposals will be judged against the adopted (Planning Strategy) and emerging (Development Management Plan) Local Plan Policies.

Focus Area 11 – Hillcrest & Ore Valley**Land at Rock Lane (Rep 0299)**

5.15.11. An objection to the omission of land at Rock Lane for housing development has been made. This site in its entirety straddles the administrative boundary between Hastings and Rother District Council (RDC). As documented in the SHLAA 2014 Update (Library reference HBC/DMP/36) the site lies beyond the built up area of Hastings in open countryside on the western side of a valley and is within the High Weald Area of Outstanding Natural Beauty (AONB). The Council's landscape assessment (Library reference HBC/DMP/158 vol.1&2) which has looked at the area between Ivyhouse Lane and Rock Lane considers that whilst there is scope to create pockets of development, the entire valley area should be considered as an area for urban fringe management. This is an objective of Planning Strategy Policy FA5(a). The Council and RDC intend to work together on a joint approach to the treatment and management of the fringes of Hastings to secure a clearer definition of the urban boundary and to protect and enhance the rural character of the countryside that immediately abuts it, as well as access to it. The Council considers that the outcome of this work will inform both the form and scale of any future development on this omission site.

Focus Area 12 – Clive Vale & Ore Valley**Land at Barley Lane (Rep 0693)**

5.15.12. This site was submitted to the Council for consideration under the Council's SHLAA process. Whilst it was included as a possible site for consideration in the 2012 Focussed Consultation ultimately it was not selected for development. The Council's submitted SHLAA July 2014 update shows this site as not developable under Site reference N07 in Planning Focus Area 12: Clive Vale and Ore Village and identifies the reason for its non-selection as being its location within a designated Local Wildlife Site.

5.15.13. The Site was surveyed in 1996 as part of the Council's developing Nature Conservation Strategy and where it was identified as a Site of Nature Conservation Importance (SNCI). The Nature Conservation Strategy was adopted by the Council in 1996. The SNCI designation was then taken forward into the emerging Local Plan. This Plan was subsequently adopted by the Council in 2004 following its Examination In Public.

5.15.14. As part of the validation process for all SNCIs a panel of experts, including Dr Alex Tait, the then County Ecologist with East Sussex County Council, Dr Tony Whitbread, now Chief Executive of the Sussex Wildlife Trust, together with local wildlife expert Andrew Grace of the Hastings Urban Wildlife Group, Mr Murray Davidson, Ecologist to the Borough Council, assessed the interest and character of each proposed SNCI to ensure that they met the appropriate standards and criteria

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for designation. The SNCI report and original designations were reviewed in 2009 and a copy of this full report and schedule of all SNCIs in the examination library (Library reference HBC/DMP/65). The change in designation from SNCI to Site of Local Wildlife Interest was in response to the Good Practice Guidelines issued by DEFRA in respect of local wildlife sites. Within the submission DMP therefore the name of the designation is now shown on the submitted Policies Plan as a Local Wildlife Site and where Policies EN3, EN6 and HN8 apply.

- 5.15.15. In response to Mr Hollidge's enquiry of Council's Development Control service in 2009 as to the suitability of the site it was also confirmed that there was a history of land instability and further that the agent seek advice from the Highways Authority owing to instability issues and possible problems of access onto this section of Barley Lane . From his site visit the Inspector will also note the extremely steep topography of this land. In conclusion and with other better and more sustainable land allocations available to choose from the Council does not consider that this site should be allocated for residential development.

Land between Old London Road and Greville Road (Rep 2123)

- 5.15.16. Whilst Mr and Mrs Valliami are appearing under Matter 1, a representation is made suggesting that a significant additional area of land in the area known locally as "Speckled Wood" is included for residential development. This land is shown in the DMP as Local Green Space.
- 5.15.17. The representation suggests that the Plan has not been positively prepared because the various allocations are "skewed" to the west of the Borough in terms of provision. The landowners representation also states that the allocation at Policy CV03 for 10 units does not allow for the costs necessary of contributing to maintenance of the adjoining woodland. They further contend that as the Councils ecological surveys were undertaken in 2009 they are out of date and the Plan thus unsound. A further comment made in this representation states that allocation of the land as local green space is not consistent with the NPPF paragraph 77 which requires such designations to only be used where *"the green area is demonstrably special to a local community and holds particular local significance"* (Framework para 77).
- 5.15.18. With respect to the representation made, the very special nature of this general area to the local community is evidenced by the general weight of objection to any housing allocations in this area. The County Council as Highways Authority has also clearly advised that they could not support more than the number of units indicated for CVO3 because of highways access issues.
- 5.15.19. The Council has accordingly endeavoured, through its DMP, to retain the area with greatest potential for ecological enhancement and green space provision whilst also endeavouring to secure some limited residential allocations also to help meet the Borough's housing needs. The Council does not accept the suggestion that allocations in the DMP are in any way skewed, or indeed that the area now proposed for additional residential development by this representation is not special to the local community. The Council also disputes the suggestion that its ecological

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survey information is so out of date as to make the designation unsound. Indeed the Council considers its Policy CV03 and associated allocation to be consistent with paragraph 114 of the Framework in seeking to enhance protection and management of green space.

- 5.15.20. In considering the potential for this area to be managed as local green space the Cabinet decision of 5th Dec 2012 makes it clear that the Council will, following examination of the DMP, enter into discussions with the landowners to seek possible agreement to declaration of a Local Nature Reserve.

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Appendix A – Site specific details for sites in Focus Area 11

1. HOV 1 - FORMER STILLS FACTORY, ORE VALLEY

- 1.1. This former commercial kitchen equipment manufacturer factory by the 'Stills' Family is a sizeable brownfield site of 2.71ha, which if taken together with HOV2 could provide at least 125 new low cost and affordable homes for the benefit of people in the Ore Valley area as well as the rest of the town.

Location

- 1.2. HOV1 is within the Eastern spatial area, 0.6 miles from Ore Valley Station, and 1.5 miles from the Town Centre and 1.7 miles the Seafront. The HOV2 site also has close proximity to the Sussex Coast College, as well as a mainline railway station (Ore Valley) to London and Ashford.

Planning Designations and Planning History

- 1.3. The Policy and General Text (pages 184 & 185) of the Development Management Plan (DMP) provide the current planning information and requirements for this site. A Design Brief is also provided in Appendix A of the DMP for both this and the HOV2: Ore Valley site. Together they illustrate an opportunity for comprehensive master planning for the whole area. The HOV1 site on its own has an indicative capacity of 75 units.
- 1.4. Previously this site was allocated in the 2004 Local Plan in Policy B2 'Broomgrove Regeneration' for mixed use 120 Houses and 1,000m² commercial light industrial, at the time when the Ore Valley was to be redeveloped as part of the much wider Millennium Villages Sustainable Community programme.
- 1.5. Adjacent to the Former Stills factory site on Fellows Road, Amicus Horizon have recently completed a scheme to provide 17 new affordable homes (8 x 1 bed flats, 2 x 2 bed houses and 7 x 3 bed houses for affordable rent at Code for Sustainable Homes Level 3 with the support of HCA funding).

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 1.6. The former factory was the premises of W.M.Stills which manufactured catering equipment and ceased in 1991, has already been demolished. All that remains are the concrete bases on which it once stood. The site has now become a magnet for local skateboarders and graffiti artists causing the need for greater security measures to deter them.

Design

- 1.7. The site could provide an opportunity to provide innovative sustainable design proposals. At least 25% of the development will be required to be built to meet

local affordable housing needs, and thus will need to meet the highest standards for sustainable building as prescribed in the Code for Sustainable Homes Level 6 (Zero Carbon Homes). The remaining open market development will also need to demonstrate how the Sustainable and Green Development Policies specified in the Planning Strategy (Policy SC3, and SC4: Working towards Zero Carbon Development) have been met.

Deliverability, NCS

- 1.8. Part of the site allocation (25 units) was considered in the NCS Whole Plan Viability Assessment (page 33, Library reference HBC/DMP/164) as being 'red' site not currently viable based on implementation of Council policies and standard returns to developers, within the next 10 years. However "*It should be recognised that the sites in this category could be viable if (a) the abnormal costs of bringing the site into a developable state (including some upfront infrastructure investment) are deducted from the land value, (b) the Council is minded to relax affordable housing or infrastructure contributions (c) the landowners / developers accept some reduced profit return to stimulate the development (d) the developable area is reduced.*"
- 1.9. The other part of the 2.71 site (50 units) is regarded as being 'green' towards the end of the plan period (11- 15 years). 'Green' is defined as being viable '*having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31). The profit indicated is £86,273.
- 1.10. It is anticipated that with further remediation works to clear the concrete factory base by Sea Space in the near future, combined with rising market conditions as well as any further national leverage funding opportunities for Brownfield Developments, that the areas potential to meet housing needs will be realised and development completed by the end of the plan period. Further details regarding how HOV1 and HOV2 can become more viable are discussed in the Whole Plan Viability Assessment Report by NCS 2014 (page 38, paragraph 7.10 – 7.11, Library reference HBC/DMP/164).

Land Ownership

- 1.11. The site is currently owned by Sea Space who have confirmed: it will be the intention to release the land in Phases - this being Phase 3, hopefully in 2018, following on from Mount Pleasant Hospital (HOV3) site Phase 1 and the Old Power Station site (HOV1) as Phase 2.

Strategic Housing Land Availability Assessment (SHLAA)

- 1.12. The SHLAA (pages 39 & 53 of the 2014 July update, Library reference HBC/DMP/35) considered the site's suitability and confirmed that residential development will come forward on the site, later in the plan period between 2020 and 2028.

Access & Parking

1.13. An access road with street lighting from Fellows Road is still in situ, and provides an obvious point of entry. There are however several potential access routes shown on the Design Brief (page 240 of the DMP). Earlier regeneration proposals, included a road new access road from the Community College through HOV1, HOV2 and HOV3 to link up to The Ridge. However the extent of the ground works and levelling required have meant that these proposals are no longer programmed in the Local Transport Plan. However, new cycle connections set out in the Hastings Walking and Cycling Strategy will provide vital connections which will open up the area over the plan period.

Landscape & Biodiversity

1.14. The site topography is considerably varied but well screened with trees and to the south provide a clear boundary with HOV2. There are long range views into the site from the top of Mount Pleasant Road and Priory Road across the Valley. The open undeveloped green spaces within the site offer an opportunity to supplement the Green Infrastructure Network as well as the opening up of new access routes for walkers and cyclists (in keeping criteria g) of Policy FA5: Strategic Policy for the Eastern Area in the Planning Strategy). East, immediately adjacent to the site is a designated Local Wildlife Site previously referred to as an Site of Nature Conservation Importance (SNCI). The Policy requires the preparation of an ecological opportunities and constraints plan which will also enable appropriate access and connections to the local wildlife site including children's learning and activity areas, as well conservation and mitigation measures as appropriate.

Flood Risk & Drainage

1.15. The 2012 Site Sequential Test prepared by AECOM concluded that the site was not located in a high flood risk zone. This was confirmed as only Flood Risk Zone 1 (lowest) in the 2014 Sequential test update (Library reference HBC/DMP/168). No history of surface water flooding is noted. Southern water are confident that water connection can be made without any major network implication.

Sustainability Appraisal (SA)

1.16. This site was originally referenced in the SHLAA as 'A23' and is listed accordingly in the SA appraisal on 170 of the 2012 URS Report. The commentary indicated that the site scores well across the range of sustainability objectives. *"A brownfield site with a number of positive features, including being in an area amongst the 20% most deprived nationwide. Its distance from a District or Local Centre and a Cycle Route could present some issues in terms of accessibility."*

- 1.17. The concerns about connections to cycle and walking routes have been largely been addressed in the Hastings Walking and Cycling Strategy published in May 2014. (Library reference HBC/DMP/159).

Consultation comments and responses

- 1.18. No representations were made on the revised DMP consultation published in March 2014.

2. HOV2 - ORE VALLEY

- 2.1. This 2.35ha site was once home to the Broomgrove Power Station. Its over 200ft Chimneys made it a Landmark Building for the Ore Valley Area until 2000 when a fire swept through it. The Power Station site has now been completely demolished and the site levelled. Most recently the land was being leased to Network Rail for improvements to the Ore Valley tunnel. The brownfield site is now vacant again and has been identified for up to 50 new homes with gardens and offers opportunities to link up with the neighbouring Local Wildlife Site and the railway station at Ore.

Location

- 2.2. The HOV1 & 2 Ore Valley sites are situated in the 'heart of the Hastings Borough' just inside the Eastern Spatial Area, 1.3 miles from the Town Centre and the 1.6 Seafront. The HOV 2 site also has the closest proximity to the Sussex Coast College, as well as a mainline railway station to London and Ashford at Ore (0.5miles).

Planning Designations and Planning History

- 2.3. The Policy and General Text (pages 186 & 187) of the Development Management Plan (DMP) provide the current planning information and requirements for this site. A Design Brief is also provided in Appendix A of the DMP for both this site and also HOV1: Former Still Factory and illustrates the opportunity for comprehensive master planning for the whole area. The HOV2 site on its own has an indicative capacity of 50 units. This site was also allocated in the Hastings 2004 Local Plan as part of the wider Millennium Village Community proposals which received planning permission in 2008 which have since lapsed as development has not yet taken place on this site.

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 2.4. Its former use as a power station makes ground contamination likely.

Design

- 2.5. The brownfield site is well screened and could provide an opportunity to provide innovative sustainable design proposals. At least 25% of the

development will be required to be built to meet local affordable housing needs, and thus will need to meet the highest standards for sustainable building as prescribed in the Code for Sustainable Homes Level 6 (Zero Carbon Homes). The remaining open market development will also need to demonstrate how the Sustainable and Green Development Policies specified in Planning Strategy policies SC3, and SC4: Working towards Zero Carbon Development have been met in the accompanying Design and Access Statement. At least 2% of the total number of new homes will need to be fully accessible for Wheelchair users.

Land Ownership

- 2.6. The site is currently owned by Sea Space in conjunction with HOV1, and HOV3.

Deliverability, NCS

- 2.7. The site allocation was considered in the NCS Whole Plan Viability Assessment (page 33 Library reference HBC/DMP/164) as being 'red' (defined as above for site HOV1). However, with marketing of the site by Sea Space, (See separate statement by Alan Blackwell provided in Appendix C), improved walking and cycling networks, rising market conditions combined with further leverage funding opportunities, and rail improvements, that this site's potential to meet housing needs will be unlocked and development completed by the end of the plan period. Further details regarding how HOV1 and HOV2 can become more viable are discussed in the Whole Plan Viability Assessment Report by NCS 2014 (page 38, paragraphs 7.10 – 7.11, Library reference HBC/DMP/164).

Strategic Housing Land Availability Assessment (SHLAA)

- 2.8. The SHLAA (pages 39 & 53 of the 2014 July update, Library reference HBC/DMP/35) considered the site's suitability and assessed that residential development will come forward later in the plan period between 2020 and 2025.

Landscape & Biodiversity

- 2.9. There is a belt of established trees and vegetation running along northern edge, under the almost unnoticeable overhead High Voltage Power lines. Design and works around the Power Lines will need to be in accordance with the Health and Safety Executive as well as National Grid. The National Grid website provides some useful guidance on designing places near High Voltage Power Lines. <http://www2.nationalgrid.com/UK/Services/Land-and-Development/A-sense-of-place/>
<http://www2.nationalgrid.com/Corporate/Search/?q=swing%20distance%20for%20homes>
- 2.10. To the south and west the site is also bounded woodland and a Local Wildlife Site. The site slopes gently north to south, but there has been some levelling

in the exposed redundant areas to the south. There is no history of land instability in the area.

Access & Parking

- 2.11. Vehicular Access to the site would be available through Fir Tree Road and Upper Broomgrove Road. However a Transport Assessment and a Travel Plan will be required to minimise the impact on neighbouring properties. Further advice is available from East Sussex County Council (ESCC).
- 2.12. The Policies Map illustrates proposals for new cycle routes set out in the Hastings Walking and Cycling Strategy flow around the southern edge of the site. The mainline to Ashford and Hastings Town Centre runs just south of HOV2 which can be accessed via Ore Valley Station (0.5 miles).

Flood Risk & Drainage

- 2.13. The 2012 Site Sequential Test (and 2014 update) prepared by AECOM concluded that the site was not located in a high risk fluvial or Tidal flood risk zone, but that the site is within in an identified area of deep surface water flood risk. Southern Water indicated that connections/improvements will be required in Parker Road prior to its development. Therefore criteria (v) and (x) have been appropriately incorporated into Policy HOV2: Ore Valley (Revised Development Management Plan, page 187) to reflect these concerns.

Sustainability Appraisal (SA)

- 2.14. This site was originally referenced in the Strategic Housing Land Availability Assessment (SHLAA) as site 'A18' and listed accordingly in the Sustainability Appraisal Report 2012 by URS (page 170). The commentary in the SA report indicates that the site scores well across the range of sustainability objectives. *"Situated on brownfield land, in an area in the 20% most deprived nationally, and within 25 metres of cycle route, this site has a range of positive aspects. However, it has some notable constraints, including being within or adjacent to a Local Wildlife Site and intersecting with an area of deep" surface water flood risk."*
- 2.15. The Environment Agency and Southern Water have since confirmed that they are satisfied that the site can be sustainably developed with the Policy Criteria of HOV 2: Ore Valley (page 186 of Development Management Plan (DMP) which requires a Flood Risk and Ecological Assessment to be provided with the future application.

Consultation comments and responses

- 2.16. DMP 2014: Timothy Jemison (126) *"Because of the adjacent college surely this site might be better developed as a Techno park complex with the emphasis on the training apprenticeships of young people: and a skills and employment program aimed at more jobs in Ore". "Network Rail's potential Hastings to Ashford line enhancement might trigger the viability of NR training centre".*

3. HOV3 - FORMER MOUNT PLEASANT HOSPITAL

- 3.1. This Former Victorian Hospital is a priority for Sea Space who are currently marketing this 1.84ha brownfield site to come forward as Phase 1 of the three remaining former Millennium Community sites to provide for 40 new homes including affordable housing.

Location

- 3.2. The site is located west of Frederick Road, just north of the Priory Road and is close to community amenities such as the Bridge Community Centre and Ore Village shopping area as well as the area known to many as 'Speckled Wood'. The development site is approximately 0.85m from Ore Station.

Planning Designations and Planning History

- 3.3. The Policy and General Text (pages 188 & 189) of the Development Management Plan (DMP) provide the current planning information and requirements for this site. A Design Brief is also provided in Appendix A (page 241) of the DMP and illustrates the location of the strategic cycle network as well as the 'Ecology Zone'.

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 3.4. The site was originally developed as an Isolation Hospital but fell into despair and was demolished. A new access road shown on Figure 83 (page 188) of the Revised Development Management Plan has been constructed as part of the former Link Road proposals, but now offers an opportunity to facilitate the sites redevelopment.

Design

- 3.5. The site provides an opportunity to provide a varied mix of new homes. At least 25% of the development will be required to be built to meet local affordable housing needs, and thus will need to meet the highest standards for sustainable building as prescribed in the Code for Sustainable Homes Level 6 (Zero Carbon Homes). The remaining open market development will also need to demonstrate how the Sustainable and Green Development Policies specified in Planning Strategy (policies SC3, and SC4: Working towards Zero Carbon Development) have been met in the accompanying Design and Access Statement.

Land Ownership

- 3.6. The site is currently owned by Sea Space who have confirmed: it will be their intention to release the land as a priority Phase 1, during the Local Plan period. The site has just very recently been placed with 'Cluttons' for marketing. A link to their website and the accompanying brochures are provided below:
<http://www.cluttons.com/gb/property-detail/hastings-south-east-united->

kingdom/sale-former-mount-pleasant-hospital-hastings/site and <http://www.cluttons.com/sites/default/files/Details%20for%20mailing%20%26%20website.pdf>

Deliverability, NCS

- 3.7. The site allocation (40) was considered in the NCS Whole Plan Viability Assessment (page 33, Library reference HBC/DMP/164) as being 'green' - deliverable within the first 5 years of the plan - *having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31).

Strategic Housing Land Availability Assessment (SHLAA)

- 3.8. The SHLAA (pages 39 & 52 of the 2014 July update, Library reference HBC/DMP/35) considered the site's suitability but classified that residential development for approximately 40 new homes will come forward on the site, later in the plan period between 2020 and 2025.

Landscape & Biodiversity

- 3.9. There is a slight gradient from west to east, as well as south to north and the site contains trees protected by TPOs 148 & 158. To the south an 'ecology zone' has been identified to protect the Badger setts and as such any future development proposals should safeguard and provide measures for the on-going maintenance of the area.

Access & Parking

- 3.10. The current access road was originally constructed to meet the standards of the first part of a new link road to connect HOV1 and 2 as part of the Millennium Villages - Sustainable Communities programme (see Design section above). The current access road could also possibly be rearranged to give a more fluid layout. Entrance to site is from the junction of Frederick Road and Oakfield Roads, which provide an opportunity to make the development frontage along Frederick Road.
- 3.11. The Policies Map and Design Brief also reflect the proposals for new cycle routes set out in the Hastings Walking and Cycling Strategy through the allocation site. There are also opportunities to link the very close proximity of the site with the neighbouring children's playspace for football as well as the Bridge Community Centre, Deepdene Gardens and Farley Bank.

Flood Risk & Drainage

- 3.12. The 2012 Site Sequential Test (and updated in 2014) prepared by AECOM concluded that the site was not located in a fluvial or tidal high flood risk zone. There is however a large drainage tank to the west of the current turning head

on site that need to be protected. Currently the Design Brief shows this area as being retained for green space.

Sustainability Appraisal (SA)

- 3.13. This site was originally referenced in the SHLAA as 'A02' and is listed accordingly in the Sustainability Appraisal Report (page 169) by URS in 2012. The commentary indicated that the site scores well across the range of sustainability objectives. *"This brownfield site has a large number of positive aspects. It is situated within the 20% most deprived areas nationally, adjacent to an open space and within 25m of a cycle route and 50m of a playground. However, it is distant from an amenity footpath."*
- 3.14. The above concerns about connections to cycle and walking routes have been addressed in the Hastings Walking and Cycling Strategy published in May 2014. (Library reference HBC/DMP/159) and illustrated on the accompanying Policies Map.

Consultation comments and responses

- 3.15. No reps were made on the revised DMP consultation in March 2014.

4. HOV4 – THE CHEVIOTS / COTSWOLD CLOSE

Location

- 4.1. This brownfield site 1.23ha is located off Pennine Rise which connects with Malvern Way on to the Ridge in the north eastern area of Hastings. It is very close to local amenities which are only 0.95km away. Ore Valley station is just 1.05miles, and Ore Village 0.74miles.

Planning Designations and Planning History

- 4.2. The Policy and General Text (pages 190 & p191) of the DMP provide the current planning information and requirements for this site. The site has full planning permission for 79 units approved in December 2013. Planning permission was granted for an offsite affordable housing contribution.

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 4.3. This area was mostly flats for rent, predominantly similar to elsewhere in the area before it was cleared.

Design

- 4.4. Ground works have commenced on site by the Park Lane Group for 80, 2 & 3 bedroom homes which can be acquired with the Government 'Help to Buy Scheme'.

Deliverability, NCS

- 4.5. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable - within the next 5 years '*having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31).

Land Ownership

- 4.6. The site was originally cleared by the Amicus Horizon group as part of the wider regeneration proposals. It was subsequently sold onto the Park Lane Development Group in March 2012.

Strategic Housing Land Availability Assessment (SHLAA)

- 4.7. The SHLAA (pages 39 & 52 of the 2014 July update, Library reference HBC/DMP/35) considered the site's suitability and confirmed that residential development for approximately 68 new homes will come forward on the site, earlier within the first 5 years of the plan period between 2015 and 2020.

Housing/Employment Needs

- 4.8. The scheme provides an opportunity for local residents to acquire low cost home ownership on a former Housing Association site predominantly offering flats in an established Regeneration area.

Landscape & Biodiversity

- 4.9. The site slopes north-south site just off The Ridge in the eastern area of the town. However there is no history of instability on the site.

Access & Parking

- 4.10. Cotswold Close and Cheviot Close were originally the designated access roads, although recent permission for street naming & numbering has since changed the address to be: 1 to 27 (odds) & 2 to 44 (evens) Endeavor Way, 1 to 33 (odds) & 2 to 12 (evens) Bannister Close & 2 to 40 (evens) The Cheviots.

Flood Risk & Drainage

- 4.11. The 2012 Site Sequential Test prepared and updated by AECOM in 2014, concluded that the site was not located in a high risk fluvial or tidal flood risk zone. Also no history of surface water flooding is noted.

Sustainability Appraisal (SA)

- 4.12. The commentary in the URS 2014 Sustainability Appraisal (page 87) indicated that the site scores well across the range of sustainability objectives. It was reviewed again in 2014, because of an increase in site capacity and site boundary amendment only, which did not affect previous appraisal results, which were as follows: *“This brownfield site has a number of positive features, including its location in one of the 20% most deprived areas nationwide and within 25m of a cycle route. The sites distance to a District or Local Centre and an amenity footpath are constraints”.*

Consultation Comments and Responses

- 4.13. DMP 2014: Park Lane Group (Mike Pickup) [1612] *“It is questionable whether it is appropriate to include this site as a housing 'allocation' as it is now a housing 'commitment' given that it has extant permission. If site remains allocated, refer to extant permission in paragraph 6.268 as this comprises a material consideration in determining any subsequent planning application.”*
- 4.14. Mr Ingleton [169] *“The density approved was 64 dwellings pha higher than the 51dph in the proposed in the DMP”.*

5. HOV5 – 87-221 (ODDS) FARLEY BANK

Location

- 5.1. Construction of this 0.73ha site to the rear of the Bridge Community Centre, south of the railway line on the northern facing slopes of the Ore Valley, is also well under way and is expected to be completed 2014/2015. Mount Road shopping facilities are in close proximity at 0.376km, and Ore Valley Station 0.94miles.

Planning Designations and Planning History

- 5.2. Amicus with Skillcrown Homes are developing 29 new homes for rent in four blocks. Block 1 = 7 x 4 bed 3 storey houses, Block 2 = 2 x 5 bed 3 storey houses & 5 x 3 bed 3 storey houses, Block 3 = 7 x 3 bed 3 storey houses, Block 4 = 6 x 2 bed flats & 2 x 1 bed flats (2 x 2 bed on ground floor, 2 x 2 bed & 1 x 1 bed on 1st floor and 2 x 2 bed & 1 x 1 bed on 2nd). Planning permission was gained on 05/09/2013 (Planning application number HS/FA/13/00267).

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 5.3. This brownfield site was previously developed in the 1960's as 48 flats in blocks similar to those in the surrounding locality. The flats were demolished to make way for a much denser open market scheme under the 'Millennium Community' plan.

Design

- 5.4. The final designs for the current 100% Affordable Housing scheme were informed by meetings with local residents.

Strategic Housing Land Availability Assessment (SHLAA)

- 5.5. The listing in the latest SHLAA (2014) is '*currently being developed 2014/15*'.

Deliverability, NCS

- 5.6. The site allocation was considered as part of the appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable within the next 5 years.

Landscape & Biodiversity

- 5.7. The roofs of the site are just visible downhill from the Bridge Community Centre, on Priory Road.

Access & Parking

- 5.8. Although the development is clearly visible from Priory Road access to the properties is from the Farley Road to the north of the site on the lower slopes, opposite the entrance to HOV6: Ore Business Park.

Flood Risk & Drainage

- 5.9. The 2012 Site Sequential Test prepared by AECOM concluded that the site was not located in a fluvial or tidal high flood risk zone. No history of surface water flooding is noted.

Sustainability Appraisal (SA)

- 5.10. Commentary in the Sustainability Appraisal (page 88) 2014, indicated that the site scores well across the range of sustainability objectives. It was reviewed again in 2014, because of the decrease in site capacity only which did not affect previous appraisal results, which were as follows: *"This brownfield site performs well against a large number of the criteria, including its location in one of the 20% most deprived areas nationwide and adjacent to an area of open space. A notable constraint is its distance from an amenity footpath, which is over 1km/0.67 miles away."*
- 5.11. The SA concerns have been addressed in the main by the adoption of the new strategic routes in the Hastings walking and cycling strategy.

Consultation Comments and Responses

- 5.12. Mr Ingleton (169) “ *Planning permission has been given for a mixture of two storey houses. It is possible to get sensible houses and gardens in lieu of flats at the capacity of 44.*”

6. HOV6 - ORE BUSINESS PARK - FARLEY BANK

Location

- 6.1. The policies map shows this 0.7ha brownfield site extending from the above residential site (HOV5) at Farley Bank down to Hurrell Road in the north, adjacent to the railway line. The site comprises a steeply sloping area of land served by an access road which zig zags down from Farley Bank to Hurrell Road.
- 6.2. To the South West and North East are residential properties in Farley Bank and Hurrell Road, and the local shopping amenities on Mount Pleasant Road (0.62miles). Hastings Town Centre (1.42miles), Ore Valley Station (0.59 miles) to the south east and the new College/University is to the west of the site.

Planning Designations and Planning History

- 6.3. The site now has full planning permission (with a Section 106) to demolish the remaining single storey industrial buildings in favour of 19 new open market 3 bedroom homes granted on 08/03/2013. It also has a previous planning permission for 37 homes in four blocks for a mix of shared and social rented accommodation. Back in 2010 and 2007 two previous applications for the demolition of existing buildings and construction of 48 dwellings were refused, amongst other reasons because the proposals did not adequately conform to the Ore Valley Design Codes (now revoked).

Strategic Housing Land Availability Assessment (SHLAA)

- 6.4. The listing in the SHLAA is ‘developable within the next 5 years’.

Deliverability, NCS

- 6.5. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being ‘green’ viable within the next 5 years.

Land Ownership

- 6.6. The site currently has planning permission and was last up for auction in August with Allsop Auctions.

Housing/ Employment Needs

- 6.7. Market Housing in this area would provide a mix and balance to the existing community which is predominantly provided by affordable housing associations. Contributions to the local play zone would however be required.

Landscape & Biodiversity

- 6.8. Established tree belts to the north and south of the site that almost entirely enclose the site. The site is currently partially occupied by single storey industrial units but also in higher southern part appears to be used for tipping. As you approach the entrance from Farley Road, the built environment has an air of dereliction.

Access & Parking

- 6.9. This partially redundant brownfield site has its own 'Estate Road' 'off Farley Bank. The Planning Strategy and Policies Map designate a 'Greenway' cycle and pedestrian route to run through the site connecting the area with Ore Valley Station with The Ridge.

Flood Risk & Drainage

- 6.10. The 2012 Site Sequential Test prepared by AECOM concluded that the site was not located in a high flood risk zone. This was confirmed as only Flood Risk Zone 1 (lowest) in the 2014 Sequential test update. No history of surface water flooding is noted.

Sustainability Appraisal

- 6.11. The commentary in the Sustainability Appraisal (page 88) by URS in 2014, indicated that the site scores well across the range of sustainability objectives. It was reviewed in 2014, because of the decrease in site capacity only which did not affect previous appraisal results, which were as follows: *"This brownfield site performs positively against a wide range of the criteria, including its location within the 20% most deprived areas nationwide and within 25 metres of a cycle route. The location of the site over 1km/0.67 miles from an amenity footpath is a notable constraint."*

- 6.12. The concerns about connections to cycle and walking routes have been largely addressed in the Hastings Walking and Cycling Strategy published in May 2014 as well as the proposed 'Greenway'. (Library reference HBC/DMP/159).

Consultation Comments and Responses

- 6.13. No reps were made on the revised DMP consultation in March 2014.

7. HOV 7 – UPPER BROOMGROVE ROAD

Location

- 7.1. This 0.28ha site is also known as the former 18-32 evens & land adjacent at Upper Broomgrove Road and is situated very close to the other HOV1 & 2 sites within the regeneration area. The land wraps around a terrace of single storey bungalows on Chiltern Drive.

Planning Designations and Planning History

- 7.2. This site has planning permission granted in 23/08/2011 for 12 2 bed flats/maisonettes which have recently lapsed. It also has an extant reserved matters approval (Planning application number HS/DS/14/00647). Some discussions have also taken place in the past with the former owners Amicus Horizon for supported living accommodation.

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 7.3. Previously the site was developed with flats which were demolished in 2010/11.

Design

- 7.4. Future applications will need to provide an affordable housing requirement in accordance with Policy H3: Provision of Affordable Housing (Planning Strategy pages 74-75). For proposals over 4 units applicants will be expected to provide 20% on site. A new Supplementary Planning Document for Affordable will be prepared to accompany the application of the new Local Plan. This will be finalised in 2015.

Strategic Housing Land Availability Assessment (SHLAA)

- 7.5. Listed in the SHLAA as likely to come forward in the first 5 years of the plan period, 2015 – 2020.

Deliverability, NCS

- 7.6. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being '*amber*' within the first 5 years of the plan period. This is defined as viable "*making allowance for all reasonable development impacts, a standard developers profit but acknowledging that landowners may need to accept land value reductions for abnormal site development costs if development is to proceed*".

Land Ownership

- 7.7. The site is currently in private ownership and was recently auctioned by Yourmove.co.uk.

Landscape & Biodiversity

7.8. The site is partially bisected by high voltage overhead power lines, and there are some trees and planting on the site itself (mostly on the slopes). The site slopes gently southwards and from east to west. Steps to the more elevated areas still remain from which there are long range views across the Ore Valley. Adjacent to the site is a large local wildlife site that runs down to the railway line and through to Ore Valley itself. Therefore an Ecological Constraints and opportunities plan for the site will be required.

Access & Parking

7.9. The site has three roads that surround the site, but the Upper Broomsgrove Road, has the most level access. A strategic walking and cycling route is also shown running along Chiltern Avenue on the policies map, which will link any new homes with the footpath to the east of HOV1 & 2 towards Ore Station (0.7miles) and the Town Centre (1.6miles).

Flood Risk & Drainage

7.10. The 2012 Site Sequential Test prepared by AECOM and updated in 2014, confirmed that the site was not located in a flood risk zone. No history of surface water flooding is noted.

Sustainability Appraisal

7.11. This site was originally referenced in the SHLAA as 'B49' and is listed accordingly in the (page 169) the Sustainability Appraisal Report 2012 by URS. The commentary indicated that the site scores well across the range of sustainability objectives. *"This brownfield site performs well against several of the criteria, including its location within the 20% most deprived areas nationwide. It has some constraints, notable its distance from an amenity footpath, which is over 1km away."*

Consultation comments and responses

7.12. DMP (March 2014) Mr Mike Pickup (Park Lane group) *"Site has extant planning permission (HS/OA/11/00311) for 12 flats. The extant permission doesn't contain any requirement for affordable housing or a transport report. It is questionable whether it is appropriate to include the site as a housing 'allocation' as it is now a housing 'commitment' given that it has extant planning permission. If the site is to remain allocated, paragraph 6.272 should be amended to refer to the extant planning permission which comprises a material planning consideration in determining any subsequent planning application. If the Policy is to be retained, parts (i) and (iii) should be deleted."*

8. HOV 9 – 107 THE RIDGE

Location

- 8.1. This awkward shaped 0.22ha derelict site is in a prominent position on the corner of Malvern Way and The Ridge. The Site is 0.96miles from Ore Village Shopping area and 1.27 miles from Ore Valley Station. Hastings Town Centre is just over 2miles.

Planning Designations and Planning History

- 8.2. Planning permission was granted for demolition of the former Industrial buildings and for the erection of 8 new dwellings in 2011. This was extended in February 2013 for a further 2 years until 14/02/2016 (Planning application number HS/DS/10/0744).

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 8.3. This former metal fabrication yard by 'Simes and Sons' Ltd. falls within an Archaeological Notification Area. Therefore a desk based Historic Environment Report to be completed as part of the application process and a 'watching brief' in liaison with East Sussex County Council kept during any development works. There is also potential for contamination which should be investigated in future proposals.

Design

- 8.4. If access is developed carefully, the site could make a more contemporary entrance into the Malvern Way, along The Ridge and newer housing developments beyond. The Council expect 20% affordable housing to be provided on site in any future planning application and be supported by a Transport Statement. Future proposals will also need to carefully consider access and the frontage onto the Ridge as well as the high voltage overhead power cables and towers, as well as the eastern section of Ore Railway Tunnel. However there is scope here for some homes which could lift the mix and variety in the area.

Land Ownership

- 8.5. The owners have confirmed that in the past there has been an issue with restrictive covenant on part of the site restricting its use to car parking, but they are working with the Council to resolve this.

Strategic Housing Land Availability Assessment (SHLAA)

- 8.6. The SHLAA lists the site as coming forward within the next 5 years.

Deliverability, NCS

- 8.7. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable between 6-10 years allowing for land value adjustments.

Access & Parking

- 8.8. Access to this site will need to be carefully considered through a Transport Report which will need to account of the proximity of traffic flows along The Ridge. Potential developments may need to contribute towards traffic improvements.

Flood Risk & Drainage

- 8.9. The 2012 Site Sequential Test prepared by AECOM and updated in 2014, concluded that the site was not located in a high risk flood zone. No history of surface water flooding is noted.

Sustainability Appraisal (SA)

- 8.10. This site was originally referenced in the SHLAA as D28 and is listed accordingly (page 186) in the SA appraisal Report 2012 by URS. "This brownfield site has a number of positive aspects, including its location within the 20% most deprived areas nationwide and the proximity of a cycle route, which is less than 25 metres away. The site does feature some constraints, notably its location over 400 metres from an area of open space."

Consultation Comments and Responses

- 8.11. No reps were made on the revised DMP consultation in March 2014.

9. HOV 11 – IVYHOUSE LANE, NORTHERN EXTENTION

Location

- 9.1. Situated in the north east of the town and to the north of Hastings Ridge, the 5.8ha area is bounded by Ivyhouse Lane to the west and Rock Lane to the east, and offers 7,000m² of new employment space (B use classes). The site is 1.39miles from Ore Valley railway station.

Planning Designations and Planning History

- 9.2. This site is carried forward from the 2004 Hastings Local Plan (Policy E1) Sites for Employment Development as an extension to the existing industrial estate (up to 3ha in Hastings Borough Council (Use Class B1 & B2). The supporting text in the 2004 plan indicates that the land was originally identified in the 'A21 Corridor Study'. The up-to-date policies and design brief for the site can now

be found in of the Revised Development Management Plan (pages 197 & Figure 117 on page 242).

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 9.3. Generally the ridge is regarded as the northern boundary of Hastings and has provided a transport route to London. Historically small areas of development have extended over The Ridge along the established historic highways.

Deliverability, NCS

- 9.4. The site allocation was considered as part of the employment allocation appraisals in the NCS Whole Plan Viability Assessment (page 35, Library reference HBC/DMP/164) as being 'green' viable within years 6-10 of the Plan.

Land Ownership

- 9.5. AJ & Mr JJ Pern, DR & Ms MCD Young (also own the adjoining Stalkhurst Caravan site) are believed to be the current landowners of the site.
- 9.6. We last heard from the Mr Perns in 2010, they are willing to dispose of the site but have made no attempts to market it. A full copy of the supporting statement is provided as an Appendix to the Council's Statement in relation to Matter 3.

Housing/Employment Needs

- 9.7. This 5.84ha site has been allocated to meet local employment needs by way of offering viable greenfield land for the location of pristine development for small businesses in a parkland setting as an extension to the already existing Ivyhouse Lane Employment area. It is easily accessible from The Ridge which connects with the new Bexhill – Hastings link road.

Landscape & Biodiversity

- 9.8. The Borough wide Landscape Assessment (2008) (Library reference HBC/DMP/37J Vol.1 & 2) identified land in this area as a landscape with *medium capacity for change*, assuming an AONB buffer zone is incorporated into the design layout (page 17 & Map 3 Vol.2). A summary of the character area describes the eastern part of the allocation as having a "*high level of informal access by local people*" and "*an air of dereliction*" (page 15).
- 9.9. Furthermore, the 2008 landscape assessment concluded "*The Ivyhouse area (8) is essentially run down and in need of a comprehensive facelift, as it is unworthy of its status as AONB*" (page 18 paragraph 3.2.2).
- 9.10. As the proposals here are located within the AONB (designated in 1983), Hastings with Rother District Council jointly commissioned East Sussex County Council in 2013, to prepare a detailed Landscape analysis for the wider Hastings and Rother administrative areas to bring up to date the Design Brief

and Policy HOV11 specially for the Ivyhouse area. Ivyhouse Lane – Rock Lane Study Area Landscape Assessment (Library reference HBC/DMP/158 Vol.1 & Vol.2) thus refers.

- 9.11. The study identified that there are long range views across and into the site from the higher ground and surrounding ridges which enclose the valley to the west and east as well as Hastings Cemetery. There are also closer views into the north of the site from Rock Lane. However trees and woodland prevent views into the southern parts. The Landscape Assessment (2013) found belts of ‘ghyll woodland’ and Semi Natural Ancient Woodland which are not currently within positive management within the study area (close but notably not within the proposed allocation) (paragraph 3.4.9 page 13). Policy criteria (ii) therefore appropriately recommends that any future application for the site be accompanied by an Ecological Opportunity and Constraints plan that incorporates conservation and mitigation measures.
- 9.12. Map 4 Volume 2 of the 2013 assessment identifies the areas (A & B) with capacity or potential for development within the southwest of study zone. Those within the Hastings Borough Council administrative boundaries, are accordingly illustrated on the design brief (Figure 117, page 242) of the Development Management Plan.
- 9.13. The character in the southern area is affected by “*adjacent industrial units and urban fringe problems such as illegal dumping*”. The eastern corner of the allocation is also dominated by electricity pylons and National Grid will need to be notified of any development proposals (see references in HOV2: Ore Valley). The 2008 Borough Landscape Assessment by ESCC concluded “*There is a real opportunity to create a stronger definition of the urban area and enhancement of the AONB, through a comprehensive management plan for landscape, wildlife and access.*” (page 15).
- 9.14. Policy HOV11 therefore allows some development to take place, coupled with the management of existing and creation of new woodlands, and open spaces. This urban fringe area could be revitalised to provide a good example of co-ordinated landscape planning.

Access & Parking

- 9.15. A footpath 47 crosses the site to the north and links the two lanes, which was probably a historic track to Coghurst Hall.

Flood Risk & Drainage

- 9.16. The 2012 Site Sequential Site Analysis table (Library reference HBC/DMP/157, page 12) indicates that employment use is not regarded as a particularly vulnerable use (in planning policy terms) and that the site is not considered to be within a Flood Risk Zone. Nevertheless historic flooding is noted on the site. Accordingly criteria (v) has been included within Policy HOV11: Ivyhouse Lane, Northern Extension which requires a Flood Risk Assessment incorporating resilient design.

Sustainability Appraisal (SA)

- 9.17. This site was originally referenced in the SHLAA as E10 and is listed accordingly in the (page 192) the 2012 URS SA Report. *“Whilst this site performs well against a range of criteria, including its location within the 20% most deprived areas nationwide, it also suffers from several constraints. Notable constraints include the sites greenfield nature and its location in a landscape character area with no capacity to accept business development.”*
- 9.18. The Policy Criteria for HOV11: Ivyhouse Lane, Northern Extension and the design brief (page 117) adequately address the SA landscape and ecological concerns raised in 2012.

Consultation Comments & Response

- 9.19. Giles Haywood [2174] *“On behalf of Hayland Developments Ltd, the proposed site allocation is supported. The site is suitable for a comprehensive northern extension of the Ivyhouse Lane Industrial Estate which is an established employment area. The site is capable of providing a range of employment floorspace which is likely to be suitable for local, regional and national occupiers. Development of the site is likely to provide positive spin-off effects to the local area and the Hastings economy.”*
- 9.20. Roger Comerford (Rother District Council) [3210] *“New policy supported subject to limited minor amendments requested.”*

10. HOV 12: LAND EAST OF BURGESS ROAD, IVYHOUSE

Location

- 10.1. 0.51ha site offers a possible net capacity of 1,400m² of new employment space, east of Burgess Road. Combined with the allocations in Rother the full development area could be 1.5ha. Ore Valley Station is 1.4miles away.

Planning Designations and Planning History

- 10.2. This allocation was included in the 2004 Hastings Local Plan - Policy E3 (page 31), to enable a road connection to be made to Hayward way, although for a slightly smaller amount. It is carried forward in the 2014 development management plan as part of a wider allocation extending into Rother District. The site will be comprehensively redeveloped in close consultation with Rother District Council (where the majority of the future Industrial Estate will be located). Pre-Application discussions have already taken place.
- 10.3. The up-to-date policy for the new employment (B use classes) can be found (page 199 – 200) of the Development Management Plan.

Deliverability

- 10.4. The site allocation was considered as part of the employment allocation appraisals in the NCS Whole Plan Viability Assessment (page 35, Library reference HBC/DMP/164) as being 'green' viable in years 6-10 of the plan period.

Land Ownership

- 10.5. The land is currently believed to be in the ownership of Hayland Properties Ltd and Mr DA Bowie.

Landscape & Biodiversity

- 10.6. The site is currently mostly wooded and located in the Area of Outstanding Natural Beauty. Therefore landscape and ecological appraisals will be required as well as an arboricultural plan demonstrating how the trees on site will be integrated and compensated for. The site is transversed by high voltage power lines and therefore National Grid good practice guidelines provided in HOV2 should be considered.

Access & Parking

- 10.7. This part of the Industrial estate is accessed from turning right off Ivyhouse Lane into Burgess Road and is currently laid out in a grid formation.

Flood Risk & Drainage

- 10.8. This site was not considered as part of 2012 Sequential Site Appraisals. However it was included in the 2014 update prepared by AECOM who concluded that the site was located not located in a high flood risk zone. But a history of surface water flooding was noted. The AECOM 2014, site appraisal concludes that Sustainable Urban Drainage Systems will therefore be required.

Sustainability Appraisal (SA)

- 10.9. This site was originally referenced in the SHLAA as E11 and is listed accordingly in the (page 192) SA Report 2012 by URS. *"This site performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide. It does feature a number of constraints, notably the sites greenfield nature and its location in a landscape character area with no capacity to accept business development."*
- 10.10. The Policy Criteria for HOV12: Land east of Burgess Lane, Ivyhouse, address these landscape and ecological concerns.

Consultation Comments & Response

- 10.11. Giles Haywood [2174] *“On behalf of Hayland Developments Ltd, the proposed site allocation is supported. The site is suitable for additional employment floorspace and comprises a natural extension to the established Ivyhouse Lane Industrial Estate. The estate is popular with a range of local and regional businesses and is capable of delivery in the short to medium term. In addition to jobs and inward investment, development of the estate will bring other benefits including the potential to formalise the northern boundary of the estate and an opportunity to improve road and pedestrian links across the estate.”*
- 10.12. Mr Roger Comerford [3210] (Rother District Council) *“Support site allocation”*.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12****1. CVO1 – VICTORIA AVENUE****Location**

- 1.1. This 0.77ha site is situated at the northern end of the Upper Ore Valley, just below Victoria Avenue which leads directly into Ore Village District Shopping Centre on Old London Road.

Planning Designations and Planning History

- 1.2. This site was previously allocated in the 2004 Hastings Local Plan as part of a much wider development area (3.17ha) referred to as housing allocation (6) & (64) – Ore Valley - for housing within policy H1, for 166 dwellings in total.
- 1.3. Policy CV01 (page 204) of the Development Management Plan (DMP) now provides the latest Planning Policy for the area and suggests a possible net capacity of 51 units with a much larger area in the centre designated as Local Greenspace.
- 1.4. Outline application for residential development of 34 new homes, garaging & car parking and community amenity facilities was granted at Planning Committee subject to a legal agreement in February 2014 (Planning application number HS/0A/13/00600). The proposals approved in outline include several blocks of terraced housing, a new access road from Victoria Avenue and a children's play space.
- 1.5. Previous applications for the site include an extension of time limit to implement for 51 dwellings (5 houses & 46 flats), 37 garages, 4 car ports & 10 parking spaces plus 14 visitor spaces (Planning application numbers HS/FA/10/00719 & HS/FA/06/00663). The original consent for 5 houses, 46 flats and car spaces and community amenity facilities was granted on appeal in 2006.

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 1.6. This site is considered to have historic environment potential and therefore advice should be sought from East Sussex County Council (ESCC) County Archaeologist. The informal track in north-eastern corner runs behind and leads out to Greville Road, was home to a number of Victorian homes and businesses long before it was demolished in the 1950's. Small patches of hard standing are all that is visible of former properties along Church Street today. (Further details are provided in this Statement with CV04: Church Street).
- 1.7. Given the close proximity and significance of The Ridge as a historical highway, this site is also adjacent (but not within) an Archaeological Notification Area, in which the County Archaeologist usually likes to keep a watchful eye. The site is also close to Christ Church which is Grade II listed on Old London Road.

Design

- 1.8. Policy CV01: Victoria Avenue in the DMP (page 205), specifies a varied housing mix with an affordable housing contribution of 40% as well as 2% of new homes adapted

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA

Appendix B – Site specific details for sites in Focus Area 12

for wheelchair users. Contributions are also listed as being required towards children's play provision.

Deliverability, NCS

- 1.9. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable - within the next 6-10 years '*having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31).

Land Ownership

- 1.10. The applicant for the recent planning application was Hollyberry Holdings represented by Mr. Leo Norris. Previous landowners for the site have been associated with the Homes and Communities Agency.

Strategic Housing Land Availability Assessment (SHLAA)

- 1.11. The SHLAA (page 49 of the 2014 July update, Library reference HBC/DMP/35) considered the site's suitability and confirmed that residential development for 35 units will come forward on the site, later in the plan period between 2020 and 2025.

Landscape & Biodiversity

- 1.12. The area is covered by dense vegetation and some of the more mature trees on the site are covered by a 'Woodland Order' covering all the trees on the site. However changes in ground levels will require some removal of the existing trees to make way for development. There is an associated risk of contamination from builders waste from the site given the presence of intrusive species such as Japanese Knotweed and the areas previous association with landfill and waste – and again relevant consents will be required to undertake ground works. The latest report by the Ecology Consultancy provides the most up-to-date information regarding the habitats and species that are likely to be found residing in this site, as well as the ecological opportunities and constraints (Library reference HBC/DMP/177).

Access & Parking

- 1.13. The policies map also shows a strategic cycle and walking route running along the western edge of the development site along the former Church Street.

Flood Risk & Drainage

- 1.14. The Site Sequential Test prepared by AECOM in 2012 concluded that the site was not located in a high flood risk zone. This was confirmed as only Flood Risk Zone 1 (lowest) in the 2014 update (Library reference HBC/DMP/157 & 168).

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12****Sustainability Appraisal**

- 1.15. The 2012 Sustainability Appraisal considered housing allocation and commented: “This site is relatively free of constraints. It is within 50 metres of a District or Local Centre and a cycle route, and has an open space adjacent. However, it scores poorly for proximity to an amenity footpath. It makes use of both brownfield and greenfield land”.

Consultation Summaries and Responses

- 1.16. In response to the 2014 DMP consultation: Friends of Speckled Wood Mr Martin Newbold [2163] *“The nomenclature of this region is incorrect and should refer to Speckled Wood: http://en.wikipedia.org/wiki/Speckled_Wood,_Hastings. Speckled Wood has been used for over five years and is on Public Landmarks, been used in the press as a reference. Discretion should have been used when granting Outline Application HS/0A/13/00600 whilst this was under transition through an Inspectorate's office process. A condition of this Application made subject to Inspection outcome of the Develop Management Plan so as not to prejudge this. I have complaint with LGO reference 14000398 referring to contravening the s.68 of Town and Country Planning Act. 2000+ objections.”*
- 1.17. Sad Owls Residents Action Group, Mr Dave Hemsley [477] *“Changes to site references between consultations are misleading, “Speckled Wood” and Frederick Road sites are within the Upper Ore Valley which lies to the West of the A259. Clive Vale to the East of the A259 is not connected to the Upper Ore Valley. CV01 hasn't been managed by its owners & has become a more mature wildlife habitat in which resident-led groups maintain footpaths/green areas. This wooded Ghyll is recognised for its rare flora and fauna something which is not recognised under HN8, HN9 and HN10. HN7 should also apply if any part is developed.”*
- 1.18. Heritage Watchdog Mr. Richard Price [311] *The outline planning permission on this site predetermines the Inspector's consultation. The outline permission won't be revoked-changes will be done as conditions. Nature Conservation Strategy Map 1998 shows site as part of green network. In 2004 site allocated for housing without public consultation leading to removal from green network. The community do not want building in the wood. The open spaces CV01/CV04/CV03 provide valuable ecosystem services in an urban area people have accessible woodland on their doorstep. It has been enjoyed for generations. This is Ghyll woodland and Sussex BAP priority, the stream has water snails”.*
- 1.19. Mr Ingleton [169] *“Site not suitable for development. Part of Speckled Wood, will not comply with Manual for Streets or be suitable for refuse/emergency vehicles. Strong opposition to proposals. This site should remain as part of Speckled Wood.”*
- 1.20. Over 1000 objectors commented *“I oppose any housing development in the Speckled Wood area. I wish to see the Development Management Plan changed.”* Many added additional comments along the lines of:
- a) *Woods are an important local amenity for children and dogwalkers as well as those seeking a place for informal tranquillity;*

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12**

- b) *Habitats of protected species should not be destroyed to make money for offshore companies;*
- c) *Sufficient capacity for new homes exists on other Brownfield Sites which should be developed first;*
- d) *Children and future generations shouldn't be deprived of an increasingly rare natural environment;*
- e) *The woods provide a unique opportunity for an educational resource in the urban area e.g. Forest School;*
- f) *Government believes in localism, so the Local Council should listen to the people;*
- g) *Roads near the sites have already reached their capacity and are regularly congested;*
- h) *Borough Plan in the 1930's designated the area as 'open space';*
- i) *The proposals are 'ridiculous' and not developable, how can houses be placed over a stream and Japanese Knotweed?*
- j) *In a world where climate change is becoming ever more real, woods like these offer an opportunity to reduce Co2;*
- k) *Access to woods helps promote healthy lifestyles and reduces childhood obesity;*
- l) *The area acts as a drainage basin for the surrounding built up areas;*
- m) *The area is rich in wildlife including birds and other protected species.*

2. CV02 - LAND WEST OF FREDERICK ROAD**Location**

2.1. This triangular 0.6ha brownfield allocation is for 29 units next to the railway tunnel, and is currently only occupied by a Bungalow (known as Little Acres Farm). It is situated 0.4 miles from Ore Village District Shopping centre and 1.2 miles from Ore Station. Nearby amenities include a Petrol Station on the Ridge (200m) and the site is directly adjacent is a modern development at Cookson Way.

Planning Designations and Planning History

2.2. The site was previously allocated in 2004 Hastings Local Plan. It has a 'live' outline permission for layout and demolition of the existing bungalow which doesn't expire until July 2015. It also has an extant detailed planning permission for the details of the scale and external appearance of the building(s), and the landscaping of the site. The Planning application number is HS/DS/10/00700 which lapsed in February 2014. The site has quite a considerable planning history and a number of previous planning applications were refused and 2 appeals dismissed by the Inspectorate before outline planning permission was finally approved by the Council in 2010. [Appeal decision (Planning application number HS/OA/06/741) reference APP/B1415/A/07/2034385 reason 9 deemed the site to be brownfield requiring 25% affordable.]

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA

Appendix B – Site specific details for sites in Focus Area 12

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 2.3. The northern tip of the site is close to the Archeologically Notification Area along The Ridge but not within it. Therefore it is likely that a 'watching brief' from the County Archaeologist will be required.

Design

- 2.4. Future detailed signs will need to be in accordance with the recent adopted Planning Strategy Policies and Policy CV02 of the DMP (page 206, as well as contributions towards local play facilities. An Ecological Constraints and Opportunities plan with mitigation measures incorporated into the development design and layout will be required.

Deliverability, NCS

- 2.5. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable - within the next 5 years '*having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31).

Land Ownership

- 2.6. A 'For Sale' sign is up on the entrance from Frederick Road, but it is not known whether the property has changed hands.

Strategic Housing Land Availability Assessment (SHLAA)

- 2.7. The 2014 SHLAA update lists this site as having a capacity for 29 and being developable within the next 5 years.

Landscape & Biodiversity

- 2.8. The site is occupied by a single storey bungalow with various outbuildings and paddock sited on a predominantly open, grassed plot of land that falls from north to south towards Tuppeney Close, but well screened by a belt of trees. Views into the site may be possible from HOV4: The Cheviots/Cotswold Close currently being developed. There is no history of land instability.

Access & Parking

- 2.9. The site is currently accessed from the driveway directly from Frederick Road, close to The Ridge, although Highways indicate that the drive would only be suitable for pedestrian and cycle access. Space for pedestrian/cycle access into the site has been left open ended at Cookson Way a large modern residential estate with access onto Frederick Road. Policy CV02: criteria (iv) stipulates that vehicular access be from Tuppeney Close and Cookson Close. Previous extant permissions sought access across the tunnel, from HOV4: The Cheviots.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12****Flood Risk & Drainage**

2.10. The Site Sequential Test prepared by AECOM in 2012 concluded that the site was not located in a high flood risk zone. This was confirmed as only Flood Risk Zone 1 (lowest) in the 2014 update (Library reference HBC/DMP/157 &168).

Sustainability Appraisal

2.11. The 2012 Sustainability Appraisal considered housing allocation and commented thus: “This site makes use of previously developed land and is in an area amongst the 20% most deprived nationwide. Distance to a District or Local Centre and an Amenity footpath could result in some accessibility issues.”

Consultation Comments and Responses

2.12. In response to the 2014 DMP Consultation: Mr Ingleton [169] *“Planning permission was finally given after several repeat applications and after the Planning Inspectorate refused the application as being too dense. Planning permission has lapsed, no work was carried out and the developer has gone bankrupt. Site now owned by the Bank. The site is a steeply sloping triangular site alongside the railway tunnel. The numbers should be reduced from 29 to 18 no. i.e. 0.60ha @ 30d.p.h. 18no.”*

3. CV03 – REAR OF LONDON ROAD**Location**

3.1. This site is situated to the rear of 382 – 386 Old London Road, which is in close proximity (0.3km) from Ore Village Centre. It is also (0.590km) from a new Aldi proposed on Rye Road as well as 1 mile from Ore Valley Railway Station. There is also a Tesco Express on Old London Road (0.36km).

Planning Designations and Planning History

3.2. This site was included in the 2004 Hastings Local Plan. This site at the rear of Old London Road, was retained to provide an opportunity to improved access into the woodland and Old London Road as well as to meet future affordable housing and regeneration needs.

Heritage (Listed Buildings and Conservation Areas) & Archaeology

3.3. It is possible that historic footpaths cross the site, that have become hidden by the dense overgrown vegetation.

Design

3.4. Policy CV03: Rear of Old London Road, stipulates that due to the lack of affordable housing in this area, a 40% provision from the 10 units will be required. In addition an

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Ecological Constraints and opportunities plan, and an arboriculture plan to demonstrates how existing trees on site will be integrated into the development.

Deliverability, NCS

- 3.5. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) in June 2014 as being 'green' viable - within the next 6-10 years '*having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31).

Land Ownership

- 3.6. The owner of this site is registered as Mrs Vairvan Valliammai who the proprietor of land east and north of the allocation as well, including most of the central valley. She was represented by ECE Planning when making representations to the 2013 proposed submission version of the DMP (Rep 2123) seeking a much larger allocation for housing in the DMP.

Strategic Housing Land Availability Assessment (SHLAA)

- 3.7. The 2014 SHLAA update lists this site as having potential for 10 units and coming forward later in the plan period between 2020 and 2025.

Landscape & Biodiversity

- 3.8. The latest report by the Ecology Consultancy (November 2014) provides the most up-to-date information regarding the habitats and species that are likely to be found residing in this site The Ecology Study also includes CV03 Old London Road in the Ecological Opportunities and Constraints plan for the wider area. Despite the sloping topography there is no recorded history of land instability associated with this site.

Access & Parking

- 3.9. County Highways have confirmed support for a smaller allocation of 10 units and Policy CV03 subject to a criteria (vi) which seeks a transport Report to evaluate the existing vehicle access.

Flood Risk & Drainage

- 3.10. The Site Sequential Test prepared by AECOM in 2012 concluded that the site was not located in a high flood risk zone, although a water course runs close to the site. The site was confirmed as being only Flood Risk Zone 1 (lowest) in the 2014 update (Library reference HBC/DMP/157 & 168).

Sustainability Appraisal

- 3.11. The 2012 Sustainability Appraisal considered housing allocation and commented thus: This site makes use of previously developed land and scores well against a large

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number of the appraisal criteria. Distance to an amenity footpath represents the main constraint.

Consultation Summaries and Responses

- 3.12. In relation to Revised Submission DMP 2014: Mr Newbold [2163]: *The nomenclature of this region is incorrect and should refer to Speckled Wood: http://en.wikipedia.org/wiki/Speckled_Wood,_Hastings. Speckled Wood has been used for over five years and is on Public Landmarks, been used in the press as a reference. There is no vehicular access to this Site. There has been tipping on this area for some 30 years with historical references. There are well established easements across this area. A complete Wildlife Survey has not been procured. There has been a huge public out-cry against splitting up this woodland with over 2000 objections. The Flora and fauna need to be protected. This area is covered with highly invasive plants Japanese knotweed and Giant Hogweed. Japanese Knotweed is known to damage paths, drives, walls and even foundations. Both are subject to the same legal regulations The Wildlife and Countryside Act (as amended) 1981, The Environmental Protection Act 1990, The Environmental Protection (Duty of Care) Regulations 1991. See 2012 Report: There has been a huge public objection to this site being developed in 2012, 1231 respondents ask for this area not to be built on. In 2013, 464 additional objections came in by way of a Planning Application, every objection which was received stating no to housing in this area. I strongly believe that these objections should be made available to the Inspector during this hearing. In a 2014 Consultation in excess of 1218 responses were obtained requesting this area is removed from the DMP. These responses have resulted in some of the area being reclassified but not all. This ignored the public wishes to save the whole Woodland Ghyll and is not democratic under the Localism Act.*
- 3.13. Mr Richard Price Heritage Watchdog [311] *“Site shown in the Nature Conservation Strategy Map 1998 as part of the green network. In 2004 site allocated for housing without public consultation leading to removal from the green network. The idea of the Localism Bill is that people are able to control their environment. The community do not want building in the wood. The open spaces CV01, CV04 & CV03 provide valuable ecosystem services for the community. In an urban area they have accessible woodland on their doorstep. It has been enjoyed for generations. The space is Ghyll woodland and Sussex BAP priority, the stream has water snails”.*
- 3.14. Mr Ingleton [169] *This is back development on a sloping site with a narrow access to the busy Old London Road. The ESCC Highways should be consulted on the access before including in the Local Plan. Problems with refuse collecting and full access for emergency vehicles.*
- 3.15. 1000+ objectors made the comment *“I oppose any housing development in the Speckled Wood area. I wish to see the Development Management Plan changed.”* Many of the representations recorded were the same as those made for all the Upper Ore Valley sites and the additional comments are the same as for CV01, with a few exceptions as follows:
- a) *What is the highways view of access from the development?;*

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- b) *Precious wildspace and haven for wildlife;*
- c) *Green lung for the town and future generations to enjoy;*
- d) *Vital habitat corridor;*
- e) *New development will lower the tone of the area;*
- f) *Ridiculous to 'shove housing into the 'ghyll' at speckled wood.*

4. CV04 CHURCH STREET**Location**

4.1. CV04 is a small allocation of just 6 units that can be seen as a small open space on the left hand side of Clifton Road when travelling south westerly towards the Town Centre (1.9miles). It is situated just before the Clifton road joins Frederick Road which leads up to The Ridge (350m). A triangular section of the site is on the north side of Church Street, bounded to the north-west by Clifton Road and on the other side by the curtilage of 2 Greville Road.

Planning Designations and Planning History

4.2. The Hastings 2004 Local Plan allocated this site as part of the substantially wider allocation referred to earlier in this Matter Statement. The current planning policy is CV04 Church Street and is set out in (pages 209 – 210) the DMP. A planning application recently has recently be received is for 5 units following pre application consultation earlier in June 2014 (Planning application number HS/OS/14/00876).

Heritage (Listed Buildings and Conservation Areas) & Archaeology

4.3. The former medical supplies building, is adjacent to the site (also known as 'Speckled Wood') and is a designated Grade 11 Listed Building. Any development here would therefore need to carefully consider its setting. The houses that once stood along Church Street had fallen into such a state of dilapidation, that they were demolished in the 1950's and little is visible of their presence today other than some hardstanding.

Design

4.4. This particular brownfield allocation is relatively level. The site has been assessed in the DMP as being required to provide at least 20% affordable housing requirement. Designs will need to reflect the strategic cycle and walking network that runs along the eastern edge of the development as well as retaining access long Church Street to the wooded area.

Deliverability, NCS

4.5. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable - within the next 5 years '*having made allowance for all development impacts. A standard developers profit and return to the landowner*' (page 31).

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Land Ownership

- 4.6. An outline application has been registered with the Hastings planning department indicates that the site is currently owned by the Homes and Communities Agency (HCA). Hastings Borough Council has also recently assisted the HCA in marketing the site for acquisition for Self Build projects and it is considered that the current outline application is to aid that process. Appendix 2 of Matter Statement 2 (HBC/4) refers.

Strategic Housing Land Availability Assessment (SHLAA)

- 4.7. The 2014 SHLAA lists the site as providing 6 units through the HCA custom build initiative within the first 5 years of the plan period.

Landscape & Biodiversity

- 4.8. The most recent study by the Ecology Consultancy (November 2014) provides the latest information regarding habitats and ecology. Badgers are known to have made a home in the Habitat offered in CV04 and as a protected species will also need to be carefully considered as part of the wider Ecological Opportunities and Constraints plan.

Access & Parking

- 4.9. The Council recognises the importance of the former Church Street to allow permeability into the remainder of the Upper Ore Valley/Speckled wood area and Policy CV04, criteria (iv) requires future developments to “*provide for public access to the Local Greenspace adjacent to the site as well as land to enable the implementation of the strategic network of cycle routes*”. The strategic walking and cycling routes along Church Street come out further down the valley at Frederick Road some 180m away.
- 4.10. Policy CVO4 suggests the need for the inclusion of a Transport Report with the application to take account of the potential implications of the development of this site on The Ridge.

Flood Risk & Drainage

- 4.11. The Site Sequential Test prepared by AECOM in 2012 concluded that the site was not located in a high flood risk zone. This was confirmed as only Flood Risk Zone 1 (lowest) in the 2014 update (Library reference HBC/DMP/157 & 168).

Sustainability Appraisal

- 4.12. The 2012 Sustainability Appraisal considered housing allocation (together with CVO1) and commented thus: “*This site is relatively free of constraints. It is within 50 metres of a District or Local Centre and a cycle route, and has an open space adjacent. However, it scores poorly for proximity to an amenity footpath. It makes use of both brownfield and greenfield land*”.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12****Consultation comments and responses**

- 4.13. Friends of Speckled Wood Mr Newbold [2014]: *The nomenclature of this region is incorrect and should refer to Speckled Wood: http://en.wikipedia.org/wiki/Speckled_Wood,_Hastings. Speckled Wood has been used over five years and is on Public Landmarks, been used in the press as a reference. This site is used for recreation. There has been a serious incident on this site in contravention of the Wildlife and Countryside Act (as amended) 1981. There has been 49 years of non-productive planning. A wet classroom is required. There has been a huge public out-cry against splitting up this woodland with over 2000 objections. The Flora and fauna need to be protected. Remove this area from the Development Management Plan inline with the Public Consultations wishes. Please then include the site with the nomenclature Speckled Wood including the areas CV01, CV03, CV04 with the nomenclature Speckled Wood in Ore with Policy HN08 as the whole Woodland.*
- 4.14. Mr Richard Price Planning & Heritage Watchdog [311]: *Site shown in the Nature Conservation Strategy Map 1998 as part of the green network. In 2004 site allocated for housing without public consultation leading to removal from the green network. The idea of the Localism Bill is that people are able to control their environment. The community do not want building in the wood. The open spaces CV01, CV04 & CV03 provide valuable ecosystem services for the community. In an urban area they have accessible woodland on their doorstep. It has been enjoyed for generations. The space is Ghyll woodland and Sussex BAP priority, the stream has water snails.*
- 4.15. Mr Ingleton [169]: *This woodland with scrubland is the entrance to Speckled Wood, has multi ownership, would mean the destruction of trees and wildlife habitat. Church Street and the Greenway and cycle route cross the site.*
- 4.16. Again over 1000 representations were recorded for this site allocation, as follows: “I oppose any housing development in the Speckled Wood area. I wish to see the Development Management Plan changed.” The additional comments were almost identical to CV01 and CV03 with the following exceptions:
- a) *This area used to be known as ‘The Hollow’;*
 - b) *Kids from Sandown School from the Church Street side of ‘The Hollow’ used the area as a shortcut to school and as a play area*
 - c) *Development should not be allowed to take place until the developer improves the open space e.g. tarmac paths, picnic areas and a playground;*
 - d) *Tree climbing, frog spawning spotting - this is an essential local space for children to learn about nature*
 - e) *Concerns about subsidence.*

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12****5. CV05 - 309 – 311 HAROLD ROAD****Location**

- 5.1. Site CV05 is located at 309 – 311 Harold Road, offers a deceptively sizeable opportunity for residential redevelopment, 0.4miles from Ore Village District Centre and 0.6miles from the Ridge via Saxon Road.

Planning Designations and Planning History

- 5.2. Previously the site had planning permission granted in April 2012 for 6 x 2 bedroom homes (Planning application number HS/FA/0061). More recently 2 new applications have been approved in June 2014 for 'Demolition of existing buildings & erection of 7 x 2 bed terraced dwellings subject to Section 106 for ecology (Planning application number HS/FA/13/00752) and 'Redevelopment of site into 12 self-contained flats' (Subject to S106 Agreement under Planning application number HS/OA/13/00850).

Heritage (Listed Buildings and Conservation Areas) & Archaeology

- 5.3. No Heritage or Archaeological issues are known. The site is a former warehouse/offices appear in need of regeneration and their redevelopment will enhance the surrounding residential district in the far eastern area of Hastings.

Design

- 5.4. Policy CV05 seeks 20% affordable housing requirements as well as an Ecological Opportunities and Constraints plan and a Transport Assessment.

Deliverability, NCS

- 5.5. The site allocation was considered as part of the site allocation appraisals in the NCS Whole Plan Viability Assessment (page 32, Library reference HBC/DMP/164) as being 'green' viable - within the next 5 years *'having made allowance for all development impacts. A standard developers profit and return to the landowner'* (page 31).

Land Ownership

- 5.6. The Park Lane Group are believed to owners of the site and intend to complete construction by 2015.

Strategic Housing Land Availability Assessment (SHLAA)

- 5.7. The SHLAA lists this site as having a capacity for 6 and being developable within the next 5 years.

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix B – Site specific details for sites in Focus Area 12****Landscape & Biodiversity**

- 5.8. Development will need to be considerate of the linkages from the property to Local Wildlife Site situated between Harold Road and Pinders Road. Policy CV05: criteria (ii) reflects these concerns.

Access & Parking

- 5.9. A transport assessment will be required to satisfactorily address parking and access issues.

Flood Risk & Drainage

- 5.10. The Site Sequential Test prepared by AECOM in 2012 concluded that the site was not located in a high flood risk zone. This was confirmed as only Flood Risk Zone 1 (lowest) in the 2014 update (Library reference HBC/DMP/157 & 168).

Sustainability Appraisal

- 5.11. The 2012 Sustainability Appraisal considered housing allocation and commented thus: This site has a number of positive features, including its use of previously developed land. The distance of the site to an amenity footpath and a cycle route are constraints.

Consultation comments and responses

- 5.12. Mr Mike Pickup (Town and Country Planning Solutions) [27]: *Site has extant full permission (HS/FA/11/0064) for 6 dwellings and the Council has resolved to grant 7 dwellings (HS/FA/13/0752) also outline permission for 12 flats (HS/OA/13/0050). Although planning obligation for a Badger Protection Zone, the consent doesn't require provision of affordable housing or transport report. Questionable to include as a housing 'allocation' as it is now a housing 'commitment' given that it has extant permission. If allocation retained, amend paragraph 6.302 to refer to extant consent which comprises a material consideration in determining any alternative application on the site. Delete parts (i) and (iii) should draft Policy be retained. Amend paragraph 6.302 to refer to the extant planning permission. Delete draft Policy or if retained, deleted parts (i) and (iii) and renumber the remaining requirement.*

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix C – Supporting statement from Alan Blackwell**

Hastings and Bexhill Renaissance Ltd, trading as Sea Space, is a public/private company originally established by a Task Force set up by the South East Regional Development Agency. The prime function of the company has been to successfully promote economic development in Hastings and Bexhill by the development of high quality office and other employment space encouraging new employers to the town. It has promoted the need for improvements in educational standards and attracted the University of Brighton to establish a university campus in Hastings town centre. Sea Space was also successfully facilitated the Learning and Skills Council establishing a new FE college, with campuses in the town centre and the Ore Valley.

The company was asked by the Task Force to act as the project manager for the Millennium Community Project, awarded to Hastings Borough Council by the Office of the Deputy Prime Minister in conjunction with the then English Partnerships. The scheme was jointly promoted by the organisations and despite the recession the first phase was completed with the development of 51 housing units together with a retail outlet and office accommodation.

The company was given permission by the Department for Business Innovation and Skills to continue to operate after the demise of the Regional Development Agencies and still owns the land originally designated for the Millennium community in the Ore Valley.

Sea Space is a not for profit company, limited by guarantee and whilst not actively undertaking development work, still promotes the objectives set by the Task Force. In continuing to offer the land in its ownership for housing development Sea Space is prepared to work in partnership with housing developers to achieve the objectives set out within the Hastings Borough Council's Development Management Plan and in certain circumstances would be prepared to discount the land to achieve those objectives.

Given the level of investment and the overall improvement in the economic performance of the area Sea Space is confident that the housing objectives can be achieved within the timescales of the current plan period.

Alan Blackwell

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MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix D – Statement from Kevin Boorman****HS1 To Hastings**

Network Rail are developing a technical case for electrifying the 'Marshlink' line between Hastings (Ore) and Ashford via Rye, to enable the high speed 'Javelin' trains to run direct between St Pancras International and Hastings/Bexhill via Ashford. This will give journey times between Hastings and London of around 68 minutes, compared to the 90+ minutes off-peak 'fast' trains, and 105+ minutes peak and slow trains currently take. The journey time reductions, if the scheme goes ahead, will be truly transformational, for residents commuting, and for the town's visitor economy.

In parallel with this technical study, Hastings Borough Council is contributing a significant sum towards a study jointly commissioned by East Sussex County Council, Hastings Borough Council, and Rother District Council to develop a strategic economic case for running high speed rail services between Hastings/Bexhill and London via the Marshlink. Mott McDonald, who are acknowledged experts in this field, have just been appointed to carry out this work, and the inception meeting took place in October.

Kevin Boorman
Head of Communications & Marketing
Hastings Borough Council
04.11.14

MATTER 5: THE PROPOSED ALLOCATIONS BY FOCUS AREA**Appendix E – Mott McDonald Project Brief****PROJECT BRIEF****ECONOMIC CASE FOR HIGH SPEED RAIL SERVICES TO HASTINGS AND BEXHILL****August 2014**

Summary of Brief

The purpose of this project brief is to appoint consultants to develop a strategic economic case for running high speed services via Ashford along the Marshlink line to Hastings and Bexhill. This would support and complement the technical case for the infrastructure investment being developed in parallel by Network Rail.

1. Background to Commission**1.1 Introduction**

1.1.1 The once thriving East Sussex coastal towns of Hastings and Bexhill have over the last few decades suffered from a number of economic trends caused partly through the loss of the manufacturing sector and changes in visitor numbers set within comparatively high levels of deprivation. Hastings is the most deprived town in the South East and the 19th most deprived local authority in England.

1.1.2 Despite welcome investment and gradual economic recovery, economic confidence is eroded by a perception of poor accessibility. Proposals for improving accessibility have therefore formed a key policy driver for the area through improvements to the strategic transport infrastructure serving Bexhill and Hastings.

1.2 Accessibility by Rail: Existing Situation

1.2.1 There are known poor rail connectivity issues to Hastings area with long journey times between the south coast and London via all three routes: the Hastings – Tonbridge line, the East Coastway and the Marshlink lines. This is set within a growing travel market on Marshlink via Ashford & HS1, some peak over-crowding of Brighton fast services and the wider context of growth on HS1 services in Kent

1.2.2 However there are a number of service improvements that are coming forward. Following successful lobbying, the direct Hastings/Cannon Street services on the Tonbridge line will be retained following a threat that they would be removed. In addition, the ‘Hastings express’ service will come into effect in December 2015 – this will provide an additional train in the

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a.m. and p.m. peak from/to Hastings, although the timing of these (0804 ex-Hastings, 1620 ex-Charing Cross are not ideal for most commuters).

1.2.3 At present a number of projects have or are in the progress of being delivered to improve rail infrastructure in the Hastings/Bexhill area:

- Ashford embankment line speed improvement - completed
- East Coastway Resignalling – programmed for completion 2015
- Raising the line speed between Ore and Doleham - now scheduled for CP5 (2014 – 2019) delivery, funding permitting
- Addition of barriers to Winchelsea Level Crossing – however this will not raise line speed
- Conducting a feasibility study into raising the line speed through Bo Peep Tunnel

1.3 Network Rail's Hastings Rail Improvement Study

1.3.1 Network Rail have over the last 12 months have undertaken an in-house review of how rail service could be improved. This has focussed on improving journey times to London, Ashford and Brighton and has taken account of existing work underway as identified above.

1.3.2 The outcomes of the work feed into the forthcoming Kent Route Strategy being developed by Network Rail which will be looking at requirements over next 5 - 30 years. Work of the Route Strategy is due to start in late 2014 with a draft due in 2015.

Tonbridge Line

1.3.3 The study identified that although there were possible easy wins in some of the tunnels and where track is due to be renewed in future (re-canting) on the Tonbridge line, most of the options for the Tonbridge line were high cost and of minimal benefit.

Marshlink Line

1.3.4 As part of their Rail Improvement study, Network Rail have examined the case for:

- electrification (third rail or Overhead Line) and re-doubling
- line speed improvements
- running High Speed services from St Pancras via Ashford to Rye, Hastings and Bexhill

1.3.5 The outcomes of this assessment identified that re-doubling Marshlink does not currently have a business case - it doesn't really improve journey times and is an expensive way to increase capacity. It also identified that electrification of the existing service represents low value for money – with other lines having a stronger case – and that further line speed enhancements have a poor business case for the existing service.

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- 1.3.6 **However, running High Speed (HS) 1 services from Ashford along a faster Marshlink to Hastings and Bexhill does have a strong business case with substantial journey time savings from Ashford, all day:**
- **Rye: currently 72-85 mins to > 55 minutes**
 - **Hastings currently 91-100 mins to > 68 minutes**
 - **Bexhill currently 101-112 mins to > 78 minutes**
- 1.3.7 As a consequence, this will attract more passengers (commuters, and business & leisure travellers) onto the service which will have a regeneration effect for Hastings & Bexhill.
- 1.3.8 The study has identified that delivering High Speed Trains will require:
- Remodelling and wiring Ashford West Junction to permit High Speed access to platform 2 at Ashford
 - Third Rail or OLE electrification from Ashford to Ore
 - Resignalling and increase line speed between Ashford – Appledore - Rye – Doleham from 60 to 90mph
 - Extended passing loop from Rye westwards
 - Fully gating, re-routing or closing level crossings
 - Assessments for user and pedestrian crossings (e.g. at Hamstreet)
 - Potentially acquisition of more class 395 or similar High Speed trains
- 1.3.9 By Christmas 2015, Network Rail will be developing and substantiating costs to formalise the business case for these requirements. In order to develop the best case possible for bidding through Network Rail's five year funding process, further work is required on the economic and regenerative benefits that the delivery of high speed rail to Hastings and Bexhill will bring.
- 2. Study Scope and Methodology**
- 2.1 The Hastings and Rother Taskforce would like to commission consultants **to undertake a strategic economic case for running high speed services via Ashford along the Marshlink line to Hastings and Bexhill**. This would support and complement the technical case for the infrastructure investment being developed in parallel by Network Rail.
- 2.2 The focus of the study area is the towns of Bexhill and Hastings. However assessing the wider economic and regeneration benefits, particularly within the wider Hastings travel to work area (see Figure 1), is also important to this study and will therefore need to include Eastbourne, Battle and Rye as the more immediate areas, and Brighton and Ashford in the wider area.
- 2.3 The study on the strategic economic case for running High Speed services to Bexhill and Hastings will need to consider the following elements:

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Figure 1 – Hastings Travel to Work area



1. Background

This should consider the following:

- Current position – synopsis of existing situation on the rail infrastructure/services to Hastings and Bexhill and on existing/proposed improvements to High Speed network and services in the south east
- Future prospects – outcomes from Network Rail’s Hastings Rail Improvement Study and the South East Local Enterprise Partnership study, undertaken by consultants Greengauge 21, on High Speed services in the SELEP area.¹

2. Economic and Policy context

This element section should set out the following:

- Hastings and Bexhill economic areas
- Economic challenges and opportunities
- Strategy and policy context – including the following policy documents:
 - South East Local Enterprise Partnership Strategic Economic Plan
 - Local Transport Plans
 - Economic Development Strategies
 - Local Plans

¹ <http://www.southeastlep.com/south-east-local-transport-board/consultation-responses> - High Speed Rail in the South East

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3. Anticipated economic and regenerative benefits

In relation to the introduction of high speed rail services to and from Hastings & Bexhill, this section should consider as a minimum the anticipated economic and regeneration benefits for:

- a) the planned and potential for further housing and employment growth of Hastings & Bexhill as a significant growth point in the LEP area; delivered through Sea Change the area's local regeneration company
- b) housing demand in the study area;
- c) the culture and tourism offer which is viewed as being particularly important to the area;
- d) other key sectors e.g. manufacturing
- e) the availability of local skills, particularly higher skill needs
- f) the potential of the University and College sector for generating growth in the region;
- g) The potential for growth in each of the key town centres of Bexhill, Hastings, Rye and St. Leonards;
- h) employment opportunities for local residents and the retention of talent in the area;
- i) the growth of the wider East Sussex area and East Kent sub-region;
- j) the impact of the growth of the London economy on East Sussex ;
- k) longer term connectivity benefits;
- l) making best use of sunk investment in existing facilities;
- m) potential saving to public sector spend (i.e. benefit claims) arising as a result of any improvement to local GVA / GDP; and
- n) what can be learnt from other coastal towns such as Folkestone and Dover in terms of the economic and regeneration benefits they have seen as a result of high speed rail services

An appraisal of the socio economic benefits should be provided using appropriate and Government compliant guidance.

4. Conclusions and recommendations

This section should set out the conclusions from section 3 of the study scope and make any recommendations.

3. Study Aims and Outputs

Study Aims

- 3.1 The key aims of this study is to outline by quantification where possible the economic and regeneration benefits that will be accrued by running High Speed services along the Marshlink line to Rye, Hastings and Bexhill. Whilst the focus of the study will be on the

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benefits accrued in the three towns, it must also take account of the benefits that will be accrued to the wider travel to work area including Eastbourne, Battle and Rye and Brighton/Ashford.

- 3.2 Potential benefits of running High Speed services to Hastings and Bexhill include:
- Improved accessibility, not just between the towns, and increased interaction between the two towns in relation to skill acquisition and use, jobs and inter-business trade;
 - Benefits to business including the support for regeneration by reassuring business and investor confidence in the local area; and
 - Particular benefits to the more deprived communities of Hastings and Bexhill.

Study Outputs

- 3.3 The study needs to address the following issues:
- How will improved accessibility lead to increased GVA/GDP and can it be quantified?
 - How will it affect, and in what way employment, business creation and business retention?
 - What affect will it have on the movement of skilled and unskilled labour in and out of the Hastings / Bexhill area?
 - The availability of sites for development is not considered sufficient and are often considered unviable in terms of delivery What mechanisms are required for the stimulation of business and enterprise and commercial sites and how will High Speed to Hastings and Bexhill impact these? Is development more likely with High Speed to Hastings and Bexhill, and what impact will it have in regeneration terms?
 - Will there be positive effects in relation to education and or health and how can this be quantified?
 - How will Hastings and Bexhill benefit from High Speed rail services in terms of addressing current unemployment and combating deprivation especially in the more deprived areas?
 - What other policies (ie planning, transport, economic development) support the regeneration and could they be sufficient on their own? What has already been achieved? How does High Speed to Hastings and Bexhill bring added value to these policies?
 - What positive and negative socio-economic trends can be seen in the 4 key towns and how would these change via High Speed to Hastings & Bexhill?
 - With High Speed to Hastings & Bexhill who will journey time gains most benefit, why and what affect will this have?
- 3.4 It is also important to demonstrate whether such benefits could have been fully achieved by other policies which do not involve High Speed to Hastings and Bexhill. In addition, it is important to demonstrate the extent to which High Speed services to the area creates local

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opportunities rather than encourages activities to go elsewhere (by improving the ability to get into the area rather than getting out).

4. Working Arrangements

4.1 To be confirmed with the client:

- Any changes to the Project Brief shall be agreed in writing with the client prior to the changes being implemented
- If additional work is required for the report, to ensure this is discussed and agreed in writing with the client prior to the implementation of the work
- The report shall be accompanied by a Non Technical Executive Summary not exceeding 4 pages of A4 to assist stakeholders in disseminating the conclusions of the study.
- 5 hard copies of the final study (four bound, one unbound) shall be provided in addition to an electronic (word and pdf) version of the report should be provided.
- The consultant will be expected to hold an inception meeting, two progress meetings and a final report meeting with the project team. In addition, the consultant will be expected to attend other meetings with stakeholders during the life of the project.
- The consultant will be expected to present the outline conclusions and recommendations to the Hastings and Rother Taskforce.
- All information produced by the project including subsequent reports, illustrations and presentation materials will be the property of the Hastings and Rother Taskforce and shall not be used for any other purpose within the permission of the Taskforce.
- No public/media comments on the work shall be made without the consent of the client.

5. Consultation/Engagement

5.1 In addition to the Rail Industry – Network Rail, Train Operating Companies and DfT – and the South East Local Enterprise Partnership, the consultants will also be expected to engage with the following stakeholders at key milestones, as discussed with the client, within the study timetable:

Local Reference Group

5.2 A wider local reference group/working group, led by the Member of Parliament for Hastings and Rye, Amber Rudd MP, has been established for this overall High Speed Rail for Hastings and Bexhill project. In addition to the local MPs, the local authorities and Network Rail, this group involves representatives from the local rail campaign/commuter groups, Railfuture and the business community

5.3 The aim of the group, which will meet approximately every 2/3 months, is to co-ordinate the direction of the overall project across the stakeholders of what needs to be done and what

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action needs to be taken collectively going forward to ensure delivery of High Speed for Hastings and that the momentum of the project is maintained.

- 5.4 At appropriate times during the project, the consultant may be required to attend/present an update to the working group meeting including a short presentation once the work is completed.

Stakeholder Engagement

- 5.5 During the project, and as agreed by the project team, the consultant will also need to engage as appropriate with other stakeholders including Seachange Sussex, the local business community (through the Association of Chambers for East Sussex and the Let's Do Business Group) and rail/ rail user groups.

6. Project Management

- 6.1 The project is being commissioned by East Sussex County Council and will be managed on behalf of the Hastings and Rother Taskforce by Hastings Borough Council.

- 6.2 The project will be supported by a core project team involving officers from:
- East Sussex CC
 - Rother DC
 - Hastings BC
 - Kent CC
 - Network Rail

7. Budget

- 7.1 A budget of £26,000 is available for this commission.

8. Timescales

- 8.1 To support the technical case being developed by Network Rail on the infrastructure investment for running high speed services to Hastings and Bexhill, the work should be completed by **Friday 19 December 2014**.

9. Appointment Procedure

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- 9.1 The successful candidate will be chosen on the following criteria (Price 40%; Quality 60%). The evaluation criteria with associated weightings to be used in assessing your quotation are set out in the Quotation Questionnaire.
- 9.2 If necessary a shortlist of candidates will be drawn up and invited for interview to assist the selection of the preferred contractor. If interviews are required successful candidates will be contacted and appropriate arrangements will be made to interview prospective candidates.
- 9.3 The successful candidate shall be responsible for any public indemnity or public liability insurance costs.
- 9.4 Appointment of the successful candidate will be made by exchange of letters/emails via Intend E-Tendering system. The appointment may be terminated by the Hastings And Rother Taskforce, as project manager on behalf of the Hastings and Rother Taskforce, on payment of all fees to work completed up to the date of termination.
- 10. Submission**
- 10.1 Submissions and a fee proposal are invited for undertaking this work. The submission and fee proposal should include:
- The cost of undertaking the work based on the scope and methodology above, identifying any fixed costs for all or parts of the work and a schedule of rates of the staff proposed to be employed for the work, with estimated numbers of hours, for non-fixed price work should be stated in your submission; and
 - Curriculum vitae of the staff proposed to be employed for the work;
 - A timetable for undertaking this work based on the completion dates set out above; and
 - two appropriate references from previous clients who are willing to comment independently on the candidate's work.
- 10.2 Quality Questionnaire submission should be on no more than two A4 sheets and should be uploaded via Intend. Price submissions should be made against the price schedule supplied and should be completed and uploaded via Intend.
- 10.3 ESCC welcomes innovation. If you feel you can offer a better solution to our needs please submit full details (including price if relevant) with your submission. Please note that for evaluation reasons it is only possible to consider an alternative tender if you have already submitted a 'compliant' quotation. Any alternative should be submitted with your quality proposal only.
- 10.4 Submissions should be received by the County Council no later than **noon on Tuesday 2 September** via the Intend system.