

Hastings Local Plan, Development Management Plan Examination

Matter 7: Conclusions on the Soundness of the Plan

Prepared November 2014

MATTER 7: CONCLUSIONS ON THE SOUNDNESS OF THE PLAN**Issue 7: Whether the Plan is sound and, if not, whether any measures by way of Main Modifications could be introduced to make it sound.**

7.1 In conclusion, has the Plan been positively prepared, is justified, effective and consistent with national policy and, hence, whether it is sound; and, if not, which policies or proposals should be excised from it, or added to it, to make it sound?

- 7.1.1. Yes. Statutory bodies, service providers and public sector bodies have been very closely involved in the preparation of the Development Management Plan (DMP). East Sussex County Council (ESCC) has particularly assisted the Borough Council in assessing the quality and capacity of the infrastructure needed to deliver the Plan. The Statement of support submitted to the examination by Mr J. Wheeler of ESCC (Rep 2144 – East Sussex County Council) confirms this. Other key infrastructure providers in areas identified in paragraph 162 of the NPPF (Library reference HBC/DMP/67) e.g. The Environment Agency, Education Authority, Southern Water, English Heritage, Natural England, EDF Energy, have all been consulted at key stages of Plan preparation and have contributed to the updating of the Infrastructure Delivery Plan (IDP) (Library reference HBC/DMP/13). The IDP has been produced to an agreed county wide format for all Local Plans in East Sussex and identifies what is required, by when and by whom in terms of provision. This process has not resulted in any overriding quality or capacity issues being identified that would prejudice the implementation of the DMP and the growth allocations shown within it.
- 7.1.2. As part of the Council's formal response to the Inspector's procedural questions raised at the Pre Hearing Meeting held on the 7th October (under Agenda item 5) the Council has submitted a detailed written response to the six questions posed at that meeting. This confirms that the Council has met the legal and procedural requirements of producing its Plan (See HBC/1). In now responding to the Inspectors Matter 7 and the four required tests of soundness we set out our submissions as follows:

Positively prepared

- 7.1.3. As set out in the opening Statement from Cllr Peter Chowney and within a number of the Council's detailed responses to Matters 1-6 the Council considers that it can show that the Plan has been positively prepared and that this positive approach is evidenced within the Policies and site allocations in the DMP. The Development Management Plan (DMP) is seeking to deliver "at least" the levels of housing, employment and regeneration set down within our adopted Planning Strategy – a document that itself was adjudged to be sound and thus met this test of positivity. The Planning Strategy was adopted by the Council as recently as February of this year (2014). In this regard it is also of note that in seeking in particular to address the housing, employment and infrastructure needs of both Hastings and Rother that we have clearly acknowledged that such needs cross administrative boundaries and have worked collaboratively on many of our evidence based studies. The Rother District Council (RDC) Core Strategy was also underpinned by this robust assessment of needs which was undertaken at the request of the Inspector examining the Strategy together with the Inspector looking at the Rother Core

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Strategy. The Hastings Planning Strategy has recently been adopted following successful conclusion of its examination. Mr Marlow's statement on behalf of RDC refers at paragraph 3a Matter 1 to the robust nature of the assessment of housing and employment needs that underpins both the adopted Hastings Planning Strategy and Rothers adopted Core Strategy.

- 7.1.4. Cllr Chowney also confirmed the particular challenges facing Hastings in preparing its Plan – for regeneration and renewal, housing and employment growth, provision of affordable homes, but also for the conservation and enhancement of the Borough's many Listed Buildings and other Heritage Assets and its Natural Environment. The Council has not shied away from those difficult decisions and is acutely aware that in looking to plan positively and allocate land to meet the levels of growth set down within the Strategy that a number of individuals and organisations clearly feel the Council has been too positive in its approach. That there is, in effect, too much growth planned - some of these individuals have made their views very clearly known at these Hearing sessions. However within a tightly constrained Borough such as Hastings and with objectively assessed housing needs accepted as being substantially greater than we are able to accommodate whilst also complying with National Policy there needs to be taken every reasonable opportunity to grow the Town. And with only limited opportunities for growth as acknowledged in the Inspectors report on the Planning Strategy (paragraphs 54 and 56 of his 2013 report, Library reference HBC/DMP/25) we believe that the Plan is thus positively prepared in accordance with the Framework and meets the test of soundness in that respect.
- 7.1.5. Whilst some have objected to certain allocations proposed within the Plan most have not been able to suggest feasible alternatives to help us meet especially our housing and employment needs. Those wider responsibilities and duties however clearly remain with the Council as set down in the legislation and the Framework . In planning positively to meet these levels of growth the Council has undertaken a very wide and comprehensive Strategic Housing Land Availability Assessment (SHLAA) exercise. All SHLAA sites selected represent a positive approach between the Council and those owners/agents who have put forward land for consideration – however those many landowners who are thus in support of the Plan rarely attend to participate in Hearings of this nature. All of those sites now selected and proposed to be allocated for development do, however, represent a significant amount of positive work between the Council, landowners and their agents, business groups, as well as with a multitude of statutory and other consultees such as neighbouring Authorities, the Highway Authority (ESCC), Environment Agency and Sea Change to name just some. All of this confirms the Council's commitment to a Plan led approach in seeking to plan positively to meet, and on some sites to exceed, the yields for new homes and employment space provision set down in the Strategy.
- 7.1.6. The Statement submitted by ESCC to this examination supports the fact that a huge amount of positive planning and joint work has gone on to help deliver this Plan – together with a clear indication of the positive approach bearing fruit. This is exemplified by many cases and sites now coming forward or under construction. Particularly at the strategic level through the Bexhill - Hastings Link Road, where work now on the ground or agreed to be funded, to ensure timely delivery of necessary infrastructure to support sustainable growth is evident. This in turn will help support the housing and other growth in the DMP and deliver other sites

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allocated within the Plan – again evidenced by the application now submitted but as yet undetermined in respect of a Queensway Link Road and associated employment allocations from the DMP at Policy LRA7 and LRA8.

- 7.1.7. Whilst some sites put forward for consideration have not been selected – and understandably may have led to objections from those landowners that the Plan provides for too little growth, these have not been put selected in the DMP for good reasons and where clear justification for their non-inclusion is set out in the Councils evidence base. Their exclusion is not in the Council's submission any evidence that its Plan is not positively prepared.

Justified

- 7.1.8. As an integral part of identifying suitable land sufficient to meet the housing and employment needs of each identified Focus Area as well as for each Site Allocation the Council developed and consulted upon its SHLAA methodology prior to inviting interest from any landowner who wished their land to be considered for development .The SHLAA itself which is published on the Council's website as part of our evidence base was a comprehensive and Borough wide exercise to ensure that there was an adequate pool of potentially available land from which to test, asses and ultimately choose site locations for the Plan purposes. The SHLAA has been kept up to date to accommodate late requests from landowners and to reflect interest from applications – the last published SHLAA update being July 2014.
- 7.1.9. Each of the parcels of land put forward was subject to a rigorous appraisal including assessment by Building Control officers to assess the suitability of ground conditions, to a landscape assessment/appraisal process undertaken by an external specialist, and where appropriate by reference to ecological surveys. The sites were then assessed for capacity (i.e. the potential numbers of housing units that might be delivered) by planning officers and from further consultation and discussions with housing and development management colleagues. These discussions were also informed by planning histories of the sites in question, by information offered by landowners and agents in pre-application discussions and in some instance where a Planning Forum to precede an application had taken place.
- 7.1.10. The whole Plan, together with its site allocations has also been subject of viability testing by NCS consultants to ensure deliverability/viability of any sites selected. This work which has been submitted as part of the evidence base and is referred to in our response on Matters 2 and 3 has confirmed the viability of both the Plan and of the site allocations within it (Library reference HBC/DMP/164). In tandem with this exercise the Plan, its Policies and site allocations were also the subject of detailed Sustainability Appraisal work, as required of the Regulations and 2004 Act (as amended). This assessed the whole Plan and its individual elements, i.e. Policies and site allocations, against a number of adopted sustainability indicators (social, economic and environmental) to ensure that the most appropriate and sustainable locations and solutions could be found to meet existing and future needs. This was also done to ensure alignment with the adopted Planning Strategy and the core principles of sustainable development enshrined within the Framework. The Councils Sustainability Appraisal was carried out by UCS Library reference numbers HBC/DMP/03 and 20).

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- 7.1.11. The development and consultation upon our Infrastructure Delivery Plan (IDP) (Library reference HBC/DMP/13) with all of the key infrastructure delivery partners has also maintained a clear focus upon the justification and need for mechanisms for the provision of necessary infrastructure – particularly transport improvements – to underpin the levels of growth proposed. The IDP is a living document and will be updated as appropriate. The IDP clearly sets down the key infrastructure needed to deliver the levels of growth proposed within the DMP and sets down how and when this will be funded together with the lead agency responsible for provision. In particular the Statement submitted by East Sussex County Council confirms that capacity exists or can be provided within the transport network to appropriately accommodate the levels and locations of growth proposed within the Plan. This statement is supported by a number of transport assessments and studies carried out by or on behalf of the County Council. Rother District Council's statement provides further evidence of and support for the justification for the content of the DMP.
- 7.1.12. Most importantly the Council has set out in its Statements on Consultation (Library reference HBC/DMP/06) and on the Duty to Co-operate (Library reference HBC/DMP/10) the huge amount of effort and resource that has gone into seeking views on its Plan, testing and re-testing these through rounds of informal and focussed consultation in 2012 and then through not one but two rounds of inviting formal representations – in 2013 and 2014. Within the DMP at pages 268-278 at Appendix D are set out the significant changes to the Plan, together with the reasoning for the change, that have arisen as an integral and iterative part of the process. The Council has also published a schedule of minor modifications to the Plan (July 2014, Library reference HBC/DMP/04) to correct minor factual errors and in response to comments received.
- 7.1.13. In conclusion the Council considers that the Plan together with its supporting text, proposed content, Policies and site allocations are clearly justified by its submitted and extensive evidence base.

Effective

- 7.1.14. The purpose of the Development Management Plan (DMP) is in essence to deliver the spatial vision, objectives and levels of growth set down within the adopted Planning Strategy and which is in compliance with the Framework having been found sound, subject to modification, following examination. In particular but not exclusively will it prove effective in delivering the levels of housing and employment growth set down in that adopted document, in regenerating the Borough whilst also conserving the Historic and Natural Environment as is consistent with and required by the Framework.
- 7.1.15. We consider that the Plan is clearly effective in this regard. As testimony to this statement we are able to cite a significant number of examples where there is clear evidence on the ground of the effectiveness of the Plan through delivery and developer interest as well as through regeneration initiatives such as the restoration now well advanced of Hastings Victorian Pier, and through Government and other funding support (SELEP) for implementation of key elements of the DMP. Perhaps

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at the most strategic level is the example of the work now underway on the Bexhill - Hastings Link Road (BHLR) which is referred to in some detail in Mr Jon Wheelers' statement on behalf of East Sussex County Council. This key element of infrastructure underpins the Strategies of both Hastings and Rother and represents the culmination of much joint effort, joint strategic objectives, and positive planning over many years – particularly engaging the East Sussex County Council (ESCC) and Government, Hastings Borough and Rother District. This key transport artery will help unlock and ensure effective delivery of much of the growth potential now allocated within the DMP for regenerative and employment growth and in particular the employment allocations within the Queensway Corridor Enviro21. The road itself has received significant central funding support together with substantial monies from ESCC and helps deliver key Strategic Objectives from the Planning Strategy which are now taken forward in the detail of the DMP. For example Planning Strategy Objective 1 (Achieve and sustain a thriving economy) criterion 1i) which talks of allocating and protecting employment land at e.g. Queensway Employment Corridor, Castleham, and Ivyhouse Lane. These objectives are followed through in the DMP by specific Site Allocations and Policies LRA6, LRA7 and LRA9 - two key sites - LRA7 and LRA8 are now subject of an application having successfully bid for funding through the Local Enterprise Partnerships Growth Deal. Other proposed allocations in the DMP at Ivyhouse – Policies HOV11 and HOV12, together with supportive representations as attached to the Council's Matter 3 statement confirm the Council's confidence in the effectiveness of the Plan to deliver.

- 7.1.16. Within the supporting Statement to the Council's Matter 3 (Appendix 1 of HBC/5) from Mr John Shaw of Sea Change, together with those views and information submitted by ESCC and Rother District Council are a number of other examples of schemes that show delivery of key elements of the Strategy through the DMP. Mr Shaws' statement also identifies the continuing success of Sea Change in the delivery of the office accommodation provided in the allocation at Priory Quarter (Policy FA3 of the Planning Strategy).
- 7.1.17. In addition to effective delivery of employment and infrastructure many of the proposed housing allocations have shown recent and keen developer interest in bringing forward investment and delivery of much needed homes, including provision of affordable homes. This level of investment interest further confirms the effectiveness of the Plan and the work undertaken by the Council on choosing the best available and most deliverable/viable sites. Many of these specific examples have been referred to in the Council's detailed submission on Matter 2 Housing (HBC/4) and within the site specific responses and considerations in respect of Matter 5 (HBC/8(a-c) and HBC/10(a&b) and in which we show that there is more than a realistic prospect of delivering the estimated capacities to deliver houses as set down within the Focus Areas and within Site allocations. Our Matter 5 submission concludes in Matter Statement HBC/10(b) that in respect of meeting the required Strategy figure of "at least 3,400 homes" over the Plan period that this number will be likely to be exceeded by some 15%.
- 7.1.18. A number of key examples of the effectiveness of this Plan that we believe are embodied within the work underpinning the DMP include the current state of play on land at the former West St Leonards Primary School (Policy FB2) where a Planning

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Forum was held as recently as 2nd October 2014 and where an application is expected shortly that can deliver the 120 housing units expected. On land allocated at Holmhurst St Mary (Policy LRA1) early discussions with prospective applicants have indicated that a potential yield, subject to planning permission, of up to 25% in excess of that suggested within the DMP might be possible. On the site allocated at Gambia House (Policy MBL3) it is also expected that yields could substantially increase based upon most recent discussions. Whilst it is acknowledged that when some sites are finally approved and delivered through the due application process yields can also reduce. Our experience and firm belief is that overall these will be likely to increase. More detailed evidence for this is set out in the individual site allocations assessments and updates referred to in the Council's submissions on Matter 5 (HBC/8(a-c) and HBC/10(a&b)). Indeed on some allocations e.g. LRA3 the Council has been more than cautious in its assessment of yield and where this 1.86ha site has only been given an indicative yield of 10 units.

- 7.1.19. In looking at the effectiveness of the Plan we have in our response at Matter 1 (HBC/3) to the Inspectors question of securing stronger and more explicit wording to reflect the primacy of the Development Plan (paragraph 1.4.1-1.4.3) confirmed that the Council is happy to propose some alternative and additional wording to reflect this suggested approach. We also recognise, and reflect in our Matter 1 response the need to ensure that as many Policies as possible can be framed positively to promote sustainable development but also acknowledge the need for Policies of restriction where appropriate (Matter 1 – paragraph 1.4.4-1.4.6). We have formally requested that the Inspector consider this matter when he is framing any main modifications that he considers may be necessary to the DMP (HBC/2).
- 7.1.20. The overall effectiveness of the Plan must therefore also be looked at in light of those other Policies which seek to restrict growth where justified and to protect designated Heritage Assets and the Natural Environment. At Matter 4 (HBC/6, paragraphs 4.1.16 and 4.1.17, and at 4.2.7) the Council has set out its response to why we consider that the general Guidance Policies in the DMP together especially with those that seek to protect and enhance the Natural and Built Environment are needed and will be effective in their application. We also set down within each site allocation the Policy criteria that we believe are necessary to ensure that whatever the allocated use that we achieve a high quality of development that appropriately respects the character of the surrounding area and provides appropriate protection and or mitigation in respect of heritage assets and the natural Environment. These criteria within the Policies also take account of the need for, for example, provision of transport studies, ecological studies and others where considered to be necessary and of relevance to the development of the site in question.

Consistent with National Policy

- 7.1.21. Within the Inspectors report on the Planning Strategy (Library reference HBC/DMP/25) the Inspector confirmed at paragraph 133 that in his assessment of Legal compliance and that, in respect of National Policy "The Planning Strategy complies with national policy except where indicated and Main modifications are recommended". The Council had requested the Inspector to recommend any Main Modifications which he considered were necessary to make the Plan sound .Following receipt of his report all main modifications recommended by the

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Inspector have been incorporated. For the purposes of this examination and similarly, the Council has formally requested the Inspector to recommend any main modifications which he may feel necessary to make the Development Management Plan sound.

- 7.1.22. The Development Management Plan now sets out those detailed Policies and site allocations to deliver the Strategy. Within the Council's submitted responses to Matters 1-6 we have highlighted numerous examples of supporting text, Policies, and Allocations which clearly align with and deliver the Strategy and are, in the Council's submission, consistent with National Policy. We have shown within our Plan how and where we address the three key dimensions of sustainable development as set down in paragraph 7 of the Framework – an **Economic** role – through the allocation and delivery of sites and jobs as referred to at Matter 3 – together with provision of key infrastructure to support this. A **Social** role – particularly through the allocation of sufficient land to “at least” meet the housing requirements of provision of the numbers of homes set down in the Strategy. This approach is articulated in the Council's Matter 2 response and within Matter 5 in respect of individual sites and where we can show that we believe we will exceed the overall Strategy figure by some 15%. And finally an **Environmental** role where, through appropriate designations of Heritage assets and those affecting landscape and wildlife matters, together with appropriate policies, we show how we intend to continue to protect and enhance our natural, built and historic environment.
- 7.1.23. These three key roles of the Plan, when taken together as we are advised in paragraphs 8 and 9 of the Framework help provide for the creation of jobs, widening the choice of high quality homes, including the provision of affordable homes, promoting good design, and securing biodiversity gains. Appendix A to this submission is a statement from Mr P Canavan, formerly with the Borough Council, confirming both the overall approach and his professional view on the Soundness of the Plan.
- 7.1.24. Although allocating land for development is challenging within a tightly constrained Borough with a rich built heritage and many natural environmental assets and designations, we have positively sought opportunities to meet the development needs of the area as required by the Framework. In some instances this has caused objection to proposals from some on grounds of too much development whilst others have argued for yet more development.
- 7.1.25. We have embodied the core principles of sustainability in the Plan through a rigorous process of Sustainability Appraisal. This has enabled us to meet the Core Planning principles set down within the Framework at Paragraph 17 – namely that Planning should be Plan led (as evidenced by the Planning Strategy and the detail set down in the Development Management Plan to deliver it). Further examples of the core principles that have been taken on board in preparing the Plan include taking into account the different character of areas and promoting the vitality of the main urban areas. This is shown in the Plans overall spatial approach to identifying Focus Areas and looking at the protection and role of Local and District Centres. We have shown in the Plan our desire and commitment to drive and support

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economic development to deliver homes, business and industrial units together with the supporting infrastructure to underpin that growth.

- 7.1.26. In conclusion we believe that we have delivered a Plan that is appropriate for the area. Appropriate when considered against the reasonable alternatives, to deliver our Strategy and that is consistent with National Policy and guidance. Some representations have sought, via this examination, to exhume arguments already considered at length and rejected as part of the examination of our Planning Strategy. In particular this has been through repeated arguments about housing needs and requests for re-consideration of certain omission sites.
- 7.1.27. The Council would draw attention to Paragraph 80 of the Inspectors 2013 report which concludes that: *“in view however of the importance of the environmental assets which give the Borough its unique character and which should be protected, the Planning Strategy provides for as much housing as is consistent with the policies set out in the Framework, and in the right places. In this respect it is sound”*.
- 7.1.28. In the Council’s submission there has been no change in National Policy since this date to alter the clear reasoning and conclusion behind this statement and the DMP, together with the Council’s responses to Matters raised have shown how and where it will deliver the Strategy. Indeed in respect of these continued arguments about housing figures in the DMP as recently as October of this year no lesser authorities than the Communities Secretary and the Planning Minister confirmed that “The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered in drawing up a Local Plan”. The Council considers its Plan to be consistent with this approach and thus meets this final test of soundness.

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Appendix A – Statement from Mr P Canavan

Statement by Peter Canavan, Senior Planning Policy Officer, South Oxfordshire District Council

Relevant experience

Qualifications:

BA (Hons) Geography – University of Leicester – 2008
Msc Town Planning – Anglia Ruskin University – 2011
Licentiate member of the Royal Town Planning Institute

Position held at Hastings Borough Council (HBC): Senior Planner (Policy)
Length of employment at HBC: Sept. 2011 – Jan. 2014

Current employment: Senior Planning Policy Officer at South Oxfordshire District Council (SODC).

The majority of the time I spent working at Hastings Borough Council was spent coordinating the production of the Development Management Plan. This work included gathering and assessing evidence, community engagement and drafting the document. My work also included the development of the Local List initiative at HBC.

I was closely involved in the development of the Core Strategy, including defending parts of its contents at the examination hearings in 2013.

My work at SODC is focussed on the review of the Core Strategy adopted in 2012 in order to produce the Local Plan 2031. This work has included in depth assessments of what constitutes the objectively assessed housing need and how to engage in the challenge of delivering unmet housing need from neighbouring authorities through the duty to cooperate; as part of this I appeared, on behalf of SODC, in support of the Cherwell Local Plan at the examination hearings in June 2014.

My work at Hastings Borough Council in the creation of the Development Management Plan

It was important that the creation of the Development Management Plan (DMP), as a document fully produced in the post National Planning Policy Framework era, took on board its messages of positive production and delivering sustainable development. This was something that I was keen to help achieve in Hastings and I believe that the DMP includes sufficient detail and flexibility to do it.

From the outset, the DMP was intended to be a positive and accessible document. The objective was to create a plan that identified solutions to challenges. It was also important that the policies in the plan could be used to understand the root cause of any issue; be that design, access or amenity for example, rather than repeat these issues in a number of similar circumstances. Previous "Development Guideline" policies were grouped together to help aid understanding of what the policy is for. This can be seen in the table of superseded policies, for example policies for gas mains and power lines were grouped under "hazards" because the policy is to protect people from harm, and not necessarily that power lines and pipes need different considerations. In the Local Plan 2004 there are a number of policies for the location of employment (E4, E5, E6, E8 and E9) but what these all relate to are appropriate design and access and that they do not unnecessarily impact upon their neighbours (amenity), so it is felt that separate policies are not

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Appendix A – Statement from Mr P Canavan

required and that it should not matter what the application is for, employment or residential, as long as it is appropriate to its location then the considerations will be the same. There were also separate policies for security shutters DG15 (relating to primarily to design) and early years education CN7 (relating to design and access) that did not serve any additional purpose than to suggest that for each situation the same issues of design were important. Using the redrafted design policy, together with the spatial portrait and consideration of heritage assets as appropriate, brings both the applicant and the council to the full understanding of the implications of design, irrespective of the nature of the application.

The Council accepted, through the Core Strategy submitted evidence, that there was an identified high level of need for homes in Hastings. The Core Strategy and its examination also made it clear that the borough was tightly constrained and that the full need was not going to be met and this fact was accepted by the Inspector in his final report to the Council following examination. Nevertheless the Council endeavoured to plan for as much as was sustainable and achievable. The Development Management Plan meets that challenge by identifying a range of sites for the delivery of housing, but I was also keenly aware that there are important elements of the places that make up Hastings that need to be protected; the green spaces, the historic buildings and monuments for example, that make up the character of Hastings.

We embarked upon the task of adding the detail to the strategic policies of the Core Strategy to understand what “sustainable development” means in Hastings. Evidence was collected to aid in the assessment of those places able to accommodate growth across Hastings. Important green spaces were identified along with heritage assets, and policies were drafted to help protect them. We also wanted to know what was important to the community of Hastings.

I ran a particular workshop in January 2012 as a launch for the DMP. The aim for this workshop was to find out what the community thought was *good enough for Hastings?* Other important outcomes from these workshops were the creation of networks for information sharing. It was the first time that I met a number of people who became very familiar to me over the next couple of years and their comments were taken on board and as appropriate reflected in the DMP as it developed. We made amendments to a number of allocated sites as a direct result of this community engagement (e.g. Off London Road around “Speckled Wood” and increased detail for Robsack A and Grove School).

I held regular discussions with elected members at the Council, particularly the portfolio holder for planning, and chair of the planning committee, in a two way flow of feedback about regulation change, the reaction of the community and exchanges of ideas about what should be included in the DMP. One outcome of these discussions was the “spatial portraits” for the focus areas and how these could be used as a reference tool to demonstrate what was important about each area and to highlight some of the things that developers should consider if they intended to present an application for development.

As it became clear which sites were the most appropriate and achievable and were likely to be included in the DMP as development allocations, opinions were sought from service providers and utility companies. The information that we received from these parties was included in the Infrastructure Delivery Plan, alongside the assessed infrastructure need identified through the creation of the Core Strategy. As we included more detail into the DMP we spoke further to utility providers about how they perceived the servicing of sites could be delivered. This was one of the reasons we moved to include site specific policies in the revised submission version of the DMP, for example Southern Water advised us that there was a need for particular water infrastructure in certain locations. This demonstrates how we identified positive solutions to issues faced by development and it will aid its delivery.

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Appendix A – Statement from Mr P Canavan

Conclusion

I am of the firm professional opinion that the resultant document has policies that have been developed and are framed in a positive manner; they do require justification (the making of a case) for design etc from developers, but not necessarily the burden of unachievable standards, that can then be properly considered by the Council and challenged as appropriate. If an application has the required detail and an evidenced and compelling case can be made, having considered what we think is important about Hastings, then it ought to be good enough to be granted permission.

I believe that the importance of sustainable development is clearly articulated through the DMP and that the protection of the environment, social equity and economic viability are all appropriately balanced. The overall vision from the Core Strategy is delivered in the DMP and, as set out earlier in my statement, both documents (the Strategy and the DMP) comply with the objectives and guidance set down in the National Planning Policy Framework.