

# Explanation of Housing Evidence

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## Introduction

1. This paper documents the evidence that has been prepared either by or on behalf of the Council to support the housing policies in the submission version of the Hastings Planning Strategy. In particular, it highlights the role of:
  - The evidence that steered the Council away from seeking a strategic housing allocation on land at Breadsell;
  - The Sustainability Appraisal in appraising a housing growth figure higher than the South East Plan requirement;
  - The role of the Strategic Housing Land Availability Assessment in influencing the estimated distribution of future housing development in the Plan's Spatial Areas;
  - The degree of reliance placed on the windfall allowance;
  - The Council's approach to meeting affordable housing requirements; and
  - The 5-year housing land supply; and the inclusion of a 20% buffer.

## Evidence to support Housing Strategy

### Land at Breadsell

2. The Core Strategy Preferred Approaches Document 'Shaping Hastings' which was published for consultation in summer 2008, identified a major greenfield site at Breadsell, in the northwest part of the Borough. (Sometimes referred to as Breadsell Farm or Breadsell Lane). This had estimated potential to provide up to 1000 new dwellings - approximately 200 in Rother District and 800 in Hastings Borough. Natural England (NE) - the Government agency with responsibility for wildlife and landscape conservation, strongly objected to the identification of the Breadsell area for housing development. Their main concern was the potential impact on the adjacent Marline Valley Woods Site of Special Scientific Interest (SSSI), and particularly how this might affect the rare bryophyte populations associated with the Marline Stream. As a result of NE's objection, the Council subsequently undertook both design and impact studies agreed with Natural England to determine feasibility and scope for mitigation of development in this location. The principle landowner was given copies of this information.
3. In March 2010 the outcome of this additional work was reported to HBC's Cabinet<sup>1</sup> and the decision taken not to proceed with the inclusion of this strategic site in the now 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 (Natural England letter 28<sup>th</sup> Jan 2010).
4. In February 2012, the principle landowner at Breadsell submitted to Natural England and to both Hastings and Rother Councils, a Surface Water Strategy (dated 17<sup>th</sup> Feb 2012) addressing the concerns raised by NE. Again NE has responded to this report and re-asserted that their objection remains. The Council has shared NE's response with the landowner (Natural England letter 10<sup>th</sup> April 20102). A list of all the relevant documentation relating to the Breadsell site is appended to this paper (appendix A).

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<sup>1</sup> Cabinet Paper, 1<sup>st</sup> March 2010 "Hastings Local Development Framework"  
[http://www.hastings.gov.uk/decisions\\_democracy/council\\_meetings/meetings/](http://www.hastings.gov.uk/decisions_democracy/council_meetings/meetings/)

## Testing a higher housing growth figure

5. In developing the Planning Strategy up to the “Preferred Approaches” stage, which was the subject of public consultation in 2008, the Council had been working to a housing provision figure of 4,200 net new dwellings between 2006 – 2026 which equates to 210 dwellings per annum. This housing provision figure is set out in the Regional Spatial Strategy (RSS) – the South East Plan (SEP).
6. Following the Government announcement in 2010 of their intention to revoke RSSs, the Council undertook a further round of informal consultation on the emerging Hastings Planning Strategy in order to seek views on a revised locally derived housing growth figure, and other modifications the Council wished to introduce to the Planning Strategy. This further round of informal consultation was carried out in 2011.
7. The earlier 2006 Hastings & Rother Housing Market Assessment, had considered trend-based population growth (paragraphs 10.12-10.14) against the housing proposals put forward in the South East Plan. Whilst the substantial difference between the two sets of population growth figures was acknowledged, the document, together with the 2009/10 Hastings & Rother Strategic Housing Market Assessment Update, concentrated on and considered in much greater detail the implications of the planned rate of housing growth set out in the South East Plan. This is because the South East Plan remains effective and a statutory part of the “development plan” with which the Hastings Planning Strategy must generally conform.
8. The Council however, has undertaken further work with regard to a locally determined housing target, and whilst the evidence underpinning the preparation of the South East Plan provides the foundations, the Council has supplemented this through further examination of more recent information in order to determine the most appropriate level of housing growth, drawing on the evidence presented in the Hastings & Rother Employment Strategy and Land Review (2008) and the 2011 update, the Strategic Housing Land Availability Assessment and Annual Monitoring Reports.
9. The Hastings Local Development Framework – Core Strategy Informal Consultation document (now known as the Local Plan Planning Strategy) set out the Council’s recommended housing provision - 3,418 dwellings or 201 units per annum over the period 2011-2028. The consultation document also presented 2 other housing growth scenarios – a higher than South East Plan figure and a lower growth figure. The background paper “Future Housing Provision in Hastings, 2011” which is at Appendix A of the 2011 consultation document, sets out in detail how we arrived at our recommendation. A Sustainability Appraisal to determine the likely effects of each scenario is also set out at Appendix B of the consultation document, and has been incorporated into the May 2012 Sustainability Appraisal Report which accompanies the submitted Planning Strategy.
10. In addition, a separate background paper – An Assessment of Housing Need in the Hastings & Rother Housing Market Area May 2012, sets out how, at the strategic level, we have also taken into account planning for housing

development across the Hastings and Rother Local Authority areas, which together constitute a single housing market area.

11. Following the summer 2011 consultation, various issues arose with a bearing on the level of housing growth to plan for, including the publication of the then draft National Planning Policy Framework (NPPF) which introduced the requirement for a 20% contingency on top of the 5-year housing land supply requirement. However, the preferred level of housing growth set out in the Proposed Submission Version of the Planning Strategy, May 2012, remains a medium level growth figure of 3,400 or 200 units per annum from 2011-2028. This is virtually the same figure proposed under the medium scale growth scenario in the 2011 consultation document and provides for the most sustainable level of housing growth.

## **The Spatial Areas and Housing distribution**

12. Policies FA1, FA2 and FA5 of the Planning Strategy set out the likely level of new housing that could come forward in each of the constituent planning focus areas. This breakdown is derived from development in the pipeline (sites under construction, with planning permission or already completed), potential new sites, estimates regarding the level of small site windfalls expected later in the Plan period, and from the return of long term empty dwellings back into use. Most of this information is derived from the SHLAA and all of these sources are expressed as (or incorporated into) the totals in Table 1 of Chapter 4: Development Strategy of the submission Planning Strategy. Figure 1 attached to this paper (at Appendix B) shows SHLAA sites in relation to the 3 Spatial Areas – Western, Central and Eastern.
13. Figure 1 illustrates the potential distribution of housing sites (identified in the SHLAA) but is not intended to pre-empt the Development Management Plan, through which housing allocations will be determined. It is an indication of what we consider to be deliverable / developable based on the SHLAA work. It is for this reason that the levels of housing development in Policies FA1, FA2 and FA5 are expressed as a range. The quantum set out in FA1, FA2 & FA5, is based on the best information available at the time, involving the sources identified in the above paragraph. An additional calculation of plus and minus 10% has been added to each Focus Area figure to reflect the possibility that slightly more or slightly less housing development may come forward as a result of delays to individual site development, lower than expected unit numbers, or new large sites (6 of more dwellings) not previously identified in the SHLAA, coming forward. As work on the Development Management Plan progresses this may result in some adjustments to the numbers and proportions set out in each of the three Spatial Areas. These adjustments will be acceptable provided they do not diminish the overall growth figure. The upper end of the range is not intended to represent a cap on housing development in a Focus Area, and meeting only the minimum end of the range will mean that this will have to be off-set by providing more in other Focus Areas.
14. The Regulation 18 Development Management Plan consultation documents illustrate how the distribution figures contained in FA1, FA2 & FA5 are being taken forward. They also introduce 8 new sites, not included in the SHLAA 2011 update.

## Windfall Evidence

15. Past rates of delivery from windfall development have been strong, and based on research we expect it to remain so. However, in line with earlier guidance, which cautioned against inclusion of a windfall allowance in the first 10 years of the Plan, no allowance for windfall development has been included in the first 10 years. No allowance at all for 'large' windfall sites (i.e. of 6 or more dwellings) has been made on the basis that we have assessed the potential for such sites to come forward through the SHLAA, and would anticipate allocating sites of this size in the follow on Development Management Plan. This does not pre-empt the possibility of further large sites coming forward during the Plan period. Any such sites would still become part of the identified supply when they gain planning permission.
16. The Council has taken into account the potential for new dwellings arising from small windfall sites – those of only 5 or less dwellings – but only for the last five years of the Plan period (i.e. 2023/24 – 27/28). A rate of 40 units per annum has been assumed, although past rates of delivery suggest this figure could be higher, although some discounting has been applied to reflect the likelihood that in a small Borough such as Hastings certain windfall sources/opportunities may begin to diminish over time. Information on past rates of small site windfall development is contained in the Council's Annual Monitoring Report. Analysis of both the location and source of windfall development has shown that small site windfall schemes are more prevalent in certain parts of the Borough where the built stock lends itself to conversion and change of use<sup>2</sup>. This is reflected in the distribution figures contained in Policies FA1, FA2 and FA5, where certain Planning Focus Areas are expected to yield a higher rate of small site windfall development.
17. In reality small site windfall development is likely to occur across the whole of the Plan period. This potential additional supply can be seen as either increasing the total amount of house building, and/or as a contingency if allocated sites do not come forward as planned for any reason.

## Meeting Affordable Housing Requirements

18. New housing can also contribute to meeting the needs of people who currently cannot afford their own home or who are homeless. Policy H3: Provision of Affordable Housing, has been developed in conjunction with the economic viability work undertaken in the Housing Sites Viability and the Impact of Affordable Housing report March 2011.
19. A Housing Need Survey (HNS) was undertaken in 2005. This identified shortfall of a affordable housing of 596 affordable homes per annum in Hastings. This is almost 3 times the rate of annual house building proposed in total. The 2009/10 SHMA update indicated that there was little reason to believe that the number of households expressing a preference for public sector housing is likely to have declined in the intervening years. This is evidenced by the number of people on the housing register, currently there are 2,392 (March 2012) people on the housing register, the equivalent figure in the SHMA for 2008 was 2,180. Whilst housing officers advise that many

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<sup>2</sup> Our analysis indicates that conversion or subdivision of existing dwellings, together with the change of use of non-residential buildings such as shops and former care homes for example, are amongst the strongest sources of small site windfall developments.

households on the housing register are in existing affordable housing, and are looking to transfer to more suitable or better situated properties, there is a clear need for as much affordable housing as can realistically be developed.

20. In considering the scale of need, relative to the amount that is likely to be provided in association with new development, there is little prospect of all the need identified being satisfied through the planning system. In part this is because to meet this level of need through the planning system would require house building rates not seen in Hastings even in the most buoyant of times. Furthermore, if planning policy requirements for affordable housing are set too high, this will act as a deterrent to new development and both the output of new market housing and affordable homes will fall below desired levels. The Council, therefore employs a number of methods to help address affordable housing needs, including improving the existing housing stock through grants and loans, home ownership initiatives, assisting households to access the private rented sector and bringing empty homes back into use.
21. Moreover, the Council recognises, and addresses through core policies, the pressing need to improve local incomes through job generation and economic diversification. This is equally vital and complementary to initiatives designed to improve the supply of affordable housing. Therefore, it can be seen that the Planning Strategy, through a range of policies measures, including economic growth ones, will contribute significantly to meeting the need for affordable housing.

### **The five-year housing land supply plus 20%**

22. Policy DS1: New Housing Development sets out our overall housing target over the Plan period. A five year housing supply is identified and is based on an assessment of deliverable sites. It includes an additional buffer of 20% (moved forward from later in the plan period) in view of past records of under delivery as required by the NPPF. Although we recognise the impact of the current economic downturn which began in 2008, and the impact this will have had on housing delivery in Hastings in recent times, even during more buoyant times delivery has fallen short of statutory plan targets. Thus average annual delivery over the last five years has been 192 units compared to the South East Plan requirement of 210 units, looking back a further five years this average increases to 270 units but again this falls short of the 300 units per annum set out under the East Sussex County Council Structure Plan
23. Housing completions will be reported on in the Annual Monitoring Report, and over time we will review the necessity of maintaining a 20% buffer. For the purposes of the Planning Strategy Examination the Council is content to include a 20% buffer.

## Appendix A – Documentation relating to Breadsell Lane Site

- (1) Natural England response letter dated 3<sup>rd</sup> July 2008 to the Local Development Framework Preferred Core strategy Preferred Approaches consultation document, 2008

### Summary of Studies Undertaken For Breadsell site

- (2) Concept Masterplan Spring 2009  
2 options showing indicative site layouts and development zoning with landscaping:  
Plan ref Concept Masterplan Option 1 13037-Sk-2a  
Plan ref Summary Concept Masterplan Option 1 13037-Sk-4  
Plan ref Concept Masterplan Option 2 13037-Sk-3  
Plan ref Summary Concept Masterplan Option 2 13037-Sk-5
- (3) Visitor Survey August 2009  
SSSI is used daily by small amounts of visitors. About 150 visitors per week, mostly dog walkers from adjacent housing estates. With the new development may rise to 250 per week. Considered unlikely that the potential increase in visitor numbers will have a negative impact on the site. Need strategies to prevent access in certain places
- (4) Sustainable Urban Drainage Systems extra information Sept 09  
Provides extra information on the types of SUDS which may be suitable for the scheme
- (5) Additional woodland planting Sept 09  
Revised site layout map produced with extra buffer zones  
Plan Ref Concept Masterplan Option 1 13037/Sk/2a 12/07/2009
- (6) Bryophyte Survey Sept 2009  
The study area is not healthy as habitat for Bryophytes. Factors causing concern include: poor water quality arising from some outflows from neighbouring residential estates and farming activity; iron bacteria development; low light levels due to fallen coppice from the 1987 great storm; visitor pressure - but concentrated at access points; rubbish dumping – garden waste from the housing estate
- (7) Hydrogeological Survey Dec 2009  
Found that, ' the hydro-environmental supporting conditions for the conservation interest features within MarlineValley Woods SSSI appear (at least in part) to be water quality and quantity dependent. In the absence of further information on these supporting conditions, a precautionary approach is required, where any development will need to maintain the current pattern (spatial and temporal variation) of surface water and groundwater fluxes across the SSSI boundary, in terms of quality and quantity to maintain the hydrological status quo'. It then went on to state that a significant programme of works would be required to characterise the hydrological regime of the site in detail so that any subsequent design could be shown to maintain the hydrological status quo. To get a basic understanding would require the results of one full year of monitoring, but at least three years monitoring would be required to develop a sufficiently refined understanding to enable detailed design of the hydrological aspects of the development.

- (8) Natural England letter dated 28<sup>th</sup> January 2010
- (9) KLV covering letter 24<sup>th</sup> February 2012 enclosing the following documents:
  - 08-108-05 Revised Masterplan
  - 08-108-06 Location plan (A3)
  - 2196-RE-01C North West Hastings Landscape and Visual Appraisal
  - Colin Simmons Land West of Marline Valley Phase1 Report
  - Surface Water Strategy Breadsell Lane version B
- (10) Natural England letter dated 10<sup>th</sup> April 2012