

Hastings Local Plan The Hastings Planning Strategy - Addendum to Statement of Consultation

Regulation 22(1) (c) of the Town & Country Planning (Local Planning)
(England) Regulations 2012

August 2013

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Introduction

This report has been prepared as an addendum to the Consultation Statement prepared and submitted as part of the Hastings Planning Strategy Examination in Public. It provides an update on consultation undertaken since the Examination began and has been prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The earlier Consultation Statement (October 2012) is available to view or download from our website at

http://www.hastings.gov.uk/environment_planning/planning/localplan/planningstrategysubmission/consultationstatement/.

Consultation on the Planning Strategy Main Modifications

The Hastings Planning Strategy was submitted to the Secretary of State on 31 October 2012. During February 2013 the Government appointed Planning Inspector; Mr Richard E Hollox BA(Hons) BSc(Econ) MPhil FRTPI FRICS, examined the Planning Strategy at 6 public hearings. As a result of these hearings and other issues arising, the Council undertook further consultation concentrating on 3 key elements known collectively as the “Main Modifications Consultation”: These elements were:

- a) Significant changes to the Planning Strategy (also referred to as Main Modifications) needed to help ensure the Plan is found “Sound” and “Legally Compliant” by the Inspector
- b) The revocation of the South East Plan, and how this affects the Planning Strategy
- c) New Government demographic household projections

The Main Modifications consultation ran for 6 weeks between 20 May and 1 July 2013. The consultation document is available to view or download from our website at

http://www.hastings.gov.uk/environment_planning/planning/localplan/proposed_main_mods/.

Legislative requirements

Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires us to submit a statement setting out:

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make representations under regulation 18,
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) how any representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in regulation 20, that no such representations were made;

Representations made in respect of the Main Modifications consultation were made pursuant to regulation 20. This report therefore, focuses on criteria (v) and (vi) only. For details of all other consultations, please refer to the earlier Consultation Statement, mentioned above.

Hastings Planning Strategy Main Modifications

Process and publicity

Consultation on the Proposed Main Modifications ran for 6 weeks between 20 May and 1 July 2013. It was advertised in advance using a variety of methods, including

- Hastings Borough Council website – front pages, planning pages, Planning News
- Hastings & St Leonards Observer – advert and press release
- Hastings Voluntary Action newsletter
- Display of leaflets and posters at various locations including supermarkets, Priory Meadow, Community Contact Centre, Hastings Voluntary Action, as well as emailable versions circulated via the Town Centre Manager and Community Cohesion and Youth & Seniors Participation Officer
- A1 Seafront Posters
- Article in Hastings & St Leonards Town Centre Newsletter
- Facebook/twitter
- Letters to statutory consultees
- Local Plan Newsletter
- East Sussex Strategic Partnership E-news article

This consultation was opened up to the general public, although those already involved in the Examination process were written to directly. People were invited to submit comments either online using dedicated consultation software, or in paper form. Representations were required to be submitted in accordance with the procedures adopted for consultation under Regulation 19 (publication) of the Town & Country Planning (Local Planning) (England) Regulations 2012. Guidance notes were provided to help explain these procedures.

Representations received

46 representations were made online or through paper submissions. A compilation report of these representations was submitted to the Inspector in July 2013, and is available on our website at http://www.hastings.gov.uk/environment_planning/planning/localplan/proposed_main_mods/mainmods_representation/

A summary of the main issues raised is provided in the table below. This information was also submitted to the Inspector in July 2013 and will be considered at a further Examination Hearing on 10 September 2013.

For further information regarding the Planning Strategy Examination, please contact us using the details on the front page, or visit our website.

Proposed Main Modifications Consultation – Main issues raised

Section	Subject	Issue
Proposed Main Modifications to Planning Strategy	MM1 - Duty to Co-operate statement	<p>Should be amended to ensure assets or funds are not transferred lower than market value</p> <p>Do not consider adequate evidence has been provided to demonstrate fulfilled requirements under the Duty to Co-operate between Hasting and Rother Councils with regard to development at Breadsell Lane (since abolition of South East Plan)</p> <p>Comment recorded as support, but consider respondent to be objecting. Building land should be provided around Bexhill instead of Robsack A</p>
Proposed Main Modifications to Planning Strategy	MM2 – Presumption in Favour of Sustainable Development	<p>Exclusion of Breadsell Lane is contrary to “positive planning” and the presumption in favour of sustainable development. Removal of the site has not been justified by evidence, or a balancing exercise to compare benefits against unknown risks facing bryophytes.</p> <p>Should include statement that planning applications will be assessed in accordance with the NPPF as well as the Local Plan</p>
Proposed Main Modifications to Planning Strategy	MM3 – Development Strategy	<p>Object to housing target being lower than projected housing need. Constraints not appropriate argument to lower housing target. Target should be between 363 and 440.</p> <p>Object to statement saying 200 dwellings will be achieved through the delivery of identifiable development sites – there is a heavy reliance on windfall, which is unjustified when considered against alternatives (Breadsell)</p> <p>Argue we should remove the clause (new para 4.5) which states that adjustments to the overall housing figure for each planning focus area will be acceptable providing they do not diminish the overall level of housing proposed for that area.</p>
Proposed Main Modifications to Planning Strategy	MM4 - Development Strategy	<p>Object to windfall allowance of 35dpa over 12-year period as it is contrary to NPPF. Suggest it should be capped at 5 years</p>

		Windfall allowance has been assumed and 200 dwellings per year is not yet approved
Proposed Main Modifications to Planning Strategy	MM5 - Development Strategy	Should be a maximum target. Considers further clarification is needed regarding the table and breakdown of sources of supply. Argues some of sites will not come forward so figure should be reduced.
Proposed Main Modifications to Planning Strategy	MM7 – Sustainable Communities Policy/ renewable energy developments	Cross reference NPPF to say that permission will only be granted if benefits outweigh the loss.
Proposed Main Modifications to Planning Strategy	MM8 – Policy EN4 Ancient Woodland and supporting text	No evidence of commitment to honour policy. Withdraw Robsack A.
Proposed Main Modifications to Planning Strategy	MM9 – New environmental protection policies EN5/EN6 and supporting text	Local Wildlife Site policy and text should be redrafted – needs to recognise need to balance environmental matters with economic and social benefits of development proposals. Allow developments to proceed on sites adjacent to/in vicinity of Local Nature Reserves and Local Wildlife Site, subject to mitigation. Argue needed to be consistent with Policy E4 Policies need to be stricter (objects to all MM, although this is most relevant) Suggest amendments to policy text relating to nationally and internationally important sites, to cross reference requirements of National Planning Policy Framework. Request clause (b) be removed. Shouldn't allow any development in Local Nature Reserves. Should not place a caveat on policy. Development should not be permitted
Proposed Main Modifications to Planning Strategy	Omission	Requires replacement bowls facility – or acknowledgement of the need.
Revocation of the South East Plan	Tourism accommodation	Consider that Policy E4: Tourism and Visitors needs to be more explicit to reference changing visitor expectations and the potential need for significant expansion of existing caravan and camping sites and holiday parks, subject to environmental policies.

Proposed Main Modifications to Planning Strategy	Housing numbers	Support revocation, Development Management Plan site not approved so overall target should be 150 per annum, maximum 200.
Government household projections		<p>Object to housing target being lower than projected housing need. Constraints not appropriate argument to lower housing target</p> <p>Object to Breadsell being disregarded – unjustifiably</p> <p>Argue Borough cannot accommodate high levels of new housing.</p>