

Hastings Local Development Framework  
Core Strategy  
Informal Consultation  
27 June – 08 August 2011  
Summary Report

December 2011

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## **1.0 Summary of outcomes**

### **What was the consultation about?**

- 1.1 This was an informal consultation carried out following significant changes to the planning system since we last consulted on the Preferred Approaches in 2008. We asked people for their views on changes and new parts of the Plan.
- 1.2 The consultation was based around 3 main areas of change:
  1. How many new homes?
  2. Significant policy changes
  3. Spatial Strategy

### **How many new homes?**

- 1.3 The Government has advised that it intends to abolish the regional plan for the area (known as the South East Plan), and that when this happens it will be down to local planning authorities, like Hastings Borough Council, to determine and justify housing targets themselves. Therefore, we consulted on a locally determined target that 3,418 new homes (201 per year) should be provided in the town between 2011 and 2028 as well as providing details of higher and lower housing options.

### **Significant policy changes**

- 1.4 Changes to policies, or new policies added, since the previous consultation on the Local Development Framework (LDF) Core Strategy Preferred Approaches in 2008 - included:
  - A revised affordable housing policy
  - a policy setting out the criteria against which planning applications for gypsies, traveller and travelling showpeople accommodation will be judged by the Council
  - a policy to control the spread of houses in multiple occupation (HMOs)
  - climate change, design, flood risk, green infrastructure and biodiversity policy changes, grouped together under the heading "sustainable communities"
  - policies on planning for renewable and low carbon energy
  - a strategy to show how we could accommodate retail growth in the town centre
  - a draft infrastructure delivery plan and schedule setting out what will be needed by way of school places, doctors, open space, transport improvements etc to support the levels of growth being planned

### **Spatial strategy**

- 1.5 We divided the town into 13 planning focus areas and set out the level of development planned for in each area, up to 2028. This makes it clear where major growth and change could happen in the town.

## Who and how did we consult?

- 1.6 The consultation took place between 27 June and 8 August 2011. We made every effort to get as many responses as possible and did the following:
- The June 2011 LDF Newsletter was sent to around 600 people and organisations (including residents associations and other community groups) on our Local Development Framework (LDF) database. The newsletter included details of the consultation, where to view the document and how to make comments.
  - An early advert was placed in the Hastings Voluntary Action Newsletter of 24.05.11 - notifying readers in advance of the consultation going live
  - Early notification of the consultation was advertised on the HBC Planning Policy web pages and on Facebook and Twitter from 2.06.11 with regular updates on each site since
  - A general advert appeared in both the Hastings and Bexhill Observer issues dated 24.06.11
  - A press release was issued by the HBC marketing team which was picked up by the Argus on 30.06.11 and also run on Arrow FM on 30.06.11
  - Corporately the HBC website consultation page carried information on the LDF consultation and included a direct link to the consultation web page, and the link was available from the HBC Homepage almost continuously since the consultation began
  - Information about the consultation was also available in the main Central Library, the HIC and at HBC planning offices at Aquila House
  - We also promoted the consultation at the LSP meeting and at St Leonards festival in July 2011.
- 1.7 The summary of the responses to the consultation are set out in sections that follow.

## 2.0 How Many New Homes?

### Proposed Target A – Housing Provision

Between 2011 and 2028 it is recommended that the net new homes target for Hastings should be 3,418 or 201 new homes per year

#### Comments received

##### Number commenting

Individuals	16
Local groups/organisations	3
Developers/agents	2
Public bodies/agencies	3

##### Number of comments

Support	2
Object	16
Comment	26

- Most individuals objected that the target was too high
- There were concerns about high density housing and whether more housing would attract more people from outside the town.
- Concerns about loss of greenspace and lack of infrastructure to support additional housing.
- Targets as low as 100 per year were suggested
- Need to consider empty properties first.
- The housing target was supported by Rother District Council
- Agents representing owners of land off Breadsell Lane queried how well the plan and targets met the new draft National Planning Policy Framework guidance and argued that land off Breadsell Lane should still be included for housing development although perhaps encompassing a smaller site area

#### Hastings Borough Council response

- 2.1 The Council maintains that a target of around 200 new homes per year provides the right balance between supporting the regeneration agenda of the town and protecting and enhancing the natural environment. Empty homes brought back into use will contribute to meeting the housing target, but we also need to develop new housing to provide choice in terms of housing type and location for people seeking new homes. The Council will meet with the agents representing the landowners at Breadsell, Natural England and Rother District Council to seek agreement about the way forward for land in this area.
- 2.2 We will not be recommending any modification to this report to this policy as a result of the consultation process. However, based on the most recent information it is likely that minor modification will be made to the overall number.

### 3.0 Housing

#### Proposed Policy B – Provision of Affordable Housing

- a) Housing developments on previously developed land (Brownfield) should make the following provision for affordable housing:

Site size range (number of net dwellings)	Minimum percentage requirement	On-site provision required? Yes/No	Or, financial contribution in lieu of on-site provision? Yes/No
1-4	10% financial contribution	No	Yes
5-14	20%	Yes	Yes
15+ or 0.5 ha or more in size (irrespective of the number of dwellings)	25%	Yes	No

- b) Housing developments on Greenfield land should make the following provision for affordable housing:

Site size range (number of net dwellings)	Minimum percentage requirement	On-site provision required? Yes/No	Or, financial contribution in lieu of on-site provision? Yes/No
1-4	20% financial contribution	No	Yes
5-9	20%	Yes	Yes
10-14	40%	Yes	Yes
15+	40%	Yes	No

- c) Affordable housing will be provided on the application site, except where the development involves 4 or less units where, a financial contribution will be required. However, where the Council determines that off-site provision can provide an equivalent or better housing solution, off-site provision or a financial contribution in lieu of on-site provision (of at least equivalent value) may be invited. This will only be done where the agreed approach contributes to the creation of mixed communities elsewhere in Hastings. This may be particularly relevant in situations referred to in paragraph (d) where a better tenure or housing mix can be achieved.
- d) The type and level of provision on individual sites will be determined through negotiations – taking into account market conditions. The Council’s preferred approach is for the greater part of affordable housing to be for affordable rent, although other forms may be acceptable where they would complement wider strategic priorities for tenure diversification. Schemes should enable the provision of different forms of affordable housing where necessary, avoiding the over concentration of any one tenure.
- e) The Council will work with the private sector and registered social providers to achieve the required level of affordable housing. If it can be demonstrated, by transparent financial evidence, that the full affordable housing contribution makes a site unviable, developers and the Council will work through a cascade

approach until a site is made viable, whilst still retaining an element of affordable housing.

- f) Due to the on-going level of need in the Borough, affordable housing will normally take precedence over other types of planning contributions.
- g) If an allocated site comes forward as two or more separate development schemes, the Council will seek a level of affordable housing on each part to match, in total, the provision that would have been required for the site as a whole.
- h) Affordable homes must be well integrated within the development scheme and be indistinguishable from other tenures in terms of style, location and build quality, small clusters of affordable housing would be preferred.
- i) Homes should remain at an affordable price for future eligible households, or if these restrictions are lifted, for the development subsidy to be recycled for alternative affordable housing provision.
- j) Reflecting the targets in a) and b) as a guide, the proportion, size and form of affordable housing will, where appropriate, be indicated for each housing site proposed in the Site Allocations and Development Management Plan.
- k) Windfall sites will also be subject to this policy, as will planning applications for conversions and/or change of use which result in additional units of accommodation.

This policy will be supported by a Supplementary Planning Document giving further information together with details of Section 106 requirements.

### **Comments received**

#### **Number commenting**

Individuals	10
Local groups/organisations	3
Developers/agents	2
Public bodies/agencies	2

#### **Number of comments**

Support	12
Object	15
Comment	24

- Need to create a community trust – the policy doesn't go far enough
- Don't think affordable housing should be mixed with other types of housing
- Developers object to the percentage requirement approach, but most individuals and local groups support it
- Affordable housing should be spread around the Borough not concentrated in particular locations
- Some think 40% requirement on greenfield sites is too high
- 'Pepperpotting' i.e spreading the affordable housing around the development is generally supported, but it was felt that local communities should be consulted more about schemes in their areas.

## Hastings Borough Council response

- 3.1 National planning policy requires local authorities to plan for a mix of houses to support mixed communities, which includes providing affordable housing alongside of open market housing within development. The percentage requirements set out in the proposed policy have been tested and developed through a background viability study which will provide the necessary evidence to support our approach. We agree that affordable housing should be provided borough-wide. We would aim to avoid over concentrations of any particular tenure type in any one area. In terms of consulting local communities more, currently all planning applications are publicised on the Council's website, and every effort is made to notify neighbours in the immediate area of a planning proposal.
- 3.2 No changes to the policy are recommended as a result of consultation.

## Proposed Policy C – Accommodation for Travelling Communities

In assessing the suitability of sites for allocation for permanent residential sites for Gypsies and Travellers, and for the purposes of considering planning applications for sites for Gypsies, Travellers and Travelling Showpeople, proposals will be supported where the following criteria are met, the site should:

- a) respect areas of high conservation or ecological value
- b) be acceptable in respect of vehicular access and parking
- c) achieve a reasonable level of visual and acoustic privacy for both people living on the site and for those living nearby
- d) be accessible to local shops, services, schools and healthcare facilities, by walking, cycling, and public transport
- e) avoid locations where there is a risk of flooding, and is not adjacent to a potentially incompatible neighbouring use

In the case of sites for Travelling Showpeople, site suitability assessment will also take account of the nature and scale of the Showpeople's business in terms of the land required for storage and/or the exercising of animals

### Comments received

#### Number commenting

Individuals	6
Local groups/organisations	0
Developers/agents	0
Public bodies/agencies	2

#### Number of comments

Support	2
Object	3
Comment	3

- There was very little response to consultation on this draft policy and views were mixed about whether or not the Council should provide sites

## Hastings Borough Council response

3.3 No changes to the policy are recommended as a result of this consultation.

### Proposed Policy D – Houses in Multiple Occupation

In order to support mixed and balanced communities and maintain an appropriate housing mix within the Borough, applications for changes of use from:

- a Class C3 (dwelling house) to a Class C4 (House in Multiple Occupation), or;
- a Class C3 (dwelling house) to a House in Multiple Occupation in a sui generis use (more than six people sharing)

will not be permitted where:

- more than 10% of the total numbers of properties within a 100m radius of the application property are already in use as either Class C4, mixed C3/C4 use or other types of HMO in a sui generis use.

In all cases regard shall be had to the following factors:

- a) Whether the proposals would lead to a level of car-parking that would exceed the capacity of the street;
- b) Whether the proposals could provide acceptable arrangements for bin storage and other shared facilities; and
- c) Whether the design of any extension would be appropriate in terms of the property itself or the character of the area.

This policy will not apply to applications for social housing, care homes, children's homes, bail hostels and properties occupied by students that will be managed by an educational establishment.

This policy will not apply to households who have foreign students staying as guests for a set period of time.

### Comments received

#### Number commenting

Individuals	8
Local groups/organisations	2
Developers/agents	1
Public bodies/agencies	0

#### Number of comments

Support	8
Object	6
Comment	4

- The Residential Landlords Association considers the criteria about restrictions on development due to car parking/noise issues to be discriminatory.
- Conversely, a private individual says the criteria don't take antisocial behaviour factors such as noise into account

- Need to be clear about the definition of 'property' – is it the whole building, or units within a house?
- Concerns about houses in multiple occupation being concentrated in small areas and causing anti social problems

### **Hastings Borough Council response**

- 3.4 The comments made in relation car parking and noise are accepted, it is not necessary to include them here in this policy as these issues are covered by other development management policies. The need to define what is meant by 'property' is also supported.
- 3.5 It is intended to recommend that this policy is modified as a result of the consultation.

## 4.0 Creating Sustainable Communities

### Proposed Policy E – Strategy for Managing Change in a Sustainable Way

Growth and change will be managed so that development meets sustainability objectives, avoids significant vulnerability to the impacts of climate change, supports the diverse needs of communities and provides vibrant, safe, healthy and inclusive places where existing and future residents want to live and work. This will be achieved through:

- a) meeting housing needs of all sectors of the community, including the provision of affordable housing
- b) providing access to education, training and jobs and supporting the creation of new enterprises to bring economic prosperity and greater self-sufficiency
- c) supporting the social, economic and environmental regeneration of disadvantaged areas and communities
- d) enhancing the cohesion and vitality of communities, providing neighbourhoods with a vibrant mix of flexible and compatible uses, services and community facilities
- e) providing accessible forms of development that reduce the need to travel by car and are integrated with public transport and other sustainable modes of travel to allow for ease of movement and provide safe environments
- f) managing flood risk and reducing the potential effects of climate change on future communities
- g) requiring high quality architecture and urban design which adds to local character and sense of place
- h) reducing opportunities for crime and disorder through innovative design and the clear distinction of public and private space
- i) the provision of an accessible greenspace network and protection and enhancement of biodiversity
- j) protecting against light, air, water, land and noise pollution.
- k) supporting the move to a low carbon economy

#### Comments received

##### Number commenting

Individuals	12
Local groups/organisations	0
Developers/agents	1
Public bodies/agencies	4

##### Number of comments

Support	10
Object	3
Comment	10

- The Highways Agency and the Environment Agency support this draft policy
- Some individuals raised concerns about drainage issues on development sites in the town.
- Need to mention the historic environment
- May conflict with other policies promoting growth
- McCarthy and Stone commented that we need a positive policy supporting older peoples accommodation

- Rother District Council would like to see reference to protecting strategic gaps between Hastings and Bexhill, Crowhurst and Battle
- In general this policy was supported

### **Hastings Borough Council response**

- 4.1 Policies on the historic environment and flood risk will be included in the final version of the Plan. These issues were not consulted on as part of the informal consultation as our approach had not changed significantly since the previous consultation on the Preferred Approaches in 2008. In terms of specialist housing, any application for a housing scheme will be assessed on its own merits, regardless of type, using our Development Management policies.
- 4.2 The issue of drainage will be clarified further in both the Infrastructure section of the Plan, as well as the Infrastructure Delivery Plan. It is also important to note that in June 2010, it was agreed to apply a standard sewerage condition to planning permission given for changes of use or conversions resulting in 10 or more residential units, as well as for new build developments, which requires full details to be submitted prior to connection to the sewer. Southern Water would also be consulted on all large scale developments, whether there were obvious capacity issues or not.
- 4.3 Although we acknowledge that there will always be some tension between growth and protecting the environment, the Plan will ensure this is addressed. The Plan will seek to balance social, economic and environmental issues.
- 4.4 In terms of identifying a 'strategic gap' we feel that there is adequate protection for urban fringe areas around the town, without additional local designations. This includes Pebsham Countryside Park, the High Weald Area of Outstanding Natural Beauty, Marline Valley and Combe Haven Valley Sites of Specific Scientific Interest that surround the town and protect the urban fringes.
- 4.5 We intend to make clear that this is an overarching policy that further policies contribute to. Minor amendments to the wording of this policy will be recommended as a result of the consultation.

### **Proposed Policy F – Green Infrastructure**

In recognition of the multifunctional role of our greenspaces, a green network comprising open space and nature conservation areas will be established to conserve and enhance priority natural areas, and the connections between them.

The network will ensure that everyone has access to natural open space, and will maximise opportunity to conserve and enhance biodiversity. New development will contribute to this network

The extent of the network will be established in the Site Allocations and Development Management Plan, and will be clearly shown on the Local Development Framework Proposals Map.

## Comments received

### Number commenting

Individuals	7
Local groups/organisations	3
Developers/agents	1
Public bodies/agencies	3

### Number of comments

Support	7
Object	1
Comment	7

- There were responses relating to the protection of individual sites from 2 individuals
- The Environment Agency support this policy
- Rother District Council and east Sussex County Council suggest we refer to green corridors extending into the surrounding countryside
- The importance of the Greenway was stressed in relation to this policy
- A local group objected on the basis that this policy doesn't fit in with the Council selling off open space
- Bourne leisure commented that green infrastructure needs to be balanced with the need for retention, enhancement and expansion of tourism developments, including holiday parks.

## Hastings Borough Council response

- 4.6 We acknowledge the general support for this policy.
- 4.7 The protection and management of specific sites will be considered as part of the Development Management Plan. We disagree with the comments made about the Council's commitment to greenspace, and consider that in the main, the Council has sought to protect all spaces, and particularly those identified in the adopted Local Plan and the Open Spaces Strategy.
- 4.8 The extent of the green network will be considered as part of the evidence base being prepared to support the Development Management Plan, which will consider the extent of the network and its designation in the surrounding countryside. Providers in the tourism industry in particular will be able to make detailed comments at that stage. The Greenway will be delivered through the green infrastructure network.

## Proposed Policy G – Nature conservation and improvement of biodiversity

The town's biodiversity and geological resources will be protected and enhanced. Priority will be given to:

- a) Protection of the integrity of the Hastings Cliffs Special Area of Conservation (SAC), and other European sites near the town
- b) Conserving and enhancing protected biodiversity and geodiversity sites and features including Sites of Special Scientific Interest, Local Nature Reserves, and Local Wildlife Sites, ensuring that unavoidable damage to biodiversity is

minimised through mitigation, that any damage is compensated for, and that such measures are monitored.

- c) Improving the integrity and biodiversity of the green infrastructure network
- d) Minimising potential impacts of new development on the Hastings Cliffs SAC through the delivery of new greenspace and through appropriate recreation management of Hastings Country Park to meet the European regulations
- e) Meeting the objectives and targets in the Hastings Local Biodiversity Action Plan and habitat restoration and creation in Biodiversity Opportunity Areas
- f) Protecting ancient woodland and veteran trees
- g) Strengthening populations of protected and target species
- h) Improving site management and increasing public access to wildlife
- i) Influencing and applying agri-environment schemes, forestry, flood defence and other land management practices to deliver biodiversity targets

### **Comments received**

#### **Number commenting**

Individuals	9
Local groups/organisations	2
Developers/agents	0
Public bodies/agencies	2

#### **Number of comments**

Support	13
Object	3
Comment	13

- Some individuals objected to the idea that unavoidable damage should be mitigated for – in their opinion there should be no damage at all
- One group and one individual did not believe that the Borough Council will implement this policy
- There were comments relating to specific sites where in the opinion of the commentator development has occurred without regard to biodiversity impacts
- There was a query about how populations of protected and target species will be monitored
- Overall there was support for this policy

### **Hastings Borough Council response**

4.9 The draft policy is consistent with Draft Planning Policy Statement: Planning for a Natural and Healthy Environment, and the new National Planning Policy Framework, which requires us to protect valued landscapes and minimise impacts on biodiversity, and provide net gains in biodiversity where possible. Whilst no damage to the environment would be ideal, this has to be balanced with the need for growth and regeneration to support the wider objectives of the Plan.

4.10 Clear measures for implementation and delivery of the policy will be set out in the monitoring chapter in the final version of the Plan. Issues relating to specific sites will be considered as part of the Development Management Plan process.

4.11 Minor amendments to the wording of the policy will be recommended as a result of consultation on this policy.

## Proposed Policy H – Promoting good design

All development must be designed to:

- a) respect or enhance the character and street layout of the local area to contribute to the sense of place and local distinctiveness
- b) incorporate high quality design features and layouts that will reduce crime and the fear of crime and support inclusive communities, particularly in terms of accessibility and functionality. This includes creating opportunities for street play as part of residential developments
- c) incorporate appropriate climate change mitigation and adaptation measures such as green roofs and walls, sustainable drainage systems, multi-functional green space, protecting and enhancing biodiversity, waste reduction, recycling facilities and flood risk management
- d) enable a low carbon future in a changing climate by supporting proposals involving micro-generation technologies such as domestic wind turbines and solar panels and for retro-fitting existing properties to make them more energy efficient
- e) be adaptable and accessible to all

Design and access statements accompanying planning applications should demonstrate the evolution of the design prior to submission, the rationale behind the scheme, and how it meets the above criteria.

To assess design quality in major planning proposals for new homes (10 or more dwellings), the Council will require the applicant to address the 20 questions that make up the Commission for Architecture & the Building Environment (CABE) and the Home Builders Federation “Building for Life” standard. We will expect schemes to score 14 and above. Planning permission will normally be refused for schemes that score less than 10 out of 20 in the assessment.

### Comments received

#### Number commenting

Individuals	10
Local groups/organisations	3
Developers/agents	0
Public bodies/agencies	2

#### Number of comments

Support	8
Object	3
Comment	10

- Should have a legal minimum size for properties
- Properties over 3 storeys should have lifts
- The Environment Agency and East Sussex County Council support this policy
- Needs to refer to the preparation of planning briefs
- Need to recognise the importance of Victorian housing
- Doubts about whether the Council will implement the policy
- There is a need for garden space for family housing, including flats
- Design and access statements need to be checked for accuracy
- The scoring proposed against the Building For Life Standard is not ambitious enough – acceptable schemes should score the top mark of 20 rather than 14

- A score of 14 should be mandatory and the Council should aim higher

### **Hastings Borough Council response**

- 4.12 The need for internal space standards and the provision of garden space are detailed issue that will be taken forward for consideration in the Development Management Plan, as is the need for a more robust policy on lift provision. The resources of the Local Planning Authority are limited, and while we have prepared additional guidance in some cases, we do have the resources at this time to commit to preparing site specific planning briefs. Instead, we will make the best use of pre-application discussions and the pre-application consultation forum for larger applications.
- 4.13 Taking account of the comments made, we would like to re-affirm that design is a key concern in the planning policy process, and in the determination of planning applications. There are 18 Conservation Areas in the town that contribute to the protection of our rich heritage, and whilst we can't control the quality of submission of design and access statements, officers will always make a further assessment of design issues.
- 4.14 With regard to the requirement to address the Building for Life criteria, advice from the newly formed CABE Design Council is that a simplistic scoring arrangement is not appropriate though planning policies should be related to their guidance. In the light of this advice, modifying the policy, which will also need to reflect design guidance contained in the draft National Planning Policy Framework document, will be recommended.

### **Proposed Policy I - Low Carbon Development**

The energy hierarchy sets out the most suitable and cost effective method of achieving low carbon development. Developers are required to follow the hierarchical approach in achieving the energy and carbon dioxide emission requirements of the Building Regulations, for all new residential development. New non-residential development is encouraged to follow the same approach

- To improve energy efficiency through thermal and fabric performance improvement measures, then:-
- Provide on site renewable energy generation or onsite connected heating, or Combined Heat and Power (CHP) technologies, then:-
- The remainder of the CO<sub>2</sub> reduction targets to meet the Building Regulations targets should be met through suitable additional measures such as larger CHP or district heating systems or Mega Watt (MW) scale wind offsetting.

Developers will be required to demonstrate compliance with this policy approach through design and access statements submitted with a planning application.

### **Comments received**

#### **Number commenting**

Individuals	2
Local groups/organisations	1
Developers/agents	0
Public bodies/agencies	1

**Number of comments**

Support	3
Object	0
Comment	1

- The Environment Agency would like a policy on water efficiency included due to the water stressed nature of the South East

**Hastings Borough Council comment**

4.15 The policy is not recommended to change as a result of this consultation. However, it is intended to recommend that the 'Promoting Good Design' policy, as part of the need for climate change mitigation and adaptation measures, should include water efficiency.

**Proposed Policy J - District Heating Networks and Combined Heat and Power Systems**

To help meet the Government's timetable to deliver zero carbon homes and buildings, Hastings Borough Council will explore opportunities for Combined Heat and Power systems connected to district heating networks in the vicinity of the Conquest Hospital, Summerfields Sports Centre, and Hastings town centre. Opportunity areas will be identified in the Site Allocations and Development Management Plan.

**Comments received****Number commenting**

Individuals	1
Local groups/organisations	0
Developers/agents	0
Public bodies/agencies	0

**Number of comments**

Support	1
Object	0
Comment	0

**Hastings Borough Council response**

4.16 This draft policy attracted very little comment and there will be no recommendation to alter it.

## 5.0 Community Infrastructure

### Proposed Policy K - Infrastructure and developer contributions

The Council will seek to ensure that the right infrastructure is in place at the right time to meet the needs of Hastings and will secure developer contributions from new development towards the necessary provision of environmental and social infrastructure. This will be achieved through the following:-

1. Preparing, regularly updating and facilitating the implementation of an Infrastructure Delivery Plan for the town. This will set out the infrastructure to be provided in Hastings by infrastructure partners, including the public sector and utilities, to meet future needs.
2. Mitigating inadequacies in infrastructure arising from proposed development through development contributions that will provide towards sufficient and appropriate improvement through upgrade, enhancement or new infrastructure.
3. Contributions will relate to all aspects of land use, community infrastructure and services that may be directly related to the development proposed and which accord with the council's identified local priorities and objectives for delivering sustainable communities.

Further detailed guidance on the circumstances and range of developer contributions that may be sought from development will be set out in an Infrastructure Delivery Supplementary Planning Document (SPD) which will establish a sound basis and methodology for agreeing the level and type of infrastructure requirements necessary from developer contributions.

### Comments received

#### Number commenting

Individuals	2
Local groups/organisations	1
Developers/agents	1
Public bodies/agencies	2

#### Number of comments

Support	3
Object	1
Comment	4

- Southern Water have requested a specific policy protecting their sites and premises and a detailed policy about the proximity of new development to wastewater facilities
- Need to update this policy to take account of the introduction of the Community Infrastructure Levy in the future

### Hastings Borough Council response

- 5.1 The protection of Southern Water sites and the proximity of new development to wastewater facilities are site specific issues that will be dealt with through Development Management policies.
- 5.2 The Council has not yet decided how the proposed Community Infrastructure Levy (CIL) will be taken forward. A potential tariff approach will be explored in

consultation with East Sussex County Council. However, it will be recommended that the policy is amended to provide flexibility in how we require development contributions in light of future CIL requirements and Section 106 agreements.

## 6.0 Town Centre Retail Boundary

### Proposed Policy L – Town centre retail boundary

Amend the town centre retail boundary as shown on the map in Appendix A

#### Comments received

##### Number commenting

Individuals	9
Local groups/organisations	1
Developers/agents	0
Public bodies/agencies	1

##### Number of comments

Support	2
Object	2
Comment	10

- Why is Central St Leonards not mentioned?
- Need to refer to St Andrews area rather than St Andrews Square
- One individual commented that St Andrews Square should be developed for large scale retail
- St Andrews Square restrict development to residential and small scale independent retail
- In Earl Street retain warehouses to provide apartments and small retail units
- Need to look at how smaller retail units across the town can be protected and further developed

#### Hastings Borough Council response

- 6.1 Our commitment to some additional retail space in central St Leonards remains and this will be reflected in the Spatial Strategy for that area in the final version of the Plan.
- 6.2 We will also make clear that a small amount of retail development, as well as residential development, is acceptable in the St Andrews area. The future of the warehouses on Earl Street will be considered as part of the preparation of the Development Management Plan, as will how we can better protect and manage retail areas across the town.

## 7.0 Spatial Strategy

### Planning Focus Areas

#### Comments received

4 comments

- Stick to Super Output Area statistics
- There is a suspicion that the new boundaries are being proposed to cloud issues at hand and make direct comparison with other statistics impossible
- Add detail about historic development of Hastings Borough Council
- Detailed comments about density in central St Leonards

#### Hastings Borough Council response

- 7.1 The planning focus area boundaries have been drawn as closely as possible to Super Output Area boundaries to allow use of the Index of Multiple Deprivation and Census data. The planning focus areas are areas where there is an identifiable community or geography, or where landscape or function, means they make a logical area for spatial planning purposes – data can still be collected that relates to them.
- 7.2 Detail about the historic development of the town will be included in the introductory sections of the final version of the Core Strategy. It was not necessary to present this as part of the informal consultation. Density issues in Central St Leonards are considered further in the Council's response to Proposed Policy M: Spatial Spread of Housing Development, below.

#### Proposed Policy M: Spatial Spread of Housing Development

Area	Name	Potential range of dwellings by area
1	Little Ridge & Ashdown	210 – 310
2	Greater Hollington	230 – 350
3	Filsham Valley and Bulverhythe	580 - 720
4	St Helen's Wood	190 - 290
5	Silverhill & Alexandra Park	210 - 310
6	Maze Hill and Burtons' St Leonards	240 - 360
7	Central St Leonards	390 - 550
8	Hastings Town Centre	220 - 320
9	Old Town	60 - 80
10	West Hill	60 - 80
11	Hillcrest and Ore Valley	400 - 600
12	Clive Vale and Ore Village	220 - 340
13	Hastings Country Park	0

### **Little Ridge and Ashdown**

1 comment

- Complaint about properties being destroyed for redevelopment – Hastings Cottage, Ore House, Ledsham Court

### **Greater Hollington**

1 objection

1 comment

- Object if Robsack Meadow and Fern Road included in the calculations
- No more should be built anywhere in this area and any sites earmarked for development should be removed from the old development plan

### **Filsham Valley and Bulverhythe**

2 objections

- Implied density is too high.
- South Saxons and Seaside rd areas are at risk from flooding
- Object as cannot understand where all the houses are going to go

### **St Helens Wood area**

5 objections

1 comment

- Concerns about impacts of development on St Helens Wood and the natural environment of the area

### **Silverhill and Alexandra Park**

1 objection

- Object to development within the boundaries of Alexandra park

### **Maze Hill and Burton's St Leonards**

2 objections

1 comment

- The area covers 4 conservation areas – how come it is expected to absorb more than Greater Hollington which is many times its size?
- The target is too high given the unique architectural and historic constraints of the area
- High density development of small flats is not the type of accommodation the area needs to facilitate regeneration
- Concerns expressed re Hastings College site proposed redevelopment

### **Central St Leonards**

3 objections

1 comment

- The proposed figure is too high. The area is already densely developed and has overcrowding with high levels of deprivation. This will not assist regeneration.
- Sort out the low quality housing before you build more.
- Object if it includes building on the convent site at Magdalen Road

## Hastings Borough Council response

- 7.4 Planning consent has been obtained for some developments, so site specifics cannot be debated because they already have consent. However, the concern over the removal of older properties that are considered to have character, is noted.
- 7.5 It is not appropriate to consider individual sites in the Core Strategy. The future of any individual site should be considered as part of the Council's overall planning policies contained in the developing Development Management Plan. There will be the opportunity to consider all potential housing sites across the Borough as part of the preparation of the Development Management Plan which is part of the LDF, with the exception of those sites with an extant planning consent.
- 7.6 The figures proposed for each area in the informal consultation, provided a draft indication of the levels of development only.
- 7.7 We have prepared a Strategic Flood Risk Assessment (SFRA) to ensure the risk of flooding from new development is minimised, particularly in areas like Filsham Valley and Bulverhythe. Broad locations have been assessed against this, but individual sites will still be required to demonstrate that the proposal accords with the sequential test to ensure that development is located in the areas at the least risk of flooding and that any mitigation or adaptation measures are imposed. The SFRA is available to view on our website at [http://www.hastings.gov.uk/environment\\_planning/planning/local\\_development\\_framework/ldf\\_documents/#bak](http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/ldf_documents/#bak)
- 7.8 The St Helens Wood Local Nature Reserve and Alexandra Park are still areas protected from development and will remain so. Proposed Policy G: Nature Conservation and Improvements to Biodiversity will address concerns about the protection of the natural environment in all areas of the town, as well as these protected areas.
- 7.9 The proposed spatial spread of housing development has taken into account the characteristics of each area, including development opportunities that may exist.
- 7.10 We acknowledge the comments made with regard to high density development and potential for overcrowding in Central St Leonards. However, the Plan seeks to ensure a mixed and balanced community is provided in the area to achieve regeneration objectives and reduce deprivation. A strategy for Central St Leonards making this approach clear, and our mechanisms for achieving it, will be set out in the final version of the Plan.

## Proposed Policy N: Proposed spatial spread of employment, office and retail development

Area	Name	Additional (net) employment land up to 2028 Mixed B1, B2 & B8	Additional (net) office (B1a) development up to 2028	Additional (net) retail comparison floorspace between 2014 and 2028
1	Little Ridge & Ashdown	23,400m <sup>2</sup> (at Queensway & Whitworth Rd) already allocated in the 2004 Local Plan		
2	Greater Hollington	13,300m <sup>2</sup> (at Churchfields, Castleham & Ponswood Industrial Estates) already allocated in the 2004 Local plan		
3	Filsham Valley and Bulverhythe			
4	St Helen's Wood			
5	Silverhill & Alexandra Park			
6	Maze Hill and Burtons' St Leonards			
7	Central St Leonards			
8	Hastings Town Centre		21,700m <sup>2</sup> (the remaining phases of the Priory Quarter development - potential new allocation)	Up to 30,000m <sup>2</sup> of comparison retail space (potential new allocation) in town centre
9	Old Town			
10	West Hill			
11	Hillcrest and Ore Valley	11,400m <sup>2</sup> (at Ivyhouse Lane Industrial Estate) already allocated in the 2004 Local plan		
12	Clive Vale and Ore Village	800m <sup>2</sup> (Land to rear of 430-438 Old London Road, Graystone Lane		
13	Hastings Country Park			

### Comments received

#### Number commenting

Individuals	5
Local groups/organisations	3
Developers/agents	0

Public bodies/agencies 1

**Number of comments**

Support 0  
Object 4  
Comment 11

- Need to reassess if the Link Road is built
- Need to work with Rother District Council to review employment land at Ivyhouse Lane
- Land off Queensway – it is wrong to affect Marline Valley Site of Special Scientific Interest (SSSI)
- Object to any development of Robsack Meadow, Marline Valley SSSI or any development off Ironlatch Avenue that affects the Local nature reserve. Not clear what your plans are.
- Should mention new retail space in St Leonards town centre and there should be mechanisms to support incubator businesses and small offices suitable to the high density location
- Town centre – object to recent application at Queensbury House
- Ore Business park should be retained for employment and not used for housing

**Hastings Borough Council response**

7.10 The figures provided in the table above have been prepared on the basis that the Link Road is being built.

7.11 The suitability of future development proposals for Queensway or in the vicinity of Robsack Meadow (also known as Robsack A which is allocated for residential purposes not employment) will be considered as part of the Development Management Plan. Applications for development at Queensbury House, and Ore Business Park have already been given consent, and therefore, are not relevant for consideration under this document. This Plan considers the long term strategy for the town, not site specific proposals. Sites for development, protection and management purposes will be identified in the Development Management Plan.

7.12 The need for additional retail space in St Leonards Town Centre will be incorporated in the final version of the Plan, and the strategy for the area will recognise the need to support incubator businesses and offices suitable to a high density location.

## 8.0 Draft Infrastructure Delivery Plan and Schedule

### Infrastructure Delivery Plan

8.1 The draft infrastructure delivery plan that was published as part of the informal consultation on the Core Strategy is available from our website at <http://hastings.jdi-consult.net/ldf/>.

### Comments received

#### Number commenting

Individuals	18
Local groups/organisations	4
Developers/agents	0
Public bodies/agencies	4

#### Number of comments

Support	18
Object	9
Comment	110

8.2 As so many comments were received on different aspects of the plan, these are summarised in the table below along with our response where appropriate.

Comment	Hastings Borough Council Response
Concerns over adequacy of existing infrastructure	Currently, we endeavour to ensure that adequate infrastructure is provided
Infrastructure needs to be provided before housing/development	Proposed Policy K: Infrastructure and Developer Contributions (subject to some minor amendments in the final version of the Plan) will ensure the correct infrastructure is provided to support new development through development contributions, taking into account proposals for Community Infrastructure Levy as well as Section 106 Agreements.
There is no need for the current population to expand – don't want in-migration	The Council considers that for the Town to prosper and regenerate a suitable level of redevelopment both residential and employment related is required. Whilst the need for new housing is in part being driven by people moving in to Hastings from elsewhere. The need for new housing also reflects changes in the way we live – and the tendency for households to become smaller, in particular there is projected to be significant growth in the coming years in single person households as a result of people living longer and rising divorce levels. This is happening nationally not just in Hastings.
Object to the Community Infrastructure Levy – it won't pay for strategic roads	The Council has not formally decided whether Community Infrastructure Levy will be introduced yet, however, strategic roads will still need to be funded by central Government.
Community centres are needed	Individual sites for development, protection or

in Central St Leonards and St Andrews in Hastings Town Centre	management purposes, including community centres will be dealt with in the Development Management Plan
South St Leonards need sports facilities	Individual sites for development, protection or management purposes, including sites for sports facilities will be dealt with in the Development Management Plan
Need to add cultural infrastructure	Public art required as part of new development, together with the proposed new library, and Pebsham Countryside Park (which will have cultural elements) will add to our cultural infrastructure. The Council will be open to culturally based proposals that have funding attached to them.
Education – should aim for upgrading existing facilities rather than building more	We are not the education authority. The provision of top class facilities is an important contributor to the regeneration objectives of the town.
There is a need for apprentice courses	This is supported through a new ‘access to jobs policy’ that will be included in the final draft version of the Plan.
Public realm and historic environment need to be included	Cultural facilities and heritage assets will be included in the final version of the Infrastructure Delivery Plan
Need to state the existing community facilities will be safeguarded	This is a development management issue, to be dealt with through the Development Management Plan
Role for Hastings Greenway project – links to health and education agendas	Noted. The Greenway will be delivered through the Green Infrastructure Network
Developer contributions should go towards community facilities	Agreed, where there is a proven need and in balance with other requirements.
Need to ensure the Primary Care Centres are built at Ore and Silverhill	This will be followed up once the review of healthcare structures, including the Primary Care Trust, has been completed. We are in close liaison with the relevant authorities and will update the Infrastructure Delivery Plan and schedule as and when appropriate
Concerns over adequacy of adult social care provision	We are in close liaison with East Sussex County Council on this issue. Further detail regarding future needs and provision will be set out in the final version of the Infrastructure Delivery Plan
Concerns over sewerage infrastructure and ensuring developers address this properly	The issue of drainage will be clarified further in both the Infrastructure section of the Plan, as well as the Infrastructure Delivery Plan. We recognise that it is important that the necessary local infrastructure is provided before the development progresses, and our approach to this, including the application of appropriate planning conditions, will be set out in the final version of the Infrastructure Delivery Plan.
Broadband (para 6.41) needs to be updated re Hastings coverage and Superfast Broadband	Agreed. The timetable and update on progress for next generation broadband will be set out in the final Infrastructure Delivery Plan.

Concern over lack of future open space provision for South St Leonards	Individual sites for development, protection or management purposes, including open spaces will be dealt with in the Development Management Plan
Should say open space will rather than may be required	Change agreed
Hastings Heritage Watchdog wants the Council to protect the whole of Ore Valley rather than having open space and huge blocks of flats	Individual sites for development, protection or management purposes, including the Ore Valley will be dealt with in the Development Management Plan
Identify and develop a play area in St Andrews area	Individual sites for development, protection or management purposes, including play areas will be dealt with in the Development Management Plan
Need a real commitment to identifying and creating children's' play areas in south St Leonards	Individual sites for development, protection or management purposes, including play areas will be dealt with in the Development Management Plan
The playground at Warrior Square station should be extended to the BR Social Club site (for toddlers)	Individual sites for development, protection or management purposes, including play areas will be dealt with in the Development Management Plan
Greenspace needed in St Andrews areas - Salvation Army site?	Individual sites for development, protection or management purposes, including greenspace will be dealt with in the Development Management Plan
No faith in the Council's promise to protect and maintain green infrastructure	The Council has sought in the main, to protect and retain all green spaces, particularly those identified in the adopted Local Plan.
Designate the entirety of the convent grounds in Magdalen Road and Robsack Meadow as green spaces	Individual sites for development, protection or management purposes, including greenspaces, will be dealt with in the Development Management Plan
Green infrastructure – more emphasis need on landscape and urban fringe areas	The final draft version of the Plan will contain a Landscape Protection policy that will cover these issues.
The Link Road will not ease congestion	It is expected that the regenerative benefits arising from the Link Road will also lead to reduced congestion on parts of the network.
Need to improve the A21	The Council and its partners will continue to lobby for these improvements
Support for Glyne Gap station welcome	Noted.
Need for improvements to rail services supported	Noted.
Call for better and more bus services	Stagecoach are planning a significant investment in their fleet during 2012, and have recently experimented with additional evening services on a commercial basis.
East Sussex County Council have put forward a number of helpful factual corrections, particularly on transport issues	Agreed and included in final version of Infrastructure Delivery Plan

Role of Hastings Greenway in the Strategic cycle network	The strategic cycle network will follow the route of the Greenway
Need to include ambitious targets for cycle paths, secure cycle parks and modal shifts towards walking and cycling	The development of cycle paths and parks is strongly dependent on external funding and development contributions provided as a result of new development. It is therefore difficult to set a target for their implementation. The final draft version of the Plan will include a policy on Sustainable Transport that supports a modal shift towards walking and cycling
Needs to make reference to the Community Infrastructure Levy	Accepted, and policy in the final version of the Plan will be amended to reflect this

## Infrastructure Delivery Schedule

8.3 The draft infrastructure delivery schedule that was published as part of the informal consultation on the Core Strategy is available from our website at <http://hastings.jdi-consult.net/ldf/>.

### Comments received

#### Number commenting

Individuals	4
Local groups/organisations	2
Developers/agents	0
Public bodies/agencies	2

#### Number of comments

Support	0
Object	0
Comment	21

- Southern Water say the schedule needs to include universal water metering, local sewerage infrastructure and local water distribution infrastructure
- East Sussex County Council comment that we need to include junction improvements on the Ridge and more about Hastings Quality Bus Partnership
- Should describe how critical each scheme is to the delivery of growth
- Will need a new leisure centre as well as Summerfields given the number of new homes proposed
- Play provision is more important than public art
- The timing for Ore valley open space should be short term rather than medium term. The space exists and need to be managed
- ESCC provided information about transport schemes
- The local and national cycleway schemes should not be a high priority as they will not have a major beneficial impact on Hastings residents or businesses. Better to spend the money on improvements to public transport

### Hastings Borough Council response

8.4 The format of the Infrastructure delivery Schedule has been revised in consultation with East Sussex County Council and other Local Planning Authorities. This now takes into account the need to identify how critical schemes are to the delivery of the Plan, as well as incorporating the specific

schemes and amendments proposed by East Sussex County Council and Southern Water, including those mentioned above.

- 8.5 There is a clear aspiration for a new leisure centre in the town, although no funding has been identified. The situation will be reviewed in 2016 when the current arrangement with Freedom Leisure expires. The Infrastructure Delivery Schedule is a living document that will be updated at this time if necessary.
- 8.6 It is not possible to re-classify the Ore Valley open space as coming forward in the short term as no funding sources have been identified and as such, there is a high risk to delivery. The final Infrastructure Delivery Plan and Schedule will be amended to make the situation clearer, and provide definitions of the categories used.
- 8.7 The local and national cycleway schemes are critical to the Plan's health objectives, and therefore warrant high priority. Funding has also been identified for the National Cycleway Network, making it a low risk to delivery, to the benefit of the town. As stated above, the final Infrastructure Delivery Plan and Schedule will be amended to make the situation clearer, and provide definitions of the categories used.

## 9.0 Sustainability Appraisal of Housing Target

9.1 The Sustainability Appraisal of the Housing Target that was published as part of the informal consultation on the Core Strategy is available from our website at <http://hastings.idi-consult.net/ldf/>.

### Comments received

#### Number commenting

Individuals	7
Local groups/organisations	1
Developers/agents	0
Public bodies/agencies	0

#### Number of comments

Support	0
Object	0
Comment	11

- Must maintain momentum on private sector housing improvements
- Need more emphasis on the historic environment
- Should not be under pressure to build on greenfield sites
- Should consider air pollution
- Poverty and social exclusion will not be addressed by additional housing development in Central St Leonards – need to upgrade existing properties, provide better infrastructure and reduce numbers of 1 bed flats
- Natural resources, biodiversity, water pollution, flooding etc could be unbalanced with increases in housing and population
- Scenario 2 supported lowest amount of housing

### Hastings Borough Council response

9.2 These comments will all be taken forward in the drafting of the final Sustainability Appraisal report that will accompany the Proposed Submission version of the Plan. However, we acknowledge the general support to Scenario 2, and set out our response to the other comments made below.

9.3 The Sustainability Appraisal of Housing Target was undertaken using an approved set of Sustainability Objectives consulted on as part of the Scoping process for the Local Development Framework. The updated Scoping Report is available at [http://www.hastings.gov.uk/environment\\_planning/planning/local\\_development\\_framework/ldf\\_documents/#sus](http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/ldf_documents/#sus). These objectives included one that related specifically to the protection and enhancement of the historic environment (objective 11) and the need to reduce air pollution (objective 12). We therefore consider that the historic environment and air pollution have both been adequately taken into account in this process.

9.4 The need for us to maintain momentum on private sector housing improvements is noted. In terms of pressure on greenfield sites, our strategy for development concentrates on brownfield sites where possible, but it is important for us to retain flexibility around land supply to meet our housing

targets. We therefore need to ensure we do not preclude development on greenfield sites should they be required to meet this target.

- 9.5 The Plan seeks to upgrade existing properties, provide better infrastructure and reduce the numbers of 1 bedroom flats as suggested. More housing will result in the provision of more affordable housing, and provide a greater mix of dwelling types, which will address our social housing need, help low income households, and contribute to the creation of mixed and balanced communities, a particular concern in Central St Leonards
- 9.6 The Sustainability Appraisal documents that any development will have a negative effect on the environmental sustainability objectives. It is the role of the Plan policies to ensure that these negative effects are minimised and mitigated against, to ensure they are not unbalanced with the level of growth.