

Hastings Local Plan
The Hastings Planning Strategy
Statement of Consultation
Regulation 22(1) (c)
October 2012

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Tel: 01424 451098 Email: fplanning@hastings.gov.uk



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1 Introduction

- 1.1 This Statement of Consultation has been prepared in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. Its purpose is also to show how the preparation of the Planning Strategy complies with the Council's adopted Statement of Community Involvement (SCI).
- 1.2 The Statement of Consultation meets the requirements of Regulation 22 (1) (c) by setting out:
- Which bodies and persons the local planning authority invited to make representations under regulation 18;
 - How those bodies and persons were invited to make representations under Regulation 18;
 - A summary of the main issues raised by the representations made pursuant to Regulation 18, and
 - How any representations made pursuant to Regulation 18 have been taken into account.
- 1.3 The Hastings Planning Strategy has evolved over the past six years and consultation with local people, groups and statutory bodies has been an integral part of this process. Hastings Borough Council has also worked closely with Rother District Council on certain technical research.
- 1.4 What has grown out of all of that work is a strategic spatial plan that will replace some policies within the existing Hastings Local Plan 2004, and shape the sustainable development of Hastings for the next 15 years.
- 1.5 The Hastings Planning Strategy focuses on regenerating the town through economic growth and prosperity but also recognises the need to protect the heritage of the town (both built and natural) and has an emphasis on building healthy, sustainable and fair communities.
- 1.6 The Hastings Planning Strategy separates the town into 4 spatial areas and 13 planning focus areas.
- 1.7 The preparation of the Hastings Planning Strategy has involved considerable background research, evidence gathering and a wide range of consultation exercises that have sought to gain the views and opinions of the local population and various stakeholders.

Overview of Key consultation Stages and compatibility with Statement of Community Involvement

- 1.8 The list of the specific consultation bodies and general consultation bodies the Council formally sought representations from is provided in Appendix A.
- 1.9 All of the relevant supporting documents that have informed this statement are available to view on the Council's website at https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/supportingdocs_evidencebase/evidencebaseddocuments/

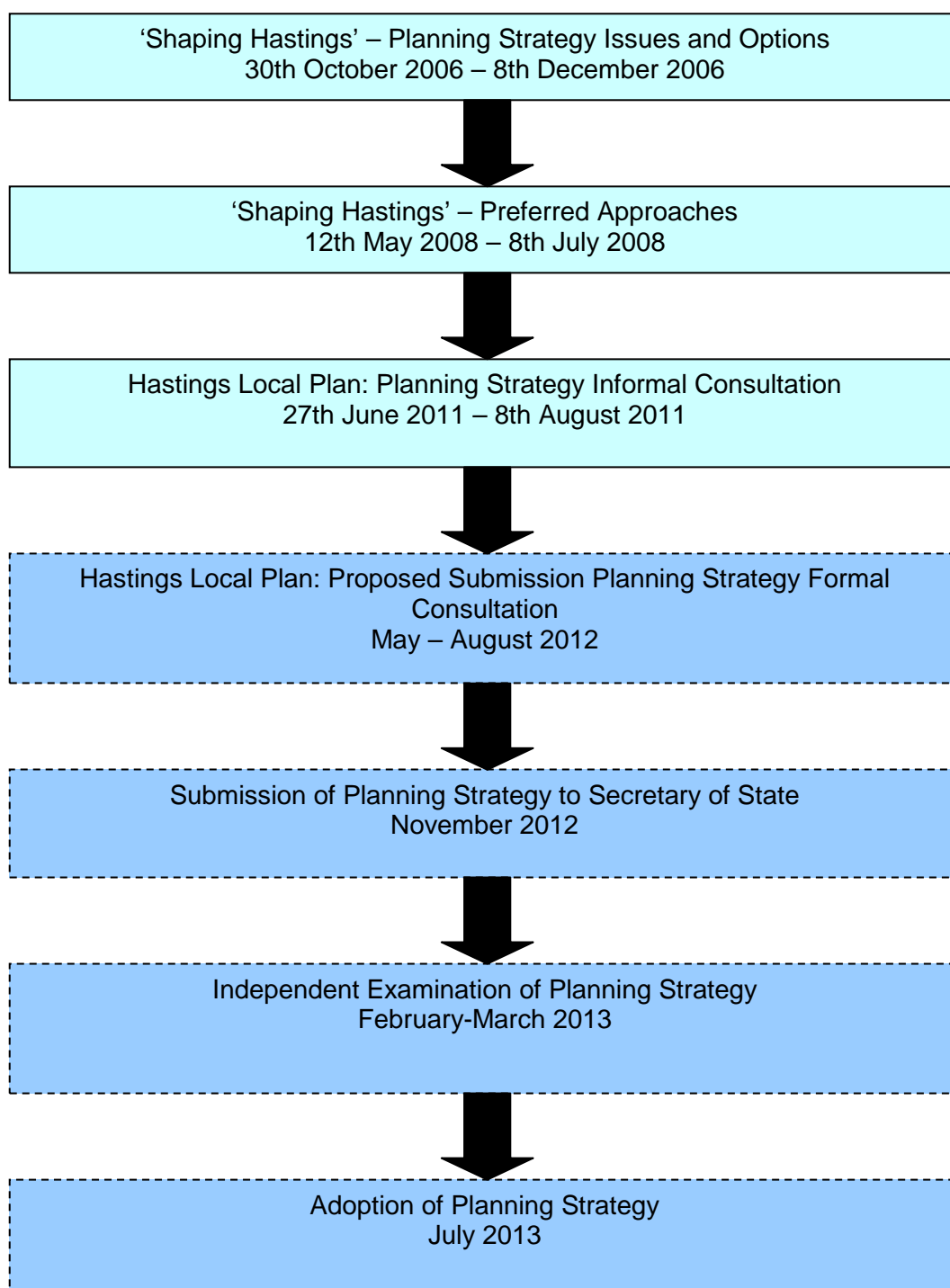
Key Consultation Stages

- 1.10 The key consultation stages are set out in Figure 1. Please note that the figure also shows the future stages of the Planning Strategy process.

Compatibility with Statement of Community Involvement

- 1.11 The most important document that has guided the approach to consultation throughout the preparation of the Hastings Planning Strategy is the Statement of Community Involvement (SCI).
- 1.12 The SCI sets out the Council's vision, strategy and principles for community and stakeholder involvement in the preparation of Local Plan Documents, and in considering planning applications. The SCI covers the whole of the town as a geographical area, and was adopted by the Council in June 2006. The SCI was subsequently updated in September 2011. It is available to view or download on the Council's website at <https://www.hastings.gov.uk/planning/policy/consultations/involvement/>
- 1.13 As well as providing information about the stakeholders, businesses, organisations and all of the groups that the Council will consult with, the SCI also lists the basic consultation standards employed on all of the documents prepared as part of the Local Plan process. In particular:
- We will maintain a presence in the local press, through local radio and through our own 'About' Magazine, delivered to every household in the town. We will post articles in local community newsletters, interest group newsletters and voluntary and community sector periodicals where appropriate
 - All documents will be published on the website http://www.hastings.gov.uk/environment_planning/planning/localplan/ and be available for download free of charge, as well as being made available in hard copy at Council venues and local libraries as appropriate
 - Social networking tools including Facebook and Twitter will also be used to notify followers of Local Plan progress and involvement opportunities, as well as to encourage and facilitate on-going discussion with interested parties. The 'Shaping Hastings' profile is available at <https://www.facebook.com/shapinghastings> or on Twitter at <http://twitter.com/ShapingHastings>
 - By working in partnership with other groups and organisations in the town, we will also aim to link our website with other community pages to increase the use of the Council's site and the Local Plan, ensuring that the Local Plan is closely linked with current community affairs.

Figure 1 Consultation Stages of the Hastings Planning Strategy



- 1.14 Paragraph 4.11 of the SCI states that “The production stage provides for a formal six week public participation period on the proposed submission document...Where possible, we will extend the consultation period to 12 weeks in accordance with the Compact for East Sussex”. The Proposed Submission consultation is planned to run for the full 12 weeks in accordance with the Compact for East Sussex.

- 1.15 The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe a series of statutory and general bodies which the Council should consult with during each consultation stage, under Regulation 2(1). Please see the list in Appendix A. The Council also engaged with other consultation bodies it felt were appropriate to the development of the Planning Strategy and these are listed in Appendix A also.
- 1.16 The Council maintains a database of all the statutory, general and 'other' consultation bodies and their respective contact details, ensuring any information regarding the development of the Planning Strategy and related documents is disseminated to the appropriate persons/organisations. Appendix A lists **all** the bodies and organisations consulted which fall into the following broad categories:
- Local Businesses
 - Residents Associations/Forums
 - Educational establishments
 - Councillors
 - Council staff
 - Voluntary sector organisations
 - Statutory consultees
 - Infrastructure providers

Local residents who are interested in being consulted also have their name and contact details on the database.

- 1.17 Finally, the Council has a commitment to engage with hard to reach and vulnerable groups. The Council recognises that more specialised methods of consultation are needed to ensure that these groups have an equal opportunity to have their say. The Planning Policy Team offered to go out to community groups, venues that were compliant with the Disability Discrimination Act (DDA) to hold special meetings and engaged a Community Cohesion Officer to ensure all groups were consulted with.

2 Early engagement

- 2.1 Between July and August 2005 several informal consultation events took place in order to inform the production of the Planning Strategy. A questionnaire was also utilised. The following events were held:
- 4 open workshops aimed at general and specific consultation bodies
 - 3 business workshops
 - 1 housing workshop
 - 1 staff and elected members workshop
 - 1 Local Strategic Partnership (LSP) workshop
 - 1 session with Ore Valley Forum Planning SIG
 - 1 session with Hastings Youth Council
- 2.2 Following these events further informal consultation took place between January 2006 and September 2006 to feed into the 'Issues and Options' stage of the Planning Strategy development. These consisted of:
- 4 Neighbourhood Renewal road shows
 - 2 Café Consultations (impromptu conversations)
 - 1 workshop for new elected members
 - 3 workshops for new Hastings Borough Council staff members
 - 1 workshop with Hastings Youth Council
 - 1 workshop with Ore Valley Forum Planning SIG
 - 1 workshop with Celebrating Cultural Diversity Network
 - 1 workshop with Hastings Environmental Network
 - 1 workshop with representatives from the Black and Minority Ethnic communities
- 2.3 In total over 200 people from Hastings contributed to the development of the Planning Strategy at this stage.

3 Shaping Hastings Issues and Options Consultation (2006)

Purpose of Consultation Stage

- 3.1 The Council embarked on an information gathering process to determine the needs and issues relevant to Hastings that should be considered in the Planning Strategy. Consultation on the Issues and Options took place from 30th October 2006 to 8th December 2006.
- 3.2 The earlier Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 required local planning authorities to undertake consultation with each of the specific and general consultation bodies, as appropriate, as well as with local residents and businesses during what was formerly termed as the “Issues and Options” stage of preparing the Planning Strategy.

Who was invited to make representations?

- 3.3 The Council consulted with the specific, general and ‘other’ consultation bodies as set out in the Regulations and earlier guidance from the Department of Communities and Local Government (CLG) as well as those detailed in the SCI (see Appendix A).
- 3.4 Local groups were invited to book a briefing event so they could find out more about the Local Plan and the Planning Strategy, and how to take part in the consultation. The sessions were not consultation events (opportunities to actually make comment) but a tool to raise awareness of the Planning Strategy and explain some of the concepts being consulted on. Table 3.1 details the groups who requested and received a briefing.
- 3.5 In addition to the above, an event was co-hosted between Hastings Borough Council and Hastings Voluntary Action (HVA) to brief local voluntary groups. 15 people attended the event on Monday 13th November 2006.

Table 3.1 Groups receiving briefing events from Planning Policy Team

Group	Date (2008)	Number present
Castle Ward Forum	Tues 24th Oct	10
HBC Democratic Services	Tues 31st Nov	7
Hastings Environmental Network	Mon 6th Nov	7
HBC Development Control	Thurs 9th Nov	12
St Leonards Area Board Meeting	Thurs 9th Nov	Display only
HBC Local Plan Briefing Group	Thurs 16th Nov	10
South St Leonards Community Forum	Thurs 16th Nov	8
Hastings & Rother Disability Forum	Mon 20th Nov	3
Local Strategic Partnership	Mon 27th Nov	30
Hastings & Rother Primary Care Trust	Mon 27th Nov	20
Briefing for elected members	Tues 28th Nov	7
High Street Traders	Weds 29th Nov	7
Older People's Groups	Thurs 30th Nov	60
Ore Valley Forum	Thurs 30th Nov	9

How were people invited to make representations?

- 3.6 A statutory notice of consultation was placed in several local newspapers, the Hastings Observer, Friday Ad and Ad News. Consultation packs were mailed out to the following:
- Statutory consultees and organisations (187 packs sent out)
 - Councillors (32 packs sent out)
 - Local voluntary groups and residents (77 packs)
- 3.7 A press release, a radio interview and a leaflet were used to promote the Issues and Options document and consultation. Customised letters were also sent to the different groups and organisations included on the Local Plan database
- 3.8 In total, 301 organisations were written to advising that the document was available and that they could download it from the Councils website, or request a copy from the Planning Policy Team.
- 3.9 The document was distributed in the week commencing Monday 23rd October 2006, to ensure that consultees received it prior to the start of the consultation period. The document was also made available on the Council's planning pages of the website, with a link to both the front page and the consultation section. The document can be viewed at http://www.hastings.gov.uk/environment_planning/planning/localplan/documents/#cs
- 3.10 The Council provided two versions of the document and a structured questionnaire on the Council's website. One version was electronic, complete with graphics and designed layout. The other was a simple text version that could be easily read by screen reading software. The questionnaire was structured so as to ask specific questions of respondents in relation to each Issue and Option in order to gain their comments and views.
- 3.11 The questions asked within the questionnaire were structured around themes such as the Vision, Strategic Objectives and Affordable Housing, amongst others. The majority of questions sought a simple 'Yes'; 'No'; 'Agree' or 'Disagree' answer from respondents in relation to a statement or option presented. Respondents were also asked to suggest alternative ideas or scenarios.

Summary of main issues raised by representations and how they were taken into account

- 3.12 In total 161 individuals/groups responded to the consultation, resulting in over 6,000 comments. The majority of the responses were received on the official questionnaire however a small number of responses were made by letter.
- 3.13 Due to the nature of the consultation and the document, the process resulted in broad responses, providing a general direction in which to take the next stage, the Preferred Approaches.

- 3.14 A number of recurring themes emerged from the analysis including the following:
- Having a realistic vision for Hastings that includes reference to the sea, tourism and culture but which does not wholly rely on these for development
 - Sustainable development and culture are key to promoting the image of Hastings
 - Strong support for:
 - Prioritising development on Brownfield land
 - HBC taking a strong line with developers on provision of affordable housing
 - Town Centre and Seafront being priority areas for change
 - Investment in public transport and good transport links as critical to prosperity
 - Development proposals contributing to community infrastructure
 - Introducing the Building Research Establishment Environmental Assessment Methods (BREAAM)
 - Focus on retail provision in local centres with a balance between national and local stores
 - Balance needed between employment and housing provision
 - Priority to avoid a net loss in biodiversity
- 3.15 All the comments received and responses from the Council were collated into three documents; a high level Consultation overview providing a summary of the comments made; a Consultation Summary listing key points and finally a Consultation Catalogue detailing all the comments made in their entirety.
- 3.16 The Consultation Summary runs to 125 pages and the Consultation Catalogue runs to over 400 pages. Both are available for review on the Councils website at http://www.hastings.gov.uk/environment_planning/planning/localplan/documents/#cs
- 3.17 Appendix B summarises the comments made on each of the 'Issues and Options' and where they have been addressed in the next stage of the Planning Strategy, the Preferred Approaches. A full record of all comments made is available in the consultation catalogue and summary mentioned above.

4 Shaping Hastings – Planning Strategy Preferred Approaches 2008

Purpose of Consultation Stage

- 4.1 The Preferred Approaches document set out a vision, strategic objectives, a spatial planning strategy and topic areas for change management up to 2026¹.
- 4.2 The Preferred Approaches document laid out a preferred approach having considered the comments received at the Issues and Options stage, and evidence from further studies.
- 4.3 The Council's preferred policy approaches were grouped together by subject area, with suggestions as to how an issue may be dealt with by a policy or policies. Consultation on these approaches was undertaken in accordance with Regulations 26 and 27 of the Town and Country Planning (Local Development) (England) Regulations 2004, which were in force at the time the consultation was undertaken.
- 4.4 The consultation ran for 12 weeks from 12th May 2008 to the 8th July 2008. The document was prepared having full regard to the comments raised through the Issues and Options stage.

Who was invited to make representations?

- 4.5 The Council consulted with the statutory and general consultation bodies as set out in the Regulations (see Appendix A) as well as those detailed in the SCI and included on the Local Plan database.
- 4.6 All contacts on the database were invited to make representations including those who responded to the Issues and Options consultation.

How were people invited to make representations?

- 4.7 Cabinet approval to undertake public consultation on the Planning Strategy Preferred Approaches and accompanying Sustainability Appraisal was given on 31st March 2008. The report was approved with minor amendments and the decision can be viewed by searching on the Council's website at http://www.hastings.gov.uk/decisions_democracy/council_meetings/meetings/
- 4.8 Mail shots were sent to those on the Local Plan database, everyone who responded to the Issues & Options consultation and people/organisations who requested notification of publication of the Local Plan documents.
- 4.9 In addition, the statutory stakeholders were sent a pack containing a copy of the Preferred Approaches and Sustainability Appraisal documents, a non-

¹ The Planning Strategy has subsequently been re-phased and now runs from 2011 – 2028.

technical summary of the Sustainability Appraisal, a summary leaflet of the Preferred Approaches document and a paper copy of the response and Equal Opportunities forms. The statutory stakeholders are listed at Appendix A.

- 4.10 The non-statutory stakeholders were sent a CD of the Preferred Approaches and Sustainability documents, leaflets advertising the exhibition dates; a response form, an Equal Opportunities form and links on where to find the relevant information on the Council's website.
- 4.11 There were seven exhibitions held at various locations within the town which were open to all members of the public, in an effort to ensure as many people as possible had the opportunity to attend. The exhibitions were advertised in local magazines, with leaflets and posters displayed at various locations and at the exhibition venues. The exhibitions and numbers who attended are detailed in Table 4.1

Location	Number of attendees
Sainsbury's	351
Gensing & Central St Leonards Forum	35
West St Leonards Community & Social Club	11
All Saints Church Hall	27
The Bridge Community Centre	40
4 Courts Community Centre	9
Priory Meadow Shopping Centre	542
Total Attendance	1,015

Table 4.1 Exhibition Locations and Number of people attending

- 4.12 A statutory notice of consultation was placed in the Hastings Observer (See Appendix C). A Planning News article (No.75), was placed on the Council website advertising the consultation and exhibitions. The consultation and planning pages of the Council's website were also updated with details and information on the consultation process.
- 4.13 As with the Issues and Options consultation, briefings were offered to local groups and residents associations via the website and local Councillors. The Council's internal newsletter advertised the exhibitions² preview to Councillors and staff in advance of the go-live date in the town.
- 4.14 Members of the Planning Policy Team attended meetings of local forums and groups and the Local Area Management Board, as well as attending the Local Strategic Partnership (LSP) meeting.

² @Bit Newsletter – Issue 190 – 5th May 2008 http://intranet/abit/issue190_080505.aspx

Summary of main issues raised by representations and how they were taken into account

- 4.15 There were a total of 1,591 representations made on the Preferred Approaches document from 132 respondents. Of the representations made 206 (12.9%) were via email; 1,214 (76.3%) were via the official response form and 171 (10.7%) were via the consultation software on the Councils website. Of the representations made, 30.3% were in support, 42% were objecting and 27.7% made additional comments.
- 4.16 All the representations made were compiled into a 510 page summary report, which is available to view at our offices, or copies are available on request.
- 4.17 Appendix D summarises the representations made at this stage and indicates how these were taken forward in the Submission Version of the Planning Strategy. The key issues arising from the consultation were:
- 4.18 The Vision Statement – This was a description of how we would like Hastings to be in 2026³. Castle Ward Forum provided an interesting and imaginative alternative to Vision Statement and GOSE suggested the Vision Statement needed to be more locally distinctive. Therefore, we revised the Vision Statement to take on board some of the ideas of the Castle Ward Forum.
- 4.19 Strategic Objectives and supporting critical success factors - It was recognised that these needed to address climate change, learning and education, support for new and existing local businesses, the role of the creative and cultural sector. More emphasis on sustainable transport, biodiversity, green infrastructure and healthier lifestyles.
- 4.20 Spatial Strategy – It was recognised that this needed to emphasise more the vital importance of the Link Road and the Baldslow Road Improvement to the delivery of the strategy.
- 4.21 Breadsell Lane Area – Natural England strongly objected to the proposed allocation of this strategic housing site on the grounds of its possible impact on the Marline Valley Site of Special Scientific Interest (SSSI). This site was a key component of the future housing land supply and the Council actively engaged with Natural England to explore and test development options which might have been acceptable from a nature conservation viewpoint. However, the land at Breadsell is no longer being considered as a strategic development site and is no longer included in the Planning Strategy.
- 4.22 Hastings Town Centre Strategy – Comments centred here on the need to include reference to making the Town Centre more accessible by all modes of transport, protecting and enhancing the architectural heritage, improving the existing housing stock, improving its relationship with the Seafront and promoting leisure and cultural facilities.

³ The Planning Strategy has been re-phased to cover 2011 - 2028

- 4.23 Wilting Area – A number of respondents raised concerns about proposed future development in the Wilting Area. This development area has not been taken forward in the Planning Strategy.
- 4.24 Affordable Housing – Comments centred on the need to tighten the policy approach to deal with situations where developers may split sites to avoid the policy threshold; be clear that there is a presumption in favour of on-site affordable provision and to set a Borough wide target for the overall proportion of intermediate housing. The Affordable Housing policy has been revised since the Preferred Approaches consultation and was subject to a further round of public consultation. Policy H3 of the Planning Strategy, 'Provision of Affordable Housing' seeks affordable housing or a financial contribution in lieu of on site provision on all sites involving a net of 1 or more dwellings.
- 4.25 Employment Land – The consultation revealed support for the provision of live/work units around the town and the need to plan for the needs of small and medium sized enterprises. The Planning Strategy has been adjusted to reflect this.
- 4.26 Tourism – There was considered to be a need for a clear statement on what the overall strategy is on the future direction of tourism in the town. A policy has been introduced to respond to this issue
- 4.27 Sustainable Transport –It was felt by respondents that a clear strategic transport policy, based around sustainable transport options, was needed and therefore a policy has been incorporated to respond to this issue.
- 4.28 Community Infrastructure – Many respondents put forward suggestions for infrastructure to be financed by developer contributions i.e. community facilities, local skills training, transport, green space, water, sewer and waste infrastructure. These have been considered in the drafting of a new infrastructure policy for the Submission Version of the Planning Strategy, supported by the Infrastructure Delivery Plan.
- 4.29 Biodiversity – Natural England and the Environment Agency advised that we should have a generic criterion based policy on biodiversity protection and enhancement and such a policy has been incorporated into the plan.
- 4.30 Green Infrastructure – This relates to all the different types of green space in the urban area. Natural England suggested a model policy on this and there is a commitment in the Planning Strategy to identify a green infrastructure network, which will be supported by a Green Infrastructure Strategy.
- 4.31 Strategic Gap – GOSE commented that the identification of strategic gaps was not supported in the Secretary of States comments on the South East Plan and suggested we should delete reference to protecting the 'strategic gap' between the built up edge of St Leonards and the western boundary of the Borough.
- 4.32 Renewable Energy and Climate Change – Comments centred on the need for an overall strategic policy to demonstrate what the local planning authority and partners are doing to adapt and mitigate against climate change. A strategic policy was incorporated to ensure that the principles of

sustainability and climate change are addressed in the planning for development.

- 4.33 All the representations made were considered in full by the Planning Policy team. Appendix D provides a summary of the comments made to the Preferred Approaches consultation. To view the comments, and Council responses, in their entirety please see the full summary report.

5 Planning Strategy Informal Consultation 27th June – 8th August 2011

Purpose of Consultation Stage

- 5.1 This was an informal consultation carried out following significant changes to the planning system since the Preferred Approaches consultation in 2008. This consultation sought to gain views from local people and stakeholders on the changes and new areas of the Planning Strategy. The changes to the planning system included a requirement for Councils to have a locally determined housing target, in light of the intended revocation of Regional Spatial Strategies in line with the Localism Bill⁴.
- 5.2 There were 459 comments received to this informal consultation. 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?

- 5.3 The Government has advised that it intends to abolish the regional plan for the area (known as the South East Plan). It will be down to local planning authorities to determine and justify housing targets. We consulted on a locally determined target of 3,418 new homes (201 per year) between 2011 and 2028 as well as higher and lower housing targets.

Significant policy change

- 5.4 Several policy changes and new policies have been included in the Planning Strategy since the Preferred Approaches consultation:
- 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 (HMO's)
 - 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

⁴ The Localism Bill was introduced to Parliament on 13th December 2010 and received Royal Assent on 15th November 2012, becoming an Act of Parliament.

Spatial Strategy

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

Who was invited to make representations?

- 5.6 All those listed on the database were invited to make representations, as well as all who responded to the Issues and Options and Preferred Approaches consultations. The statutory and general consultation bodies were also contacted.
- 5.7 Members on the Hastings Voluntary Action (HVA) database were also invited as were followers of the Planning Policy teams Twitter and Facebook pages.

How were people invited to make representations?

- 5.8 Extensive advertising, mailing and tweeting was carried out at an early stage to ensure people had sufficient time to make arrangements to comment, as well as regular updates throughout the process. The following advertising took place:
- An early advert was placed in the Hastings Voluntary Action Newsletter of 24th May 2011 - notifying readers in advance of the consultation going live
 - Early notification of the consultation was advertised on the Council's Planning Policy web pages and on Facebook and Twitter from 2nd June 2011 with regular updates on each site since
 - 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 and/or representations
 - Details of the consultation placed in @Bit on 27th June 2011
 - Access to the Council's consultation pages through the computer in Planning reception at Aquila House granted to the public
 - A notice was placed in the Members Bulletin No. 684, issued on 23rd June 2011.
 - Planning News issue 108, dated 21st June 2011, gave details of the consultation and was available via the Council's Planning website at http://www.hastings.gov.uk/environment_planning/planning/
 - A general advert appeared in both the Hastings and Bexhill Observer issues dated 24th June 2011
 - A press release was issued by the Council marketing team which was picked up by the Argus on 30th June 2011 and also run on Arrow FM on 30th June 2011

- Corporately the Council website consultation page carried information on the consultation and included a direct link to the consultation web page, and the link was available from the Council Homepage almost continuously since the consultation began
- The consultation pack, official response form and software use instructions were also available in the main Central Library, the Hastings Information Centre and at the Council Planning offices at Aquila House
- We also promoted the consultation at the Local Strategic Partnership meeting and at St Leonard's festival in July 2011.
- Planning Policy attended a public meeting at the Gensing & Central St Leonards Forum on 28th July 2011.

Summary of main issues raised by representations and how they were taken into account

- 5.9 The results of this consultation were analysed and a consultation report produced. The full report can be viewed on the Councils website at http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation/previous_consultations/
- 5.10 A number of issues were raised and identified through this consultation. These related primarily to:
- The housing figure being too high and concerns around high density development
 - Loss of greenspace and lack of infrastructure to support additional housing
 - Affordable housing should be spread throughout the town and within sites
 - Requiring a % of affordable housing on sites considered too restrictive by some
 - Support (local residents) for HMO policy due to antisocial behaviour resulting from high concentrations in certain areas
 - Objection (the Residential Landlords Association) to HMO policy as the requirements are too restrictive
 - Consider issues of drainage on development sites
 - Include positive policies supporting older peoples housing
 - Need to provide garden space for family housing, including flats
 - Concern that some development has occurred without regard to the impacts on biodiversity
 - Southern Water requested a specific policy protecting their sites and premises and a detailed policy about proximity of development to wastewater facilities
 - Need for a new leisure centre to account for the number of proposed new homes
- 5.11 Some comments made and issues raised required actions for and amendments to the Planning Strategy. These are summarised in Appendix E together with the actions proposed by the Council to be taken forward in the Submission Planning Strategy.

- 5.12 Other comments were made and considered in full by the Planning Policy Team, however they did not result in any proposed changes to the Planning Strategy as many of the issues raised had been addressed in the Strategy already. These comments centred around the following:
- The housing figure of 3,418 being too high
 - More homes does not always equate to attracting more people from outside the town
 - General support for policies on Green Infrastructure especially the Greenway Project and balancing the need to retain, enhance and expand tourism development such as holiday parks
 - Need a legal minimum size for properties
 - One comment made that St Andrews Square should be developed for large scale retail.
 - Concern over demolition of older buildings with character to make way for redevelopment
 - Need to focus on improving low quality housing before building more
 - Closer working with Rother District Council on a review of employment land at Ivyhouse Lane needed
 - Ensure the Ore Business Park is kept as employment land
 - Play provision is more important than public art
- 5.13 The Sustainability Appraisal (SA) of the Housing Target was published as Appendix B of the Hastings Local Development Framework: Core Strategy informal consultation document.
- 5.14 Comments relating to the SA included the need to maintain momentum on improving private sector housing; alleviate pressure to build on Greenfield sites and that social exclusion and poverty in St Leonards will not be addressed by additional housing. Existing properties and infrastructure needs upgrading to help achieve this goal.
- 5.15 A draft Infrastructure Delivery Plan (IDP) was published alongside the Planning Strategy for consultation during this informal stage. The IDP is section 6 of the informal consultation document, available online at: http://www.hastings.gov.uk/environment_planning/planning/localplan/documents/#cs. The IDP attracted 110 individual comments which are summarised, together with the Council's responses, in the 'Hastings Local Development Framework Core Strategy Informal Consultation 27 June – 08 August 2011 Summary Report' – available at: http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation/previous_consultations/
- 5.16 The main issues arising from comments on the IDP centred on the following broad topics:
- Concerns over the adequacy of existing infrastructure and need for infrastructure to be in place prior to development
 - Need for community centres in Central St Leonards and St Andrews area
 - Need to include cultural infrastructure
 - Upgrade existing educational facilities instead of building new ones

- Include public realm and historic environment as infrastructure
- State that existing community facilities will be safeguarded
- Include the Hastings Greenway Project and its associated benefits to health, transport and education
- Developer contributions should go towards community facilities
- Concerns over adult social care provision
- Sewerage infrastructure capacity requires consideration and appropriate measures to be taken by developers
- Need to update the broadband service in the town
- Protect Ore Valley instead of having blocks of flats and open spaces
- Need for the development of children's playspaces in St Andrews area; South St Leonards and Warrior Square Station
- Designate the convent grounds and Robsack Meadow as green space
- More emphasis on landscape and urban fringe areas
- Need to improve the roads i.e. the A21
- Improve rail and bus services
- Reference the Community Infrastructure Levy (CIL)
- Include targets for cycle paths, cycle parks and modal shifts towards walking and cycling

5.17 The Infrastructure Delivery Schedule (IDS) was also published for consultation during this informal stage and is available as part 7 of the Informal consultation document. The IDS attracted 21 comments, which are again summarised with the Council's response, in the Informal Consultation report mentioned above.

5.18 The main issues arising from comments on the IDS focused on:

- Universal water metering; local sewerage and water distribution infrastructure should be included
- More detail on junction improvements on the Ridge and the Quality Bus Partnership
- New leisure centre will be needed
- Play provision is more important than public art
- Ore Valley open space needs to be managed in the short term
- 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

5.19 The final IDP and IDS were updated and amended as necessary, in light of the comments made.

6. Consultation on the Proposed Submission Planning Strategy 25 May to 17 August 2012

- 6.1 On the 5th March 2012 the Council's Cabinet approved the publication of the Hastings Planning Strategy Proposed Submission Version for a final round of public consultation in accordance with Regulation 27 (now regulation 19). It was resolved that the document be published for a period of 12 weeks and residents, community groups and all other stakeholders be invited to submit representations on the "Legal Compliance" and "Soundness" of the Plan.
- 6.2 Throughout the period of consultation, the Hastings Planning Strategy Proposed Submission Version, the final Sustainability Appraisal Report, the Statement of Consultation and all other supporting documents were available for inspection at Hastings Information Centre, Hastings Reference Library and Hastings Borough Council Planning Reception, Aquila House.

Who was invited to make representations?

- 6.3 All contacts included in the Local Plan database were invited to make representations. This included any persons or organisations who had made comments during earlier rounds of consultation. In line with Regulation 19 a statement of Representation Procedure was issued to all general and specific consultation bodies inviting them to make representations (a copy of the statement can be found in Appendix F).

How were people invited to make representations?

- 6.4 4 awareness raising or 'How to' sessions were held during the consultation period, the aim of these sessions was to give guidance on how make a representation and to explain legal compliance and the tests of soundness. A separate guidance note was also made available to take away from these sessions and download from the Council's website. Both the 'How to' sessions and the guidance note were base on information contained in PINS guidance. In addition to the 'How to' session followed up with 'Drop in' sessions were held during the later part of the consultation period. These offered set times when planning policy staff would be available to provide advice and assistance in making representations. The availability of the 'How to' and 'Drop in' sessions were advertised on all the publicity material including leaflets, posters, news paper adverts and on the Council's website.
- 6.5 Extensive advertising, mailing and tweeting was carried out at an early stage to ensure people had sufficient time to make arrangements to comment, as well as regular updates throughout the process. The following advertising took place:
- Adverts were placed in the Hastings & St Leonards Observer over the consultation period, these appeared as a full page advertisement on 25.05.12, a ¼ page advertisement on 22.06.12 and ¼ page advertisement on 03.08.12. The advertisement included details of the consultation together with the dates and locations of 'drop in' sessions (an example is shown in appendix G).
 - A statutory notice was published in the Hastings & St Leonards Observer on 25.05.12 (see appendix H).

- Corporately notification of the consultation appeared on the Council's website homepage and remained on the homepage for the duration of the consultation period
- The Council's Planning Policy web pages included a dedicated 'current consultations' page which included links to all of the relevant documents (available to view or download) a downloadable representation form, a guidance note on how to make your representation, as well as the facility to comment directly online
- The Local Plan Newsletter was issued on 23.05.12 to everyone on the Local Plan database (approx 516 by email & 214 posted)
- Follow-up letters were sent to statutory consultees on 08.08.12 as a reminder following the earlier distribution of the Local Plan Newsletter.
- Notification of the consultation was included in the Development Management team's Planning News issue 116 which was published at the end of June on the Council's website
- Information regarding the consultation appeared in the Members bulletin on 21.05.12. Individual letters were also sent to Members letters (for information and dissemination purposes) on 25.04.12
- A short article appeared in the Hastings Voluntary Action (HVA) newsletter in the May/June 2012 issue (issue no.236) this newsletter is emailed to 881 HVA members & posted to approx 200 other members.
- All HBC staff were informed of consultation via an internal electronic newsletter
- A5 information leaflets were available throughout the consultation period in the Council Offices in the Planning Reception Upper Ground Floor, Aquila House, and also at the Hastings Information Centre (HIC), Hastings Town Hall, and from the offices of the HVA
- A4 Posters were also placed in the Council Offices, Planning Reception Upper Ground Floor, Aquila House, the Priory Meadow Shopping Centre, Hastings Town Centre, the HIC, the offices of Hastings Trust, Robertson St and in the Members room
- A4 posters were also given to local supermarkets for display on notice boards
- 25 A1 Posters were posted along Hastings Seafront for the duration of consultation
- An advert was included in the Summer 2012 edition of the Council's 'About magazine' which is circulated all households in the Borough
- Electronic copies of the A5 information was forwarded to the Town Centre Manager and the Council's Neighbourhood co-ordinator team for distribution purposes
- Facebook/Twitter - updates & website information links were posted during the consultation period
- Notice was given to the Council's Contact Centre regarding the consultation, they were also advised to pass on any enquiries which they were unable to answer
- An advert was placed in the Hastings & St Leonards Directory (issue no.50 covering May/June), copies are delivered to households in the town and are also available to pick up from local venues.

Summary of the main issues raised by representations

- 6.6 232 representations we received on the Proposed Submission version consultation. All representations were made in respect of the Planning Strategy, no representations were made on the Sustainability Appraisal Report. The representations came from 30 respondents (20 organisations and 10 individuals), with 128 representations being made online via our consultation software, and 104 in paper format. A summary of the key issues raised is provided below and appendix I shows a summary of all the representations received.
- 6.7 Representations can be viewed online and paper copies are available from the Council offices to view on request. Each respondent has been contacted either by email or letter with an acknowledgement of their submission and confirmation of what has been recorded on our system.

Introduction, Vision and Objectives

- 6.8 This part of the Planning Strategy provides some introductory text outlining the remaining process. It also sets the vision for the town up to 2028 (including a shared approach with Rother District Council), supported by 7 strategic objectives.
- 6.9 We received 63 representations on these chapters. Representations centred mostly on the Vision and the Vision Statement, what was included, and whether it was achievable. The main issues included:
- Query whether the document as a whole was compliant with the National Planning Policy Framework (NPPF).
 - The Vision for the town is weak - it doesn't adequately address the need to improve life expectancy, general health and well being, poverty and deprivation or improvements to education.
 - The Plan needs to address issues around drainage and sewage disposal and the Greenway.
 - Conservation areas and improvement of the Victorian heritage should be considered.
 - We should protect rather than just encourage cultural activities.
 - Rother District Council are supportive of the shared approach and objectives relating to joint working.
 - Bourne Leisure welcome the specific support for the tourism industry.
 - Kember Loudon Williams (the agent for the landowners at Breadsell Lane) also objected particularly to Objective 2, which sets out the number of new homes to be built in Hastings up to 2028. They consider that this is a significant and unsupportable reduction in provision when compared to the housing trend projection figure of 7,840 dwellings up to 2028.

The Development Strategy

- 6.10 Development Strategy policies in the Planning Strategy set out the amount of housing employment and retail development that will be needed in the town up to 2028, and identify how this will be delivered.

- 6.11 44 representations were received in relation to these chapters. The main comments centred on the designation of Planning Focus Areas and the proposed housing target in Policy DS1. Specifically, comments received centred on:
- Lack of a credible evidence base or earlier consultation on the designation of the Planning Focus Areas.
 - Overall housing target being inconsistent with the target in the South East Plan.
 - The Breadsell Lane site should be included in the proposed housing growth figures - the reasons for its exclusion can be mitigated against (Kember Loudon Williams).
 - Conversely, several objectors commented that the housing number is too high - concerns over density of development, the impact on the historic environment, and concern that the town has almost reached saturation point for development.
 - The lack of certainty over the inclusion of the return of empty homes back into use as part of the housing supply. The lack of evidence supporting the provision for windfall development
 - Current underprovision of green space and sports pitches.
- 6.12 East Sussex County Council registered support for our Employment Growth policy (DS2), although mentioned that the Planning Strategy should recognise that employment growth elsewhere in the County (not just Rother) is important to help supply local need and meet employment growth objectives.
- 6.13 It was also stated that there were some inconsistencies in the Strategy with regard to retail provision. Policy DS3 makes clear that Hastings Town Centre sequentially needs to be the first choice location for accommodating retail growth, which is inconsistent with later paragraphs that indicate support for St Leonards Town Centre.

Planning Strategy Spatial Areas

- 6.14 This section introduces strategic policies for each of the Spatial Areas - Western, Central and Eastern Area. It also includes policies for specific areas of change including Hastings Town Centre, Central St Leonards and The Seafront.
- 6.15 39 representations were received in relation to this section. Most of the comments related to particular planning focus areas and accommodating the development targets within them.

Western Area:

- Kember Loudon Williams considers the level of housing provision in this area does not reflect its capability to provide additional housing.
- Bourne Leisure propose additional wording to ensure that flood risk on a site does not entirely preclude development.
- The Highways Agency has also noted the volume of development proposed, and have highlighted that they will require sustainable

transport infrastructure to be provided in order to minimise the impact on the strategic road network, particularly in planning focus areas 1 and 3 (Little Ridge & Ashdown, and Filsham & Bulverhythe), given their proximity to the A21 and the A259.

- Rother District Council object to the reference to renewable energy generation in Combe Valley Countryside Park, as they do not consider that a sufficiently comprehensive assessment has been made to determine that this is the most appropriate area. They suggest that further work is required so as not to limit potential to the Combe Valley Countryside Park only.

Central Area:

- There needs to be more focus on regenerating St Leonards Town Centre, and a commitment to regeneration at Crystal Square.
- The references to the amounts of open space in the area are misleading.
- Objections to the proposed housing range for planning focus areas 6 (Maze Hill & Burton's St Leonards) and 7 (Central St Leonards and Bohemia).
- Burton's St Leonards needs to receive higher recognition as a high value heritage asset, as the Old Town is in Policy FA5.
- Object to inclusion of Archery Road in Strategy for Central St Leonards.

Eastern Area:

- Objection to densities in Old Town and Ore Village - 40 dwellings per hectare is too high.
- Inappropriate for Hillcrest & Ore Valley and Clive Vale & Ore Village to be separate Planning Focus Areas.
- Housing range for the above areas is inappropriate - already over developed.

The Seafront:

- Does not mention White Rock Theatre in terms of cultural quarter development.

Theme based policies

- 6.16 These policies are the overarching policies that will be needed to guide and manage the development set out in the Development Strategy and Spatial Area policies. The policies relate to a variety of issues including sustainable communities, protecting the environment, housing, local economy, community infrastructure and transport and accessibility.
- 6.17 77 responses were received on these chapters. In summary, comments were as follows:
- Managing change in a sustainable way - suggested that requiring assessment of all development against the Building for Life Standard

should be re-instated. Sewerage and sea water standards also need to be addressed. Southern Water recommended additional criterion to ensure that sensitive development such as housing is adequately separated from wastewater facilities to safeguard the amenity of future residents. The Environment Agency are in support of the flood risk element.

- Protecting the environment - concern that EN1 (Built and Historic Environment) doesn't comply with requirements of the NPPF, there is a lack of play facilities in the town and that allotment land needs to be protected. It was suggested that Speckled Wood should be protected as open space, and that White Rock Gardens should be identified as a space of town-wide significance. Southern Water argued that EN4 (Landscape) and EN5 (Open Spaces) could be unduly restrictive on utility development and should be amended to take account of situations where the benefit of the development outweighs any loss.
- Housing - Density targets of 40 dwellings per hectare should be reduced to 30 dwellings per hectare. Evidence base (Housing Needs Survey and Housing Market Assessment) is out of date and needs to be revised, and need a stronger requirement for Lifetime Homes. There is some concern that the affordable housing policy is overcomplicated, will make development unviable and is not supported by appropriate evidence. Objections to the Housing in Multiple Occupation policy due to a number of factors including the lack of evidence base to justify the policies and being contrary to the NPPF in terms of providing for all types of housing. It is also thought that the policy is designed to act as a barrier to the provision of good quality shared accommodation for students.
- Local economy - Bourne Leisure support the tourism policy but do not accept that there is no evidence of demand for more caravan and camping accommodation. Extensions to caravan and camping facilities should be encouraged.
- Community infrastructure - objection from Falaise Bowls Association Ltd, as the Plan needs to make specific reference to indoor bowling facilities. East Sussex County Council support the policy, although recommend some amendments to the wording in order to avoid confusion.
- Transport - The junction between The Ridge and A21, and the Tonbridge to Pembury Link on the A21 should be identified as Strategic Road Schemes, as they are critical to the area. Highways Agency are supportive of the policies, but stress that sites may require a Transport Assessment to ensure the impacts on the road network are understood. Objections to the section on Park and Ride - suggested that it should be re-written to make provision for such a scheme in the future. Both East Sussex County Council and Rother District Council are in support of this chapter.

Key Diagram

- 6.18 The Key Diagram provides a strategic, graphical indication of where new development will take place in the town. Only 3 representations were received on this. The most significant objection was from Rother District

Council who objects to the inclusion of the renewable opportunity area identified on the Key Diagram as it is shown to be within the boundary of Rother District Council. Other comments related to the maps and key diagram being unacceptable, and not distinguishing between areas in the Area of Outstanding Natural Beauty, and other significant open spaces.

Monitoring and Implementation

6.19 This provides a framework for monitoring the delivery of policies in the Planning Strategy. Appendices are also provided that show how existing Local Plan policies (in the 2004 Plan) will be superseded as a result of the implementation of the Planning Strategy, and as well as the Housing Trajectory. Only 2 representations were submitted in relation to this chapter, which were concerned with:

- No targets included regarding access to General Practitioner services.
- Whether addressing children in poverty, and general deprivation is addressed.
- The target for multifunctional green space/play areas being unacceptable.

Superseded Policies (Appendix)

6.20 This table set out how Local Plan policies contained within the adopted Hastings Local Plan 2004 are to be superseded by policies in the Planning Strategy, and the forthcoming Development Management Plan. Four representations were received for this chapter, although not always related to the superseding of policies themselves. The most significant comment was that Policy SC1 (Managing Change in a Sustainable Way) is quoted many times as superseding policies in the adopted Local Plan, but there was concern that this would not be achieved.

Amendments to the Planning Strategy

6.21 No significant changes are being proposed by the Council as a result of representations made under Regulation 20. The Council will submit to the Inspector, a schedule of minor amendments that the Council would like to make prior to the adoption of the Planning Strategy. This proposes mostly only minor spelling and grammatical changes and updated references as well as:

- Reference to the determination of the Built up Area Boundary in the Development Management Plan.
- Amendments to the Development Contributions Policy as suggested by East Sussex County Council (for clarification).
- Relocation of renewable energy opportunity area on the key diagram to being within the Hastings boundary, as well as some textual changes in the main document to reflect this, in order to address some of Rother District Council's concerns.

- Town, District and Local Centres - clarification of the requirements to submit retail impact assessments for developments over 1,000sqm gross floorspace.

Appendix A - Specific (Statutory) and General Consultation Bodies

Under Regulation 18 (1) of the Town & Country Planning (Local Planning) (England) Regulations 2012, the requirement to consult the public includes specific and general bodies, as well as consulting those residents and/or businesses the council considers appropriate.

Specific (Statutory) Consultation Bodies

The specific consultation bodies are listed in the Town and Country Planning (Local Planning) (England) Regulations 2012 under Regulation 2 (1) and relate to organisations responsible for services and utilities and infrastructure provision.

These are a list of specific bodies **which must be consulted with** by the council when preparing development plan documents in which they may have an interest. The specific consultation bodies are:

- The Regional Planning Body (Government Office for the South East)
- The Coal Authority
- The Environment Agency
- English Heritage
- The Marine Management Organisation
- Marine & Fisheries Agency
- Ministry of Defence
- Crown Estates Commission
- Health and Safety Executive
- Sport England
- Natural England
- The Secretary of State for Transport (Department for Transport)
- A regional development agency whose area is in, or adjoins, the area of the Council (Previously SEEDA)
- Network Rail Infrastructure Limited and the Strategic Rail Authority
- The Highways Agency
- A relevant authority, any part of whose area is in or adjoins the area of the local council, such as:
 - a council (Rother District Council)
 - a county council (East Sussex County Council)_
 - a parish council (Parish Councils of Westfield; Guestling; Fairlight; Crowhurst and Battle)
 - a police authority (Sussex Police)
- any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003 (Mobile Operators Association)
- any person who owns or controls electronic communications apparatus situated in any part of the area of the council (Vodafone; Orange; NTL; British Telecom; O2)
- The Homes and Communities Agency
- any of the bodies from the following list who are exercising functions in any part of the area of the council:
 - Primary Care Trust (Sussex Partnership NHS Trust; Surrey & Sussex Strategic Health Authority; Hastings and St Leonards PCT; East Sussex

Hospitals NHS Trust; East Sussex Downs and Wealden Primary Care Trust)

- person to whom a license has been granted under Section 7(2) of the Gas Act 1986 (British Gas)
- person to whom a license has been granted under Section 6(1)(b) or (c) of the Electricity Act 1989 (Seeboard Energy; EDF)
- Sewage undertaker (Southern Water)
- Water undertaker (South East Water).

General Consultation Bodies

The general consultation bodies are also listed under Regulation 2 (1). The Regulations identify five types of bodies as general consultation bodies that relate to voluntary organisations representing certain groups within the community. The general consultation bodies are:

- voluntary bodies some or all of whose activities benefit any part of the council's area
- bodies which represent the interests of:
 - different racial, ethnic or national groups in the Local Planning Authority's area
 - different religious groups in the Local Planning Authority's area
 - disabled persons in the Local Planning Authority's area
 - persons carrying on business in the Local Planning Authority's area.

When preparing Local Plan documents, the Council must consult those general consultation bodies it considers appropriate. The Council consulted the following general consultation bodies:

- Hastings Voluntary Action
- Hastings Trust
- Gensing and Central St Leonards Community Forum and LSP
- Hastings Arts Forum and LSP
- Hastings Planning & Heritage Watchdog
- National Federation of Gypsy Liaison Groups
- Migrant Helpline One Stop Service - Sussex
- Equality and Human Rights Commission
- The Northridge Gospel Hall Trust
- Religious Society of Friends
- Jehovah's Witnesses
- Fellowship of St Nicholas
- Ashburnham Christian Trust
- Churches Together in Hastings and St Leonards
- Hastings and Rother Disability Forum
- Focus on Mental Health
- Hastings and Rother Voluntary Association for the Blind
- Hastings and Bexhill Mencap Society
- East Sussex Disability Association
- Hastings Pensioners Association
- Age Concern
- Hastings and St Leonards Seniors Forum
- Federation of small businesses
- Hastings and St Leonards Chamber of Commerce

Other Consultation Bodies

The key principle is that the Council should carry out public consultation that is appropriate for the Local Plan document being produced. It may be appropriate to consult with other agencies and organisations in addition to those identified as specific or general consultation bodies.

The Council consulted the following 'other consultation bodies':

1066 Enterprise	KFC
161 Living Ltd	Kings Road Traders' Association
A & M Architectural Services	Laton Technical
AB Electrical and Security Co. Ltd	Little Ridge Community Primary School
Adams Hendry Consultancy Ltd	LM Associates
Adams John Kennard (AJK)	Locate East Sussex
Agent for P Vairavan	Magnifique
Agent on behalf of Mr Stuart Lyons	Manningtons
All Saints CE Junior School	Manor Insurance Ltd
Alpha Electric Ltd	Marina Estate Residents' Association
AmicusHorizon Ltd	Marine Court Residents Association
Ashley Homes	Markwick Gardens Association
Astec Computing (UK) Ltd	Marshall Tuflex
Atkinson Beeston	Maze Hill Terrace Residents' Association
Barton Wilmore	Michael Hall Building Designs
Batcheller Monkhouse	Millwood Designer Homes
Batcheller Thacker	Moat Homes Ltd
BBM Sustainable Design Ltd	Montagu Evans Chartered Surveyors
BeSure Security Systems	Morgan Carn Partnership
Better Braybrooke	Neil Choudhury Architects
Bexhill Road Residents' Association	New Horizons
Biscoe Craig Hall	Nick Wates Associates
Blacklands Primary School	Oakfield Property Management
Bohemia Area Association	Oakfield Sales
Bourne Leisure Ltd	Oasis
Bovis Homes Ltd	O'Keefe Scanlon Partnership
Boyer Planning Ltd	Old Hastings Preservation Society
Brian Kent	One Stop Estates
Broomgrove Residents' Association	Orbit Housing Group
Bullet Coffee House	Ore Community Land Trust
Campaign for Better Transport	Ore Valley Action
Capper and Co Ltd	Ore Valley Forum Planning SIG
Casa Support	Park Lane Group
Castle Courtiers Residents Association	Parker Dann
Castle Ward Forum	Peacock & Smith
Castledown Community Primary and Nursery School	Pelham Crescent Residents Association
Chartered Architect	Penbuckles Ltd
Child Support Agency	Persimmon Homes South East
Chris Thomas Ltd	Peter Shoesmith & Co Ltd

Christ Church CE Primary School	Peter Taylor Associates Ltd
Churchwood Community Primary School	Phil Standen Windows, Doors & Conservatories
Clarion Consulting	Phillips Jeans Homes
Clive Vale Residents Association	Places for People
CLM Planning Limited	Planning Potential
Club4Kids	Plastica
Cluttons LLP	PRC Planning
Colliers CRE	Protect Robsack Meadow Campaign Group
Concept Advisory Services Ltd	PRP Architects
Country Landowners Association	Pump House Designs
CPRE Sussex Group	R Winchester and Son
Creative Media Centre	Radiator Community Arts Group
Creative Partnerships Sussex & Surrey	Rambler Coaches
Crime Reduction Initiatives	Ramblers Association
David L Scott MCIAT	RDP
Delboys Wholesale	Red Lake Community Primary School
Design Council CABE	Red Lake Residents' Association
Designcrew	Refuge
DHA Planning	Renewable UK
DMH Stallard	Robert D. Stokes
Downs Farm Residents' Association	Robsack Wood Community Primary School
DPDS Consulting Group	Rother District Council - Amenities Services
DPP	Rother Homes Ltd
DPS Sussex Ltd	Rother Ramblers
Drivers Joans Deloitte	RPS Planning
Dudley Infant School	RSPB SE Regional Office
Earthscapes Design Ltd	Sacred Heart Catholic Primary School
East Sussex Fire and Rescue Service	Sad Owls Residents Group
Ebenezer Chapel	Sandown Primary School
Eco Magpie	Savills (L&P) Ltd
Edmundson Electrical	Savills Planning & Regeneration
EF HSY	Saxon Mount School
Elphinstone Community School	Scott James Commercial Ltd
Enabler	Sea Space
English Partnerships	Seaview Project
Epic Life	Secol Engineering Ltd
FAT promotions	Sedlescombe Park Estate Residents' Association
Federation of Sussex Amenity Societies	Sellens French
Focus-SB	Shining Cliff Residents Association
Forestry Commission	Shoe Shuffle
Four Courts Residents' Association	Shore Sands Community Choir
Freight Transport Association	Silverdale Primary School
Friends of Hastings Country Park	Simply Italian
Friends of the Earth	Southwater Community Centre
Friends, Families and Traveller and Traveller Law Reform Project	Southwater Residents Association

Fusion Online Ltd/Leith Planning Ltd	Speckled Wood Group
G.P.PromoWear	St Andrews Area Residents Association (STAR)
Gems	St Helen's Down Residents Association
GL Hearn	St Helens Woods Preservation Society
Gladedale Homes Ltd	St Leonards CE School
Greater Hollington Association	St Mary in the Castle Friends
Green Insurance Brokers Ltd	St Mary Star of the Sea Catholic Primary School
Gregory Gray Associates	St Matthews Residents' Association
GSL Design Partnership	Stace and Co
HARBA	Stade Partnership
Harley Shute Residents' Association	STAG
Harnells Hastings	Stagecoach in East Kent and East Sussex
Hastings & Rother Health and Social Care Forum	Stewart Ross Associates
Hastings & St Leonards Childrens Centres	Stiles Harold Williams
Hastings and East Sussex Natural History Society	Strategic Prospective
Hastings and Rother Agenda 21	Strutt & Parker
Hastings and Rother CAB	Sussex Coast College - Hastings
Hastings and Rother University of the Third Age	Sussex Turnery & Moulding Company
Hastings and Rother Urban Design Group	Sussex Wildlife Trust
Hastings and St Leonards Allotment Federation	Tempo Arts
Hastings and St Leonards Hotels and Tourism Association	The Burton's St Leonards Society
Hastings Borough Council Staff	The Campaign for Real Ale
Hastings Community Housing Association	The Golden Girl
Hastings Community Network	The Grove
Hastings Borough Council Councillors	The Hastings Centre
Hastings Democratic Alliance	The Hastings Greenway Project
Hastings Environmental Network	The High Weald AONB Unit
Hastings F.O.E	The Lawn Tennis Association
Hastings Greenway Project	The Planing Bureau
Hastings Jobcentre Plus	The Residential Landlords Association
Hastings Old Town Residents' Association	The Sammons Group
Hastings Pier & White Rock Trust	The Showmen's Guild of Great Britain
Hastings Pier Operations Ltd	The Tanning Company
Hastings Sewing Centre	The Theatres Trust
Hastings Tramway Club	The White Rock Hotel
Hastings United Football Club	Thimbleinas
Hastings Urban Bikes	Together: Working for Wellbeing
Hastings Urban Wildlife Group	Tomorrows People

Hastings Windows Ltd	Torfield School
Hastings Young Person's Council	Town Centre Management
Hawthorn Area Residents Association	Trade Carpets
Hayland Development Ltd	Turley Associates
Hazle McCormack Young LLP	University of Brighton
Healthwatch/Link	Viking Insurance Services
Helenswood School	VRD Group
Hewgill & Bennett T/A Weruwise	Walden Pond Housing Co-Operative Ltd
High Street Traders' Association	WAS
Hillcrest School	West Hill and District Community Association
Hills & Pollington Ltd	West Hill Road Residents' Association
Hivac Engineering Ltd	West St Leonards Community Primary School
Hobbs Parker Property Consultants	West St Leonards Early Years Centre
Hollington Park Charitable Trust	Westall Walker Associates
Hollington Primary School	Wheel Park Farm
Home Builders Federation	White Young Green
Hornbye Park Sports Complex	Wilks Head & Eve
HSBC Bank PLC	William Parker School
Hyde Housing Association	Winterbourne Close Residents' Association
Icklesham Joinery	Wiseup
Impact Design and Print	Wishing Tree Residents' Association
In Touch Home Improvement Agency (Hastings & Rother)	WM Morrison Supermarkets Plc
James Butcher Housing Association	Working Links
John Lambe Associates	WS Planning
Jones Homes Southern Ltd	WYG Planning
Judith Norris Ltd	Xpress Advocacy Service
Kember Loudon Williams Ltd	Your Move

Appendix B

Issues and Options consultation – Main issues raised

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
1 – Location, Scale and Type of Major Development	<p>55% of respondents support options to accommodate up to 20% more housing than indicated in the SE Plan. 38% do not and 7% had no opinion.</p> <p>Support for making best use of Brownfield land as a priority. HBF support the Greenfield option as this gives more flexibility to viably deliver new market & affordable housing and had concerns over the feasibility of developing difficult Brownfield sites without subsidy.</p> <p>Use empty buildings for housing</p> <p>There was a need for mix of housing sites and locations to accommodate skilled and professional newcomers to the town as well as provide affordable housing.</p> <p>Close working with Rother was emphasised for any development on the town's western edge and in relation to Wilting.</p>	<p>Addressed through the choice of Housing Option 3 to provide 4,966 net new dwellings between 2006-2026.</p> <p>Addressed through the choice of Option 3 Housing Delivery. 58% of net new dwellings to be on PDL and 42% on Greenfield. Also incorporated into Preferred Approach 2 'The Re-use of Previously Developed Land' of 60% residential development in the Borough each year to be on PDL.</p> <p>At the time of the consultation we were not allowed to count these in our housing provision figures</p> <p>Preferred Approach 20(3) 'Housing Mix' Preferred Approach 23 'Overall target for Affordable Housing'. Preferred Approach 26 'Land Supply'</p> <p>Preferred Approach 1 'Location of New Housing'. Preferred Approach 19 'Wilting'</p>
Employment Locations	<p>28% of respondents felt that Hastings had sufficient employment land of the right quality and in the right locations to support employment growth to 2026. 35% disagreed and 37% had no opinion.</p>	<p>Preferred Approach 3 'Employment Locations'. Council consider employment related development should be within the Town Centre, established industrial estates, land identified for employment development/mixed use/strategic sites.</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
Location of Retail Development	65% of respondents thought that we should seek to accommodate as much as possible of the forecast future needs for retail floorspace in Hastings Town Centre. 20% disagreed and 15% had no opinion.	Preferred Approach 4 'Location of Retail Development – Comparison Goods'. The majority of the 30,000m2 additional goods floorspace will be in the Town Centre with an element of new provision in St Leonards District Centre. Retail Warehousing to be accommodated on edge-of-centre or out-of-centre sites.
2 – Areas of Change Hastings Town Centre	Many people agreed that the future of the town centre was a priority issue and the need for a new library was raised.	Preferred Approach 7 'Hastings Town Centre – Overall Strategy. Preferred Approach 8 'Hastings Town Centre' New library not mentioned but educational development included.
Central St Leonards	<p>Suggestions for the area included demolishing and rebuilding areas of poor housing quality; support for incentives to encourage the creative sector to locate in the area and the need for more extensive and rigorous enforcement to improve the appearance of buildings</p> <p>Resources should be concentrated on improving housing conditions in the area</p> <p>Permission for conversions resulting in one bedroom dwellings should be refused in Central St Leonards and the Town Centre to create sustainable mixed communities. Larger family sized dwellings should be promoted where possible.</p> <p>Increase provision of owner occupied was more welcome than social rented housing as a way of improving mix of housing tenures.</p>	<p>Demolition not considered viable on a large scale as much of the area is a Conservation Area. Preferred Approach 9 'Central St Leonards – Key Developments Proposed'. Key projects and proposals taken from the Regeneration Framework</p> <p>Preferred Approach 10 'Central St Leonards – Improving Housing Choice and Conditions.</p> <p>Preferred Approach 11 'Central St Leonards – Creating a Sustainable Community' Part (a) Introduction of an area based planning policy requiring all residential schemes to provide a mix of dwelling unit sizes within single developments.</p> <p>Preferred Approach 20(2) 'Housing Mix': Achieve a more even mix of housing tenure in Town Centre and St Leonards. Preferred Approach 11 'Central St Leonards – Creating a Sustainable Community</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
	<p>The private rented sector could become an important accommodation provider for the growing student population. ESCC mentioned that a higher proportion of family housing is needed to maintain the proportion of children and hence school numbers</p> <p>Improving the physical environment was not considered in detail</p> <p>Economic development was not considered in detail in the I&O consultation but is an important part of the overall strategy for St Leonards area.</p>	<p>Preferred Approach 11 'Central St Leonards – Creating a Sustainable Community' Part (b) and (c)</p> <p>Preferred Approach 12 'Central St Leonards – Improving the Physical Environment'</p> <p>Preferred Approach 12 'Central St Leonards – Economic Development'</p>
Pebsham Countryside Park	General agreement of the creation of the park. Some people stated that only the Brownfield land in the area should be developed.	Preferred Approach 14 'Pebsham Countryside Park'. To identify the Countryside Park as a sustainable multi-functional area
Ore Valley Millennium Communities	<p>Businesses should be introduced as well as housing/landscaping, to take away the overall feel of a housing estate</p> <p>More should be said about Millennium Communities key aims – high quality design, innovative, sustainable development and the aim to increase public transport usage.</p> <p>Task force are pleased to see that Millennium Community Sites are identified.</p>	<p>Preferred Approach 15 'Ore Valley Millennium Community'. Supports the inclusion of retail/office space as well as housing and amenity land.</p> <p>Preferred Approach 15 'Ore Valley Millennium Community'. States that the entire area will be built to the standards required by the "Ore Valley, Hastings Millennium Community Urban Design Codes"</p> <p>N/A</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
	Millennium Communities sites are at risk from a failure in terms of sustainability as road improvement schemes along with over generous parking in Hastings town centre, will undermine the public transport market and discouraging cycling and walking	N/A
The Seafront	Concern was raised about over development of the seafront, particularly in relation to offices. Plans for the seafront should consider the effects of climate change, mention securing the future of the pier.	Preferred Approach 17 'The Seafront' notes that key projects and proposals for the seafront will be considered in more detail as part of subsequent development plan documents.
Wilting	<p>Concern was raised that the area could be in danger of becoming a satellite and an example of urban sprawl and that the development would extend the town beyond its boundaries. It was also thought that the area was the only true countryside and to remember that it is next to the Combe Haven SSSI. The site was considered too remote and would generate extra traffic for the link road.</p> <p>It was also thought that development is essential to provide extra employment. Suggestions included making Wilting a transport hub, and including a visitor centre, specialist shopping or a virtual 1066 centre.</p>	<p>Preferred Approach 19 'Wilting'. Supports the inclusion of the site as a preferred option for Rother but that it would provide quality housing and jobs for residents of Hastings and Bexhill. A new station would be key to the sustainability of any proposal in terms of housing and jobs. Further work needed into the feasibility. Only seeking views on the concept at this stage not the finer detail.</p> <p>As above</p>
3 – Housing (Mix)	67% of respondents agreed that we should be seeking a proportion of lifetime homes in new developments and to consider meeting the needs of older people and those with disabilities. 53% also agreed that we should seek to diversify existing housing tenure in both Hastings Town	Preferred Approach 20 'Housing Mix' proposes promotion of a mix of dwelling types, sizes and tenures in all development. Families, the elderly and those with disabilities will be catered for in particular.

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
	<p>Centre and Central St Leonards.</p> <p>The HBF stated that the mix of tenure and sizes should be decided on a site by site basis. 1066 Housing Association stated that they would welcome the private rented sector being displaced by other tenures.</p> <p>83% of respondents agreed to the promotion of larger dwellings and more innovatively designed housing.</p>	<p>As above</p> <p>Preferred Approach 20 'Housing Mix'. States that lifetime homes standards be applied to all suitable housing sites.</p>
3 – Housing (Density)	<p>A residential density of 35-40 dwellings per hectare was considered appropriate for the town with higher levels of between 70-75 dwellings per hectare in specific areas such as Silverhill, Ore and Old Town. Emphasised that we should provide mixed use developments and that density decisions should require appraisal of the topographical situation. 92% of respondents agreed that all high density schemes should be subject to a design statement.</p> <p>Higher density should not be at the expense of existing green spaces or established and valued urban character.</p>	<p>Preferred Approach 21 'Density'. Densities of at least 30 dwellings per ha unless there are very special local circumstances. 40 dwelling per ha in more sustainable locations. Included Silverhill, Ore and Old Town in this.</p> <p>Preferred Approach 3 'Employment Locations' and Preferred Approach 26 'Land Supply' both promote mixed use developments and Design and Access statements will deal with this issue also.</p> <p>Preferred Approaches 38 & 39 'Landscape Protection' & 'Nature Conservation and Improvement of biodiversity' protect and enhance the Boroughs natural assets. Preferred Approach 40 'Open Spaces – Enhancement, provision and protection' looks to promote a strategic policy direction for the provision and management of the towns open spaces. Preferred Approaches 48 and 49 'Sense of Place and Local Identity' & 'Built and Historic Environment' look to assess design quality and protect or enhance the built environment during development.</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
Gypsies and Travellers	No Options were put forward in the 2006 I&O consultation.	Preferred Approach 22 'Gypsies and Travellers'. To include location Part for a site in the Core Strategy as a basis for considering individual proposals brought forward.
Affordable Housing	<p>43% of respondents agreed that developers should pay a commuted sum so that affordable homes can be built on sites elsewhere in the town.</p> <p>Developers should be required to 'pepperpot' affordable housing throughout a development.</p> <p>Developers should provide different forms of affordable housing such as shared ownership or key worker housing – providing that they can prove that there is a market for such housing locally.</p> <p>Provision of key worker housing critical to maintaining key services including education. Concern that this approach may be used to avoid providing social housing for rent.</p>	<p>Preferred Approach 25 'Specifying the size and Form of Affordable Housing' Where the Council decide off site provision is beneficial a commuted sum or provision may be accepted</p> <p>Preferred Approach 25. Pepperpotting will be required rather than blocks of a single tenure.</p> <p>Preferred Approach 24 'Types of Affordable Housing Needed'. Preference is for greater part of affordable housing to be for social rent although a degree of flexibility will be retained in order to widen housing choice.</p> <p>As above</p>
The Local Economy	<p>New sites for employment should be identified</p> <p>Existing plans and policies to protect employment land and premises should be strengthened</p>	<p>Addressed in strategic sites in Preferred Approaches 1 and 18</p> <p>Preferred Approach 26 Land Supply. Seek to protect all viable employment land/premises through policy and a Supplementary Planning Document</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
	<p>A mix of employment generating uses should be encouraged on employment sites.</p> <p>Start up and grow on space is required</p> <p>The intensification of employment areas should be encouraged.</p>	<p>Partly addressed in Preferred Approach 3 'Employment Locations' and will subsequently be picked up in the submission version Site Allocations DPD.</p> <p>Preferred Approach 26. Encourage the redevelopment of existing out-moded stock and development of new office based employment in Hastings Town Centre.</p> <p>Preferred Approach 26. Encourage denser development within the primary employment areas at Ponswood, Ivyhouse Lane, Castleham, The Ridge West and Churchfields.</p>
Skills and Training	<p>Actively support the provision of child care services to support improving the skills base and educational attainments of the workforce.</p> <p>The potential for live-work units should be explored</p>	<p>Preferred Approach 27 'Skills and Training'. The Council will support proposals that improve, protect and where needed make new provision for childcare services.</p> <p>Preferred Approach 26. Encourage live/work units on housing development sites.</p>
Tourism	<p>General support for tourism and the need to enhance our tourist offer.</p>	<p>Preferred Approach 28 'Tourism'. Encourage the provision of new hotels and the upgrading of existing facilities. Presumption against the loss of bed spaces in the Old Town, The Town Centre, Seafront and Warrior Square. Visitor Accommodation SPD to be prepared to support this policy</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
Transport & Accessibility	<p>Need to improve access to Hastings by both road and rail to reduce its relative peripherality if the regeneration objectives of the town are to be achieved</p> <p>Improve accessibility to reduce the need to travel</p>	<p>Preferred Approach 30 'Strategic Road and Rail Schemes'. To support the timely delivery of strategic road and rail schemes identified in the draft South East Plan Implementation Plan.</p> <p>Preferred Approach 32 'More Sustainable Transport Options. Support the draft Hastings and Bexhill Local Area Transport Strategy in particular the 5 strategic objectives of maximising accessibility, improving air quality and environment, safety, tackling congestion and promoting regeneration.</p>
Community Infrastructure and Quality of Life	<p>Development proposals must contribute to improving the education attainment, health, safety, quality of life and well being of local residents and visitors to Hastings. 92% of respondents supported this.</p>	<p>Preferred Approach 36 'Community Infrastructure'. Provide an up to date policy including developer contributions towards community and other infrastructure, supported by a detailed Supplementary Planning Document.</p>
Neighbourhood Planning – Area Co-ordination	<p>Area co-ordination should be recognised as a key way of putting planning policies into practice.</p> <p>Area co-ordination is an important way to involve local communities in planning issues relevant to their neighbourhood.</p> <p>Area co-ordination should be recognised as a mechanism for ensuring continual improvement in services provided by the Council</p>	<p>Preferred Approach 37 'Area Co-ordination'. Recognise the role in the Local Plan by clearly identifying in planning documents where it can have a positive impact in policy implementation.</p> <p>Preferred Approach 37. The Council will talk to local people about development of new planning policies</p> <p>This is not a plan issue but is addressed in Paragraphs 19.12 and 19.13</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
Green Space, Landscape and Leisure	<p>Biodiversity strategy outlined in the I&O documents supported by 94% of respondents.</p> <p>Forestry Commission maintain that Ancient Woodland should have the same protection as SSSI's.</p>	<p>Outlined and taken forward in Preferred Approach 38 'Nature Conservation and Improvements in Biodiversity'</p> <p>This decision is taken by National Government</p>
Children's' Play Provision	Support for the approach to play provision set out in the Parks and Open Spaces Strategy	Preferred Approach 43 'Children's Play Provision'. Local green spaces should be designed in a way that maximises their informal play value. Developers will be required to design housing environments in which children have space to play informally and safely.
Environmental Sustainability and Design	<p>Further emphasis needed on the risk of sea flooding in the Local Plan.</p> <p>Encouragement of sustainable modes of transport in the town.</p> <p>Designing out crime and encouraging better accessibility to developments</p>	<p>Preferred Approach 44 'Sustainability and Design'. Have a strategic policy which manages flood risk through reference to the SFRA and appropriate SUDs</p> <p>Preferred Approach 32 'More Sustainable Transport Options'</p> <p>Preferred Approach 44. A strategic policy which promotes equality of access to developments for the whole community</p>
Sustainable Design	<p>All new developments should meet the minimum level of sustainable construction, for example using BREEAM and the Code for Sustainable Homes standards.</p> <p>Recognised that requiring the highest level could be too onerous on developers in a town where viability is an issue.</p>	<p>Preferred Approach 44. A strategic policy requiring all developments of 10+ dwellings to meet level 3 of the Code for Sustainable Homes. All businesses over 1,000m2 to meet BREEAM standards.</p> <p>Preferred Approach 44. Set minimum standard as Level 3 and also including viability testing of a selection of sites in Hastings as part of the preparation of the evidence base for a detailed policy.</p>

Chapter in Issues and Options	Summary of main issues raised	Where the issues raised have been taken into account
Renewable Energy	<p>Developers required to submit an assessment of a developments energy demand</p> <p>At least 10% of this energy demand should come from on site renewable energy.</p>	<p>Preferred Approach 46 'Renewable Energy – On Site Provision'. A flexible policy will be developed to encourage developers to consider a range of renewable energy technologies on sites. Policy targets may increase during later reviews of the plan to reflect the need to address climate change.</p> <p>Preferred Approach 46. All new commercial development over 1,000m2 or residential development of 10+ dwellings at least 10% of energy requirements to be provided from onsite renewable energy.</p>
Flood Risk and Water Quality	General support for according with the draft South East Plan policy in relation to Sustainable Flood Risk Management	Preferred Approach 47 'Flood Risk' Developments will be directed away from flood risk areas in accordance with principles set out in PPS25 and informed by the Council's Strategic Flood Risk Assessment (SFRA).
Sense of Place and Local Identity	<p>Support for the proposal to prepare urban design guides for those parts of the town where new development is likely to impact on features of local identity.</p> <p>Prepare site specific design briefs for major development sites.</p> <p>Support for a policy encouraging developers to invest in public art in the development and surrounding area.</p>	<p>Preferred Approach 48 'Sense of Place and Local Identity'. The Council will require all major planning proposals involving residential development to address the 20 questions that make up the CABI Building for Life Standards.</p> <p>Preferred Approach 48. Depending on circumstances, suitability and timing place specific design briefs may be appropriate.</p> <p>A detailed policy is to be addressed in the Development Management Plan</p>

Appendix C – Statutory Notice of Consultation for Preferred Approaches (placed 9th May 2008)



Public Notice

HASTINGS LOCAL DEVELOPMENT FRAMEWORK

OPPORTUNITY TO COMMENT ON THE CORE STRATEGY PREFERRED APPROACHES DEVELOPMENT PLAN DOCUMENT

Hastings Borough Council is inviting comments on the following:

- **Shaping Hastings**
Core Strategy Preferred Approaches
- **Shaping Hastings**
Core Strategy Preferred Approaches Sustainability Appraisal (incorporating the requirements of Strategic Environmental Assessment)

The Core Strategy covers the whole of the Borough, and contains planning policy and guidance that will help shape development in Hastings over the next 20 years. The Core Strategy and its associated Sustainability Appraisal are part of a series of documents that will form the Hastings Local Development Framework.

The Core Strategy Preferred Approaches and Sustainability Appraisal documents are available at the following locations:

Hastings Information Centre, Priory Meadow, Hastings
Opening hours: Mon – Fri: 8.30am – 6.15pm
Sat: 9am – 5pm
Sun: 10.30am – 4.30pm

Century House, 100 Menzies Road, St Leonards
Opening hours: Mon – Thurs: 8.45am – 4.45pm
Fri: 8.45am – 4.30pm

For inspection only at Hastings Reference Library, 13 Claremont, Hastings
Opening hours: Mon: 9.30am – 6pm
Tue, Thurs: 9.30am – 6.30pm
Wed: 9.30am – 1pm
Fri: 10.30am – 6.30pm
Sat: 9.30am – 5pm

Hastings Borough Council website at
www.hastings.gov.uk/ldf/resources.aspx

The consultation period for these documents will run from Monday 12 May until Tuesday 8 July 2008. The first two weeks will be for informal consultation and publicity; **the remaining six weeks from Tuesday 27 May to Tuesday 8 July are the statutory consultation period, and it is only during this time that we are able to accept comments.** Comments can be made online at <http://www.hastings.gov.uk/ldf/consultation.aspx>, or by filling out an official response form and returning it to LDF Core Strategy Consultation, Hastings Borough Council, Century House, 100 Menzies Road, St. Leonards-on-Sea, East Sussex, TN38 9BB.

Please indicate on your response form whether you would like to be notified at a specific address of the submission of Shaping Hastings - Core Strategy to the Secretary of State for independent examination, and adoption.

For further information please contact
Forward Planning on 0845 274 1098

Date published: 9 May 2008

www.hastings.gov.uk

Appendix D

Preferred Approaches consultation – Main issues raised

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
The Vision Statement for Hastings	The Vision Stement should be more locally distinctive.	The vision statement has been revised to reflect concerns raised by the then Government office the South East (GOSE) and points raised by local groups
Objective 1: Regeneration, housing and employment – increasing business activity & creating employment	<p>Improvements in and expansion of the education sector are critical to the regeneration of Hastings</p> <p>The location and amount of office space should be located throughout the town, not just within the Town Centre, with the inclusion of home working and smaller units.</p> <p>Ensuring a high quality urban fabric will attract inward investment (regeneration) stimulating economic activity</p>	<p>This is recognised in Objective 1 (c) and (g). Although the major investment needed to improve education provision has already been made or committed, it is expected that further related investment will continue. This is outlined at paragraphs 9.7-9.9</p> <p>This reflected in Objective 1 (d); (e); (h) (i) and followed through in Policies DS2: Employment Growth and E1: Existing Employment Land which deal with the location of new employment space and the retention of existing employment space respectively.</p> <p>The importance of a high quality urban environment is reflected in objective 3: Safeguard and improve the town's environment.</p>
Objective 2: Regeneration, housing and employment – providing new homes for exiting and future	High quality design, green infrastructure and biodiversity protection/enhancement should be integral to all development within the town.	Part i) in Objective 3 addresses the issue of biodiversity protection and enhancement in regards to development. Part c) in Objective 3 makes provision for the identification, protection and improvement of a green infrastructure network. Objective 4 incorporates sustainable design with specific reference to addressing climate change. Policies SC3; EN2 and EN3 incorporate these issues.

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
residents	<p>Greater partnership working to deliver infrastructure and services should be followed, promoted and supported.</p> <p>Affordable housing should be on all sites regardless of size to prevent developers splitting sites to avoid the threshold for provision.</p> <p>Developing land at Breadsell Lane would help improve the range of housing options available in the town</p>	<p>Policy CI1 addresses the issue of infrastructure provision to support new development. The Infrastructure Delivery Plan will set out the key infrastructure that will be required to deliver the Planning Strategy; this has been drawn up in consultation with infrastructure providers.</p> <p>Policy H3: Provision of Affordable Housing seeks affordable housing or a financial contribution in lieu of on-site provision on all sites involving a net of one or more dwellings.</p> <p>In view of the very strong objection raised by Natural England the inclusion of Breadsell Lane as a strategic development site is not being pursued in the Planning Strategy</p>
Objective 3: Regeneration, housing and employment – identifying sufficient land and floorspace to support business, retail, education & skills sectors	Business development and provision of appropriate premises are important to the town's regeneration. Support should be given to a range of businesses, purpose built units and the creative/cultural sectors as well as reducing out-commuting by providing jobs locally.	Objective 1: Achieve and sustain a thriving economy, addresses these issues, together with DS2 Employment Growth
Objective 4: Regeneration,	Previously developed land (PDL) and bringing empty homes back into use whilst not allowing development on Greenfield	There is no longer a national target regarding the redevelopment of PDL. However, since the town has a tightly drawn urban area with

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
housing and employment – prioritise the use of previously developed land (PDL)	land should be focused on; however the figure of 60% development on PDL may be unachievable.	much of the Greenfield land on the edge of town is protected; the Planning Strategy will continue to prioritise the development of PDL. This is reflected in Objective 2(b) and in the explanatory paragraphs (4.16-4.17) to Policy DS1: New Housing Development.
Objective 5: Retail – promote retail sites for development in Hastings & St Leonards centres	<p>It should be made clear whether the floorspace figures referred to in the document are Gross or Net and separate figures provided for comparison goods and service trade.</p> <p>The existing retail stock should be re-used and upgrading before developing the new space proposed, particularly in Hastings Town Centre and St Leonards. More specialised shops should be encouraged.</p>	<p>Policy DS3: Location of Retail Development and the explanatory text (4.46-4.50) clarifies this point.</p> <p>Part b) of Policy FA4 affords protection to the retail core of Central St Leonards. Part b) of Policy FA5 references the retention of traditional shops and facilities in the Old Town and Part c) maintains and enhances Ore Village as a District Centre.</p>
Objective 6: Retail – monitor and facilitate thriving district & local centres	<p>To ensure the District Centres of St Leonards and Ore continue to thrive, supermarkets and chain stores near these areas should be limited</p> <p>The objective is overly prescriptive regarding what uses can be accommodated in local shopping areas.</p> <p>The Town Centre should be referred to in this objective</p>	<p>Part b) of Policy FA4 identifies the Development Management Plan as the means to protect Central St Leonard's retail core. Part c) of Policy FA5 Provides for maintaining and enhancing Ore Village as a District Centre.</p> <p>This issue will be explored further in the Development Management Plan</p> <p>Part i) of Objective 1</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Objective 7: Transport & Accessibility – work at local, county & national level to secure strategic transport improvements	<p>The objective should focus more on sustainable transport / sustainable transport policy and modal shift, the Link Road is not likely to assist here. Walking and cycling networks should also be promoted.</p> <p>Improved rail and public transport is needed, especially for access for Old Town residents to the Ridge and Queensway by bus</p>	<p>Objective 6 considers the provision of an efficient and effective transport system incorporating sustainable transport, cycling and walking networks. The Link Road will help alleviate congestion and is an integral part of a sustainable transport strategy for the two towns.</p> <p>The potential for strategic road and rail improves is set out at paragraphs 11.9-11.11 and Policy T1. Policy T3: Sustainable Transport and the explanatory text at paragraphs 11.15-11.21 make provision for supporting sustainable transport measures including improvements bus routes/services.</p>
Objective 8: Transport & Accessibility – promote sustainable alternatives to car use in new development	<p>Opportunities to improve public rights of way and invest in maximising cycling and walking routes should be focused on and better links made with public transport and the countryside.</p>	<p>Policy T3 makes provision for the creation of a strategic cycle network and improvements to pedestrian routes</p>
Objective 9: Quality of Life & Health – achieve sustainable and continued use of the seafront	<p>There needs to be a tourism specific objective and not just one focusing on the Seafront.</p> <p>The town needs sustainable, day and year long tourism activities and facilities to attract residents, visitors and businesses.</p>	<p>Objective 7 links tourism development to the Seafront and the wider townscape.</p> <p>Part a) in Objective 7 specifically references this. Policy E4: Tourism and Visitors also makes provision for tourism and visitors.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	<p>The National Cycle route should extend along the Seafront.</p> <p>There needs to be quality improvement in tourist accommodation</p>	<p>Paragraphs 11.19 – 11.21 and Policy T3 address this</p> <p>Policy E4: Tourism and Visitors seeks to support extensions to existing tourist accommodation subject to design and location; retain existing accommodation and encourage proposals for upgrading caravan and camping facilities.</p>
<p>Objective 10: Quality of Life & Health – enable an increase take-up of sport, leisure and cultural activities</p>	<p>Access to the Pebsham Countryside Park by cycling, walking and equestrianism should be promoted and improved, particularly the upgrading of the bridge at Bridge Way.</p> <p>There is a lack of sport and leisure facilities in the town, especially in St Leonards, and land should be allocated for such facilities in the Planning Strategy.</p> <p>There are no proposals for supporting cultural activities.</p> <p>A Borough wide network of cycle routes should be developed particularly along the Seafront and through the Town Centre.</p>	<p>Comments regarding the bridge and cycle access at Bridge Way passed on to the Pebsham Countryside Park Officers group for action.</p> <p>Full consideration was given to users, including equestrianism, although there are practical issues associated with the provision of additional paths due to the urban nature of the town and potential for conflict.</p> <p>The explanatory text to Policy CI2: Sports & Leisure Facilities outlines how the supply and demand for these facilities is likely to change over the lifetime of the Plan. Policy CI2 provides guidance on the location of new facilities and criteria against which the reduction in size or number of playing fields and sports pitches will be judged.</p> <p>Cultural opportunities have been identified in Central St Leonards, the Town Centre and Seafront and are reflected in the following Focus Area Policies FA2; FA3 (i); FA4 (c) (d) and FA6.</p> <p>Paragraphs 11.18 – 11.23 and Policy T3 address this. Links between destinations are being explored as part of this.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	<p>Whilst generally supporting objectives 10 & 11, they both fail to mention the benefits of equestrianism and the provision of safe off road riding facilities.</p>	<p>No change to the Planning Strategy – The Council is working with East Sussex County Council and Rother District Council to promote equestrian facilities at the proposed Pebsham Countryside Park. However, it is important to recognise that Hastings is a tight urban area, where it is not always practical to provide footpaths and facilities to be of a standard that can be accessible by horses. In addition, there is a potential conflict of use in terms of multi-users, as well as high management expectations - most footpaths within the town are maintained by East Sussex County Council as the Highway Authority who have no identified resource for increased maintenance and management of such paths.</p>
<p>Objective 11: Quality of Life & Health – contribute to improving the health & well being of the population</p>	<p>The issue of promoting and enhancing biodiversity in the town should be a separate strategic objective.</p> <p>Identifying, developing, enhancing and delivering a network of green spaces is important and, if successfully joined up, can help promote healthier lifestyles by encouraging cycling and walking</p> <p>A timetable for the delivery of joint pedestrian/cycle routes needs to be incorporated.</p>	<p>Part a) and i) in Objective 3 reference biodiversity promotion and protection.</p> <p>Part c) and d) in Objective 3 reference a green infrastructure network and link this to improving health and amenity for residents and visitors. Policy EN2 makes provision for establishing and protecting a green network.</p> <p>Paragraph 11.20 highlights this.</p>
<p>Objective 12: Environment and Sustainability –</p>	<p>Maps showing the location and boundaries of Local Nature Reserves and Sites of Nature Conservation Importance should be provided.</p>	<p>An indicative plan of green areas within the Borough, displaying likely species movement and the creation of a network of interconnected spaces that the Council aims to protect and</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
enable the delivery of high quality & sustainably designed developments	<p>Delivering sustainable development and sustainability objectives should not be at the expense of biodiversity and should include renewable energy and waste issues</p> <p>The location of renewable energy requires careful consideration in terms of working within the capacity of the landscape and its characteristics as well as the cumulative impacts</p> <p>Housing development should promote a sense of place and identity whilst providing a range of housing options. The design of new development should be against a range of guidance</p> <p>Reference to biodiversity should be included in this Objective</p> <p>On site renewable energy, grey water recycling and other sustainable design measures should be encouraged on developments and a specific policy/strategic objective relating to climate change adaptation included.</p>	<p>enhance, is included within the Planning Strategy under Chapter 7</p> <p>Part b); d) and e) of Objective 4 address issues of sustainability, renewable energy and waste reduction in regard to development, with specific reference to climate change</p> <p>The Planning Strategy includes the findings of the Hastings Renewable and Low Carbon Energy Study (2009) in Chapter 5 for the Western Area in paragraphs 5.19 – 5.20.</p> <p>Part g) in Objective 3 references high quality design and creation of sense of place, identity and neighbourhood</p> <p>Part a); c) and d) of Objective 3 reference improving the towns biodiversity</p> <p>Following Objective(s)/Policies included in Planning Strategy: Objective 4 'Addressing the impacts of climate change' Policy SC3 'Promoting Sustainable and Green Design'. Policy SC4 'Working towards zero carbon development' Policy SC6 'Renewable Energy Developments'. Policy SC7 'Flood Risk'</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	The Council should produce and agree with the local community a Local List of Historic and Heritage buildings in Hastings	Paragraph 7.4 of the Planning Strategy “Building and structures of local importance will be identified in a Local List”
Objective 13: Environment and Sustainability – promote, enhance & manage the town's unique cultural heritage & historic & natural environment	<p>Landscape and green infrastructure should be highlighted as important assets for attracting business to the town as well as contributing to quality of life through integration with developments.</p> <p>Archaeology and the town's maritime heritage should be included as assets to be enhanced and protected</p> <p>The lack of any reference to climate change within this objective particularly as it is a coastal location is a concern.</p> <p>The promotion, protection and management of the towns cultural, built, historic and natural environment is important to the future of Hastings.</p>	<p>Policy EN3 ‘Nature conservation and Improvement of Biodiversity’ addresses the need for development to take account of the natural environment. Part b) and c) in particular.</p> <p>Policy EN1 (f) ‘Built and Historic Environment’. Part e) in Objective 3 safeguards the town's cultural and maritime heritage.</p> <p>Objective 4 ‘Addressing the impacts of climate change’</p> <p>Objective 3; Policies FA2; FA4; FA5; FA6; EN1 – EN5</p>
Preferred Approach 1 – Location of New Housing	<p>Provision of community facilities and transport links should be considered key elements of large scale development and the delivery mechanisms need to be clearer.</p> <p>Concern at Breadsell Lane including poor access to shops and transport links; creation of an isolated site; its location adjacent to a SSSI and Ancient Woodland, its inability to deliver the level of development proposed and that its</p>	<p>Policies CI1 and T1 – T4</p> <p>The site at Breadsell is no longer being considered as a strategic development site and is no longer included in the Planning Strategy.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	<p>sustainability depends on employment and community facility provision.</p> <p>Support for using Breadsell as it will protect other areas within the Borough, such as the High Weald AONB, from development; deliver housing more quickly and efficiently than numerous urban sites and is needed as the towns housing requirements cannot be met on Brownfield land alone</p> <p>Brownfield sites should be prioritised ahead of Greenfield sites.</p> <p>New housing development must be accessible by walking, cycling and public transport.</p> <p>Consultation on sites to be allocated is needed.</p> <p>The annual increase of 210 dwellings is inadequate to meet housing requirements.</p>	<p>The site at Breadsell is no longer being considered for development and so is not included in the Planning Strategy.</p> <p>Objective 2 (b) prioritises Brownfield land. Chapter 4 'The Development Strategy'.</p> <p>Policies T3 and T4</p> <p>Non-strategic sites will be looked at through the Development Management Plan. The Planning Strategy will report the findings of the SHLAA.</p> <p>Since this consultation planning legislation has changed and a locally determined housing target is included in the Planning Strategy - 200 net new homes per year.</p>
Preferred Approach 2 – The Re-use of	General support for the use of Brownfield land over the life of the plan for development to aid regeneration, however the % should be 90 – 100% not 60%	There is no target specified in the Planning Strategy however Objective 2 (b) prioritises development on previously developed (Brownfield) land.

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Previously Developed Land (6 reps)	New employment locations should make maximum provision for walking, cycling and public transport use	Policies T1 – T4
Preferred Approach 3 – Employment Locations (16 reps)	<p>Maps are needed to show the location of existing and planned industrial and employment premises with green infrastructure and biodiversity enhancements incorporated into developments</p> <p>Employment locations must have sustainable transport links including walking and cycling provision.</p> <p>There needs to remain an element of flexibility when looking to safeguard existing employment areas so as to consider a range of employment generating uses.</p> <p>Sites for live/work units and modern industrial uses need to be identified</p> <p>Support for developing Brownfield sites</p>	<p>Key diagram provided in Part 5. Strategic Objective 3 and policies EN2 – EN5 cover green infrastructure and biodiversity issues.</p> <p>Strategic Objective 6. Policy T3 and paragraph 11.21 address cycling and linkages to employment locations.</p> <p>Policies FA1 – FA3 and FA5 state type and location of employment use in the Focus Areas. Policy E1 provides Part for protecting land for employment uses.</p> <p>Policy DS2 addresses these issues. Further work will be undertaken in the Development Management Plan.</p> <p>Objective 2 (b) in the Planning Strategy prioritises development on previously developed (Brownfield) land.</p>
Preferred Approach 4 – Location of Retail	The document needs to make it clear whether floorspace figures quoted are net or gross	Policy DS3: Location of Retail Development and the explanatory text (4.46-4.50) clarifies this point.

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Development: Comparison Goods	<p>Additional retail development needs to be provided for throughout the hierarchy of centres in the town to ensure their continued viability and vitality.</p> <p>Too much emphasis on retail floorspace provision in the Town centre instead of in the Old Town and Queensway and live/work units for artisans.</p> <p>Concern over Hastings relying too heavily on becoming a retail centre when it only has a 180 degree hinterland to draw customers from. Better to focus on the seaside location to bring people in as the present suggestion bears no relation to anything distinctive in the town.</p>	<p>Policy DS3 addresses this issue through a sequential approach. Policies FA2; FA3 and FA4 set out the distribution.</p> <p>Policy DS3 sets out the sequential approach of the Council.</p> <p>Policies FA1 – FA6 set out the development in each spatial area according to characteristics and capacity. Policy FA6 specifically focuses on a strategy for the Seafront. Policy E4 addresses tourism and visitor development.</p>
Preferred Approach 5 - Location of Retail Development: Retail Warehousing (7 reps)	<p>Retail warehousing should follow the sequential approach as it has been proven to adversely affect traditional town centres.</p> <p>It should be made clear that retail warehousing is required for bulky comparison goods only.</p>	<p>We will adopt a sequential approach to site selection as required by Government guidance. Policy DS3 Location of Retail Development sets out the sequential approach.</p> <p>Paragraph 4.46 (e) defines retail warehouse floorspace in these terms. Policy DS3 outlines location of retail warehousing provision.</p>
Preferred Approach 6 – Town, District and Local Centres (12 reps)	<p>Secondary shopping centres need protecting and some areas such as Ore Village, the Old Town and Silverhill need reclassifying as local and district centres respectively.</p>	<p>Policy E3 sets out the hierarchy of town, district and local centres.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 7 – Hastings Town Centre Overall Strategy (14 reps)	<p>The town centre needs to be accessible by all modes of transport and by people with and without disabilities and needs to promote sport, leisure and culture rather than relying heavily on retail.</p> <p>There needs to be more linkage between the overall strategy and the key aims of the vision statement as well as with PA8.</p> <p>The approach lacks any connection between the town centre and central seafront and should be revised to make provision for tackling dilapidated buildings; protecting architecture and improving housing.</p>	<p>Policy FA3 details the strategy for Hastings town centre and points (e); (f); (g); (i) and (k) address the specific comments raised.</p> <p>Policy FA3 brings PA7 and PA8 together and emphasises the importance of the town centres distinctiveness.</p> <p>Policy FA3 addresses these issues.</p>
Preferred Approach 8 – Hastings Town Centre	<p>Residential development should be identified in the town centre and floorspace figures need to be referenced as gross or net</p> <p>Too much emphasis on retail and office development and not enough on promoting leisure and residential development</p> <p>The approach lacks any connection between the town centre and central seafront and should be revised to make provision</p>	<p>Policy FA2 provides an indicative figure for the likely number of dwellings that could come forward in Hastings town centre over the Plan period. It will for the Development Management Plan to allocate residential development sites. In terms of retail floorspace, Policy DS3: Location of Retail Development and the explanatory text (4.46-4.50) clarify this point.</p> <p>The strategy for the town centre is to focus on economic regeneration in line with the overall strategy. However, providing for mixed and sustainable communities is recognised in Policy FA3: Strategy for Hastings Town Centre</p> <p>Policy FA3 addresses these issues</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	<p>for tackling dilapidated buildings; protecting architecture and improving housing.</p> <p>The town centre has too much large scale retail development and should focus on niche and specialist retail. The term comparison goods needs clarification</p>	<p>Paragraph 4.46 (a) defines the term</p>
Preferred Approach 9 – Central St Leonards: Key Developments Proposed	<p>Schemes planned for the Central St Leonards area should be broadened out to include Norman Road, London Road, Silchester Road, Western Road and not just the Crystal Square site.</p>	<p>Policy FA4 outlines the strategic approach to these areas.</p>
Preferred Approach 10 – Central St Leonards: Improving Housing Choice and Conditions	<p>Any development should take account of the architectural character of the area</p>	<p>Policy FA4 (j) addresses this issue.</p>
Preferred Approach 11 – Central St Leonards: Creating a Sustainable	<p>Policies need to be written to provide certainty in a way that positively drives and delivers change. At present these, read as too aspirational.</p>	<p>This has point has been addressed in FA4: Strategy for Central St Leonards</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Community		
Preferred Approach 12 – Central St Leonards: Improving the Physical Environment (5 reps)	<p>Support for development and enhancement of Warrior Gardens; approaches to tackling key buildings to respect their architectural characteristics and historic setting and to resist the loss of retail units to residential</p> <p>Traffic, congestion and parking are key problems in Central St Leonards and need to be addressed.</p>	<p>Policy FA4 (j) addresses this issue.</p> <p>Paragraphs 11.23 – 11.27 covers the approach to car parking in the Borough as a whole.</p>
Preferred Approach 13 – Central St Leonards: Economic Development	Too much focus on parking as an issue in recent years has obscured the needs of pedestrians, cyclists and bus and rail users, which needs addressing.	Policy FA4 (m) makes provision for encouraging sustainable transport and improving pedestrian and cycle routes.
Preferred Approach 14 – Pebsham Countryside Park	<p>Support for the identification of the Pebsham Countryside Park on a key diagram and that it should be linked to other cycle/pedestrian routes in Hastings and Bexhill to provide sustainable transport modes.</p> <p>Any development of the Pebsham Countryside Park needs to consider the environmental impacts in general and specifically on the SSSI</p>	<p>Policy FA1 (j) references linking the Countryside Park with the strategic network of cycle routes. Key diagram depicts</p> <p>Policy concerned with the Pebsham Countryside Park now subsumed into Policy FA1 'Strategy for Western Area'. Policy EN5 (c) affords protection and enhancement of the Countryside Park.</p>
Preferred Approach 15 – Ore Valley	Site not suitable for the level of development proposed due to its topography	Addressed in the Policy for Eastern Area

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Millennium Community		
Preferred Approach 17 – The Seafront (19 reps)	<p>Support for the identification of the Seafront as a strategic area of change</p> <p>Ensure the national cycle route 2 is taken off of the A259 and placed on the promenade</p> <p>The whole coastal zone needs an integrated and comprehensive approach to its development including a balance between coastal protection, recreation, business, transport, tourism and accommodation; extending the tourist season and be in constant consultation with landowners and operators in this.</p> <p>The main cultural venues on the seafront should be included as existing assets to be protected and an evening economy linking the town centre with the seafront developed.</p> <p>The pier and White Rock Baths need addressing.</p>	<p>Policy FA6 is specific to the Seafront</p> <p>Policy T3 makes provision for the strategic cycle network. The network has since been extended along the length of the seafront to Glyne Gap.</p> <p>Policy E4 included addressing tourism and visitors issues. Policy SC7 addresses flood risk and paragraphs 6.22 – 6.24 state the Councils position on coastal protection and do not exclude defences.</p> <p>Policy FA6 sets out the approach to Seafront development.</p> <p>Policy FA6 (h) supports finding a sustainable future for the pier. Policy FA6 (f) supports proposals for bringing White Rock Baths back into use.</p>
Preferred Approach 18 – Bulverhythe Area	The approach to this area needs to recognise its role as the western gateway to the Borough and its existing and potential tourism role	Policy FA1 refers to the area's tourism role as well as the overall approach to development in this area.

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 19 - Wilting	Concern over development at Wilting due to its reliance on a new railway station being built and the Bexhill/Hastings Link Road; distance from Hastings itself; impact on adjacent AONB and SSSI; likely increase in traffic and the unsustainable nature of the development.	Development at Wilting is no longer being taken forward in the Planning Strategy.
Preferred Approach 20 – Housing Mix	<p>Need to ensure housing developments take account of the different life stages of the population (Lifetime Homes); provide more sheltered housing for the elderly and supported housing for the vulnerable and provide a mix of unit sizes and tenure, particularly family housing.</p> <p>Consideration needs to be given to provision of live/work units</p> <p>Need a plan to bring empty homes back in to use.</p> <p>Concern over the location of low cost housing within sites.</p>	<p>Policy H2 provides for housing mix. Policy H2 (d) references Lifetime Homes Standard and (e) references the 2% wheelchair adaptable Part.</p> <p>Paragraph 9.6 and Policy E1 reference live/work units</p> <p>Paragraph 4.18 identifies the situation with empty homes in the Borough. Policy DS1 identifies the return of long term empty homes as a source of future housing supply.</p> <p>National planning policy require the Council to provide for a range of housing types and tenures in order meet the range of housing requirements likely to be requirement in the town over the lifetime of the plan. This will include the provision low cost housing</p>
Preferred Approach 21 - Density	Concern that proposed densities are too high and will result in inappropriate development in places such as Crystal Square and Ore Village and discourage the provision of larger family housing in areas like Central St Leonards.	Policy H1 makes provision for minimum densities sought by the Council and sets out the process for considering departures from policy.

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 23 – Overall Target for Affordable Housing (14 reps)	<p>Clarification is needed on how Hastings will proactively seek to deliver affordable housing within the Borough.</p> <p>Developments under 15 dwellings should pay a commuted sum towards the provision of affordable housing</p> <p>Thresholds should be removed to prevent developers splitting sites to avoid the affordable housing provision thresholds</p> <p>Level of affordable housing on Greenfield sites should be lower than 40%</p> <p>On site provision of affordable housing should be favoured in developments</p>	<p>Following the updating of Affordable housing viability study in March 2011, the Council's approach to an Affordable Housing policy has been modified since the publication of the Preferred Approaches document. The revised policy is set out at Policy H3: Provision of Affordable Housing, together with explanatory text at paragraphs 8.9-8.16</p>
Preferred Approach 24 – Types of Affordable Housing Needed	<p>A proper analysis of the types of affordable housing needed is required.</p> <p>The approach should recognise the role of shared-ownership and key worker schemes within the affordable housing sector.</p> <p>Local housing needs should be reviewed and greater clarity on the numbers of and forms of affordable housing provided.</p>	<p>See above</p>
Preferred Approach 25 – Specifying the Size and Form of	<p>Offsite provision of affordable housing should not be considered as these are the houses that won't get built. Policy is not in line with paragraph 29 of PPS3.</p>	<p>See above</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Affordable Housing (6 reps)	An area's characteristics must be taken into account when deciding on location of affordable housing to avoid ghettos.	
Preferred Approach 26 – Land Supply	<p>Support for protecting employment land for employment uses however some flexibility is needed to allow mixed/alternative development if employment alone is unviable. This will also enable strong community ties to development & reduce the need for travel.</p> <p>There is no indication of overall job growth and so it is not possible to see whether job provision matches the expected workforce.</p>	<p>Paragraphs 9.3 – 9.6 address these issues. Policy DS2 and E1, together with the Focus Area Policies, detail types and amounts of employment land to be planned.</p> <p>Paragraphs 4.35 – 4.40. Policy E2 provides this information. The Hastings and Rother Employment Strategy and Land Review 2008 (updated in 2011) provides workforce and job forecasts.</p>
Preferred Approach 27 – Skills and Training	The strategy should refer to the major government funded programmes intended to transform primary and secondary education.	Paragraphs 9.7-9.8 provide details of the efforts being made to improve educational attainment in the Town.
Preferred Approach 28 - Tourism	<p>Any tourism strategy needs to focus on providing a range of tourist accommodation including hotels, caravan and holiday parks, bed and breakfasts and guest houses.</p> <p>There is a need to extend the tourism season and take the widest possible view of tourism in the context of economic/cultural/retail offer.</p>	<p>Policy E4 provides for visitor accommodation and attractions within the town.</p> <p>Paragraphs 9.16 – 9.25 provide this strategy. Policy E4 sets the direction.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	Support for the approach to tourism in the town as it will help underpin regeneration.	Paragraphs 9.16 – 9.25 provide this strategy. Policy E4 sets the direction.
Preferred Approach 29 – Language Schools	Objection to increasing presence of language schools as this create congestion on streets with students massing together.	Paragraph 9.17 and Policy E4 addresses provision, protection and improvement of language schools.
Preferred Approach 30 – Strategic Road and Rail Schemes	Objections relating to a lack of emphasis on sustainable transport options such as rail improvements and light rail provision, and too much focus on road improvements and the Bexhill Hastings Link Road which will be environmentally damaging.	Policies T1 – T4 address the topics of strategic road and rail improvements, local road improvements, sustainable transport and travel plans. The Planning Strategy reports on the outcomes of the East Sussex Local Transport Plan 3.
Preferred Approach 31 – Local Road Improvements	Object as road building does not automatically equate to regeneration and this approach fails to recognise the changes that will be needed in transport and travel modes over the life of the plan.	Policies T1 – T4 address the topics of strategic road and rail improvements, local road improvements, sustainable transport and travel plans
Preferred Approach 32 – More Sustainable Transport Options	<p>The approach does not prioritise sustainable transport modes such as cycling provision, improvements to buses, and car sharing. There is too much emphasis on road improvements and this policy appears to be contradicted by PA31.</p> <p>Support for this approach as it seeks to maximise sustainable transport, provide better cycling and walking routes, is the correct long term approach and should integrate with the Strategic Greenway Project.</p>	<p>The Planning Strategy reports on the findings of the LTP3 (up date to the LATS). Policy T3 addresses sustainable transport options and development.</p> <p>Policy T3 provides for working with ESCC using the LTP3.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 33 – Car Parking	There needs to be a balanced approach between limiting car parking and providing better access to the town centre by non car based transport	Policy T3 provides for the strategic cycle network as identified on the key diagram and improvements to walking routes for pedestrians.
Preferred Approach 34 – Residential Parking (5 reps)	<p>The proposed standard of at least 1 residential parking space per dwelling is too broad an approach, does not provide a balance between parking and sustainable transport modes and would be contrary to PPG13</p> <p>Support in principle however there should be more free on-road parking especially for shops and banks etc.</p>	<p>Paragraphs 11.23 – 11.27 cover the issue of car parking.</p> <p>Not taken forward in the Planning Strategy</p>
Preferred Approach 35 – Location of Development	<p>The travel plans approach appears to conflict with several other approaches which promote development based on provision of the link road.</p> <p>Travel plans should apply to all development not just major developments.</p> <p>Support for approach with S106 contributions from superstores being sought.</p> <p>Travel plans need to be incorporated into the approach</p>	<p>Policy T4 covers the issue of travel plans.</p> <p>Policy T4 covers the issue of travel plans.</p> <p>Paragraphs 10.7 – 10.9 and Policy CI1 address the issue of developer contributions.</p> <p>Policy T4 covers travel plans and will be monitored via the monitoring framework in the Planning Strategy.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 36 – Community Infrastructure	<p>Adequate infrastructure is required in conjunction with proposed developments and this should be supported with clear and relevant evidence of the need and delivery.</p> <p>The value and benefits of a multi-functional green network need to be included and emphasised.</p>	<p>An IDP is being developed with ESCC. Paragraphs 10.4 – 10.9 and Policy CI1 address the issues of community infrastructure and developer contributions. Policies CI2 and C13 also contribute to community infrastructure provision. Policy CI1 included.</p> <p>Policy EN2 provides the strategic basis for the creation of a Green Infrastructure Network in the town.</p>
Preferred Approach 38 – Nature Conservation and Improvement of Biodiversity	<p>All levels of planning and development should include measures to protect and enhance the environment and biodiversity however these need to be balanced with other policies such as those for economic and tourism development, where harm is avoided or can be mitigated against. A Green Infrastructure Strategy should be produced and a policy to this effect included in the Core Strategy</p> <p>Clearer emphasis is needed on the protection and enhancement of nature conservation and biodiversity with the 3 nationally important SSSI's listed.</p> <p>All woodlands should be identified on a proposals map and a policy protecting ancient woodland included.</p>	<p>Policy EN3 and EN4 included.</p> <p>Paragraphs 7.8 – 7.11 address the GI issue and Policy EN2 sets the strategic policy approach.</p> <p>Paragraph 7.12 lists the SSSI's. Policy EN3 provides the strategic approach to nature and biodiversity protection and improvement in relation to development.</p> <p>Policy EN3 (g) affords protection to ancient woodland. The Key Diagram highlights the AONB and significant open space.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 39 – Landscape Protection	<p>There needs to be mention of the High Weald AONB and its protection</p> <p>The strategy should reflect and reinforce the approach to protecting strategic gaps between settlements such as between Battle and Hastings.</p>	<p>Policy EN4 references the High Weald AONB Management Plan specifically.</p> <p>A strategic gap policy has not been taken forward in the Planning Strategy.</p>
Preferred Approach 40 – Open Spaces: Enhancement, Provision and Protection	<p>Protection should be provided for small green areas such as allotments, and areas such as school playing fields should not be wholly considered as open space as they are protected by national policy.</p> <p>There should be clear maps of existing and proposed green areas and designated sites in relation to development.</p> <p>Greater commitment should be given to achieving Natural England's ANGST targets.</p>	<p>Playing fields and pitches will be protected in accordance with national planning policy</p> <p>Figure 10 shows indicatively the green areas across the Borough. The Key Diagram shows the AONB and significant open spaces.</p> <p>Policy EN3 (c) refers to development proposals complying with standing advice from Natural England.</p>
Preferred Approach 41 – Open Spaces: Strategic Network	<p>A multi user path for cycling, walking and equestrianism should be considered around the perimeter of the town and not just cycle paths to the town centre.</p> <p>The network should be given high priority in terms of capital funding.</p>	<p>Paragraphs 11.20 – 11.21 address these issues. Policy T3 includes reference to a strategic network of cycle paths and improved walking routes.</p> <p>Paragraph 10.8 lists contributions towards sustainable transport as a priority. A tariff approach to developer contributions will be explored as part of the Development Management Plan.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 42 – Sports and Leisure Facilities	It is important to provide sports and leisure facilities within the western end of the Borough to take the pressure off the Town Centre.	The Hastings and Rother Leisure Facilities Strategy 2009 – 2020 provides current and projected levels of supply and demand for sports facilities and will inform future developments. Policy C12 addresses the issues of sports and leisure facilities in the town.
Preferred Approach 44 – Sustainability and Design	<p>This policy needs to include waste reduction, recycling, sustainable transport access and energy efficiency through renewables as priorities and include an overarching climate change policy.</p> <p>Objection to policy as it does not address issues of air quality and monitoring, development of communications technology and should require all new development to provide at least 10% of their energy requirement from on site renewables.</p> <p>Support for policy which promotes environmental sustainability but should incorporate carbon neutral homes and opportunities to promote and enhance biodiversity as part of building design.</p>	<p>Paragraphs 6.3 – 6.7 address the issues highlighted. Policy SC3 provides for sustainable and green design incorporating all the measures suggested.</p> <p>Policy SC1 (f) requires new development to make provision for fibre based broadband infrastructure. Policies SC3 and SC4 addresses sustainable and green design and climate change.</p> <p>Policy SC3 (a) includes protecting and enhancing biodiversity as part of building design. Policy SC4 sets the energy hierarchy to achieve low carbon development</p>
Preferred Approach 45 – Renewable Energy: Standalone Schemes	<p>Any policy should include a positive, objective, locally relevant and robust policy against which all applications for renewable energy are assessed.</p> <p>Information requested of applicants should be proportionate to the scheme (i.e. its impact on and vulnerability to climate change, need to conform with the development plan)</p>	<p>Policy SC6 provides for renewable energy development.</p> <p>Policy SC6 provides for renewable energy development.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
Preferred Approach 46 – Renewable Energy: On Site Provision	<p>Proposed policies should seek all new development to provide 10% of its energy through on site provision and support the delivery of the timetable for reducing emissions from domestic and non-domestic developments.</p> <p>There needs to be an evidenced based understanding of local feasibility and potential for renewable/low carbon energy.</p>	<p>Policy SC4 provides for working towards zero carbon homes.</p> <p>Paragraphs 6.13 – 6.17 and Policy SC6 address the issues of renewable energy developments.</p>
Preferred Approach 47 – Flood Risk	<p>Any flood risk policies should take account of local characteristics and the characteristics of the development</p> <p>There should be a specific policy on water quality All new development should incorporate suitable sustainable drainage measures.</p>	<p>Policy SC7 addresses the issue of flood risk and the SFRA.</p> <p>Paragraph 6.19 references water quality. Policy SC7 incorporates this change.</p>
Preferred Approach 48 – Sense of Place and Local Identity	<p>All new development should meet Building for Life and Code for Sustainable Homes Level 6 standards and any policy should state the level to be achieved.</p>	<p>Since the publication of the Preferred Approaches in 2008, we have undertaken further research into the most effective way of achieving low carbon development. The results of this study move away from a blanket policy and instead set out the best way to achieving the national programme for sustainable building (SC4). No developments with potential to exceed national standards were identified. Reliance on Building for Life Standards was also removed to enable us to be more flexible over the 15 year plan period. Our replacement policies (SC2 and SC3), focusing on high quality design and access statements and green design will help to ensure sustainably designed development.</p>

Chapter in Preferred Approaches	Summary of main issues raised by representations	How the issues raised have been taken account of in the Planning Strategy
	<p>The approach generally relates the level and location of development to specific places however this will need to be strengthened.</p> <p>The design of developments should reflect local context and character, design policies should be robust and cross cutting with other policy areas.</p>	<p>Policy SC1 (i) requires development to add to sense of place and local character and Policy EN1 provides for the built and historic environment.</p> <p>Policy SC1 (i) requires development to add to sense of place and local character and Policy EN1 provides for the built and historic environment.</p>
Preferred Approach 49 – Built and Historic Environment	<p>Conservation areas must not be played with and greater emphasis needs to be placed on protecting the existing built historic environment including a local list of historic buildings in the area.</p> <p>The approach generally relates the level and location of development to specific places however this will need to be strengthened for.</p> <p>Further protection is needed for archaeological areas, not just sites</p>	<p>Policy EN1 covers the built and historic environment and states that detailed design policies to protect the town's heritage assets will be set out in the Development Management Plan.</p> <p>Policy SC1 (i) requires development to add to sense of place and local character and Policy EN1 provides for the built and historic environment</p> <p>Policy EN1 affords protection to areas in the Borough of high archaeological potential but where the extent of likely finds is not yet known.</p>

Appendix E

Informal Consultation – Main issues raised

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
Housing Provision	<p>There was general support for the medium growth scenario, similar to that proposed by the South East Plan, although comments were also received supporting both a lower and a higher housing target. In particular, it was said that we would not be able to meet the national house building requirements at set out in the National Planning Policy Framework (NPPF), especially if sites do not come forward as expected due to a range of constraints.</p> <p>The Council should reconsider the inclusion of Breadsell Lane in the Plan for a smaller housing allocation</p> <p>There is an over-reliance on windfall sites to meet the housing target.</p> <p>Bringing empty homes back into use needs to be considered in the housing supply and target figures.</p>	<p>The “Medium” growth scenario was taken forward into the Planning Strategy, subject to minor modifications as a result of changing national policy, empty homes and windfall provision. Our evidence shows that we will be able to meet the requirements of the NPPF, including the 20% contingency for under delivery. This decision was based on the Council’s own evidence, and has been subject to the Sustainability Appraisal process.</p> <p>The feasibility of including Breadsell as a strategic site allocation in the Planning Strategy was ruled out following strong objections from Natural England and the need for further monitoring work.</p> <p>The need for a windfall allowance is based on clear evidence, and is not counted in the first 10 years of the Plan period. This will be continuously monitored through the Housing Trajectory and the Annual Monitoring Report.</p> <p>In line with the Council’s Empty Homes Strategy, and in recognition of the issues the town faces, an allowance for</p>

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
	<p>Any potential impacts on the strategic road network from proposed development need to be identified and addressed.</p> <p>Current green and leisure spaces must be protected in light of any proposed housing target.</p>	<p>the re-use of empty homes has been included in the housing target.</p> <p>We are undertaking extensive traffic modelling in partnership with East Sussex County Council and Rother District Council to assess the impact of this new development on the road network. Mitigation of impacts, including possible local road improvements will be considered in producing the Development Management Plan.</p> <p>Policy EN2 provides for the creation of a green infrastructure network which will help protect the town's green spaces.</p>
Provision of Affordable Housing	<p>Over-concentration of affordable housing in a particular area should be avoided</p> <p>The rigid percentage approach to affordable housing does not provide a suitable amount of flexibility to account for future changes in affordable provision over the plan period</p> <p>Several comments were received about the percentage</p>	<p>Our affordable housing policy requires affordable homes to be well integrated within the development scheme, and be indistinguishable from other tenures. Small clusters within larger developments are preferred. Where it is considered that off-site provision will provide an equivalent or better housing solution, this may also be invited.</p> <p>The proposed submission affordable housing policy addresses this by being more flexible, and provides a sliding scale of affordable housing requirements, as well as off site provision or financial contributions where appropriate.</p> <p>The proposed policy and thresholds for Brownfield and</p>

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
	<p>requirements for affordable housing provision Brownfield and Greenfield sites. This included higher, and lower percentages, as well as a request for them to be the same. Suggestions that the affordable housing target should be for guidance only, and not set in Policy.</p> <p>Support for affordable housing, as long as it is suitable for families and avoids smaller flats</p> <p>Viability section of the proposed policy could mean we have high levels of development but without the required percentage of affordable housing</p> <p>Concern that if affordable housing takes precedence over other types of contributions in new development, the proposed policy could result in more housing with inappropriate facilities to support it, as well as taking contributions away from other important issues such as employment growth.</p>	<p>Greenfield land is based on a strong evidence base and viability testing, which shows that higher requirements are more feasible on Greenfield developments. National planning guidance requires us to have an affordable housing policy, and Policy H3 has been developed based on viability assessments and housing need in Hastings</p> <p>Policy sets out that as a guide, the proportion, size and form of affordable housing will be indicated for each housing site in the Development Management Plan</p> <p>The proposed submission affordable housing policy has to take account viability, otherwise the proposed policy risks being unrealistic.</p> <p>Policy CI1 – Infrastructure and Development Contributions seeks to ensure that appropriate infrastructure is provided to support the level of development over the lifetime of the Plan. Our Infrastructure Delivery Plan looks at this in more detail, and will be updated and reviewed on a regular basis. Employment growth is key aim of the Planning Strategy, and we have put in place robust policies to support it.</p>
Accommodation for travelling communities	In addition to the criteria based policy, the Council should identify pitches for travelling communities	The criteria based location policy is included in the Planning Strategy, and site identification is a matter for the Development Management Plan.

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
	No specific travellers sites are required in Hastings	It is important that the needs of the travelling community are taken into account when planning for the town's future. The criteria based policy will ensure that the relevant considerations are taken into account, should a site be brought forward in the future
Houses in Multiple Occupation (HMO's)	<p>Clarification of the definitions used to define a HMO</p> <p>Concern that the blanket imposition of parking restrictions discriminates against occupiers of shared housing</p> <p>Concern over how HMO's impact on the community generally, and whether this policy is based on evidence.</p>	<p>Footnote inserted to clarify that the term "property" is defined as self contained accommodation with its own separate address</p> <p>Comments accepted and this reference has been removed from the policy</p> <p>This policy seeks to address these concerns by ensuring there is no-overconcentration of HMO's in a particular area.</p>
Strategy for Managing Change in a Sustainable Way	<p>The Plan needs to have specific policies relating to:</p> <ul style="list-style-type: none"> • An ageing population • The historic environment • Flood risk <p>Transport – need to ensure we promote employment opportunities through better rail and road provision, as well as emphasising sustainable transport modes overall</p>	<p>As this was an informal consultation on significant policy changes, the areas mentioned were not consulted on as draft policies had not changed significantly since the Preferred Approaches in 2008. The policy areas mentioned are covered fully in the housing and environment chapters in Part Four of the Planning Strategy – Theme Based Policies</p> <p>The Overall Strategy for Managing Change seeks to ensure that all development is underpinned by the principles of sustainability, which includes sustainable transport. This is further supplemented by the Sustainable Transport Policy T3. One of the main focuses of the</p>

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
		Planning Strategy is a whole is to promote employment provision and support better rail and road opportunities, supported by policy T1 – Strategic Road and Rail Schemes, also in the Transport and Accessibility chapter.
Green Infrastructure	<p>Whilst there is support for this policy, there is also concern that greenspaces and networks have not been protected in the past.</p> <p>Connections between Rights of Way should be improved and Pebsham Countryside Park (now known as Combe Valley Countryside Park) should be clearly referenced</p> <p>Need to ensure funding is available to deliver green infrastructure network</p>	<p>The main purpose of identifying a Green Infrastructure Network will be to protect open spaces, identify where new ones are required in areas of deficiency, and to improve the connections between them. Policy EN2 in the Planning Strategy will be supported by a Green Infrastructure Strategy, and improvements required set out in the Development Management Plan. Implementation of this policy, as well as EN3- Nature Conservation and Improvement of Biodiversity will address these concerns</p> <p>Rights of Way and Combe Valley Countryside Park will form part of the Green Infrastructure Network as required by Policy EN2</p> <p>Deliverability of the green infrastructure is referenced in paragraph 7.11. We will secure financial contributions where appropriate; deliver through the management of the Council's own land, as well as working with East Sussex County Council to provide footpaths and cycle ways.</p>
Nature Conservation and Improvement of	Further protection of woodlands (including ancient woodland and veteran trees) and wildlife is required – concern that some of the development sites included could destroy them.	Policy EN3 seeks to protect greenspaces around the town, including woodland and biodiversity. It will ensure that development contributes to the no net loss of biodiversity, avoid harm, or mitigate to compensate for unavoidable

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
Biodiversity	How will the Council monitor whether the policy is implemented	<p>damage if appropriate. Nature conservation and biodiversity issues for particular sites will be highlighted through the forthcoming Green Infrastructure Strategy and Development Management Plan.</p> <p>A monitoring and implementation chapter is included within the proposed submission Planning Strategy – this includes a measure to ensure no net loss to biodiversity. Implementation of policies will also be reported on annually in the Annual Monitoring Report.</p>
Promoting Good Design	Concern that design standards in the town are not high enough, and that the Council should consider a quality materials room size standards and Planning Briefs.	Theme based policies within the Sustainable Communities chapter seek to collectively ensure that high levels of sustainable building and design are adopted for all types of development. We are now taking a more flexible approach to specific design standards, focussing on best practice as a whole rather than a particular standard such as “Building for Life”, which is currently being reviewed. We will also be considering our own specific design standards and design briefs as part of the Development Management Plan process.
Low Carbon Development	The Plan should include a policy on water efficiency in light of the town being in a water stressed area.	These comments are noted. Sustainable design policies within this chapter as a whole aim to ensure water efficiency is integrated into the design of new developments, specifically referenced in SC1 – Overall Strategy for Managing Change.

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
Infrastructure and Developer Contributions	<p>Further clarity is required about what the Policy covers in terms of addressing existing and proposed infrastructure needs, as well as how CIL could be used in the future to secure strategic infrastructure</p> <p>There should be an additional policy on protection of amenity and infrastructure in relation to developments close to waste water facilities.</p>	<p>Policy CI1 sets the Council's approach to infrastructure and developer contributions. The Infrastructure Delivery Plan is a key document that sets out the strategic infrastructure needed to support the delivery of the Planning Strategy (future needs), which will also be used as a basis for adopting a CIL charging schedule if considered a viable option.</p> <p>Waste water infrastructure is considered in detail in the Infrastructure Delivery Plan. Policy CI1 seeks to ensure that all development is supported by adequate infrastructure. The issue of protection and amenity and infrastructure will be taken forward in the Development Management Plan.</p>
Retail Boundary	Suggested that St Andrews Area should be removed from the area of search to accommodate additional retail floorspace, and that St Leonards town centre should also be considered.	The Council has not yet decided where the additional retail space will be located; rather we have set out our approach to site selection in both Hastings and St Leonards town Centres in Policy DS3, and acknowledged that site identification will be undertaken as part of the Development Management Plan process.
Spatial Strategy	Further information should be provided to help understand the historic character of the areas.	The introduction to each of the broad spatial areas – Eastern, Central, Western and the Seafront, now included a broad assessment of historic character where appropriate. We are working with East Sussex County Council to take this further as part of the Development Management Plan.

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
	<p>Ward boundaries should be used in place of Planning Focus Areas.</p> <p>Concern that too much housing development is being proposed in particular locations, and that there is a danger of policies being waived to ensure development takes place. Issues such as land stability, water and sewerage infrastructure have not been considered.</p>	<p>Planning Focus Areas have continued to be used in the Proposed Submission Planning Strategy to help provide a more local perspective, and provide a useful basis for any future Neighbourhood Plans. The boundaries are based on the nationally set boundaries of Super Output Areas (SOA) along with recognition of local geography and communities. They have been carefully drawn so that comparisons can be made with previous figures and SOA statistics can be used for these areas to give consistency.</p> <p>The range of housing proposed in the Planning Strategy for each Planning Focus Area is based on our ongoing research in the Strategic Housing Land Availability Assessment (SHLAA), and based on the best information available at the time. We have however, worked with key infrastructure providers in preparing this assessment, including Southern Water, and will continue to do so through the Infrastructure Delivery Plan and SHLAA updates.</p> <p>We understand the numbers will be subject to change as more detail becomes available or circumstances change, and a cautious view has been taken on some sites so that we can be as realistic as possible. The exact capacity of any site can only be finally determined through the development management process. Each site will be considered in detail at the planning application stage, and the policies in this plan will be a material consideration, and as such, will be applied as appropriate. The Planning</p>

Informal consultation policy/approach	Summary of main issues raised	How the issues raised have been taken account of in the Proposed Submission Planning Strategy
	<p>Need to ensure that green spaces are protected, and development does not take place there</p> <p>Commitment to provide retail and incubator business/office space in Central St Leonards should be identified</p> <p>Need to consider the mix and tenure of housing in particular areas, and avoid an overconcentration of affordable housing</p>	<p>Strategy will also provide the framework for more detailed development management policies in the Development Management Plan.</p> <p>Policy EN3 seeks to protect green spaces around the town, including woodland and biodiversity. It will ensure that development contributes to the no net loss of biodiversity, avoid harm, or mitigate to compensate for unavoidable damage if appropriate. Nature conservation and biodiversity issues for particular sites will be highlighted through the forthcoming Green Infrastructure Strategy and Development Management Plan</p> <p>The Strategy for Central St Leonards (Policy FA4) addresses these issues, and highlights the need to enhance the districts role as a shopping centre and to develop or convert properties for training and small businesses.</p> <p>Policies H2 in the housing chapter specifically seeks to ensure that a balanced mix of housing is provided in each development, as well as across the town as a whole. Policy H3, which deals with affordable housing, also requires affordable homes to be well integrated within the development scheme, and be indistinguishable from other tenures. Small clusters within larger developments are preferred. Where it is considered that off-site provision will provide an equivalent or better housing solution, this may also be invited.</p>

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Appendix F

Statement of Representations Procedure

Hastings Planning Strategy Statement of Representations Procedure



HASTINGS LOCAL PLAN – THE HASTINGS PLANNING STRATEGY (formerly Local Development Framework Core Strategy)

Notice of publication of the Hastings Planning Strategy – proposed submission version

We are now inviting comments on the proposed submission version of the Hastings Planning Strategy for the final stage of public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Hastings Planning Strategy will inform other Local Plan documents as they are written over the next few years. It provides a long term plan to deliver regeneration and sustainable growth in the borough of Hastings, and more specifically it:

- sets out a vision for Hastings
- sets out generally how the Council intends to deliver new housing, jobs and infrastructure
- sets guidelines for the pattern of land use around the town and policies for protecting important green spaces and historic townscapes

The proposed submission version of the Hastings Planning Strategy, response forms and guidance notes are available to take away from the following locations:

**Hastings Borough Council,
Upper Ground Floor, Aquila House,
Hastings, TN34 3UY**

Opening hours:
Mon – Thurs: 8.45am – 4.45pm
Fri – 8.45am – 4.15pm

**Hastings Information Centre,
Queens Square, Hastings, TN34 1TL**

Opening hours:
Mon - Weds: 8.30am – 6.15pm
Thurs: 8.30am – 8pm
Fri: 8.30am – 6.15pm
Sat: 9am – 5pm
Sun: 10.30 – 4pm

**Or for inspection only at
Hastings Library, 13 Claremont,
Hastings, TN34 1HE**

Opening hours:
Mon: 9.30am – 6pm
Tues: 9.30am – 6.30pm
Weds: 9.30am – 1pm
Thurs: 9.30am – 6.30pm
Fri: 10.30am – 6.30pm
Sat: 9.30am – 5pm

Supporting documents (including the final Sustainability Appraisal Report and statement of consultation) are available to view at Aquila House or online.

Representations are invited during a 12 week consultation period, from 25 May 2012 until 4pm on 17 August 2012 on the “legal compliance” or “soundness” of the document. All representations must be made using the official response form or through our online consultation system – follow the link from www.hastings.gov.uk/localplan/consultation

Completed response forms should be returned to:

**Hastings Borough Council
FREEPOST RSCG-BSTS-GBRZ
Aquila House,
Breeds Place
HASTINGS,
East Sussex TN34 3UY**

Or submitted electronically to
fplanning@hastings.gov.uk

Please also indicate on your response whether you would like to be notified at a specific address of any of the following:

- a) the submission of the Planning Strategy for independent examination
- b) the publication of the inspector’s recommendations following independent examination
- c) the adoption of the Planning Strategy

For further information, please contact the Planning Policy team on 01424 450198 or email fplanning@hastings.gov.uk

Planning Policy Team
www.hastings.gov.uk/localplan



Appendix G

Example of Observer advert for the Proposed Submission consultation

Observer, Friday, August 3, 2012

NEWS

behind 'dove spectacular



old Ford factory in on, before moving ark in Stratford. is originally meant greater part in the week before the ry he received the (the bike segments used, had to be cut e to time pressure.

This meant that more than 50 individuals would not be able to take their place in history.

The parts cut to save approximately 12 minutes included a BMX display with riders from Hastings, trials riding, and fire bike riding.

"When they put all the segments together, they realised it overran. It was getting having to tell them that they were not going to be involved any more, but I understand why they did it." He is glad however that the most spectacular part of his show made the final cut, and said: "the dove bikes were always going to be the most beautiful part of any of the segments - they are the most graceful things."

"A lot of people said that the doves were the best part apart from the children."

The Hastings Planning Strategy

Your last chance to be involved

The plan that will guide how the town develops over the next 15 years is nearing completion. The final stage of public consultation on the Hastings Planning Strategy (formerly the Core Strategy) runs for 12 weeks from 25 May - 17 August 2012.

As this is a formal stage of consultation, all responses need to be made on an official response form, or through our online consultation software. Please go to www.hastings.gov.uk/localplan/consultation for further details, or to make your comments online. The Planning Strategy, response forms and guidance notes explaining this complex stage can be downloaded from our website, picked up from our offices or the Hastings Information Centre, or sent to you on request.

The final drop-in surgery will be held between 2 - 4pm on **Wednesday 15 August** at Aquila House, Breeds Place, Hastings where you can get advice about making your comments and discuss any queries you may have.

SHAPING HASTINGS



For further information, please call our Planning Policy Team on 01424 451093 or email pplanning@hastings.gov.uk

Follow 'ShapingHastings' on [twitter](#) or find us on [facebook.com](#)

Planning Policy Team
www.hastings.gov.uk/localplan

Hastings
Borough Council

Appendix H

Statutory Observer notice for the Proposed Submission consultation

HASTINGS LOCAL PLAN – THE HASTINGS PLANNING STRATEGY (formerly Local Development Framework Core Strategy)

Notice of publication of the Hastings Planning Strategy – proposed submission version

We are now inviting comments on the proposed submission version of the Hastings Planning Strategy as part of the final stage of public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Hastings Planning Strategy will inform other Local Plan documents as they are written over the next few years. It provides a long term plan to deliver regeneration and sustainable growth in the borough of Hastings, and more specifically it:

- sets out a vision for Hastings
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FREEPOST RSCG-BSTS-GBRZ
Aquila House,
Breeds Place
HASTINGS,
East Sussex TN34 3UY**

Or submitted electronically to fplanning@hastings.gov.uk

Please also indicate on your response whether you would like to be notified at a specific address of any of the following:

- a) the submission of the Planning Strategy for independent examination
- b) the publication of the Inspector’s recommendations following independent examination
- c) the adoption of the Planning Strategy

Date Published: 24 May 2012

For further information, please contact the Planning Policy team on 01424 450198 or email fplanning@hastings.gov.uk

www.hastings.gov.uk



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Appendix I

Proposed Submission Version consultation – main issues raised

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
Part One - Chapter 1: Introduction	
Paragraph 1.1	<p>1 objection</p> <p>Effective planning is also about recognising reality and accepting that old plans sometimes have no place in current or foreseeable circumstances. It's about innovating, understanding the bigger picture. Proactive is good and so is reactive.</p>
Paragraph 1.2	<p>1 objection</p> <p>There are no date plans in the document. Strategies which may be suitable for 2024 may not be suitable for 2015.</p>
Paragraph 1.5	<p>1 objection</p> <p>The Schedule for Delivery need be viewed alongside this document. Better still, lets' have a schedule in this report.</p>
Paragraph 1.13	<p>1 objection</p> <p>Is the Hastings Planning Strategy in accordance with the Communities and local Government National Planning Policy Framework?</p>
Paragraph 1.15	<p>1 objection</p> <p>The 'Issues and Options' stage led to an overview based on false assumptions.</p>
Paragraph 1.18	<p>2 representations received, both objections</p> <p>This Planning Strategy needs to be rejected by the Government when submitted for approval in 2012. Hastings has a poor record in spending wisely. The document needs to be re-written so that ordinary</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	people can understand what is proposed and how it will be implemented.
Paragraph 1.19	1 objection The document may represent a lot of work but has achieved little. In an economy burdened by too much debt, the plan shows lack of competence, few practical policies.
Paragraph 1.20	1 support
Paragraph 1.25	1 objection The Independent Inspector will notice attempts to apply 20th century solutions to 21st century challenges.
Part One - Chapter 2: About Hastings	
Paragraph 2.1	1 objection The chapter heading "About Hastings" and subsequent text omits mention of St Leonards (although 2.2 pays lip service to "the towns" plural). This omission will reinforce the views of many residents that St Leonards - historically separate from Hastings, with its own town centre, distinctive character, sense of identity (and postal designation) - is habitually disregarded.
Paragraph 2.3	1 objection and 1 support The authors of the report seem surprised by 'current signs that traditional seaside tourism is in fact experiencing something of a revival in Hastings'. This supports the absence of worthwhile promotion of the region to holidaymakers. Poor road and rail links will continue to mean that Hastings is isolated from traditional 'commercial opportunities and markets of London for rapid recovery'. Britain's economic woes and the growth of the 'staycation' has not been exploited.
Paragraph 2.7	2 objections The text is considered to more or less contradict itself. The Council does reject the idea that environmental action is a barrier to growth and examples of decisions on developments concerning Archery Ground and a road in the Combe Haven Valley are given.
Paragraph 2.8	1 objection

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	These ambitions are abstract and meaningless, having been lifted from similar reports for Clacton, Bridlington or Plymouth.
Paragraph 2.10	1 objection There will be negative or no growth in Hastings, as planners continue shutting their eyes to reality.
Paragraph 2.14	1 objection This paragraph doesn't mention poor life expectancy and the highest mortality rates for causes considered reasonable to healthcare. Commentary for Hastings Borough based on JSNA sourced Jan'12, see also East Sussex Joint Strategic Needs Assessment Mar'12 version 1.1. Life expectancy for men decreased. The vision of Hastings should be to have life expectancy in Hastings at the national level. No provision of additional Doctors & premises to tackle problems.
Paragraph 2.17	1 objection Construction of almost 200,000sq ft office space is costly test of the regeneration plan initiated in 2004. Councillors say 800 jobs created Priory Square. Agents failed to sell the space for the past five years. Saga Insurance reckons 300 jobs at Priory Square. Starting construction of another 25,000 sq ft offices makes matters worse. Seen as creating a new commercial, leisure, education district with 338,000 sq ft offices and 58,000 sq ft retail, a multi-screen cinema, car park, public squares.' These grandiose schemes operated when there was a river of cash flooding the economy. It's not like that now.
Paragraph 2.18	1 objection SEEDA and Sea Space have scarred Hastings, big time. Leaving a herd of white elephants behind them. £4.6m from Government was spent on Enviro21 Innovation Park. It's devoid of tenants. The recession is blamed for the failure. Units are the 'wrong size'. A conference and banqueting centre stands idle. Does it matter? Who on earth thought the location suitable for a conference and banqueting centre? The development has been renamed Queensway Employment Corridor. Britain's economy across the period 1997-2007, during Gordon Brown's chancellorship, was unsustainable, debt fuelled and ultimately

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	irresponsible. And Hastings borough council perpetuates the stupidity.
Paragraph 2.21	<p>1 support</p> <p>Support the objectives but query whether they are deliverable in line with NPPF 57 and 58 unless mandatory standards are made part of this strategy.</p>
Paragraph 2.25	<p>1 objection</p> <p>There is clear evidence that the only way Hastings and Rother local authorities can work together is to become one authority.</p>
Paragraph 2.27	<p>1 objection</p> <p>This is not justified in failing to mention in addition to the Victorian housing, the many conservation areas, which are equally as, and in some areas more important than the natural environment in contributing to the special character of the town. Please ensure that the wording of policy relating to the historic environment uses the phrase used here - conserve and enhance.</p>
Paragraph 2.29	<p>1 objection</p> <p>This is not justified in omitting to mention that the delivery of high quality sustainable homes must also be considered in the balance, along with generalised community benefits, and necessary infrastructure.</p>
Paragraph 2.33	<p>1 objection</p> <p>Destruction of peace and beauty of Combe Haven Valley, for a five mile stretch of road, costing £100,000,000, is silly. Council's go to central government to get funds to build big infrastructure. There are substantial risks. The whole premise rests on assumption that investment undertaken by the public sector will attract businesses. If the businesses don't come there's big debt and no means to pay it. That means higher local tax and business rates. Similarly, what if the new infrastructure simply encourages existing businesses in the area to move, rather than create new companies? It's speculating, not regenerating.</p>
Paragraph 2.38	<p>1 objection</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	Jerwood Gallery is not a good example of 'how regeneration can be well combined with new cultural offerings and make the most of a seaside location.' It's in the wrong place. The coach park at The Stade served Hastings Old Town, bringing day-trippers and money. Coaches parked at The Stade. Now, people disembark at the Old Town and coaches drive west to Falaise Road to park, or further, to Seaside Road, Grosvenor Crescent. It's created congestion, it's costly and it's polluting. It makes no sense. What's the point? Black cabs bring disadvantaged children for a day out, it's mayhem.
Paragraph 2.44	1 objection This paragraph alludes to development at Upper Wilting Farm being agreed with Rother even though it is not in their Local Plan. Upper Wilting Farm is owned by Hastings Council and is outside the borough boundaries.
Paragraph 2.45	1 objection Writing 'economic regeneration' several times in reports like this doesn't make it come true. A £300,000,000 investment has failed to lift Hastings out of the top 20 most deprived Local Authority areas in England. Delivery of the Bexhill - Hastings Link Road will not 'facilitate further economic regeneration' as stated. It will enable 'large scale housing', and Enviro21 type business space, for which there is no use.
Paragraph 2.47	1 support
Paragraph 2.49	1 objection Joined-up working between Hastings and Rother Councils sounds good. Perhaps the people responsible for landscaping at De La Warr could nip over and sort out the mess in front of Station Plaza health centre and Sussex Coast College.
Hastings and Rother Councils' shared approach to future prosperity for the Hastings and Bexhill area	1 support
Paragraph 2.50	4 representations, 2 objections and 2 in support

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	Object to the Vision of Hastings ignoring the existence of St Leonards as a separate entity with its own character and local distinctiveness and request amendments to add St Leonards to heading and text where appropriate. The Vision is considered to be weak with no aspiration to improve the life expectancy general health & wellbeing or poverty & deprivation which presently exists, no improvement to the poor & leaking drainage & sewage disposal, no improvement to education, no mention of greenway and maintenance and improvement of our Victorian heritage. More focus should be given to protecting arts and cultural uses rather than encouraging and the Stables Theatre should be mentioned as an important venue.
Paragraph 2.52	1 support Let's all remember 'this is a vision'. Let's see a figure supported argument.
Paragraph 2.57	1 support What! No 'Offices To Let' signage, no road-works? Priory Quarter and Trinity Triangle 'buzzing with cafes, restaurants and lively new leisure facilities'. Are there lots of suits about? Have a few laughs? No mega delivery trucks holding up buses?
Paragraph 2.59	2 representations, 1 objection and 1 support. The Vision for Hastings is not justified in underplaying the recognised heritage asset of Burtons St Leonards; it is a visitor attraction in its own right, and can contribute to the regeneration of St Leonards by widening the tourist offer and extending the visitor season, and contributing to the proposed cultural quarter in St Leonards. Initially all it needs is some signs, 'Welcome to the Regency New Town of Burton's St Leonards' on the seafront, and a brown heritage signpost 'To St Leonards Gardens, award winning heritage gardens' What's going on at St Mary in the Castle?
Paragraph 2.60	2 objections The wording 'classic architecture of Burtons' St Leonards' is only partially accurate, so not justified; as the one mention in the whole document of the historic and beautifully devised heart of St Leonards, it is

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	<p>woefully inadequate.</p> <p>The statement: "...the classic architecture of Burton St Leonards" is inadequate. The New Town developed by James and Decimus Burton is a heritage asset whose historic and architectural importance has been recognised by a former Secretary of State. However, this is virtually the only reference to Burtons' St Leonards in the entire document. The "Vision" for Hastings (and St Leonards) should include an historic and architectural assessment PLUS the Borough Council's specific plans and commitment to enhance, preserve and promote Burtons' St Leonards as a tourist attraction and aid to regeneration.</p>
Paragraph 2.61	<p>1 objection</p> <p>This paragraph about "The Combe Valley" it is not a Country Park! Most of the valley is an area of Special Scientific Interest and nature reserves. Details missing are how much money and resources are Hastings Council going to invest on a yearly basis "compared with Hastings Country Park" at Fairlight. Leaving aside any contributions Southern Water 106 agreement might have for "Combe Valley Countryside Park".</p>
Paragraph 2.64	<p>1 objection</p> <p>No mention of 'Priory Quarter - the coastal business haven'.</p>
Paragraph 2.65	<p>2 representations, 1 in support and 1 objection</p> <p>Is it not credulous and premature to work on celebrations 50 years hence when you cannot guarantee decent living situations for people or thriving businesses across the borough.</p>
Part One - Chapter 3 - Strategic Objectives	
Chapter 3 Strategic Objective 1 a)	<p>2 representations, 1 in support and 1 objection</p> <p>Hastings and Bexhill might do well to work together on many matters and there are other matters where presenting the two together is a disadvantage. One disadvantage is in promotion together to holiday makers.</p> <p>Marketing the destinations under the common banner '1066 Country' is inefficient. Bexhill has better landscape gardeners.</p>

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Chapter 3 Strategic Objective 1b)	<p>1 objection</p> <p>This number is based on a Retail Capacity Study dated 2006 which, in turn, is based on work in 2002. This is written in the Evidence Base and represents insufficient evidence on which to plan to 2028.</p>
Chapter 3 - Strategic Objective 1e)	<p>1 objection</p> <p>Need inclusion of telecommunications policy in Development Management Plan.</p>
Chapter 3 Strategic Objective 1h)	<p>1 objection</p> <p>There is no evidence to support the statement that the finance/insurance sector is growing. Table 8: Employment by occupation (July 2009-June 2010), in HASTINGS AND ROTHER EMPLOYMENT STRATEGY AND LAND REVIEW UPDATE (August 2011). Shows no trends.</p>
Chapter 3 Strategic Objective 1 l)	<p>1 objection</p> <p>Where is St Leonards town centre these days. Now that the concrete is down in Kings Road?</p>
Chapter 3 Strategic Objective 2	<p>1 objection</p> <p>It is considered that 3,400 net new dwellings between 2011-2028 is unsound on the basis that this is a significant and unsupportable reduction in provision when compared against the housing trend figure of 7,840.</p>
Chapter 3 Strategic Objective 2a)	<p>1 objection</p> <p>Is this a good number?</p>
Chapter 3 Strategic Objective 3	<p>1 objection</p> <p>To date there are no safeguards in place to improve the towns environment. The victorian sewage system has failed for a number of years in parts of the Borough. No monitoring systems in place. There is urgent need for ongoing annual monitoring reports for all the triple S.I. sites eg. Monkham Wood. To date Council officers have failed to ascertain the condition and neglect of the area or ensure the</p>

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	restoration of the coppice areas to the original rich mosaic pattern of wildlife and sustainable ancient woodland. The objectives as laid down on paper are not followed through in practice.
Chapter 3 Strategic Objective 3a)	<p>1 support</p> <p>Of course everyone supports the protection of our green spaces but there is little within this consultation which suggests that this council really shares this aspiration - words are not enough - the proof of this commitment will only become apparent when the evidence is there. And when we see just how much of our green spaces are up for grabs by developers.</p>
Chapter 3 Strategic Objective 3b)	<p>1 support</p> <p>Yet again all these questions about conserving and managing our historic environment for future generations will be supported - but there are doubts within the community as to whether this council is truly committed to these objectives....past experience does nothing to alleviate fears...</p>
Chapter 3 Strategic Objective 3c)	<p>1 objection</p> <p>No mention here about the sea.</p>
Chapter 3 Strategic Objective 3i)	<p>1 support</p> <p>This council should take careful note of how many proposed developments will compromise statutorily protected sites - local nature reserves, SSSIs, ancient woodland, etc because even now at this crucial stage of this consultation there are those who REFUSE to acknowledge the devastation that will affect these protected site...words are not enough - action is urgently required to fulfill all these promises which look "good" on paper but hold little weight when it comes down to the facts. If this council is truly concerned on these issues why were the maps showing these protected sites kept under wraps.</p>
Chapter 3 Strategic Objective 5f)	<p>1 support</p> <p>Far too many developments for family occupation are approved with no play provision on the site....it is an appalling situation and contravenes the existing local plan. Family housing must have SAFE play areas for children in their own gardens, not across a roadparents</p>

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	need to be able to observe young children at play and not have to leave the home in order to take they some distance away from their homes.....it is a disgraceful situation here in this town...
Chapter 3 Strategic Objective 6	1 support
Chapter 3 Strategic Objective 6e)	1 support All very well - but the proposed Bexhill by pass will do nothing to encourage people to leave the car at home - there is no other means of transport - so this is another pie in the sky objective. All these initiatives will receive support but they won't come to anything....just words on paper...very sad.
Chapter 3 Strategic Objective 7(b)	1 support
Chapter 3 Strategic Objective 7f)	1 objection No mention here about the condition of the sea.
Part Two - Chapter 4: The Development Strategy	
Paragraph 4.1	1 support
Paragraph 4.2	1 objection These were introduced in May 2012, 4 years into the process, with no consultation, no evidence base and no facts supporting the choices. They may act against effective delivery by hindering joined-up thinking and working, as they do not correspond to the established Area Co-ordination Zones, whose Area Management Boards support the delivery of the Hastings Sustainable Community Strategy. The ACZs reflect the natural divisions of the Borough - Hollington, St Leonards, Hastings New Town, and Hastings Old Town; the Spatial Areas will not support paragraph 2.64 which envisages that residents will 'identify with their own local communities'
Paragraph 4.3	2 objections Hastings Local Plan The Hastings Planning Strategy Proposed Submission Version 25th May - 17th August 2012, does not 'set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth.

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	There was no consultation and no credible evidence base - choices are not supported by facts, only subjective assessments based on a wide variety of criteria. They diverge from SOA boundaries in at least 10 locations rendering them statistically unreliable, and cut across Conservation Areas. They are too large to be effective in their aim of providing 'a more local perspective and sense of place'. The portraits are superficial and inaccurate and do not display 'an understanding and evaluation of [] defining characteristics.'[NPPF 58] and pre-empt local involvement in neighbourhood plans, contrary to the intention of the Localism Act
Paragraph 4.5	1 objection The proposals to build on a site at Robsack "A" which is located directly in the centre of two ancient woodlands and local nature reserve, has been the focus of much concern and objection here in Hollington. It is considered that the full facts continue to be misrepresented in these reports and strongly object to the Robsack "A" site being included in the new local plan. The full facts in relation to this site have never been fully acknowledged. And go against statutory legislation regarding protected sites.
Paragraph 4.9	1 objection The inclusion of site allocations that are detrimental to the historic environment are contrary to the aims outlined in this paragraph.
Paragraph 4.12	1 objection The triple S.I. site extends much further.
Paragraph 4.13	1 objection 4.13 relies on urban site allocations and coupled with reliance on windfall sites, has effectively precluded the potential allocation of sites on the edge of the currently defined settlement. Given that the basis for excluding edge of settlement sites is considered to be flawed, the reasoning in 4.13 is similarly unsound.
Paragraph 4.14	2 objections

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	<p>Not evidentially justified. I find the rationale of imposing more high density development on to areas already suffering from high population and crowded housing to be incomprehensible in terms of building and maintaining sustainable communities. Central St Leonards, at 85pph and with shockingly low IMD rankings, is earmarked for a housing quota that is only deliverable if a substantial number of sites are built to high densities; certainly it needs regeneration, but however good the design of the units, it is doubtful whether that will be the outcome.</p> <p>Paragraph 4.14 & 4.15, high, medium & low density figures are at odds with housing density in paragraph 82 of 30 dph across the town and higher density of 40dph.</p>
Paragraph 4.15	<p>1 objection</p> <p>Mix of higher density development over and above the 40dph figure is included in the Council estimate of housing capacity. This needs to be amended.</p>
Paragraph 4.16	<p>1 support</p> <p>Making use of brownfield land is a priority - this council should stop compromising our ancient woodland areas - and stop desecrating our other green spaces....and investigate all the empty homes in this town which should be brought back into use.... look beyond our green spaces - there is no need to build on these areas.</p>
Paragraph 4.21	1 support
Paragraph 4.22	<p>1 objection</p> <p>It is fool hardy to think we can go on building all these houses in such a small town. and there is no indication that these houses are needed here.</p>
Paragraph 4.24	<p>2 objections</p> <p>The Council provides no evidence that 200 dwellings are likely to be provided on unidentified (windfall) sites during the period 2023-2028. An analysis needs to be provided showing pass rates of completions from such sites and an explanation needs to be provided as to how this figure has been projected to 2023-</p>

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	<p>2028.</p> <p>There can be no certainty that the Council will be successful in bringing back empty homes into residential use. Therefore, the assumed 255 dwelling figure should be discounted from the total supply as the housing requirement is intended to be a minimum rather than maximum figure.</p> <p>Table 1 should be revised. The level of reliance on unimplemented planning permissions is unclear as the numerical split with sites under construction is not given. It is felt that in the context of an overall undersupply to meet projected need over the Plan period the table needs to make higher levels of provision in the section "additional dwellings indicated by the SHLAA". Land at Breadsell Lane could contribute at least 450 additional dwellings based on the inclusion of the northern part of Breadsell site as shown on revised masterplan submitted April 2012.</p>
Paragraph 4.29	<p>1 objection</p> <p>The objective is ambiguous and lacks certainty. The direction of this part of the Strategy needs greater clarity and certainty and it is suggested that this can be made 'more sound' if this uncertainty is removed. The introduction of the Breadsell Lane site as a confirmed allocation in the Strategy would reduce or avoid the need to rely on windfall sites at any stage of the Strategy period and would provide a clear and positive basis for housing delivery in the short, medium and longer terms.</p>
Policy DS1 – New Housing Development	<p>14 representations received, 10 objections and 4 in support</p> <p>The housing target should be based upon the full objectively assessed needs to provide a robust figure. In assessing need it should not be influenced by environmental constraints in establishing need. The Plan has not been prepared positively in exploring all possible opportunities for future housing growth and is not compliant with the National Planning Policy Framework (NPPF). There are appropriate sites available to come forward on the urban fringe to meet objectively assessed need. There is a bias towards smaller dwellings and increasing density which is in conflict with a need to deliver a range of house types.</p> <p>No justification has been provided to adopt a housing requirement for 3400 dwellings that is below that set out in policy H1, the regional housing provision of the South East Plan for the period 2006-2026, which</p>

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	<p>remains part of the development plan system. As such draft policy DS1 is not legally compliant with the existing development plan and should be amended to require a further 170 dwellings to be provided in addition to the 3400 dwellings set out in the draft policy for the period 2011-2028. The South East Plan's housing requirement for Hastings should be extrapolated to cover the period 2011-2028 at 210 dwellings per annum resulting in a requirement for 3570.</p> <p>There is a concern that 3,400 homes is too many for the Town to assimilate as there are too few suitable sites for development remaining within the boundaries of the Borough, the town has almost reached saturation point for development and the remaining areas should be sensitively developed to leave a historic town with character which will encourage tourism. Some of the sites are detrimental to the historic environment and therefore should be contrary to a number of the strategic objectives including the tourist industry which should be the first priority for the historic town.</p> <p>England is the most densely populated country in Europe and Hastings has a density of 7 times the national density. The area of Hastings and St Leonards is confined by the sea. The proposed sites for housing have not been finally designated and the proposed densities are about the 30 to 40 dwellings per hectare in clause 8.2 so the figure of 1378 will not be achieved.</p> <p>The reasons for restrictions on new housing development are unsound. The omission of Breadsell Lane as a strategic site allocation brings into question the soundness of the whole strategy and its approach to housing land allocations as a viable and deliverable area of land has been excluded on the basis of out of date and incorrect information.</p> <p>There is also concern that older people's care does not seem to be included, with an ageing population this needs to be assessed.</p> <p>The new Development Plan is far too open to abuse and the continued destruction of wildlife habitat. The Council's planning department is not strictly adhering to laws dealing with wildlife conservation and not adhering to procedures and ensuring the requirements of Section 106 legal agreements are met.</p>

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	Developers ecologists are considered to work round the central issues of wildlife conservation with misinformation and ploys with one idea in mind, money. Therefore the Council should allow an independent surveyor to check all future development sites.
Paragraph 4.32	<p>1 objection</p> <p>4.32 This is the same paragraph as 2.17 (page 16 of the report). £4.6m from the Government was spent on Enviro21 Innovation Park. It's devoid of tenants. The recession is blamed for the failure. Units are the 'wrong size'. A conference and banqueting centre stands idle, it's now in the Queensway Employment Corridor. Britain's economy across the period 1997-2007 was debt fuelled. Hastings borough council, Sea Space, Hastings & Bexhill Taskforce, Irish Banks, East Sussex Energy Infrastructure and Development, are irresponsible. What seemed like a good way of burning-off a wad of cash years ago doesn't look so clever now.</p>
Paragraph 4.33	<p>1 objection</p> <p>This is the same paragraph as 2.18 (page 16 of the report).</p>
Paragraph 4.36	<p>1 objection</p> <p>These tactics can be characterised as: Build It And They Will Come.</p>
Paragraph 4.37	<p>1 objection</p> <p>The ESLR numbers are not convincing.</p>
Paragraph 4.38	<p>1 x objection</p> <p>Particular strengths for manufacturing in Hastings are vacuum pumps and contact lenses. Not many people know that.</p>
Paragraph 4.41	1 support
Policy DS2 – Employment Growth	3 representations in support

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	<p>The strategy with respect to employment land focuses primarily on delivering development in town centre locations. The importance of the link road in delivering employment land is recognised particularly with respect to the North East Bexhill proposal. Where sites are located outside the town centre it will be important to bring them forward with associated public transport improvements to reduce the impact of in commuting by car.</p> <p>Support the inclusion of this policy and welcome partnership work with Rother District Council. The Strategy needs to recognise that employment growth elsewhere in the county is also important to meet objectives, in particular links with Eastbourne.</p>
Paragraph 4.42	1 support
Paragraph 4.43	<p>1 objection</p> <p>Considerable business confidence can be had for much less than £100,000,000.</p>
Paragraph 4.46	<p>1 objection</p> <p>There could be up to 1,600 jobs from the growth of retailing up to 2028. There could be up to 2,200 jobs. There could be items at up to 70% Off, at Debenhams.</p>
Policy DS3 – Location of Retail Development	<p>1 objection</p> <p>This does not reflect paragraph 4.49 'support the retail role of Hastings and St Leonards town centres', nor FA2 'a modest quantity of retail development would be supported in Central St Leonards compatible with function as a district centre'.</p> <p>This policy is inconsistent as it suggests that St Leonards will only be considered after Hastings town centre rather than in its own right. There was no consultation on retail in St Leonards in 2011, but Preferred Approach 4 in 2008 [Location of Retail Development - Comparison Goods] gave 'an element of provision located in St Leonards District Centre'</p>
Part Three - Chapter 5: Spatial Areas	
Paragraph 5.8	1 objection

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	Rother District Council object to the reference to renewable energy generation in the Combe Valley Countryside Park, as no comprehensive assessment has been made to determine this is the most appropriate area. Further investigative work is required to determine the most suitable location and therefore it is not appropriate to limit this potential to the Combe Valley Countryside Park, particularly given its objectives (nature conservation, recreation and strategic gap). It is considered more appropriate to make policy references to the fringes of Hastings and duly qualify the regard to the above issues in identifying any suitable locations.
Paragraph 5.15	1 support
Paragraph 5.23	1 support Bourne Leisure considers that paragraph 5.23 should be amended to state that full account will also be taken of: the specific characteristics and vulnerability of any existing or proposed land use; whether the residual risks of flooding to people and property are acceptable and can be satisfactorily managed; and whether the proposed development makes a positive contribution to reducing or managing flood risk.
Policy FA1 – Strategic Policy for Western Area	6 representations received 4 objections and 2 in support Rother District Council object to the reference to renewable energy generation in the Combe Valley Countryside Park, as no comprehensive assessment has been made to determine this is the most appropriate area. Further investigative work is required to determine the most suitable location and therefore it is not appropriate to limit this potential to the Combe Valley Countryside Park, particularly given its objectives (nature conservation, recreation and strategic gap). It is considered more appropriate to make policy references to the fringes of Hastings and duly qualify the regard to the above issues in identifying any suitable locations. Objections to policy include: <ul style="list-style-type: none"> - Queensway employment corridor is unsustainable & harmful to the environment - West Marina development should be non car dependent and have high frequency rail travel - Object to Link Road

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	<p>- Academy terminology should be revised</p> <p>The Western area contains the planning focus areas of Little Ridge & Ashdown; Greater Hollington & Filsham & Bulverhythe and is proposed between 1,100-1,290 dwellings and 36,700m2 employment floorspace. Little Ridge & Ashdown and Filsham & Bulverhythe in particular are closely located to the A21 and A259 respectively. Development proposed in these areas will need to come forward with sustainable transport infrastructure to help minimise the impact on the strategic road network.</p> <p>Purpose of sub-area basis (planning focus areas) is unclear. However, Little Ridge & Ashdown is capable of providing more housing as land that has been excluded on the western edge of the Borough is suitable for development.</p> <p>Bourne Leisure supports point (c) of Policy FA1, which encourages the retention of existing and provision of more high quality visitor accommodation in specific locations, but considers that it is important to promote tourism generally throughout the Western area.</p> <p>In regard to point (k) of Policy FA1, Bourne Leisure would reiterate the need to take account of the specific characteristics and vulnerability of any existing or proposed land use; whether the residual risks of flooding are acceptable and can be satisfactorily managed; and whether the proposed development makes a positive contribution to reducing or managing flood risk.</p>
Paragraph 5.28	<p>1 objection</p> <p>There is no evidence that additional offices and retail developments at Priory Quarter will contribute positively to the local economy.</p>
Paragraph 5.30	<p>2 objections</p> <p>Student accommodation, where and when?</p> <p>It is not justified in sustainable terms to always make Hastings the prime recipient of money and effort. While Castle's SOA IMD ranks are low : 2621, 766, 2319, 6163, they are considerably better than those of</p>

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	Central St Leonards - 331, 966, 1134, 2425. This proves the inefficacy of making a conurbation out of the two towns - by placing both town centres in the same Area, only one can be the focus, and of the two areas, Central St Leonards needs more help.
Paragraph 5.31	<p>1 objection</p> <p>This ignores the serious lack of community facilities, open space, and sports provision in Central St Leonards; and fails to make any commitment to improving those provisions. The strategy focuses on housing and the retail offer but residents also need facilities for meeting as a community, and for sports to help combat the poor health statistics of the community. Crystal Square was mooted in 2004 as a mix of retail, community facilities and housing. It is now relegated to the 'later part of the Plan period' [DMP consultation 2012, p125]; it should be promoted as a matter of urgency.</p>
Paragraph 5.34	<p>1 objection</p> <p>Unjustified in its characterisation. The 'key parks and open spaces' you mention are not near Central St Leonards and the Maze Hill/Burton St Leonard Areas. If you insist on creating this vast administrative area, at least describe it accurately and inclusively. The high density to which you refer is largely in the southern part, which in the west is very inadequately served, relying on White Rock Gardens, Gensing Gardens, Warrior Square and St Leonards Gardens, none of which are anything like as extensive as the provision enjoyed by residents further north in the lower density areas.</p>
Policy FA2 Policy for Central Area	<p>6 representation received, 5 objections and 1 support</p> <p>The housing ranges for Maze Hill and Central Leonards assumes major sites delivering high density housing this will be damaging for both areas. Burtons' St Leonards should be specifically referenced in FA2, other part of the Plan will be rendered less effective without this reference. White rock Gardens should be included in the reference to the green spaces network at (h). The target housing range for Central St Leonards is too high, it includes sites in sensitive conservation areas and will be highly detrimental to the historic environment. The whole of White rock Gardens including the oval and the north and south of the convent should be designated as open space, it should be referred to as Pugin and Wardels St Leonards.</p>

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Paragraph 5.39(j)	<p>1 objection</p> <p>The demolition of Havelock Mansions, Havelock Road, for an office building, is contrary to this strategy. Havelock Mansions should've been polished, not demolished</p>
Policy FA3 Strategy for Hastings Town Centre	1 support
Paragraph 5.44	1 support
Policy FA4 Strategy for Central St Leonards	<p>3 representations, 2 objections, 1 support</p> <p>Remove the reference to the former Hastings College site in Archery Road, it is misleading, inappropriate and a distortion of subsequent housing allocations.</p>
Paragraph 5.56	1 support
Policy FA5 Strategic Policy for Eastern Area	<p>6 representation, 4 objections, 2 supports</p> <p>Delivery of FA5(a) will be aided by the allocation of land west of Rock Lane in the Development Management Plan, development here could bring forward environmental and access improvements to the ANOB for the wider public benefit. FA5(m) 40 dwellings per hectare is too high for any area of the Borough, this should be reduced to 30 dwellings per hectare. FA5(g) include Speckled wood gill as a SSSI for option C of the recent consultation. Hillcrest, Ore Village & Ore Valley should all be focus Area 11. The housing range for each area, are inappropriate in an already overdeveloped area.</p>
Paragraph 5.59	<p>1 objection</p> <p>In August 2011, Government analysis found 51 beaches in England and Wales projected to fail new water quality standards to be introduced in 2015. Blighted sewage from storm overflows and other pollutants. Hastings and Bexhill-on-Sea on the list. Head of tourism, HBC, said: "The worst case scenario is that if the beach quality doesn't improve we'll put up signs telling people not to bathe". Laurence Bell of White Rock Hotel: "It'll be difficult but we must try. Horrified to see warning signs". Water quality standards requirements are overlooked in Hastings Local Plan The Hastings Planning Strategy Proposed Submission Version.</p>

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Paragraph 5.61	<p>1 objection</p> <p>In the film JAWS, they had to close the beach because of the great-white. Soon they'll be closing Bexhill and Hastings beaches because the sea is dirty.</p>
Paragraph 5.71	<p>1 objection</p> <p>Building an art gallery on this site was the wrong thing to do, it does not represent 'Value for Money' for the people of Hastings. What seemed like a good way of burning off a wad of cash in 2007 doesn't look so clever now.</p>
Policy FA6 Strategic Policy for the Seafront	<p>3 representations, 2 objections, 1 support</p> <p>HBC's Annual Plan 2007/2008 to undertake the external refurbishment works to Pelham Crescent didn't happen, no proposal is made to secure the management of St Marys in the Castle, no mention is made of White Rock Theatre – plan to stage 80-100 events each year; quality will improve, audiences grow, costs reduce.</p> <p>Strongly object to part e.</p>
Part Four – Chapter 6: Sustainable Communities	
Policy SC1 Overall Strategy for Managing Change in a Sustainable Way	<p>5 objections</p> <p>Sensitive development such as housing must be adequately separated from wastewater facilities, to safeguard amenity.</p> <p>There are many policies in the 2004 Plan (DG1, 2, 3, 7, 8, 11, 13, 21, 25, 27, 30-34) which are good and it is not clear where they are taken forward.</p> <p>Building houses with bricks increases CO2 emissions – houses should be built with timber or steel frames, sheep's wool for insulation, fireproofing & solar panels.</p> <p>SC1 needs to be rewritten with safeguards properly implemented.</p> <p>Planning Strategy SC1, SC2 & SC3 require a better approach, at the present time the Council expects the developer to supply all necessary information and then acts upon that information; the flaws in the present procedures must be addressed.</p>

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SC2 Design & Access Statements	<p>1 objection</p> <p>Reinstate the building for Life requirement, Building for life, or its successor will deliver a quantifiable standard. This requirement for major proposals to address Building for Life has been removed without consultation.</p> <p>Rother district Council object to the reference to renewable energy generation in the Combe Valley Countryside Park. No comprehensive assessment has been made and further investigative work is required.</p>
Paragraph 6.17	<p>1 objection</p> <p>Rother District Council object to the reference to renewable energy generation in the Combe Valley Countryside Park, as no comprehensive assessment has been made to determine this is the most appropriate area. Further investigative work is required to determine the most suitable location and therefore it is not appropriate to limit this potential to the Combe Valley Countryside Park, particularly given its objectives (nature conservation, recreation and strategic gap). It is considered more appropriate to make policy references to the fringes of Hastings and duly qualify the regard to the above issues in identifying any suitable locations.</p>
Policy SC7 Flood Risk	<p>2 representations, 1 objection, 1 support</p> <p>Sea water standards are going to be made much more difficult next year. Hastings will likely fail, much of the drainage is Victorian and will need updating. Sewage is pumped into the sea when there has been excessive rainfall</p>
Part Four - Chapter 7: Protecting the Environment	
Paragraph 7.3	<p>1 objection</p> <p>Havelock Mansions, Havelock Road was built in the 1880's, now demolished, should've been polished.</p>
Policy EN1 Built and Historic Environment	<p>3 objections</p> <p>Any developing involving listed buildings and viability reports should strictly follow English Heritage</p>

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	guidance, including an independent financial survey. EN1 needs to comply with conserving and enhancing the historic environment in accordance with NPPF pages 30-32 paras 126-141 inclusive. Why is Hastings Council insisting on the closure of this very interesting historic monument
EN2 Green Infrastructure Network	3 representations, 2 objections, 1 support The built environment loses much of its residential appeal as the natural environment is systematically destroyed. The Green Network map adopted with the 2004 Plan and policies are still in force and passed by the Secretary of State. It is only Planners who have not respected that wildlife cannot exist without sustainable habitat. The Council Planners are ignoring the mandatory requirements passed in 2008, this is very unacceptable. More allotment land is required, there is a waiting list.
EN3 Nature Conservation and Improvement of Biodiversity	2 representations, 1 objection, 1 support The new plan only deals with items within the Borough boundary. The study of the neglect of ancient/preserved woodland and the present position of TPOs will surprise the planning team. The wonderful mosaic pattern of sustainable woodland seen on the woodland rides for quiet recreational pursuits needs urgent restoration and cataloguing. We are fast losing many species of wildlife because of the continuing neglect and destruction of close meadow habitats. At 131 this also refers to 1 of 2 criteria. How will the Development Plan agree this as it refers to land owned by the Council outside the Borough boundaries?
Paragraph 7.23	1 support
Policy EN4 Conservation and Enhancement of Landscape	2 representations, 1 objection, 1 support Policy EN4 is not consistent with paragraph 152 of NPPF which suggests that economic, social and environmental consideration should be given in respect of sustainable development. Policy EN4 could unduly restrict development of essential utility infrastructure Hastings District. Whilst we appreciate the desire to conserve the landscape, there are certain limited circumstances when it is necessary to build on such land. In these circumstances, the benefit of development may outweigh any detriment to the landscape. Paragraph 152 suggests that mitigation or compensation should be considered where adverse impacts are unavoidable.

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Paragraph 7.26	<p>2 objections</p> <p>This paragraph should be deleted as Speckled Wood is to be included in the protected areas (recent consultation).</p> <p>Policies EN4 & EN5 are marvellous on paper but that will be as far as things will get in practice. Take a real walk on the wild side and make enquiries. These 2 policies are hypothetical written to persuade everybody everything is right. Very unsound and will not be practiced due to lack of funding.</p>
EN5 Open Spaces – Enhancement, Provision and Protection	<p>5 objections</p> <p>Policy EN5 is not consistent with the. Policy EN5 could unduly restrict development of essential utility infrastructure Hastings District. There are certain limited circumstances when it is necessary to build on such land. In these circumstances, the benefit of development may outweigh any detriment to the open space. Paragraph 152 suggests that mitigation or compensation should be considered where adverse impacts are unavoidable.</p> <p>White Rock Gardens should included in the list of existing open spaces that are of town wide significance, clause (c)</p> <p>We consider EN5 fails to be sound as sports open spaces are already being used for housing development. We request the plan to include the Hastings Plan 2004 sports & leisure sections as this clearly demonstrates the needs of Hastings residents.</p> <p>EN5(c) Speckled Wood to be included.</p> <p>Sports pitches, children's play facilities, Planning Strategy EN5, CI2 and CI3. Removal, alteration or lack of provision of these essential facilities in order for development to precede what is the criteria.</p>
Part Four - Chapter 8: Housing	
Policy H1 Housing Density	<p>2 objections</p> <p>At least 40 dwellings per hectare is unacceptable in any location and should be amended to 30 dwellings per hectare.</p> <p>Clause 8.2 30dph across the town and potentially higher densities in suitable locations. Policy H1 says "at least" this means a minimum of 30 to 40 dwellings per hectare, therefore 8.2 & Policy H1 are inconsistent.</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
Policy H2 Housing Mix	<p>4 objections</p> <p>The Strategy does not comply with the requirements of the National Planning Policy Framework as it does not contain specific policies to provide for a mix of housing based on current and future demographic trends recognising the ageing population but failing to encourage housing provision for them. This is not justified because a] large proportion of substandard properties in the borough b] high numbers of residents with health concerns c] need to attract a settled rather than a transient [population d] projected rise in elderly population. The Council undermines its commitment to improving the home environment by reducing the requirement to a negotiable quota.</p> <p>There is predicted to be large increase in those aged 65 years and over with a 10% increase by 2014 and 15% by 2016 (2300 more persons aged 65+). The figure in 2028 will be much larger. Lifts should be standard on all buildings over 3 storeys. All properties should be Disability Discrimination Act compliant. H2 d) & e) are poor and unacceptable in 2012.</p> <p>The Housing Needs Survey and Housing Market Assessment are out of date, these and other documents need updating. Re clause 4.24 many of the unimplemented planning permissions of 1379 are for unacceptable flats of high densities.</p>
Policy H3 Affordable Housing	<p>3 objections</p> <p>No explanation or evidence has been put forward by the Council to explain why a two tier affordable housing threshold has been applied with respect to greenfield and previously developed land. Or for the significantly higher requirement for Greenfield development.</p> <p>The Policy in its current form would add significantly to costs of housing, potentially making development unviable. Policy needs more flexibility, and should not distinguish between brownfield & greenfield. Further information needs to be provided up front about financial contributions & how monies will be spent.</p> <p>We do not need social housing or open market housing, we need housing?. 8.11 with the need for 596 affordable homes per annum, one can't have open market for the world to move into.</p>
Paragraph 8.19	<p>1 objection</p> <p>Student accommodation, where and when?</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
Policy H4 Houses in Multiple Occupation	<p>3 representations, 2 objections, 1 support</p> <p>The National Landlords Association (NLA) remains unconvinced that HBC has explored all potential avenues or provided sufficient justification to support the HMO Policy or Article 4 Direction. The new policy is a barrier to provision of good quality shared accommodation and will impact negatively on students, house prices, first time buyers and low income households.</p> <p>The Residential Landlords Association recommends deletion of the policy or if not it should be amended</p>
Paragraph 8.22	<p>1 objection</p> <p>Objection to Policy H5 and the text that precedes it does not rely on any evidence base to support it. None of the need assessed in the 2007 Gypsy and Traveller Accommodation Needs Assessment has been met, nor has there been any updating of that assessment. As the policy fails to provide any mechanism by which need will be met, nor any evidence base to show the extent of need, we consider that it fails the test of soundness.</p>
Policy H5 Accommodation for travelling Communities	<p>1 objection</p> <p>There are a number of travellers living in council property, they don't want to be in houses, therefore create proper traveller sites and reuse the houses the travellers are in.</p>
Part Four – Chapter 9: The Local Economy	
Paragraph 9.2	<p>1 objection</p> <p>New offices are being built in Priory Quarter now, adding to existing stock of space not been used for five years. Nor likely to be for 10 years. The scheme got knocked back by the Government's Regional Growth Fund last year when presented by Sea Space. Now, East Sussex Energy Infrastructure and Development Ltd have won debt from the Growing Places Fund. They're going on with what they know and won't go back, the foot of pride has come down. Ain't no going back.</p>
Paragraph 9.4	<p>1 objection</p> <p>It is accepted that there is scope to provide new floorspace. There is little scope for letting it.</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
Policy E1 Existing Employment Land and Premises	<p>1 objection</p> <p>I put it to the Council that the Land Community Trust module comes into play, rent the land at £1000 per acre per annum, if the owners won't accept this compulsory purchase it. Its the only way anyone can carry on in business, this maybe outside the local Councils control, but put it to Parliament.</p>
Paragraph 9.8	<p>1 objection</p> <p>Sussex Coast College still can't fix the landscaping out the front. Go look at the sign that's just been erected.</p>
Paragraph 9.16	1 support
Paragraph 9.17	1 support
Paragraph 9.18	<p>1 objection</p> <p>Reference to the Coastal Currents Festival should be included in this paragraph</p>
Paragraph 9.20	<p>1 support</p> <p>Bourne Leisure notes the reference to a lack of quality visitor accommodation (paragraph 9.20) and to the importance of self catering accommodation (paragraph 9.22). Bourne Leisure does not, however, accept the subsequent statement that there has been "no recent evidence" of demand for further caravan and camping accommodation in the town.</p>
Paragraph 9.23	<p>1 objection</p> <p>There must be some figures on the market for visitors who, having looked around the Jerwood gallery, make a beeline for the slot machines and go-carts. Maybe, up to 500?</p>
Paragraph 9.24	<p>1 objection</p> <p>It is time the Council included St Leonards in its tourism strategy. Visitors who appreciate the Jerwood Gallery are also likely to appreciate the architecture, and landscaping of Burtons' St Leonards, and the antique shops of lower St Leonards and art galleries along Marine Court. Marketing could create a 'string of</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	pearls' of cultural places to visit, from Eastbourne's Towner Gallery, to the De La Warr pavilion at Bexhill, to Burtons' St Leonards along to the Jerwood and than on to Rye.
Policy E4 Tourism and Visitors	<p>2 representations, 1 objection, 1 support</p> <p>The aim for tourism should be to climb back to 8000 beds (in 1951) from only 1000 now. High quality visitor accommodation is essential providing jobs and vast injections of money for the retailers and more people to see, buy and restore the beautiful buildings. Thereby making the whole community more prosperous. In order to fund higher grade accommodation and facilities, it is often necessary to increase the size of holiday parks. Bourne Leisure therefore considers that paragraph six of Policy E4 should be amended to state: Proposals for upgrading caravan and camping facilities, including an extension in area, will be encouraged where it increases the range and/or quality available to the tourist."</p>
Paragraph 10.6	1 support
Paragraph 10.9	<p>1 objection</p> <p>This must be where East Sussex Energy Infrastructure and Development Ltd comes in.</p>
Part four – Chapter 10: Community Infrastructure	
Policy CI1 Infrastructure and Development Contributions	<p>3 representations, 1 objection, 2 supports</p> <p>The Falaise Bowls Association considers the document content to be unsound because it needs to be more specific regarding indoor bowling facilities. A new facility is contained within the Hastings Plan 2004 and needs to be included in any new strategy to ensure the health of more mature people in the main but all ages and levels of fitness.</p> <p>Inclusive sport & leisure facilities, and places of worship play an important role. To positively identify this excellent document with NPPF clauses 28,70 & 171 and fulfil what is recognised as "essential for all residents" etc.</p> <p>East Sussex County Council support this policy, as well as the commitment to update the Infrastructure Delivery Plan. Suggest amendments required to sections b & c to avoid misinterpretation of policy. ESCC support introduction of CIL subject to viability. It is recommended that the policy is amended to avoid</p>

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	misinterpretation, reduce confusion and ensure flexibility by deleting section c and amending section b to include: 'through development contributions, either a Section 106 contribution or an area wide Community Infrastructure Levy....'
Paragraph 10.11	1 objection No mention of the tennis courts, abutting Magdalen Road Convent Ground, by the putting course at the back of Clambers.
Policy CI2 Sports and Leisure Facilities	2 objections The Falaise Bowls Association considers the document content to be unsound because it needs to be more specific regarding indoor bowling facilities. A new facility is contained within the Hastings Plan 2004 and needs to be included in any new strategy to ensure the health of more mature people in the main but all ages and levels of fitness. The Falaise Bowls Association believes the Policy to be unsound because it is lacking in undertakings regarding indoor bowls facilities necessary updates. Hastings is the only town in the South East without sound indoor bowling facilities where the disabled can be properly catered for. The document needs to contain the same as the 2004 Plan - sports and leisure sections. The fact the 2004 Plan contains these elements surely indicates the need is even greater for a document leading up to 2015 and beyond.
Policy CI3 Children's Play Provision	1 objection CI3 Childrens Play Provision is totally inadequate 600m or 15/20mins walking distance - totally unsuitable for children.
Paragraph 11.6	1 objection The economics of the madhouse. Very silly. Worrying. £100,000,000 Squandermania in Hastings
Part Four – Chapter 11: Transport and Accessibility	
Policy T1 Strategic Road and Rail Scheme	3 representations, 2 objections, 1 support

Planning Strategy Proposed Submission Version Policy / Paragraph	Summary of main issues raised
	<p>The junction between The Ridge and the A21 is crucial for the area and should be added to the list. Also the Tonbridge - Pembury links on the A21.</p> <p>The planned Link Road is seen as a means of growth, we are told with more employment house values go up, and then people spend most of their lives paying it off. There is a need to rethink the way we treat people, technology has replaced the need for labour.</p>
Policy T2 Local Road Improvements	2 supports
Paragraph 11.16	<p>1 objection</p> <p>Add references somewhere to Glyne Gap station proposal. This together with the 'real time' bus information systems for Bexhill and Hastings would be consistent with 'b' in FA6. You might also include quality bus corridor improvements suggested in ESCC LTP 1, recommendations of the South Coast Corridor Multi-Modal Study 2002 that refer to demand management and alternatives, and the pedestrian/cycle networks trailed in this document.</p>
Policy T3 Sustainable Transport	<p>3 representations, 1 objection, 2 supports</p> <p>The Highways Agency have stated that Policy text outlining the requirement for Transport Assessments would be welcomed in this section of the Planning Strategy.</p>
Policy T4 Travel Plans	<p>2 representations, 1 objection, 1 support</p> <p>The view expressed on 'park and ride' is subjective and should be re-written to allow possibility of a park and ride scheme in future if considered appropriate (as in the case of Maidstone, Kent).</p>
Paragraph 11.28	<p>1 objection</p> <p>This is totally weak. 360 degree catchment area - other seaside towns have park & ride. We have limited town centre parking and way higher parking charges – good reason for park & ride. The Plan should include park & ride, and costings be carried out and other seaside providers contacted.</p>
Part Five – Key Diagram	
Key Diagram	3 objections

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	<p>Rother District Council objects to the inclusion of an area shown in the Rother District boundary identified on the key diagram.</p> <p>Maps and key diagram are unacceptable.</p> <p>The key diagram does not distinguish between areas that are within the AONB and those that are "significant open spaces". As it stands, land indicated at the western edge of Hastings (Marline Woods area) could be construed as being within the AONB, which it is not. The key diagram is therefore imprecise and as such is an 'unsound' element of the Strategy. Clearer definition of the AONB and SOSs would remedy this.</p>
Part Six - Monitoring & Implementation	
Objective 3 Safeguard and improve the town's environment	<p>1 objection</p> <p>Target for multifunctional green space/play areas by not less than 2% in each of the next 5 years and to at least 82% during the life of the Plan. Totally unacceptable. The provision was 90% in the 2004 Plan for 2013. This is going backwards.</p>
Objective 5 Supporting sustainable communities	<p>1 objection</p> <p>No target included - GP service within 30 mins travel by public transport - go to Doctors at Bexhill?</p> <p>Reduce % of children in poverty. See commentary for Hastings Borough based on JSNA sourced Jan'12. Half of the wards in Hastings are amongst the 102 most deprived in East Sussex, 30% of children and 23% of older people are affected by deprivation. 24% of children receive free school meals. Very high child poverty. Mens life expectancy getting worse every year.</p>
Part Seven - Appendix 1: Superseded Policies	
Superseded Policies	<p>4 objections</p> <p>Am concerned that policy SC1 is quoted many times as endorsing Local Plan 2004 policies, but does not in fact achieve this objective eg. p142 of Local Plan 2004 'protection of views' and p144 'gardens' - both do not afford protection of policies.</p> <p>All the caravan sites cater for completely different types of cliental and their special needs. I do not think</p>

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	<p>any of the Council teams are knowledgeable enough to dictate in any way forward as each site is quite different in about every respect. The present legislation is sound. One important point is that during the height of the summer holiday season there is an extra overloading strain on the victorian sewage system. Page 105 ref. 114 - I have copies of the map and detailed book for the local nature reserves 2004 Plan. We all need complete documentation for EN2 and EN3. The fudged map with its round circles dotted about is no help and is possibly not an acceptable legal interpretation.</p> <p>Local Plan 2004 pages 119,120,122,124. Fine words "improvement of biodiversity" enhancement of landscape!. I live with smells, dust clouds, filth left by lorries visiting the tip on Bexhill Road, the drivers are no longer required to wash their wheels and tyres. The tip is a carbuncle on what was a fine landscape. The University of Brighton air pollution surveys show the situation is unacceptable. the height of the tip area was to have been no higher than 45m but is in fact 85m high and Biffa are still spreading materials over areas that were in practice finished in 2005.</p> <p>This fine historic coastal seaside town with its unique features enjoyed for centuries are very fast being eroded away with copycat planning and development. It is wrong to copy inland town developments. We have the English Channel and the unique A259 that runs the entire length of Hastings seafront. To alleviate transport problems, the A21 needs to be updated. The Link Road will not help Hastings congested transport problems in any way</p>