

Local Plan Review – proposed joint working arrangements between Hastings and Rother Councils

Introduction

1. Both Councils have now committed to reviewing their Local Plans with a new 15+ year time horizon, in line with the new NPPF 2018. There is a degree of urgency around this process following changes to the NPPF in 2018. The existing Plans of both Councils run to 2028 and will be more than 5 years old and therefore “out-of-date” in NPPF housing supply terms in 2019. The review process needs to be completed as expediently as possible in order to maintain a high degree of local control over fundamental planning decisions.

Background

2. A “shared approach to future prosperity for the Hastings and Bexhill area” was agreed by the Councils for inclusion in the respective Local Plan Core Strategies, which were both adopted in 2014.
3. This “vision statement” was established with Member support, through the then ‘Joint Members Meetings’, in the early stages of Core Strategy preparation. It was complemented on the practical front by the joint writing and procurement of key evidence bases in relation to housing market and employment land needs. Both the shared vision and the joint working in relation to housing need were commended by the respective Local Plan Inspectors at the time.

The need for close collaboration

4. The Councils agree that they operate within the same housing market area and employment market/travel to work area. There is also considerable cross-boundary movement for shopping and leisure/recreation activities. Thus, there are very similar socio-economic issues affecting both areas. It follows that the analysis and responses to these would benefit from joint consideration.
5. As the largest town in this market area, Hastings has a significant economic influence on the well-being of residents in Rother district. Hastings Borough is almost built up to its administrative boundary; hence, any peripheral development would be in Rother district.
6. In terms of producing Local Plans that pass examination, the Government has made it clear through the new NPPF that robust planning arrangements need to be in place across housing market areas. Moreover, this will be central to meeting the ‘Duty to Co-operate’ and needs to be documented in a ‘Statement of Common Ground’. Guidance accompanying the NPPF states that this Statement will need to include (but not limited to):
 - working together at the outset of plan-making to identify cross-boundary matters which will need addressing;

- producing or commissioning joint research and evidence to address cross-boundary matters;
 - assessing impacts of emerging policies; and
 - preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated, (such as the distribution of unmet needs or policies relating to county matters).
7. Hence, with both Councils just embarking on their Local Plan Reviews, we have an ideal opportunity to make sure the policy framework for the housing market area is consistent - and therefore as effective as possible for our local communities.
8. In financially difficult times for local government, it is particularly vital to achieve efficiencies in service delivery. Experience in the preparation of the existing Core Strategies showed that the ability to share the overall costs of the process, notably in the preparation of key evidence base documents, but also in the pooling of staff knowledge and skills yields significant cost savings. For the forthcoming Reviews, it will be necessary, for skills and timing reasons, to make full use of consultants. Joint appointments are estimated to save each Council around a third of its consultancy costs.

Separate Local Plans with a common vision and some strategic policies

9. Given our earlier successful track record with joint working on our respective 2014 Core strategies, a “enhanced” shared approach is seen as providing a better framework for delivering development and change across the area. This is attributable to the understanding that each Council brings, through both councillors and officers.
10. It is also expected that a jointly developed set of options and choices will be seen as positive and help draw in external parties, including to meet the regeneration needs across the labour market area. Hence, it would provide the Councils with a robust platform to deliver a consistent message for their strategy. In addition to cost efficiencies in preparing common evidence, there will be savings in relation to consultation processes.
11. With aligned Local Plans, most of the objectives and strategic policies would be expected to be the same or mutually compatible across the area. This may cover:
- Growth strategy
 - Housing quantum across the area and in each Council’s area
 - Employment land/floorspace quantum across the area and in each Council’s area
 - Strategic locations for growth, notably around Hastings

- Approaches to meeting housing needs of different groups
 - Strategic infrastructure, including cross boundary transportation and 'green infrastructure'
 - Approaches to major social, leisure, educational and health provision
12. Outside of the agreed strategic matters, housing and other “non-strategic” land-use allocations specific to each area would be dealt with (drafted, consulted upon and adopted) by the relevant Council individually, as would more detailed policies.
13. To be effective, it will be necessary to maintain consistent timetables and as far as practicable, consistent, agreed objectives taking account of the wider picture. At the same time each Council will retain its autonomy and will progress its Local Plan to examination and adoption independently. To effectively manage risks, it is envisaged that a Memorandum of Understanding (MoU), a document which will not be legally binding, will be drawn up, setting out:
- Arrangements for the establishment of a non-decision making member-level Advisory Board to oversee the process and make recommendations to respective Councils
 - The strategic matters to be within the remit of the Advisory Board
 - The political and senior management commitment to collaborative working and to agreed governance and project management arrangements
 - A parallel officer group to report to the Advisory Board, with respective planning policy managers being jointly responsible for day-to-day management of the plan-making process
 - Provisions for sharing costs
 - A commitment to an integrated consultation strategy
 - A commitment to an evidence-based approach and taking decisions for the overall benefit of the Hastings and Rother area

Conclusion

14. The course of action taken now will have very significant implications for both how the challenges and opportunities facing the area are addressed going forward, and most significantly, for how effective they are likely to be. The benefits of the working arrangements include helping deliver technically sound and legally compliant local plans by demonstrating that the “duty to co-operate” has been met through examination and presenting a strong voice in terms of bidding for infrastructure and related funding requirements.
15. The stronger the co-operation between the two Councils, the stronger position they are under the Duty to Co-operate and hence in dealings with the Ministry for

Housing, Community and Local Government (MHCLG), the Planning Inspectorate (PINS) and neighbouring authorities. A Statement of Common Ground setting out agreed collaborative working arrangements and progress will be an on-going requirement.

Timetable of Next Steps

16. List of key actions and the scheduled dates:

Action	Key milestone	Due date (provisional)	Responsible
establishment of a MoU for joint working arrangements	End of February 2019	To be agreed	Hastings & Rother Councils
establishment of a non-decision making member-level Advisory Board	End of March 2019	To be agreed	Hastings & Rother Planning Policy officers
establishment of a parallel officer group to report to the Advisory Board	End of February 2019	To be agreed	Hastings & Rother Planning Policy officers