

# Hastings Borough Council and East Sussex County Council

## Local Plan Transport Evidence Joint Position Statement

February 2026

### Purpose of this note

This note provides an overview of the transport evidence at the time of the Regulation 18 draft Hastings Local Plan Preferred Options February 2026 consultation. It has been prepared and agreed by Hastings Borough Council and East Sussex County Council<sup>1</sup>. WSP, the consultants procured to carry out the transport modelling with the County Wide Transport Model, have reviewed the document.

### Introduction

The National Planning Policy Framework requires Hastings BC to develop policies based on up-to-date evidence. The current transport evidence base comprises:

- [Local Plan Transport Assessment and Mitigation Report \(May 2023\)](#)
- [Pre-Covid19 and Post-Covid19 Model Comparisons \(2024\)](#)
- [Sustainable Transport Audit \(Oct 2022\)](#)
- [Consultation Statement \(Interim\) Regulation 22](#)

### Local Plan Transport Assessment and Mitigation Report

A SATURN based East Sussex Countywide Transport Model (ESCWTM) was developed to test transport schemes and appraise development impacts at a strategic level in East Sussex. The modelling approach and committed growth was discussed and agreed with East Sussex County Council, Local Planning Authorities and with National Highways who are responsible for the Strategic Road Network (SRN) which runs to the Borough boundary at Glyne Gap and Batchelors Bump (A259) and Baldslow (A21).

HBC and ESCC jointly commissioned consultants Jacobs to utilise the ESCWTM to undertake technical assessments and inform the preparation of the 'Hastings Local Plan Transport Assessment and Mitigation Report'.

The ESCWTM was used to appraise and test the modelled transport network capacity and capability to enable delivery of the Local Plan. This technical work was undertaken to understand the potential need for mitigation and to support the Local Plan evidence base.

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<sup>1</sup> In the case of East Sussex County Council, the Joint Position Statement has been agreed at a Senior Officer level, under the Council's Scheme of Delegation.

The ESCWTM provides a future year reference case which incorporates committed housing and economic growth alongside approved infrastructure in accordance with appraisal guidance. The reference case acts as a basis with which to compare a modelled scenario incorporating forecast Local Plan growth to determine network impacts of travel demand, to facilitate closer links with Local Transport Plan 4 and to maximise sustainable and active travel opportunities.

The Do Minimum development growth modelled for Hastings was based on committed housing and employment data as well as windfall data, captured through background growth. The Do Something Scenario includes all developments in the Do Minimum scenario with the addition of 11 new sites (potential Local Plan allocations). The level of housing need (as calculated using the standard method) for Hastings at the time of modelling was significantly higher (approximately three times) than the level of growth tested. There is a similar level of disparity between the current nationally calculated figure of local housing need for Hastings (c,12,500 dwellings) and the identified housing land supply numbers in the Regulation 18 draft Local Plan 2026 (baseline dwellings currently expressed as range of 3,141 to 3,373 ). At the time the transport modelling was carried out, 'no stone [was] left unturned' in an effort to identify sites to help meet housing need. It has always been difficult to meet (in full) the levels of housing need calculated using the prevailing methodology. As such, it was decided that it would not have been a prudent or sensible use of time and resources to test the 'full' level of need. The level of growth tested was, in effect, the maximum level of development that could realistically be delivered within Hastings Borough when the very significant constraints were taken into account.

Since the transport modelling was carried out, Hastings Borough Council decided to review potential densities of development across the Borough. This work is in development and so no potential outcomes have been modelled using the ESCWTM. Once the densification and capacity study is complete, and consultation response from the Regulation 18 2026 consultation have been analysed, HBC will consider whether there is further scope to increase the number of dwellings within the local plan, and whether any change in the number of dwellings requires updates to evidence, including the transport modelling and wider transport evidence.

The current transport assessment (The Hastings Local Plan Transport Assessment and Mitigation Report) sets out the outcomes of the analysis for Hastings in parallel with a local junction modelling appraisal of likely impacts and possible mitigations following Local Plan implementation. This technical work also highlights the need for assessment to move away from a traditional 'predict and provide' approach on the highway network to one which follows a 'Vision and Validate' in order to maximise active and sustainable travel options.

The proposed allocations included in the Hasting Local Plan are not of a strategic scale and are not considered to fall within the SRN-dependent sectors. In general terms, the allocations that are proposed are previously developed town centre opportunities or relatively small edge of town sites. As such, in general, they benefit from relatively high levels of accessibility by active travel and public transport which are already present within the Built Up Area of the borough.

## **Model Outputs**

A set of model output plots were produced to help identify the impacts of the Do Something forecast scenarios as compared to the Do Minimum. The outputs were used to understand which areas of the network were likely to be impacted most by the traffic generated by the Local Plan sites. Each of the outputs were analysed and professional judgement was applied to determine which junctions would require further examination. This analysis, along with analysis of known issues, became the basis by which fourteen key junctions were identified for further assessment in junction models to determine whether they would require measures to mitigate the impacts.

Modelling indicates that the level of travel demand from committed development in the 2039 reference case, could be significant with parts of the network constrained in the future if car dependency is left unchecked. Interventions are therefore needed to encourage both entrenched and future car use to utilise other more sustainable modes.

A review of the likely scale and type of interventions needed to encourage modal shift and reduce predicted levels of car use on the network has been undertaken. This builds on a parallel Sustainable Transport Audit study (see below) undertaken to understand the existing level of sustainable accessibility to potential Local Plan development sites.

The report, and wider evidence base, suggests a wide range of interventions and active travel initiatives that would help to mitigate the impact of Local Plan development (e.g. infrastructure for electric vehicles, behaviour change, car clubs, public transport improvements etc) and deliver improved sustainable transport infrastructure as part of the Local Plan delivery strategy.

While the focus will be on sustainable solutions, it is acknowledged that a 5-10% reduction in car use is unlikely to address all the impacts of potential Local Plan growth. Therefore, unless car use can be further reduced at source or via additional mitigation then some form of improvements to highway capacity may be needed. The report provides an initial capacity and concept review of the key junctions across Hastings which have been identified for improvements from the ESCWTM outputs.

It should be noted that the network is forecast to be under pressure at some identified locations due to current conditions and already committed growth. However, it is

acknowledged that the development sites proposed within the Local Plan could add to this pressure and exacerbate queues and delays at identified junctions. Consequently, junction mitigations are demonstrated as likely to be needed on the A21, A259 and B2093 corridors within the Hastings Borough area (not the SRN) which, with reasonable local improvements could be implemented to improve capacity at a junction level.

### **Publication Date and the Robustness of the Transport Assessment**

The Transport Assessment & Mitigation Report was published in May 2023 and the modelling work to support it was undertaken some time before the publication date. For several reasons, primarily significant changes to national planning guidance, the Hastings Local Plan has taken longer to reach Regulation 19 stage than was previously expected. For this reason, consideration has been given as to whether the outputs from the Transport Assessment remain robust. As explained in the paragraphs that follow, consideration has been given to the following:

- Local Plan development strategy
- Local Plan end date
- Covid 19 – impacts and related guidance

### **Local Plan development strategy**

Many boroughs and districts have multiple options for development and, as a consequence and for many reasons, the ‘preferred options’ for those authority areas may change significantly over a period of time. This has not been the case for Hastings. As explained in detail elsewhere the ability to deliver significant levels of growth in the borough are severely constrained, primarily due to the lack of available and suitable land. The limited number of sites and areas that are available and suitable for development are well known and have been for several years.

As a consequence, there has been very little change in the sites (location, scale and capacity assumptions) included within the Transport Assessment (May 2023) scenario tests and those now included within the Regulation 18 2026 version of the Local Plan. The overall figures for housing growth (including existing commitments and windfalls etc) are also very similar within each document, as are the assumptions made for commercial development.

Whilst it is accepted that there have been some changes to specific proposed site allocations between the preparation of the Transport Assessment and the publication of the Reg 18 2026 version of the Local Plan these are not of a scale that would have any significant impact on the overarching level of growth tested, the spatial distribution of that development and the key outcomes and conclusion reached within the Transport Assessment.

Notwithstanding the above, there will be a need to review the transport evidence before the Regulation 19 plan is submitted.

### **Local Plan end date**

Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. When the transport assessment was commissioned, it was anticipated that the Local Plan would be adopted in 2024. As a consequence, the end date of the Local Plan and the associated transport modelling was 2039.

As explained above, progression of the Local Plan has taken longer than expected and the Local Plan end date is now 2040/41. As such, it is accepted that the Transport Assessment & Mitigation Report (May 2023) did not cover the final year of the Plan. Although the period covered by the original evidence falls marginally short of the 15 years recommended by the NPPF it is considered that this doesn't automatically render it unsound or unreliable. Given the additional Regulation 18 draft plan stage, and the potential for revised housing figures for future stages of the plan, any updated Transport Assessment will extend the timeframe to cover the final years of the proposed local plan.

It should be noted that the outputs and strength of evidence for latter years of any Local Plan is not as robust as for the first 10 years following adoption. For this reason, and to allow for changes in circumstance / policy to be taken into account, the NPPF states that policies in Local Plans should be reviewed to assess whether they need updating at least once every five years. All transport evidence will be reviewed to support any subsequent review / update of the Hastings Local Plan when modelling can assess 2040/41 and beyond.

### **Covid19 - Impacts**

Much of the modelling work was undertaken before COVID19 and before related guidance to understand the impacts on traffic levels seen post-COVID19 had been published. As such, Hastings BC wanted to understand if the work undertaken to support their Local Plan and produce the Local Plan Transport Assessment and Mitigation Report was still robust and would stand up to scrutiny at any forthcoming Examination in Public (EiP).

To address this, Hastings BC commissioned consultants WSP to produce a technical report that summarises the model input and output data. The 'Pre-Covid19 and Post-Covid19 Model Comparisons' report (2025) that is published alongside the existing evidence base.

As detailed in the report, the comparisons between the Pre-Covid19 and Post-Covid19 transport models input and output data show that there are a few differences between the scenarios. In instances where there are greater differences in traffic flow, and delays, the changes are localised and are not shown to be materially different in scale than what was assessed in the previous work.

The key conclusion reached within the comparison report is that the work undertaken to date appears to be robust enough to support the submission version of the Hastings Local Plan.

### **Sustainable Transport Audit**

To demonstrate the importance of sustainable mobility in Local Plan development a [Sustainable Transport Audit](#) for Hastings was progressed alongside the Local Plan Transport Assessment and Mitigation Report summarised above. This approach has allowed for cycling, walking and public transport to be assessed separately, as well as integrating alongside the assessment of growth on the highway network. Ultimately, this will help ensure that patterns of growth fully integrate with the key aims of improving people's health and wellbeing and supporting a move towards net zero carbon emissions.

The Sustainable Transport Audit report is split into two tasks. The work undertaken in Task 1, the Accessibility Analysis, involved the assessment of accessibility to assess travel times and distance between key attractors (destinations) and Local Plan residential and non-residential development opportunities (origins). This was undertaken using Basemap's TRACC accessibility analysis software. A further analysis of catchment areas for non-residential and mixed developments was also undertaken, to assess the catchment for potential employees and customers.

The results of Task 1 illustrated the varied levels of accessibility to key attractors across the potential development sites within the study area. As might be expected some of the sites located towards the periphery of the borough have limited existing public transport services or existing pedestrian and cycling facilities. By contrast, sites located within, or close to, the town centre have a far greater level of accessibility.

Given the relatively compact nature of the borough and the level of existing provision it is not surprising that the public transport accessibility calculations show that the majority of Local Plan development sites have good or acceptable access (public transport, walking and cycling) to key facilities (employment centres, hospitals, shopping areas, schools etc). However, there is still significant scope to deliver improvements to the provision of public transport and active travel facilities – this is explored further within Task 2.

The technical note for Task 2 summarises the high-level audit of walking and cycling networks, involving a gap analysis of potential development sites and the proposed walking and cycling networks identified in the ESCC Local Cycling and Walking Infrastructure Plan (LCWIP). The LCWIP developed a network of enhanced cycling and walking interventions and an audit was undertaken of cycling and walking routes from selected sites to these proposed LCWIP networks, identifying where further investigation is recommended. Any future transport evidence will take account of the LCWIP that is currently being prepared by ESCC and will be published in 2026.

In conclusion, the Task 2 audit found that the quality of footpath provision for potential residential development sites to access the LCWIP Proposed Walking Network was generally quite positive. Most routes had safe and accessible footways, which utilised safe and quiet residential streets. Despite these positive findings, the report highlighted a number of issues / challenges for pedestrians:

- pedestrian access to the non-residential/mixed development clusters of sites is generally poor from residential areas.
- there are worn and uneven surfaces along pedestrian routes leading to a number of sites.
- there is lack of (or disrupted) pedestrian accessibility to several sites.

Several recommendations to address these issues and improve the condition and attractiveness of the pedestrian network were made. These included:

- installing tactile paving
- repairing worn / uneven surfaces
- widening footways
- addressing issues of parked cars restricting access

In relation to cycling, the audit found that the connections from the potential development sites to the LCWIP proposed cycle routes were generally quite short, which would minimise the distance that cyclists would have to travel off the proposed network. Cycling conditions were generally seen as positive with road surfaces being comfortable to cycle upon. However, the hilly topography of the borough could act as a deterrent to cyclists. The report also highlighted other issues / challenges for cyclists:

- narrow width for cyclists along routes between two sites and cycle networks
- high traffic volume on routes between two sites.

Several recommendations to address these issues and improve the condition and attractiveness of the cycle network were made. These included:

- increasing space for cyclists
- cycle lane segregation on well utilised routes
- addressing issues of parked cars restricting access for cyclists

The assessment of cycling, walking infrastructure and public transport provision through the Sustainable Transport Audits provides a good understanding of the type and level of active and sustainable transport access provision throughout the borough. When then assessed against the potential Local Plan development sites, the gap analysis identifies where improvements can / should be delivered to better integrate the sites with the pedestrian / cycle networks. These improvements / requirements are then carried through to the Infrastructure Delivery Plan and will form a key consideration when the Local Cycling and Walking Infrastructure Plan is reviewed and updated.

## **Summary**

The transport evidence that has been progressed to support the draft Local Plan responds to current guidance in that it considered and prioritised sustainable travel from the outset and saw a transition away from a traditional ‘predict and provide’ approach on the highway network and towards ‘decide and provide’ and ‘monitor and manage’ approach. This approach, collectively referred to as ‘Vision and Validate’ will help to maximise active and sustainable travel options and to minimise the impact on the highway network.

The transport evidence prepared to inform the draft Local Plan has taken account of the evidence available at the time of publication. The evidence has identified a number of key issues and challenges for Hastings. These include the need to:

- meet the Council’s ambition to be carbon neutral by 2030
- reduce the proportion of commuting by car (and resulting congestion)
- support active travel
- mitigate impacts on key junctions/corridors on the A21/A259
- improve bus infrastructure, reliability and service frequency
- improve rail services and journey times
- increase the provision of EV charging infrastructure

The review of the Local Plan development strategy and plan end date, along with a Post Covid19 comparison assessment has concluded that the outputs remain robust at this time and will continue to form a key component of the Council’s evidence base as the Local Plan progresses to submission and Examination.

As explained in the paragraphs above, careful consideration has been given to the whether the modelling work and related transport evidence remains fit for purpose for this stage of the local plan. Following the Regulation 18, 2026 consultation, the council will consider whether additional transport evidence is required prior to submission of the Regulation 19 Plan.