

Report to inform Habitats Regulations Assessment

Borough of Hastings Local Plan

Hastings Borough Council

August 2026

Quality information

Prepared by	Checked by	Verified by	Approved by
Simon Gosling Ecologist ACIEEM	Amelia Kent Principal Ecologist ACIEEM	Dr James Riley Technical Director MCIEEM	Dr James Riley Technical Director MCIEEM

Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	October 2024	Initial draft for client comment	JR	Dr James Riley	Technical Director
1	December 2024	Final draft	JR	Dr James Riley	Technical Director
2	March 2025	Updated final draft	JR	Dr James Riley	Technical Director
3	August 2026	Updated housing allocations and for new Regulation 19 Local Plan	JR	Dr James Riley	Technical Director
4	September 2026	Update based on Client Comment	JR	Dr James Riley	Technical Director

Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

Hastings Borough Council

Prepared by:

Dr Damiano Weitowitz
Principal Ecologist

AECOM Limited
Midpoint, Alencon Link
Basingstoke
Hampshire RG21 7PP
United Kingdom

T: +44(0)1256 310200
aecom.com

© 2026 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1.	Introduction.....	1
1.1	Background.....	1
1.2	Legislation.....	1
1.3	Scope of the Project.....	2
1.4	Quality Assurance.....	4
2.	Methodology	5
2.1	Introduction	5
2.2	Description of HRA Tasks	5
2.2.1	HRA Task 1 – Screening for Likely Significant Effects (LSEs).....	5
2.2.2	HRA Task 2 – Appropriate Assessment (AA)	6
2.2.3	HRA Task 3 – Avoidance and Mitigation	6
3.	Habitats Sites	8
3.1	Hastings Cliffs SAC.....	8
3.1.1	Introduction	8
3.1.2	Qualifying Features.....	8
3.1.3	Conservation Objectives.....	8
3.1.4	Threats / Pressures to Site Integrity.....	8
3.2	Dungeness, Romney Marsh and Rye Bay SPA / Ramsar.....	9
3.2.1	Introduction	9
3.2.2	SPA Qualifying Species	9
3.2.3	Ramsar Qualifying Species.....	10
3.2.4	Conservation Objectives.....	11
3.2.5	Threats / Pressures to Site Integrity.....	11
3.3	Dungeness SAC	12
3.3.1	Introduction	12
3.3.2	Qualifying Features.....	12
3.3.3	Conservation Objectives.....	12
3.3.4	Threats / Pressures to Site Integrity.....	13
3.4	Pevensay Levels SAC / Ramsar	13
3.4.1	Introduction	13
3.4.2	SAC Qualifying Features	14
3.4.3	Ramsar Qualifying Features	14
3.4.4	Conservation Objectives.....	14
3.4.5	Threats / Pressures to Site Integrity.....	14
3.5	Ashdown Forest SAC.....	15
3.5.1	Introduction	15
3.5.2	Qualifying Features.....	15
3.5.3	Conservation Objectives.....	15
3.5.4	Threats / Pressures to Site Integrity.....	16
3.6	Lewes Downs SAC	16
3.6.1	Introduction	16
3.6.2	Qualifying Features.....	16
3.6.3	Conservation Objectives.....	16
3.6.4	Threats / Pressures to Site Integrity.....	16
4.	Background to Impact Pathways	17
4.1	Recreational Pressure	17
4.1.1	Bird Disturbance	17
4.1.2	Trampling Damage, Nutrient Enrichment and Wildfires	18
4.1.3	Summary	20

4.2	Water Quality	20
4.3	Water Quantity, Level and Flow	21
4.4	Atmospheric Pollution (Nitrogen Deposition)	22
4.5	Loss of Functionally Linked Habitat	25
5.	In-Combination Scope	27
6.	Screening for Likely Significant Effects (LSEs).....	29
6.1	Recreational Pressure	29
6.1.1	Dungeness Complex.....	29
6.1.2	Hastings Cliffs SAC.....	29
6.1.3	Policy Screening	30
6.2	Water Quality	31
6.2.1	Dungeness Complex.....	31
6.2.2	Pevensy Levels SAC / Ramsar	31
6.2.3	Policy Screening	32
6.3	Water Quantity, Level and Flow	33
6.3.1	Dungeness Complex.....	33
6.3.2	Pevensy Levels SAC / Ramsar	34
6.3.3	Policy Screening	34
6.4	Atmospheric Pollution	36
6.4.1	Pevensy Levels SAC / Ramsar	36
6.4.2	Lewes Downs SAC	36
6.4.3	Ashdown Forest SAC.....	37
6.5	Loss of Functionally Linked Habitat	38
6.5.1	Dungeness, Romney Marsh and Rye Bay SPA	38
7.	Appropriate Assessment.....	45
7.1	Recreational Pressure	45
7.1.1	Dungeness, Romney Marsh and Rye Bay SPA and Dungeness SAC	45
7.2	Water Quality	47
7.2.1	Dungeness, Romney Marsh and Rye Bay SPA	47
7.2.1.1	Sewage Effluent	47
7.3	Water Quantity, Level and Flow	49
7.3.1	Dungeness, Romney Marsh and Rye Bay SPA	49
7.3.1.1	Surface Run-Off	49
7.3.1.2	Water Abstraction	51
7.3.2	Pevensy Levels SAC / Ramsar	52
8.	Conclusions	54
	Appendix A Maps	55
	Appendix B LSEs Screening Table of HLP Policies.....	56
	Site Allocation Policies	63

Figures

Figure 1: The legislative basis for Appropriate Assessment.	2
Figure 2: Four Stage Approach to Habitats Regulations Assessment. (Adapted from EC, 2001 ¹).....	5
Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT).....	25
Figure 4: Map of Habitats Sites within the Zone of Influence (ZoI) of Hastings Borough.	55

Tables

Table 1: Wastewater Treatment Works (WwTWs) serving Hastings Borough the growth allocated and resulting HRA implications.	21
Table 2: Main sources and effects of air pollutants on habitats and species.	23
Table 3: Residential and employment development allocated in Local Plans and Core Strategies of adjoining authorities.	27
Table 4: Assessment of sites allocated in the HLP for their potential to represent functionally linked habitat to the Dungeness, Romney Marsh and Rye Bay SPA.	39
Table 5: Residential sites allocated within 500m of the Dungeness, Romney Marsh and Rye Bay SPA.....	49
Table 6: LSEs Screening assessment of policies included in the Reg.19 HLP. Where the LSEs Screening Outcome column is shaded orange, this indicates that impacts of the policy on Habitats Sites cannot be excluded and the policy is screened in for AA. Where this column is shaded green, there are no impact pathways present and the policy is screened out.....	56

1. Introduction

1.1 Background

- 1.1 AECOM was appointed by Hastings Borough Council (hereafter referred to as 'HBC') to undertake a report to inform the Habitats Regulations Assessment (HRA) of its Regulation 18 Hastings Local Plan (HLP) titled "Hastings Local Plan Draft Local Plan Preferred Options (Regulation 18) February 2026" and subsequent changes to housing allocations made for the 2026 Regulation 19 Local Plan. The objective of this assessment is to identify any aspects of the HLP that may result in Likely Significant Effects (LSEs) and, where these are present, adverse effects on the integrity of Habitats Sites, (formerly referred to as European sites), including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment (AA; a more detailed stage of analysis) is required, where a plan or project is likely to result in LSEs on Habitats Sites. HRA appraisal considers potential impacts alone and in-combination with other plans and projects. Where adverse effects on site integrity cannot be excluded, the AA also advises on appropriate policy mechanisms to completely avoid or mitigate the impact.
- 1.2 The emerging HLP will cover the period between 2023/24 and 2040/41, detailing HBC's strategy for managing development to deliver their vision for the borough and providing the legal framework within which new planning applications will be assessed. The HLP comprises several components, such as Strategic Policies (identifying the types of uses planned for different parts of Hastings Borough), Development Policies (stipulating detail on the conditions that future development will have to satisfy) and Site Allocation Policies (setting out the precise geographic distribution of residential and employment development).
- 1.3 The borough of Hastings is home to around 91,500 people and located on the south coast of England, comprising approx. eight miles of coastline, within the Borough boundary, the High Weald National Landscape lies to the north and east, within which lies Hastings Country Park (HCP). It also supports diverse landscapes and important wildlife sites, such as the Hastings Cliffs SAC. Overall, the HLP seeks to achieve the renaissance of the borough by promoting social, economic, cultural and environmental regeneration. Two key targets of the HLP with direct relevance to HRA are the delivery of more jobs and homes. For example, it has been identified that Hastings Borough needs an additional 70,400 sqm of employment floorspace and 4,750 full-time jobs to 2041. Furthermore, HBC have determined an overall requirement for at least 2,970 new residential units and have identified development sites that will deliver up to 1,139 of these dwellings over the Plan period.
- 1.4 Hastings Borough encompasses only one Habitats Site (the Hastings Cliffs SAC), which is not considered to be highly sensitive to impacts arising from development. Notwithstanding this, most negative ecological impacts transcend authority boundaries, especially when considered in-combination with other plans and projects. Hastings Borough lies relatively close to (i.e. within 3km of) the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar and the Pevensy Levels SAC / Ramsar. Both these Habitats Sites are sensitive to a range of development-related impact pathways such as water quality and hydrology. Furthermore, the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar and Dungeness SAC (collectively hereafter referred to the 'Dungeness Complex', where relevant) is particularly sensitive to recreational pressure. Other Habitats Sites (e.g. the Ashdown Forest SAC, Lewes Downs SAC) lie much further away, but could be impacted by atmospheric pollution effects resulting from commuter journeys undertaken by new residents. Therefore, the potential impacts of the HLP on these Habitats Sites require further consideration.

1.2 Legislation

- 1.5 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a

requirement for HRA will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹.

- 1.6 The HRA process applies the 'Precautionary Principle'² to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an AA should be undertaken of the Plan or project in question. Figure 1 below sets out the legislative basis for AA.
- 1.7 Plans and projects that are associated with potential adverse impacts on Habitats Sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site ... (either alone or in combination with other plans or projects) ... must make an appropriate assessment of the implications of the plan or project in view of the site's conservation objectives ... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

Figure 1: The legislative basis for Appropriate Assessment.

- 1.8 Over time the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.
- 1.9 In spring 2018 the 'Sweetman' European Court of Justice ruling³ clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a European site that would otherwise arise) should **not** be taken into account when forming a view on LSEs. Mitigation should instead only be considered at the AA stage. This HRA is cognisant of that ruling.

1.3 Scope of the Project

- 1.10 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats Sites should be included in the scope:
 - All Habitats Sites within the boundary of Hastings Borough; and,
 - Other Habitats Sites shown to be linked to development in Hastings Borough through a known 'pathway' (discussed below).
- 1.11 Generally, it is uncommon for development plans to result in significant impacts on Habitats Sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and the average vehicle commuting distance of a UK resident is approx. 10km. It should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats Site does not mean that LSEs will occur.
- 1.12 In some cases, development impacts can extend beyond 10km, particularly where hydrological pathways are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to Habitats Sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.

¹ These don't replace the 2017 Regulations but are just another set of amendments.

² The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".

³ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

- 1.13 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats Site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect Habitats Sites through, for example, disturbance of overwintering birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (MHCLG, 2006, p.6).
- 1.14 This basic principle has also been reflected in court rulings. The Court of Appeal⁴ has ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)⁵. In this case the High Court ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*'.
- 1.15 Given an initial assessment of the relevant Habitats Sites and the impact pathways present, and referring to the HRA work that was undertaken for the Reg.18 version of the HLP, this HRA will discuss (at least as far as the LSEs stage) the following Habitats Sites:
- Dungeness, Romney Marsh and Rye Bay SPA (adjoins the coastline of Hastings Borough);
 - Dungeness SAC (approx. 6.9km to the north-east of Hastings Borough);
 - Hastings Cliffs SAC (located in the south-east of Hastings Borough);
 - Pevensey Levels SAC / Ramsar (located approx. 5.2km to the west of Hastings Borough);
 - Lewes Downs SAC (located approx. 31km to the west of Hastings Borough); and
 - Ashdown Forest SAC (located approx. 32.5km to the north-west of Hastings Borough).
- 1.16 For the HRA, the views of the statutory nature conservation advisors, namely Natural England, will be sought as part of the consultation process on the identified scope. The distribution of the above Habitats Sites in relation to Hastings Borough is shown in Appendix A. An introduction, the qualifying features (species and habitats), Conservation Objectives, and threats and pressures to the integrity of these Habitats Sites are set out in Chapter 3.
- 1.17 In order to fully inform the HRA, several studies and online information databases have been consulted, including:
- Future development proposed in the Local Plans and Core Strategies of the adjoining authorities of Rother, Wealden, Tunbridge Wells, Mid Sussex, Lewes, Eastbourne, Ashford and Folkestone and Hythe;
 - Previous HRAs produced for the HLP and development plans of adjoining authorities;
 - Road traffic statistics from the Department for Transport (<https://roadtraffic.dft.gov.uk>);
 - Journey-to-work data from the 2021 Population Census ([Nomis - Query Tool - TS061 - Method used to travel to work](#));
 - Visitor data and mitigation measures presented in the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS)⁶;
 - Natural England's Site Improvement Plans (SIPs) and Supplementary Advice on Conservation Objectives (SACOs) for all identified Habitats Sites;

⁴No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

⁶Shepway District Council and Rother District Council. (October 2017). Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS). 142pp.

- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk).

1.4 Quality Assurance

- 1.18 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.
- 1.19 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2019)

2. Methodology

2.1 Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA⁷ and general guidance on HRA published by government in 2021⁸ and updated in 2023. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.
- 2.2 Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information becoming available, recommendations incorporated and any relevant changes to the Plan being made.

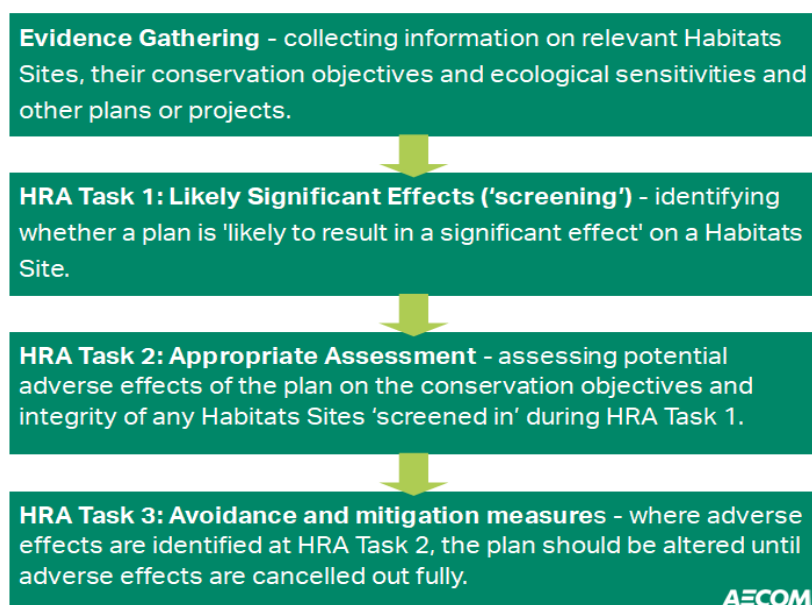


Figure 2: Four Stage Approach to Habitats Regulations Assessment. (Adapted from EC, 2001¹)

2.2 Description of HRA Tasks

2.2.1 HRA Task 1 – Screening for Likely Significant Effects (LSEs)

- 2.3 Following evidence gathering, the first stage of any HRA is the screening for LSEs, essentially a high-level assessment to decide whether the full subsequent stage known as AA is required. The essential question is:
- "Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"*
- 2.4 The objective is to filter out those plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats Sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendix B.

⁷ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁸ [Habitats regulations assessments: protecting a European site - GOV.UK](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site)

2.2.2 HRA Task 2 – Appropriate Assessment (AA)

- 2.5 Where it is determined that a conclusion of ‘no LSEs’ cannot be drawn, the analysis proceeds to the next stage of HRA known as AA. Case law has clarified that AA is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to AA compared to the screening stage.
- 2.6 By virtue of the fact that it follows screening, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during AA is whether there is available mitigation that would entirely address any potential adverse effects. In practice, the AA would take any policies or allocations that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats Site(s)).
- 2.7 Also, in 2018 the Holohan ruling⁹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that ‘*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*’ [emphasis added]. Due account of this decision has been given in this HRA in relation to the Dungeness, Romney Marsh and Rye Bay SPA, which is designated for mobile breeding and overwintering birds.

2.2.3 HRA Task 3 – Avoidance and Mitigation

- 2.8 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on Habitats Sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for impact pathways on Habitats Sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but it must provide an adequate policy framework within which these measures can be delivered.
- 2.9 When discussing mitigation for a high-level development plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves.
- 2.10 In any plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at this strategic level. This is because either:
- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail. In these cases, the AA focusses on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or
 - The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) is related to how the development will be designed and constructed. In these instances, the AA focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any Habitats Sites. Typically, the AA will also discuss the requirement of project-level HRAs where detail at the plan-level is insufficient.
- 2.11 In these instances, the advice of Advocate-General Kokott¹⁰ is also worth considering. She commented that: ‘*It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible*

⁹ Case C-461/17

¹⁰ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49 <http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure [i.e. later stages of the planning process i.e. planning applications]' [emphasis added]. In other words, the HRA for the Local Plan is not required to fully resolve all HRA matters; some points of detail can be left for further investigation and resolution as part of the HRA for the planning application.

3. Habitats Sites

3.1 Hastings Cliffs SAC

3.1.1 Introduction

- 3.1 This SAC is a 182.47ha site comprising a variety of habitats, including shingle / sea cliffs (30%), broad-leaved deciduous woodland (25%), heath / scrub (13%) and dry grassland (8%). The Hastings Cliffs are located on England's south coast and are an area of actively eroding soft cliffs, including the most southerly exposure of the lower Hastings Beds. Within the SAC are three valleys which support woodland and scrub with a rare bryophyte flora. On the border with the sea, tree growth is stunted and bryophytes are dominant, including the fragrant crewort *Lophocolea fragrans*. Close to the cliff edges there is maritime scrub, coastal heathland and grasslands sustaining various maritime species (e.g. thrift *Armeria maritima*). Active processes such as erosion are required to sustain the succession of the SAC's habitats.
- 3.2 The SAC is situated within the High Weald National Landscape and the High Weald National Character Area. The Hastings Cliffs SAC also partly overlaps with the Hastings Country Park Local Nature Reserve (LNR), which is popular for recreational activities such as countryside hiking. One of its important characteristics is that it reveals where the Weald's sand and clay geologies are exposed to the sea. The cliffs are permeated by many faults, which make it an important site for botanical and vertebrate fossils. Dinosaur footprints and petrified forests are visible during low tides.

3.1.2 Qualifying Features¹¹

- 3.3 Annex I habitats that are a primary reason for selection of this site:

- Vegetated sea cliffs of the Atlantic and Baltic Coasts

3.1.3 Conservation Objectives¹²

- 3.4 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of the qualifying natural habitat
 - The structure and function (including typical species) of the qualifying natural habitat, and
 - The supporting processes on which the qualifying natural habitat rely

3.1.4 Threats / Pressures to Site Integrity¹³

- 3.6 The following threats and pressures to the integrity of the Hastings Cliffs SAC have been identified in Natural England's Site Improvement Plan:
- Inappropriate coastal management
 - Water pollution
 - Air pollution: Risk of atmospheric nitrogen deposition

¹¹ Available at: <https://sac.jncc.gov.uk/site/UK0030165> [Accessed on 11/06/2024]

¹² Available at: <http://publications.naturalengland.org.uk/publication/5180133988106240> [Accessed on 11/06/2024]

¹³ Available at: <http://publications.naturalengland.org.uk/publication/5611006969511936> [Accessed on the 11/06/2024]

3.2 Dungeness, Romney Marsh and Rye Bay SPA / Ramsar

3.2.1 Introduction

- 3.7 The Dungeness, Romney Marsh and Rye Bay SPA / Ramsar lies on England's south coast and encompasses an area of 42,417.53ha. The site includes the largest and most diverse area of shingle beach in Britain, with hollows providing nationally important saline lagoons, natural freshwater pits and basin fens. The rivers previously draining to the northern area were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment. In recent times, human gravel extraction has created extensive areas of wetlands. The SPA's / Ramsar's qualifying species are dependent on the diversity of habitats present in the area. Due to the ecological importance of this section of coastline, the site was formally designated as a SPA / Ramsar on the 30th March 2016.
- 3.8 The site supports a range of breeding bird species, including marsh harrier *Circus aeruginosus*, avocet *Recurvirostra avosetta*, sandwich tern *Sterna sandvicensis*, little tern *Sterna albifrons* and common tern *Sterna hirundo*. Furthermore, various species overwinter in the SPA, including Bewick's swan *Cygnus columbianus bewickii*, bittern *Botaurus stellaris*, hen harrier *Circus cyaneus*, golden plover *Pluvialis apricaria* and ruff *Philomachus pugnax*. The SPA also supports numbers of European importance of aquatic warbler *Acrocephalus paludicola* and a waterbird assemblage of over 20,000 individuals in the non-breeding season.
- 3.9 The Ramsar was selected for the site's complex network of wetland types and habitats that support a rich and diverse group of bryophytes (e.g. mosses, liverworts and hornworts), vascular plants and invertebrates.
- 3.10 One of the primary pressures on the site relates to recreation. Natural England's Advice on Operations site highlights that most qualifying species of the SPA / Ramsar are sensitive to above water noise and visual disturbance arising from horse riding and dog walking. Development plans resulting in an increase in recreational pressure must therefore be given due consideration.

3.2.2 SPA Qualifying Species¹⁴

- 3.11 Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC:

Breeding

- Eurasian marsh harrier *Circus aeruginosus*
- Pied avocet *Recurvirostra avosetta*
- Mediterranean gull *Larus melanocephalus*
- Sandwich tern *Sterna sandvicensis*
- Common tern *Sterna hirundo*
- Little tern *Sterna albifrons*

Non-breeding

- Great bittern *Botaurus stellaris*
- Bewick's swan *Cygnus columbianus bewickii*
- Northern shoveler *Anas clypeata*
- European golden plover *Pluvialis apricaria*
- Ruff *Philomachus pugnax*

¹⁴ Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/uk9012091.pdf> [Accessed on 11/06/2024]

- Aquatic warbler *Acrocephalus paludicola*

Waterbird Assemblage

- In the non-breeding season, the area is regularly used by 34,625 individual waterbirds (5 year peak mean 2002/3-2006/7), including (but not limited to) *Cygnus columbianus bewickii*, *Anser albifrons albifrons*, *Anas penelope*, *A. strepera*, *A. clypeata*, *Aythya ferina*, *Tachybaptus ruficollis*, *Podiceps cristatus*, *Phalacrocorax carbo*, *Botaurus stellaris*, *Fulica atra*, *Pluvialis apricaria*, *Vanellus vanellus*, *Calidris alba*, *Philomachus pugnax*, *Numenius phaeopus* and *Actitis hypoleucos*

3.2.3 Ramsar Qualifying Species¹⁵

3.12 The site qualifies as a Ramsar site under the following criteria

Criterion 1

The site qualifies under Criterion 1 because it contains representative, rare, or unique examples of natural or near-natural wetland types:

- Annual vegetation of drift lines and the coastal fringes of perennial vegetation of stony banks (Ramsar wetland type E – sand, shingle or pebble shores)
- Natural shingle wetlands: saline lagoons (Ramsar wetland type J – coastal brackish/saline lagoons), freshwater pits (Ramsar wetland type K – coastal freshwater lagoons) and basin fens (Ramsar wetland type U – non-forested peatlands)

Criterion 2

3.13 The site qualifies under Criterion 2 because it supports threatened ecological communities:

- The bryophyte flora includes an assemblage of wetland thread-mosses *Bryum* species. These mosses are colonists of unshaded calcareous sand that must be persistently damp all year but not inundated by standing water. They occur on wet sand beside large freshwater gravel pits and small pools in Dungeness RSPB Reserve.
- Foremost amongst the assemblage are the suites of species associated with grazing marsh and saltmarsh (including brackish ditches and wetlands associated with low-lying depressions within shingle areas). Saltmarshes and other brackish wetlands are particularly rich, with at least eight nationally scarce species, including the vulnerable sea barley *Hordeum marinum*, Borrer's saltmarsh-grass *Puccinellia fasciculata* and slender hare's-ear *Bupleurum tenuissimum*, and the near-threatened sea-heath *Frankenia laevis*. Grazing marshes support the nationally rare (and critically endangered) sharp-leaved pondweed *Potamogeton acutifolius* and at least six nationally scarce species, including the vulnerable divided sedge *Carex divisa* and rootless duckweed *Wolffia arrhiza*. The remaining species are chiefly associated with gravel pits and their margins, saline lagoons, shingle beaches and fens.
- The freshwater wetlands (with the exception of the deep, cold and largely sterile open waters of the main gravel pits) exhibit a number of similar characteristics. Shallow open water and emergent vegetation, largely comprising common reed *Phragmites australis* and bulrush *Typha latifolia*, supports a rich water beetle assemblage. Other noteworthy aspects of the invertebrate assemblage include a suite of reed beetles *Donacia*, snail-killing flies (Sciomyzidae) and soldierflies (Stratiomyidae) that are typical of coastal marshes. Much of this assemblage is found within the ditch systems. The saline and brackish gradients of the saltmarsh, saline lagoons, brackish ditches and damp brackish hollows in the shingle beaches also share many characteristics in terms of the habitats they provide for invertebrates.
- The site also supports 9 individual wetland species of international importance that are vulnerable, endangered or critically endangered, including greater water-parsnip *Sium latifolium* (UK BAP priority species), Warne's thread-moss *Bryum warneum* (UK BAP priority species),

¹⁵ Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509228/dungeness-romney-rye-ramsar-documents.pdf [Accessed on 11/06/2024]

water vole *Arvicola amphibious* (UK BAP priority species), aquatic warbler *Acrocephalus paludicola* (UK BAP priority species), great-crested newt *Triturus cristatus* (UK BAP priority species), medicinal leech *Hirudo medicinalis* (Red Data Book species), a ground beetle *Omophron limbatum* (Red Data Book species), marsh mallow moth *Hydraecia osseola hucherardi* (UK BAP priority species and Red Data Book species) and De Folin's lagoon snail *Caecum amoricum*

Criterion 5

- 3.14 The site qualifies under Criterion 5 because it regularly supports 20,000 or more waterbirds. In the non-breeding season, the site regularly supports 34,957 individual waterbirds (5 year peak mean 2002/3 – 2006/7).

Criterion 6

- 3.15 The site qualifies under Criterion 6 because it regularly supports 1% of the individuals in the populations of the following species or subspecies of waterbird in any season:
- Mute swan *Cygnus olor*; 348 individuals (1.1%) of the overwintering Britain population (5 year peak mean 2002/3-2006/7)
 - Northern shoveler *Anas clypeata*; 485 individuals (1.2%) of the overwintering NW and C Europe population (5 year peak mean 2002/3-2006/7)

3.2.4 Conservation Objectives¹⁶

- 3.16 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.17 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

3.2.5 Threats / Pressures to Site Integrity¹⁷

- 3.18 The following threats and pressures to the site integrity of the Dungeness, Romney Marsh and Rye Bay SPA have been identified in Natural England's Site Improvement Plan:
- Military
 - Vehicles: Illicit
 - Predation
 - Changes in species distributions
 - Invasive species
 - Inappropriate scrub control
 - Overgrazing
 - Public access / disturbance

¹⁶ Available at: <http://publications.naturalengland.org.uk/publication/5208885390475264> [Accessed on 11/06/2024]

¹⁷ Available at: <http://publications.naturalengland.org.uk/file/5885279032311808> [Accessed on 11/06/2024]

- Direct impact from 3rd party
- Air pollution: Impact of atmospheric nitrogen deposition
- Inappropriate water levels
- Inappropriate ditch management
- Coastal squeeze
- Water pollution
- Fisheries: Commercial marine and estuarine

3.3 Dungeness SAC

3.3.1 Introduction

- 3.19 The Dungeness SAC is a 3,241.43ha site, comprising an area of shingle and sea cliffs (64%), tidal rivers and estuaries (20%) and bogs and marshes (10%). It is the UK's largest shingle structure, comprising over 500 shingle ridges building out into the English Channel. Each shingle is a former shoreline and the existing foreland having been built up over 3,000 years. While most shingle beaches form narrow spits, at Dungeness the flints have accumulated to form a tooth-shaped spit. Flint shingle beaches are a globally rare habitat rarely over 50ha in area. The 1,650ha at Dungeness make it the largest example in the UK (three to four times larger than Chesil Beach) and enable expansive transitions into other habitats, such as sand dunes, freshwater pits and fen, saltmarsh and saline lagoon, grazing marsh and neutral grassland.
- 3.20 The SAC retains many intact parallel ridges of vegetation zones. It harbours the most extensive, stable zone of vegetated shingle in the UK, including notable communities of broom *Cytisus scoparius* and blackthorn *Prunus spinosa*. Another unique zone are the depressions within the shingle structure that support fen and open water communities.
- 3.21 Within the site a large and viable population of great-crested newts *Triturus cristatus* can also be found across a natural and anthropogenic habitat gradient. This includes natural pools as well as old gravel extraction sites. Terrestrial habitats for feeding and shelter are found among shingle vegetation with scrub in the vicinity of some of the waterbodies.

3.3.2 Qualifying Features¹⁸

- 3.22 Annex I habitats that are a primary reason for selection of this site:
- Annual vegetation of drift lines
 - Perennial vegetation of stony banks
- 3.23 Annex II species that are a primary reason for selection of this site are:
- Great-crested newt *Triturus cristatus*

3.3.3 Conservation Objectives¹⁹

- 3.24 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.25 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species

¹⁸ [Link with qualifying features of Dungeness SAC](#) [Accessed on 11/06/2024]

¹⁹ <http://publications.naturalengland.org.uk/publication/5032956682829824> [Accessed on 11/06/2024]

- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site

3.3.4 Threats / Pressures to Site Integrity²⁰

3.26 The following threats and pressures on the site integrity of the Dungeness SAC have been identified in Natural England's Site Improvement Plan:

- Military
- Vehicles: Illicit
- Predation
- Changes in species distributions
- Invasive species
- Inappropriate scrub control
- Overgrazing
- Public access / disturbance
- Direct impact from 3rd party
- Air pollution: Impact of atmospheric nitrogen deposition
- Inappropriate water levels
- Inappropriate ditch management
- Coastal squeeze
- Water pollution
- Fisheries: Commercial marine and estuarine

3.4 Pevensey Levels SAC / Ramsar

3.4.1 Introduction

3.27 The Pevensey Levels SAC is a low-lying, 3,585.38 ha site comprising humid grassland (97.5%) and inland water bodies (2.5%). It lies between Eastbourne and Bexhill in East Sussex, to the south-west of the High Weald Area National Landscape. The geology of the site mainly consists of sandstones and clays, overlain by impermeable marine silts and clays. In combination with the flat, low-lying land this may result in long periods of standing water during winter, attracting birds to the wet fields.

3.28 The SAC is mainly reclaimed land with extensively grazed wet meadows, actively maintained by bespoke drainage systems and dykes. These ditches reflect the historic reclamation of the meadows dating back to the 13th century. The ditch network provides botanical interest, public water supply and acts as flood storage reservoirs. The Pevensey Levels is one of the largest and least fragmented wet grassland systems in southeast England, officially designated for the whirlpool ram's-horn snail. The site also sustains nationally rare aquatic plants and invertebrates. One of the main values of the site is its role in

²⁰ <http://publications.naturalengland.org.uk/publication/6253977968574464> [Accessed on 11/06/2024]

shoreline stabilisation, dissipation of erosive forces, recharge / discharge of groundwater, flood water storage and maintenance of water quality through nutrient removal.

- 3.29 Most of the land within the SAC is under private ownership (200 owner occupiers and 60-80 active managers) and is used for low intensity livestock grazing. Around 100 ha of the site are owned by Natural England and the Sussex Wildlife Trust. Recreational and tourism activities include walking, horse riding, cycling, angling and rowing.

3.4.2 SAC Qualifying Features²¹

- 3.30 Annex II species that are a primary reason for selection of this site

- Ramshorn snail *Anisus vorticulus*

3.4.3 Ramsar Qualifying Features

- 3.31 The Pevensey Levels are designated as a Ramsar under the following criteria:

Criterion 2

The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species.

Criterion 3

The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles Coleoptera and supports an outstanding assemblage of dragonflies Odonata.

3.4.4 Conservation Objectives²²

- 3.32 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.33 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of the habitats of qualifying species
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which the habitats of qualifying species rely
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site.

3.4.5 Threats / Pressures to Site Integrity²³

- 3.34 The following threats and pressures on the site integrity of the Pevensey Levels SAC have been identified in Natural England's Site Improvement Plan:
- Inappropriate water levels
 - Invasive species
 - Water pollution

²¹ [Link with qualifying features of Pevensey Levels SAC](#) [Accessed on 11/06/2024]

²² <http://publications.naturalengland.org.uk/publication/5669878623109120> [Accessed on 11/06/2024]

²³ <http://publications.naturalengland.org.uk/publication/4935024482713600> [Accessed on 11/06/2024]

3.5 Ashdown Forest SAC

3.5.1 Introduction

- 3.35 The Ashdown Forest SAC is a 2,715.88ha site comprising heath / scrub (60%) and mixed woodland (40%) in southeast England. It is an area of tranquil open heathland straddling the highest sandy ridge-top of the High Weald Area of Outstanding Natural Beauty. It is situated approx. 30 miles south of London. Its underlying sandstone geology combines with a local wetter and cooler climate to produce acidic and nutrient-poor soils that produce fertile ground for heathland, valley mires and damp woodland.
- 3.36 Notably, the Ashdown Forest SAC contains the largest single continuous block of lowland heathland in south-east England, including dry heaths and a large proportion of wet heaths. It is particularly important in the context of the recent loss of heathland, which has shrunk by 50% in East Sussex over the past 200 years. The site supports important assemblages of beetles, dragonflies, damselflies and butterflies. Bird species of European importance are European nightjar, Dartford warbler and Eurasian hobby.
- 3.37 Atmospheric pollution in the SAC, particularly from traffic associated with development contained within Local Plans has become a significant issue in the past years. The SAC is permeated by a network of roads, many of which form major routes-to-work for local residents. A joint Air Quality Impact Assessment (AQIA) has been undertaken by Wealden District Council, Lewes District Council and other adjoining authorities. This has shown that the additional urban development will result in marginal retardation of the drop in atmospheric nitrogen deposition, but this will not affect / reduce plant species richness. Notwithstanding this, air quality remains a strategic issue in the wider geographic area around Ashdown Forest.

3.5.2 Qualifying Features²⁴

- 3.38 Annex I habitats that are a primary reason for selection of this site
- Northern Atlantic wet heaths with *Erica tetralix*
 - European dry heaths
- 3.39 Annex II species present as a qualifying feature, but not a primary reason for site selection
- Great-crested newt *Triturus cristatus*

3.5.3 Conservation Objectives²⁵

- 3.40 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.41 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site.

²⁴ Available at: <https://sac.jncc.gov.uk/site/UK0030080> [Accessed on 11/06/2024]

²⁵ Available at: <http://publications.naturalengland.org.uk/publication/6183967367626752> [Accessed on 11/06/2024]

3.5.4 Threats / Pressures to Site Integrity²⁶

3.42 Natural England's Site Improvement Plan lists the following threats / pressure on the site integrity of the Ashdown Forest SAC:

- Change in land management
- Air pollution: Impact of atmospheric nitrogen deposition
- Public access / disturbance
- Hydrological changes

3.6 Lewes Downs SAC

3.6.1 Introduction

3.43 The Lewes Downs SAC is a 146ha site comprising dry grassland / steppes (85%), heath / scrub (5%), humid grassland (5%) and improved grassland (5%). The site represents an isolated block of downland that forms part of the South Downs. It is important for its rich chalk grassland and scrub vegetation, invertebrate fauna and a community of breeding downland birds.

3.6.2 Qualifying Features²⁷

3.44 Annex I habitats that are a primary reason for selection of this site:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites)

3.6.3 Conservation Objectives²⁸

3.45 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.46 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

3.6.4 Threats / Pressures to Site Integrity²⁹

3.47 Natural England's Site Improvement Plan highlights the following threats / pressures to the site integrity of the Lewes Downs SAC:

- Game management: Pheasant rearing
- Undergrazing
- Public access / disturbance
- Air pollution: Impact of atmospheric nitrogen deposition

²⁶ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on 11/06/2024]

²⁷ Available at: <https://sac.jncc.gov.uk/site/UK0012832> [Accessed on 11/06/2024]

²⁸ Available at: <http://publications.naturalengland.org.uk/publication/4618459505754112> [Accessed on 11/06/2024]

²⁹ Available at: <http://publications.naturalengland.org.uk/publication/5857326774878208> [Accessed on 11/06/2024]

4. Background to Impact Pathways

4.1 Recreational Pressure

- 4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels³⁰, and impacts on Habitats Sites^{31 32}. An increase in recreational disturbance due to housing growth may represent an issue for any flora and fauna, but it is of particular significance for Habitats Sites that are designated for bird species. Different Habitats Sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational disturbance that occurs as a result of new residents³³.

4.1.1 Bird Disturbance

- 4.2 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways such as through inducing stress responses). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death³⁴.
- 4.3 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and time spent responding to disturbance is time that is not spent feeding³⁵. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of individual birds. Additionally, displacement of birds from one feeding site to another can increase the pressure on the resources available within alternative foraging sites, which consequently must sustain a greater number of birds³⁶. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{37 38}.
- 4.4 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the magnitude of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in winter months and lower overall sensitivity of birds to disturbance outside the breeding season. Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher

³⁰ Weitowitz D.C., Panter C., Hoskin R. and Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/iuz019>

³¹ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

³² Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

³³ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

³⁴ Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

³⁵ Riddington, R. et al. (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279.

³⁶ Gill, J.A., Sutherland, W.J. and Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72.

³⁷ Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. <https://doi:10.1371/journal.pone.0072984>.

³⁸ Liley D. and Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* 114: 219-230.

reduction in bird diversity and abundance compared to hiking³⁹. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁴⁰. Furthermore, differences in on-site route lengths and usage patterns obtained in visitor surveys likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that ought to be taken into account in HRAs.

- 4.5 The Dungeness, Romney Marsh and Rye Bay SPA is designated for its diverse population comprising breeding (i.e. avocet, common tern, little tern, marsh harrier, Mediterranean gull and sandwich tern) and non-breeding (e.g. Bewick's swan, golden plover and bittern) birds. While all birds show disturbance responses to varying degrees, it is widely accepted that breeding birds are associated with heightened sensitivity. Various academic publications have assessed the impacts of recreation on behavioural and physiological responses in breeding birds. For example, a study investigating the effects of overflying aircraft and recreation on colonial waterbird nesting behaviour found that the mean incubation rate of tern was significantly lower during pedestrian disturbance events compared to control periods⁴¹. Another study assessed the flight initiation distances (FIDs) of five species of breeding waders in relation to pedestrian and boat disturbance events in a Mediterranean lagoon⁴². The data obtained indicate that breeding avocet had the longest FID of all species (102m) investigated, which led to the recommendation of maintaining a minimum buffer zone of 100m surrounding breeding avocet colonies. Research evidence on other ground-nesting birds also identifies strong negative recreational impacts. For example, Liley and Clarke^{43,44} found that the density of European nightjar *Caprimulgus europaeus* was directly related to the amount of surrounding development, with sites surrounded by higher levels of development supporting fewer nightjars. The species' breeding success appears to be much higher at less visited sites⁴⁵, with path proximity correlating strongly with nest failure, up to 225m from the path edge. Although Dartford warbler do not appear to be as sensitive to human disturbance (potentially because they nest low in gorse bushes), their breeding parameters are still affected by disturbance levels from humans and their pets⁴⁶. Overall, the available scientific evidence base indicates that qualifying breeding bird species in the SPA require particular attention in HRAs.

4.1.2 Trampling Damage, Nutrient Enrichment and Wildfires

- 4.6 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson and Seney⁴⁷ examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al⁴⁸ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow and grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and

³⁹ Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

⁴⁰ Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

⁴¹ Hillman M.D., Karpanty S.M., Fraser J.D. and Deroose-Wilson A. (2015). Effects of aircraft and recreation on colonial waterbird nesting behavior. *The Journal of Wildlife Management* **79**: 1192-1198.

⁴² Scarton F. (2018). Flight initiation distances in relation to pedestrian and boat disturbance in five species of waders breeding in a Mediterranean lagoon. *Revue d'Ecologie (Terre et Vie)* **73**: 375-384.

⁴³ Liley, D. and Clarke, R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.

⁴⁴ Liley, D. and Clarke, R.T. (2002) The impact of human disturbance and human development on key heathland bird species in Dorset. Sixth National Conference (eds Underhill, J.C. and Liley, D.). RSPB, Bournemouth.

⁴⁵ Murison, G. (2002). The Impact of Human Disturbance on the Breeding Success of the Nightjar *Caprimulgus europaeus* on Heathlands in South Dorset, England. English Nature.

⁴⁶ Murison, G.C. (2007). The impact of human disturbance, urbanisation and habitat type on a Dartford warbler *Sylvia undata* population. PhD thesis, University of East Anglia.

⁴⁷ Wilson, J.P. and J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88

⁴⁸ Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole⁴⁹ conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.
- Cole and Spildie⁵⁰ experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

4.7 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g.⁵¹). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually⁵². While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components⁵³. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

4.8 The Dungeness SAC comprises the qualifying habitats 'annual vegetation of drift lines' and 'perennial vegetation of stony banks'. These habitats occur above or at the height of mean high-water spring tides. While annual vegetation of drift lines shows high inter-annual variability, the more stable shingle structures give rise to more predictable and established communities. Recreational use is widely accepted to be one of the main threats to vegetated shingle⁵⁴, with relatively small incursions into the surface layer of the shingle activities possibly remaining visible for many years. The use of off-road vehicles on vegetated shingle has been shown to lead to the breaking up of vegetation and, in the worst case, to total habitat destruction following prolonged incursions. Floral communities comprising abundant lichens (very slow-growing species) are most sensitive to people walking or cycling on an established shingle ridge. Compaction of the shingle and finer sediment occupying spaces between individual pebbles make it more difficult for seeds to germinate, potentially affecting long-term community composition.

⁴⁹ Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

⁵⁰ Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71

⁵¹ Taylor K., Anderson P., Taylor R.P., Longden K. and Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

⁵² Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.

⁵³ Taylor K., Anderson P., Liley D. and Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

⁵⁴ Doody J.P. and Randall R.E. (2003). A guide to the management and restoration of coastal vegetated shingle. 130pp. Available at: <https://publications.naturalengland.org.uk/file/77011> [Accessed on 07/06/2024]

4.1.3 Summary

- 4.9 Several Habitats Sites in Hastings Borough and adjoining authorities are designated for habitats and species that are sensitive to recreational pressure, including the Dungeness, Romney Marsh and Rye Bay SPA, Dungeness SAC and Hastings Cliffs SAC. The increase in residential development allocated in the HLP will lead to an increase in the local population and demand for access to outdoor spaces for recreational purposes. Therefore, this HRA needs to adequately assess potential negative impacts of the HLP regarding recreational pressure.
- 4.10 Overall, the following Habitats Sites in the Zone of Influence (Zol) of Hastings Borough are sensitive to increased recreational access that may arise due to the delivery of housing development associated with the HLP (the sites in **bold** are taken forward into the following HRA chapters):
- **Dungeness, Romney Marsh and Rye Bay SPA** (adjoins the coastline of Hastings Borough);
 - **Dungeness SAC** (approx. 6.9km to the north-east of Hastings Borough); and
 - **Hastings Cliffs SAC** (located in the south-east of Hastings Borough).

4.2 Water Quality

- 4.11 Water quality is an important determinant of the nature and condition of qualifying habitats and species in Habitats sites. Declining water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life and have additional detrimental effects (even at lower levels), such as increased vulnerability to disease and changes in wildlife behaviour.
 - Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication, deoxygenates water further, exacerbating the ongoing oxygen depletion. In the marine environment, nitrogen is the main growth-limiting plant nutrient and so eutrophication is primarily associated with discharges containing bioavailable nitrogen.
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.
- 4.12 With regard to ecological features in Hastings, groundwater quality, as well as surface water quality, is relevant as the borough has areas of high vulnerability to groundwater pollution, such as the sandstone layer in proximity to the Marline Valley Woods SSSI. However, this SSSI is not specifically an HRA issue as it does not relate to European sites.
- 4.13 One of the main risks associated with the HLP is an increase in the discharge of treated sewage effluent from Wastewater Treatment Works (WwTWs) serving Hastings Borough. This can increase nutrient concentrations (nitrogen and phosphorus are the main growth-limiting nutrients in freshwater bodies and coastal waters) in Habitats Sites that are hydrologically connected to the locations where effluent is discharged⁵⁵. The HLP provides for development in the catchment served by Southern Water, which is the company that is responsible for the public water supply and wastewater treatment in large areas of south-east England. The potential implications of growth allocated in the HLP for relevant WwTWs and Habitats Sites are outlined in Table 1 below.
- 4.14 Other than treated wastewater, water quality can also be affected by runoff. Proliferation of impermeable surfaces can lead to increased surface runoff into the environment, including Habitats Sites that lie in relatively close proximity to proposed development sites. Surface runoff can carry non-toxic and toxic pollutants into aquatic ecosystems, resulting in potential negative impacts on community composition and condition. Various academic papers have investigated the impacts of stormwater runoff on water quality in recipient ecosystems. One study recorded the highest biochemical oxygen demand (BOD), phosphorus

⁵⁵ Potential measures introduced through the HLP and measures coming in to effect outside of the planning process can reduce the impact of this increase.

(P), total suspended sediment (TSS) and orthophosphate concentrations in an urban freshwater stream (compared to a suburban and rural streams)⁵⁶. This also has groundwater quality implications. There was also a significant positive correlation of these water quality parameters with the percentages of the catchment being developed and coverage with impermeable surfaces. A 17-year field investigation of water quality and ecosystem composition in a freshwater system⁵⁷ found that increasing development in the surrounding catchment were correlated with significant increases in nutrient concentrations and overall eutrophication levels, and a significant reduction in Secchi disk depth (SDD; a proxy for water transparency). Decreased aquatic vegetation presence frequency was significantly correlated with increased nutrient and chlorophyll *a*, and decreased SDD. Given the close proximity of Hastings Borough to sensitive Habitats Sites, surface runoff is an important element to consider in the assessment of water impacts.

Table 1: Wastewater Treatment Works (WwTWs) serving Hastings Borough the growth allocated and resulting HRA implications.

WwTWs serving Hastings Borough	Residential / employment development allocated in the HLP	HRA implications
Hastings WwTW (operated by Southern Water)	A minimum of 2,970 net new dwellings 4,750 new jobs and 19,830 m ² of business floorspace	Discharge of treated sewage effluent and industrial pollutants into local watercourses and / or coastal waters of the English Channel

4.15 Overall, the following Habitats Sites are sensitive to negative changes in water quality, both due to increased volumes of treated sewage effluent discharged from WwTWs and surface runoff from impermeable surfaces (**sites in bold are taken forward to the following chapters of the HRA**):

- **Dungeness, Romney Marsh and Rye Bay SPA** (adjoins the coastline of Hastings Borough);
- **Dungeness SAC** (approx. 6.9km to the north-east of Hastings Borough); and
- **Pevensey Levels SAC / Ramsar** (located approx. 5.2km to the west of Hastings Borough).

4.3 Water Quantity, Level and Flow

4.16 The unique nature of wetlands combines shallow water, high levels of nutrients and high primary productivity. Similarly, estuarine and inshore coastal waters are characterised by high nutrient concentrations from tidal incursions. The abiotic conditions in both habitat types are ideal for the growth of organisms at the basal level of food webs, which sustain a wide range of birds, mammals, fish and amphibians. Both breeding and overwintering bird species are particularly reliant on these foraging sources for successful chick provisioning and building up sufficient nutritional reserves prior to migrating to summer breeding grounds.

4.17 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of freshwater is fundamental to maintaining good ecological condition in these sites. In estuarine and coastal waters, conditions are determined by a complex interplay of freshwater and seawater, which influences various important habitat parameters for qualifying birds. In freshwater habitats, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of bird, invertebrate or plant species. For example, a significant reduction in freshwater flows to grazing marsh or standing waters can lead to changes in floral and faunal community composition or, in the worst-case, to the drying up of water features. Altered hydrological regimes in estuaries or coastal waters can lead to changes of mixing

⁵⁶ Mallin M.A., Johnson V.L. and Ensign S.H. (2009). Comparative impacts of stormwater runoff on water quality of an urban, a suburban, and a rural stream. *Environmental Monitoring and Assessment* **159**: 475-491.

⁵⁷ Zhang Y., Liu X., Qin B., Shi K., Deng J. and Zhou Y. (2016) Aquatic vegetation in response to increased eutrophication and degraded light climate in Eastern Lake Taihu: Implications for lake ecological restoration. *Nature Scientific Reports* **6**. DOI: 10.1038/srep23867.

conditions, temperature, DO, suspended sediments and salinity. Changes in these water quality parameters may trigger shifts in intertidal habitats (e.g. saltmarsh zonation) and associated invertebrate communities, eliciting further indirect impacts on bird populations.

4.18 There are two mechanisms through which urban development might negatively affect the water level in Habitats Sites:

- The supply of new housing with potable water may require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the volume of freshwater supplied to Habitats Sites in the same hydrological catchment.
- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface runoff. As traditional drainage systems often cannot cope with the volumes of surface runoff, particularly during storm event, sewer overflows are designed to discharge excess water directly into watercourses. Often this additional discharge results in downstream inundation of watercourses and the potential flooding of wetland habitats.

4.19 Specifically, the Site Improvement Plan for the Pevensey Levels SAC⁵⁸, and its Supplementary Advice on Conservation Objectives, identifies inappropriate water levels as a primary threat to site integrity. The SAC (and overlapping Ramsar) is a complex managed hydrological system in which adequate water levels must be maintained to provide optimum habitat to the ram's-horn snail and British Red Data Book wetland invertebrates. The site has a complex hydrology which is subject to a water level management plan. The Environment Agency and the Pevensey and Cuckmere Water Level Management Board are jointly responsible for delivering this plan. Levels are controlled by a series of sluices and pumping stations. Maintaining adequate water levels (0.3cm below ditch neck) is critical to the feature. A reduced freshwater supply due to higher abstraction volumes and increased surface water runoff from impermeable urban surfaces may threaten the hydrological conditions within the SAC / Ramsar. It is to be noted that the WWTWs at Hailsham play an integral role in maintaining freshwater supply to the SAC / Ramsar in the summer months via the discharge of treated effluent.

4.20 The plan does not commit to specific employment uses in its allocations. The industrial policies have therefore been screened with traditional uses in mind, such that any proposals for data centres or other water heavy uses should demonstrate that they are capable of meeting their water use demand through the recycling of greywater and rainwater, including from the municipal system with consent of the undertaker, and achieve zero liquid discharge into the sewer system. It is recommended that this should be supported by a proposal-specific water cycle study as part of a planning application.

4.21 The emerging HLP could result in reduced water quantity, level and flow in the catchment of several Habitats Sites, if it required additional abstractions from sources that are hydrologically connected to these sites. Furthermore, any future development on greenfield sites would increase the volume of surface runoff compared to the existing development scenario, contributing additional flows to connected Habitats Sites. At the extreme, such changes in flow would cascade up the food chain and materialise in population level changes of SPA / Ramsar birds. Overall, the following Habitats Sites are considered to be sensitive to changes in water quantity, level and flow (**sites in bold are taken forward to the following chapters of the HRA**):

- **Dungeness, Romney Marsh and Rye Bay SPA** (adjoins the coastline of Hastings Borough);
- **Dungeness SAC** (approx. 6.9km to the north-east of Hastings Borough); and
- **Pevensey Levels SAC / Ramsar** (located approx. 5.2km to the west of Hastings Borough).

4.4 Atmospheric Pollution (Nitrogen Deposition)

4.22 The main pollutants of concern for Habitats Sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂), and are summarised in Table 2. NH₃ can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges⁵⁹. NO_x can also be toxic at very high concentrations (far above the annual average Critical Level). However, most importantly, high levels of NO_x and NH₃ increase the total N deposition to soils, potentially leading to deleterious knock-on

⁵⁸ Available at: <http://publications.naturalengland.org.uk/publication/6057793526169600> [Accessed on the 22/10/2021]

⁵⁹ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

effects in resident ecosystems. Increases in N deposition from the atmosphere are widely known to enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{60 61}.

Table 2: Main sources and effects of air pollutants on habitats and species⁶².

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	The main sources of SO₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO₂ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO₂ emissions in the UK.	Wet and dry deposition of SO₂ acidifies soils and freshwater and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO₂ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.	Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the	The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.

⁶⁰ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006**. Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

⁶¹ Dijk, N. **2011**. Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: Evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

⁶² Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>)

deposition rates are strongly influenced by
meteorology and ecosystem type.

Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. Nitrogen oxides have been consistently falling for decades due to a combination of coal fired power station closures, abatement of other combustion point sources and improved vehicle emissions technology. They are expected to continue to fall over the plan period.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 ug/m³. Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_x) or reduced (e.g. NH₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural forbs cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost by making the plants less resilient to stress.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions involving NO_x, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O₃ above 40 ppb can be toxic to both humans and wildlife and can affect buildings. High O₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

4.23 SO₂ emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁶³⁶⁴. NH₃ emissions predominantly originate from agricultural practices⁶⁵, with some chemical processes also making contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with the emerging HLP.

4.24 In contrast, NO_x emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NO_x

⁶³ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁶⁴ The Westbound Lane of the Dover Strait Traffic Separation Scheme (TSS) is five miles offshore and is the busiest shipping lane in the world.

⁶⁵ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. Atmospheric Environment 32: 309-313

footprint (92%) through its associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁶⁶. The emerging HLP, which will result in an increase in Hastings's population, can therefore be reasonably expected to increase NOx emissions through an increase in vehicular traffic.

- 4.25 According to the World Health Organisation, the critical NOx concentration (Critical Level) for the protection of vegetation is $30\mu\text{g}/\text{m}^3$; the threshold for SO_2 is $20\mu\text{g}/\text{m}^3$. In addition, ecological studies have determined 'Critical Loads'⁶⁷ of atmospheric N deposition (that is, NOx combined with ammonia NH_3).
- 4.26 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is insignificant (Figure 3 and see reference ⁶⁸). Therefore, this is the distance that has been used throughout this HRA to identify the relevant major commuter routes along European Sites that may experience a substantial increase in vehicular traffic due to the HLP and from which LSEs in relation to atmospheric pollution could occur.

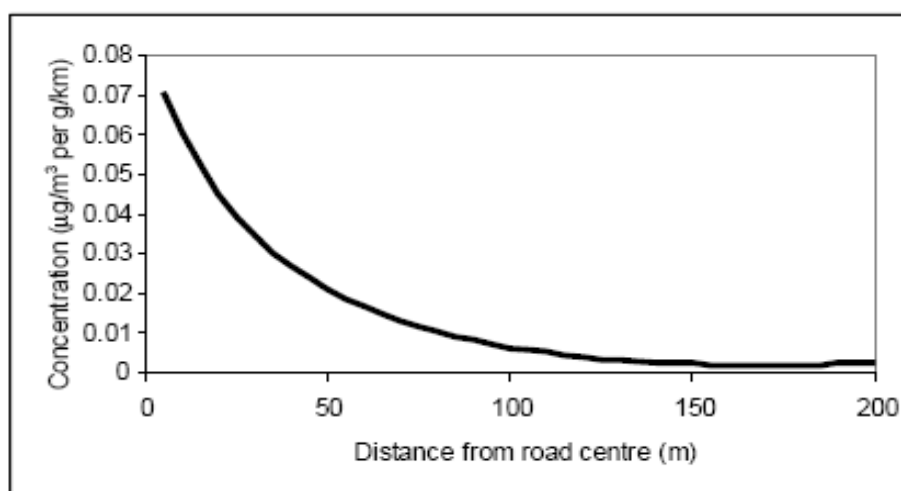


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁶⁹).

- 4.27 Overall, an increase in the net population and employment opportunities within Hastings Borough will result in higher volumes of inward and outward commuter traffic. This may increase the number of two-way vehicle trips through or within 200m of the following SACs (**sites in bold are taken forward to the following chapters of the HRA**):
- **Pevensey Levels SAC / Ramsar** (located approx. 5.2km to the west of Hastings Borough);
 - **Lewes Downs SAC** (located approx. 31km to the west of Hastings Borough); and
 - **Ashdown Forest SAC** (located approx. 32.5km to the north-west of Hastings Borough).

4.5 Loss of Functionally Linked Habitat

- 4.28 While most Habitats Sites have been geographically defined to encompass the key features that are necessary for the coherence of their structure and function, and the support of their qualifying features, this is not always the case. A diverse array of mobile species including birds, bats and amphibians are not confined to the boundary of designated sites.
- 4.29 For example, the highly mobile nature of both wader and waterfowl species implies that areas of habitat of crucial importance to the maintenance of qualifying populations lie outside the physical limits of Habitats Sites. Despite not being designated, these habitats are integral to the maintenance of the structure and

⁶⁶ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

⁶⁷ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

⁶⁸ <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>; accessed 12/05/2016

⁶⁹ Available at: <http://www.dft.gov.uk/ha/standards/dmr/vol11/section3/ha20707.pdf> [Accessed on the 21/10/2021]

function of the designated site and, therefore, development plans that may affect such functionally linked habitat require further assessment.

- 4.30 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England recognised the potential importance of functionally linked habitat. For example, bird surveys in relation to a previous HRA established that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were recorded on functionally linked habitat (and would have been negatively impacted in the absence of mitigation), which required the inclusion of mitigation measures in the relevant plan's policy wording. Another important case study originates from the Mersey Estuary SPA / Ramsar, where functionally linked habitat adjoining the estuary yielded a peak survey count of 108% of the 5 year mean peak population of golden plover. Similar to the above example, this led to considerable amendments in the planning proposal being made to ensure that the site integrity was not adversely impacted.
- 4.31 The identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and require the analysis of existing data sources to be firmly established. In some instances, data may not be available at all, requiring further survey work.
- 4.32 The Dungeness, Romney Marsh and Rye Bay SPA / Ramsar is designated for mobile bird species that routinely forage beyond the designated site boundary. For example, Bewick's swan are known to forage in agricultural parcels up to 10km from their roosting or loafing areas. Golden plover have a core foraging range of 3km with a maximum range of 11km. Hen harrier have core foraging ranges of 2km with maximum distances of up to 10km. The presence of these species within the SPA implies that greenfield sites allocated in Hastings Borough, which lies only approx. 2.3km from the Dungeness Complex, require thorough assessment as these might constitute habitat that is functionally linked to the SPA / Ramsar. Therefore, the following Habitats Site is taken forward into the following chapters (**marked in bold**):
- **Dungeness, Romney Marsh and Rye Bay SPA / Ramsar** (adjoins the coastline of Hastings Borough, but the freshwater habitats most relevant to bird species that rely on functionally linked habitats lie approx. 2.3km to the east of the borough).

5. In-Combination Scope

- 5.1 Any HRA should assess relevant impact pathways associated with a Local Plan alone and in-combination with other plans and projects. At this strategic level, the in-combination assessment involves consideration of residential and employment sites that are allocated in the development plans of adjoining authorities. Table 3 below summarises the development allocated in plans of the authorities of Rother, Wealden, Tunbridge Wells, Mid Sussex, Lewes, Eastbourne, Ashford and Folkestone and Hythe.

Table 3: Residential and employment development allocated in Local Plans and Core Strategies of adjoining authorities.

Local Plan	Stage	Residential growth	Employment growth
Rother Local Plan (2025-2042) ⁷⁰	Regulation 18	Up to 15,504 net new dwellings	74,189 sqm of net additional employment floorspace
Wealden District Core Strategy Local Plan (2006-2027) ⁷¹	Regulation 19	4,525 net new dwellings	40,000 sqm of net employment floorspace
Mid Sussex (2021- 2040) ⁷²	Main Modifications	7,459 net new dwellings	None – already adequate provision
Lewes (up to 2040) ⁷³	Statement of Community Involvement	Not set in current Local Plan consultation	Not set in current Local Plan consultation
Eastbourne (up to 2042) ⁷⁴	Regulation 19	6,401 net new dwellings	53,000 sqm of employment floorspace
Tunbridge Wells Local Plan (2020-2038) ⁷⁵	Adopted	12,204 net new dwellings	14 ha of net employment land
Ashford Local Plan (2011-2030) ⁷⁶	Scoping Consultation	13,118 net new dwellings	630,000 sqm (63 ha) of net new employment land
Folkestone and Hythe Core Strategy Review (2020-2037) ⁷⁷	Scoping Consultation	13,284 net new dwellings	72,460 sqm of net new employment floorspace
South Downs National Park Authority Local Plan (2026-2031) ⁷⁸	Regulation 19	6,735 net new dwellings	5.9 ha office space and 13.2 ha industrial/warehouse space

⁷⁰ Draft Version. April 2024. Available at: https://rdcpublish.blob.core.windows.net/website-uploads/2024/04/New-Local-Plan_Reg-18_version_Final.pdf [Accessed on 11/06/2024]

⁷¹ Adopted February 2013. Available at: https://www.wealden.gov.uk/UploadedFiles/Adopted_Core_Strategy_2013_for_web.pdf [Accessed on 11/06/2024]

⁷² Main Modifications, July 2026. Available at: [Link to Mid Sussex Local Plan Main Modifications document](#) [Accessed 10/09/2026]

⁷³ Lewes Local Plan Strategy. Available at: [Link to Lewes Local Plan](#) [Accessed: 10/09/2026]

⁷⁴ Eastbourne Local Plan. Available at: https://planningpolicyconsult.lewes-eastbourne.gov.uk/ELP_R19_2026/consultationHome [Accessed 10/09/2026]

⁷⁵ Submission Version. Submitted October 2021. Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0009/403587/CD_3.128_Local-Plan_Submission-accessible_reduced.pdf [Accessed on 11/06/2024]

⁷⁶ Adopted February 2019. Available at: <https://www.ashford.gov.uk/media/jw3nbvq1/adopted-ashford-local-plan-2030.pdf> [Accessed on 11/06/2024]

⁷⁷ Adopted March 2022. Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022> [Accessed on 11/06/2024]

⁷⁸ Regulation 19 Local Plan. Available at: https://www.southdowns.gov.uk/app/uploads/2026/05/LG_Plan_2026_13_web.pdf [Accessed 10/9/2026]

- 5.2 It should be noted that the authorities of Rother, Eastbourne, Lewes and Wealden are currently developing new strategic plans for submission by 31 December 2026. . Local Plans under development are not formally adopted and there is a degree of uncertainty whether they will be c subject to future modifications. Therefore, while the most recent versions of plans are considered here, it is to be noted that the proposed quantum and type of development is subject to potential changes.

6. Screening for Likely Significant Effects (LSEs)

6.1 Recreational Pressure

6.1.1 Dungeness Complex

- 6.1 The Dungeness Complex is designated for a range of bird species supralittoral habitats, all of which are sensitive to recreational impacts such as disturbance and trampling damage. For example, non-breeding and breeding SPA / Ramsar birds are sensitive to recreational disturbance for different reasons. Existing levels of recreation within these Habitats Sites are high and diverse, comprising kite surfing, angling, birdwatching, walking and dog walking. Wider data trends indicate that the number of people visiting the coast and countryside is projected to increase considerably. By allocating 2,970 net new dwellings, the HLP will modestly increase the population of the borough as well as demand for recreational outdoor space. Given the inherent attractiveness of coastal sites for recreational use, combined with the relatively short distance to the Dungeness Complex (at its closest, the Dungeness, Romney Marsh and Rye Bay SPA directly adjoins the borough), **it is considered that LSEs of the HLP on the Habitats Sites regarding recreational pressure cannot be excluded. Therefore, this impact pathway is screened in for AA in relation to the Dungeness Complex.**

6.1.2 Hastings Cliffs SAC

- 6.2 The Hastings Cliffs SAC is designated for vegetated sea cliffs of the Atlantic and Baltic coasts, which are characterised by typical component species of MC8, U1, MG5, H2, W10, W7 and W21 vegetation. The SAC comprises three valleys that cut into the Lower Hastings Beds and support woodland / scrub habitats with an unusual Atlantic bryophyte flora. Closer to the sea other bryophytes dominate, with this being the only site for records of *Lophocolea fragrans*. Plant communities are inherently sensitive to trampling damage, which can result in soil compaction, root uptake of nutrients / water and damage of individual plants. Furthermore, a high proportion of dog walkers among the user base has the potential to result in nutrient enrichment. Many species of conservation interest are adapted to low-nutrient environments (this applies especially to coastal heathland, which occurs towards the SAC's cliff edge) and are replaced by more competitive species under high nutrient regimes.
- 6.3 It is noted that the SAC is part of the Hastings Country Park, which is maintained in accordance with a management plan. The importance of the SAC was further highlighted when the country park was designated as a Local Nature Reserve, extending increased protection to the 345ha of habitat. A review of the available access infrastructure indicates that the SAC is permeated by an extensive network of footpaths that covers the entire SAC boundary. This comprises four circular Heritage Trails, each of which incorporate specific points of attraction (e.g. areas where conservation grazing by horses and cattle is promoted, viewpoints such as North's Seat and the Bale House Visitor Centre). Ensuring that a Habitats Site is adequately covered by well-maintained paths is one of the key prerequisites to ensuring that visitors stay on-track and do not trample sensitive plant species or their supporting habitat. Furthermore, an information leaflet published by the Friends of Hastings County Park Nature Reserve also advertises areas within the SAC where unrestrained visitor access is encouraged, such as the Fairlight Road Picnic Area. Promoting sections of the SAC where the free roaming of visitors is welcome, will make it more likely that they act responsibly in others (particular in combination with adequate signage, information boards and fenced-off areas).
- 6.4 Another factor that is likely to minimise off-trail recreational impacts within the Hastings Cliffs SAC is the steep terrain through most of the site, particularly towards the sensitive plant communities near the cliff edge. Difficult terrain is one of the main drivers of staying on footpaths and safety considerations of visitors will also prevent its role in deterring trampling damage. The management of the country park (including the SAC) is undertaken by a team of rangers, the Friends of Hastings County Park Nature Reserve, conservation volunteers and the local Natural England office. As part of embedded measures, allocations close to the country park also seek enhancements to formal footpaths into areas of the Country Park, to divert recreation into the country park away from the SAC. The present circumstances in

the SAC indicate that an adequate delivery framework is in place to manage the anticipated increase in recreational pressure due to the HLP and other local plans implemented in adjoining authorities.

- 6.5 Hastings Borough is situated in a geographic area that is served by various designated semi-natural parks and Local Nature Reserves. These destinations all have the potential to divert recreational pressure from the more sensitive Hastings Cliffs SAC. For example, the Combe Valley Countryside Park between St. Leonards and Bexhill has been created by a partnership between the authorities of Hastings, Rother and East Sussex. This is continually being enhanced to increase its attractiveness, access and draw of local residents and is expected to include growth in the western part of Hastings Borough and East part of Rother District within its catchment.
- 6.6 Overall, it is concluded that the HLP will not lead to a material increase in recreational pressure impacts in the Hastings Cliffs SAC. Therefore, LSEs of the HLP on the SAC regarding recreational pressure are excluded and this impact pathway is screened out from AA. This is corroborated by Natural England's SIP and SACO, neither of which identify recreational pressure as an issue for the Hastings Cliffs SAC.

6.1.3 Policy Screening

- 6.7 Overall, LSEs of the HLP on the Dungeness Complex regarding recreational pressure cannot be excluded, alone and in-combination. The following policies are screened in for AA because they will lead to an increase in Hasting's population and may result in more recreational visits to the Dungeness Complex being undertaken:
- Policy SP1: Directing Growth (identifies the overall development strategy for Hastings Borough);
 - Policy SP2: New and Affordable Housing (specifies that a minimum of 2,970 new homes will be delivered over the HLP period, with potentially additional homes being delivered in the Hastings Central Regeneration Area);
 - Policy D1: Land at Breadsell 200-300 residential units (not yet determined as suitable and not included in land supply figures)
 - Policy R1: Hastings Central (identifies the potential for new residential and employment development to be delivered in this Regeneration Area);
 - Policy R3: St Johns Road (identifies the potential for new residential development to be delivered in this Regeneration Area);
 - Policy HS1: Land adjacent to Sandrock Park, The Ridge (allocates 95 net new dwellings);
 - Policy HS2: Seaside Road, West St Leonards (allocates 120 net new dwellings);
 - Policy HS3: Former Westerleigh School, Hollington Park Close (allocates 100 net new dwellings);
 - Policy HS5: Former West St Leonards Primary School, Bexhill Road (allocates 50 net new dwellings);
 - Policy HS6: Ore Valley (Former Power Station; allocates 78 net new dwellings);
 - Policy HS7: Former Post Office and University of Brighton building (allocates 41 net new dwellings);
 - Policy HS8: Mayfield E, Bodiam Drive (allocates 38 net new dwellings);
 - Policy HS10: Land at Rock Lane (allocates 26 net new dwellings);
 - Policy HS11: Cinque Ports Way (; allocates 58 net new dwellings);
 - Policy HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road (allocates 20 net new dwellings);
 - Policy HS13: Land North-West of Winchelsea Lane (allocates 20 net new dwellings);
 - Policy HS18: Land at Tilekiln Farm (allocates 75 net new dwellings);

- Policy HS20: Former West Hill Road Reservoir (allocates 30 net new dwellings);
- HS21: Land East of Rock Lane (allocates 20 net new dwellings);
- HS23: Land East of Beaney's Lane, The Ridge (allocates 18 net new dwellings);
- HS25: Former Convent of Holy Child Jesus, Magdalen Road; (allocates 200 net new dwellings)
- HS26: Site of Four Courts, Stonehouse Drive (this is a housing renewal site for a gross development of 450 with a net of gain of 64 new dwellings);
- HS27: My Way Lodge, The Ridge West (allocates 20 net new dwellings);
- HSS5: Land at Chiltern Drive (allocates 13 net new dwellings);
- Small site allocations HSS8, HSS13, HSS14, HSS16 (allocate a cumulative figure of 45 net new dwellings);
- Policy TP1: Land South of Crowhurst Road (allocates two net new permanent gypsy and traveller pitches); and
- Policy TP2: Land at Tilekiln Lane (allocates two net new permanent gypsy and traveller pitches)

6.2 Water Quality

6.2.1 Dungeness Complex

- 6.8 The SACO for the Dungeness, Romney Marsh and Rye Bay SPA identifies that all qualifying species are sensitive to a deterioration in water quality, predominantly due to cascading impacts that affect trophic interactions in resident infaunal, epifaunal and fish communities. For example, a significant decrease in DO concentrations may result in sub-lethal and lethal impacts to foraging resources of SPA birds, reducing the quality and availability of suitable foraging habitat. The qualifying habitats of the Dungeness SAC (i.e. annual vegetation of drift lines and perennial vegetation of stony banks) are not particularly sensitive to water quality because their condition does not primarily depend on hydrological input. However, great-crested newt that are breeding in SAC freshwater ponds are dependent on adequate chemical status and clarity of water. Invertebrates such as mayfly larvae and water shrimps, the main food source of developing newt larvae and adults, are susceptible to water pollution resulting from excessive nutrient concentrations and sediment input.
- 6.9 Given that the marine section of the SPA adjoins the Hastings Borough coastline, the short flowpath distance allows for little dilution and attenuation of pollutants. Furthermore, the terrestrial freshwater part of the SPA and the Dungeness SAC could be impacted through the discharge of treated sewage effluent from WwTWs (depending on discharge / outfall locations). **Overall, LSEs of the HLP on the Dungeness Complex regarding water quality cannot be excluded and this impact pathway is screened in for AA.**

6.2.2 Pevensey Levels SAC / Ramsar

- 6.10 The Pevensey Levels SAC is designated for ram's-horn snail, which is a small aquatic snail. It requires unpolluted, calcareous waters with a dense aquatic flora. Ditches that are overpopulated with weeds or have high levels of silt / sediment input are unsuitable for this species and the SACO identifies eutrophication (potentially arising from the discharge of treated sewage effluent) as one of the main threats to ram's-horn snail populations. An adequate water chemistry status is provided, including between 0.063-0.085mg/l reactive phosphorus, 70% DO saturation, Biological Oxygen Demand (BOD) of 4mg/l and ammonia (NO₃) of 0.6mg/Nl. The condition of the Ramsar assemblage of wetland plants and invertebrates is also determined by water quality status. Due to its low-lying nature, the SAC / Ramsar receives freshwater input from a well-defined hydrological catchment.
- 6.11 Two WwTWs (Hailsham and Windmill Hill) in the Wealden area discharge treated sewage effluent into the top of the catchment serving the SAC / Ramsar. Water quality analysis undertaken by the Environment Agency indicates that phosphorus concentrations downstream of the WwTWs are above 0.1mg/l, which are above the limits tolerated by healthy freshwater and invertebrate communities. Due to low flow

volumes, the residual phosphorus in treated effluent is not sufficiently diluted before reaching the ditch network of the SAC / Ramsar. Furthermore, the storm water tank of the Hailsham WwTW is situated directly on the designated site boundary and discharges untreated sewage under peak flows following intense rainfall events.

- 6.12 A potential hydrological connection between WwTWs serving Hastings Borough and the SAC / Ramsar catchment is the primary consideration in determining whether the HLP could result in LSEs on the Pevensey Levels. As shown on the Environment Agency Catchment Data Explorer, the Pevensey Operational Catchment only extends as far east as Bexhill-on-Sea. However, Hailsham WwTW and Windmill Hill WwTW are not serving development in Hastings Borough. The Hastings WwTW, situated in the Combe Haven Operational Catchment, is responsible for treating sewage effluent in the borough, which discharges into the English Channel via two long outfalls. Due to the absence of a hydrological connection, there is no potential for treated sewage effluent resulting from the HLP to reach the Pevensey Levels SAC / Ramsar. Furthermore, due to the distance of approx. 5.2km between the boundary of Hastings Borough and the Pevensey Levels SAC / Ramsar, there is also no potential for surface run-off from development allocated in the HLP to reach the Habitats Site. Overall, LSEs of the HLP on the Pevensey Levels SAC / Ramsar regarding water quality are excluded and this impact pathway is screened out from AA.

6.2.3 Policy Screening

- 6.13 Overall, LSEs of the HLP on the Dungeness Complex regarding water quality cannot be excluded, alone and in-combination. The following policies are screened in for AA because they will lead to an increase in the volumes of treated sewage effluent and surface runoff produced in Hastings Borough, potentially reaching the designated boundary of the Dungeness, Romney Marsh and Rye Bay SPA and Dungeness SAC:

- Policy SP1: Directing Growth (identifies the overall development strategy for Hastings Borough);
- Policy SP2: New and Affordable Housing (specifies that a minimum of 2,970 new homes will be delivered over the HLP period, with potentially additional homes being delivered in the Hastings Central Regeneration Area);
- Policy SP3: Business Development – Office and Industrial (stipulates that 4,750 new jobs and 19,830 sqm of business floorspace will be delivered across the Strategic Industrial Employment Areas, SIEAs, of Queensway Corridor, Ivyhouse Lane, Ponswood and Bulverhythe Estate);
- Policy D1: Land at Breadsell 200-300 residential units (not yet determined as suitable and not included in land supply figures)
- Policy R1: Hastings Central (identifies the potential for new residential and employment development to be delivered in this Regeneration Area);
- Policy R3: St Johns Road (identifies the potential for new to be delivered in this Regeneration Area);
- Policy R3: St Johns Road (identifies the potential for new to be delivered in this Regeneration Area);
- Policy HS1: Land adjacent to Sandrock Park, The Ridge (allocates 95 net new dwellings);
- Policy HS2: Seaside Road, West St Leonards (allocates 120 net new dwellings);
- Policy HS3: Former Westerleigh School, Hollington Park Close (allocates 100 net new dwellings);
- Policy HS5: Former West St Leonards Primary School, Bexhill Road (allocates 50 net new dwellings);
- Policy HS6: Ore Valley (Former Power Station; allocates 78 net new dwellings);
- Policy HS7: Former Post Office and University of Brighton building (allocates 41 net new dwellings);

- Policy HS8: Mayfield E, Bodiam Drive (allocates 38 net new dwellings);
- Policy HS10: Land at Rock Lane (allocates 26 net new dwellings);
- Policy HS11: Cinque Ports Way (; allocates 58 net new dwellings);
- Policy HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road (allocates 20 net new dwellings);
- Policy HS13: Land North-West of Winchelsea Lane (allocates 20 net new dwellings);
- Policy HS18: Land at Tilekiln Farm (allocates 75 net new dwellings);
- Policy HS20: Former West Hill Road Reservoir (allocates 30 net new dwellings);
- HS21: Land East of Rock Lane (allocates 20 net new dwellings);
- HS23: Land East of Beaney Lane, The Ridge (allocates 18 net new dwellings);
- HS25: Former Convent of Holy Child Jesus, Magdalen Road; (allocates 200 net new dwellings)
- HS26: Site of Four Courts, Stonehouse Drive ((this is a housing renewal site for a gross development of 450 with a net of gain of 64 new dwellings);
- HS27: My Way Lodge, The Ridge West (allocates 20 net new dwellings);
- HSS5: Land at Chiltern Drive (allocates 13 net new dwellings);
- Small site allocations HSS8, HSS13, HSS14, HSS16 (allocate a cumulative figure of 45 net new dwellings);
- Policy TP1: Land South of Crowhurst Road (allocates two net new permanent gypsy and traveller pitches); and
- Policy TP2: Land at Tilekiln Lane (allocates two net new permanent gypsy and traveller pitches)
- Policy ES1: Queensway North, Queensway (allocates 6,500 sqm of employment floorspace);
- Policy ES2: Site PX, Churchfields (allocates 1,800sqm of employment floorspace);
- Policy ES3: NX2, Sidney Little Road, Churchfields Estate (allocates 800 sqm of employment floorspace);
- Policy ES4: NX3, Sidney Little Road, Churchfields Estate (allocates 280 sqm of employment floorspace);
- Policy ES5: Adjacent Unit C, 1-8 Brook Way (allocates 500 sqm of employment floorspace);
- Policy ES6: UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane (allocates 1,900sqm of employment floorspace);
- Policy ES7: Ivyhouse Lane, Northern Extension (allocates 2,800 sqm of employment floorspace);
- Policy ES8: Land at the Junction of Ridge West and Queensway (allocates 4,700sqm of employment floorspace); and
- Policy ES10: Marline Fields, Enviro21 Business Park, Land West of Queensway (allocates 550sqm of employment floorspace).

6.3 Water Quantity, Level and Flow

6.3.1 Dungeness Complex

- 6.14 The qualifying species in the Dungeness, Romney Marsh and Rye Bay SPA are sensitive to changes in water quantity, level and flow for a range of reasons. For example, many waders are sensitive to changes

in salinity gradient, which is a crucial factor in determining the distribution and composition of aquatic invertebrates, amphibians and fish. The overall salinity of brackish water is determined by the complex interplay of tidal seawater and inflows from freshwater bodies. Waders, waterfowl and predatory bird species that utilise freshwater habitats such as ponds, pools, dykes and flooded grassland (e.g. bittern, Bewick's swan, shoveler, marsh harrier, avocet, ruff and aquatic warbler), are dependent on certain water depths at key times during the year. For example, the SACO for the SPA highlights that bittern rely on a water depth of 30-100cm in swamp and marginal supporting habitat, as well as 200-400cm in pools and dykes. This ensures an adequate visual detection of prey items and protection of nest sites from predators.

- 6.15 Great-crested newt in the Dungeness SAC are also dependent on suitable water levels within breeding ponds. Generally, it is recommended that both breeding and non-breeding ponds should show a high degree of permanence (i.e. they rarely or never dry out completely, other than for natural reasons), persisting, as a minimum from winter to mid-summer. By allocating a minimum of 1,139 net new dwellings and 19,830m² of employment floorspace, the HLP will result in increased potable water requirement across Hastings Borough. Where new abstractions in the hydrological catchment of the Dungeness Complex are required to meet this demand, this could result in a reduction of freshwater supply to the SAC. **Overall LSEs of the HLP on the Dungeness Complex regarding water quantity, level and flow cannot be excluded and this impact pathway is screened in for AA.**

6.3.2 Pevensey Levels SAC / Ramsar

- 6.16 Ram's-horn snail, the qualifying species of the Pevensey Levels SAC, is an aquatic snail species that completes its entire life cycle in the ditches and drains permeating the site. Sufficient water levels and flows within supporting habitats are critical for the survival and migratory behaviour of this species. According to Natural England's SIP, water levels should not fall to below 0.3 cm from the ditch neck to meet the ecological requirements of ram's-horn snail. Furthermore, the site's assemblage of wetland plants and invertebrates (its Ramsar feature) is also dependent on sufficient water levels across the year, with the life cycle of most species being reliant on aquatic habitat.
- 6.17 As highlighted in relation to the Dungeness Complex, the HLP allocates urban development within Hastings Borough in the form of 2,970 net new dwellings (1,139 of them specifically allocated) and 19,830 ha of employment floorspace. The increase in potable water demand associated with this, may impact the hydrological conditions if new abstractions fall within the catchment of the SAC / Ramsar. **Therefore, LSEs of the HLP on the Pevensey Levels SAC / Ramsar regarding water quantity, level and flow cannot be excluded and this impact pathway is screened in for AA.**

6.3.3 Policy Screening

- 6.18 Overall, LSEs of the HLP on the Dungeness Complex and the Pevensey Levels SAC / Ramsar regarding water quantity, level and flow cannot be excluded, alone and in-combination. The following policies are screened in for AA because they may result in an increase in the volume of water abstracted from surface water and groundwater bodies, as well as accelerating the flow rates of water into Habitats Sites:
- Policy SP1: Directing Growth (identifies the overall development strategy for Hastings Borough);
 - Policy SP2: New and Affordable Housing (specifies that at least 2,970 new homes will be delivered over the HLP period, with potentially additional homes being delivered in the Hastings Central Regeneration Area);
 - Policy SP3: Business Development – Office and Industrial (stipulates that 4,750 new jobs and 19,830 sqm of business floorspace will be delivered across the Strategic Industrial Employment Areas, SIEAs, of Queensway Corridor, Ivyhouse Lane, Ponswood and Bulverhythe Estate);
 - Policy D1: Land at Breadsell 200-300 residential units (not yet determined as suitable and not included in land supply figures)
 - Policy R1: Hastings Central (identifies the potential for new residential and employment development to be delivered in this Regeneration Area);
 - Policy R3: St Johns Road (identifies the potential for new to be delivered in this Regeneration Area);

- Policy HS1: Land adjacent to Sandrock Park, The Ridge (allocates 95 net new dwellings);
- Policy HS2: Seaside Road, West St Leonards (allocates 120 net new dwellings);
- Policy HS3: Former Westerleigh School, Hollington Park Close (allocates 100 net new dwellings);
- Policy HS5: Former West St Leonards Primary School, Bexhill Road (allocates 50 net new dwellings);
- Policy HS6: Ore Valley (Former Power Station; allocates 78 net new dwellings);
- Policy HS7: Former Post Office and University of Brighton building (allocates 41 net new dwellings);
- Policy HS8: Mayfield E, Bodiam Drive (allocates 38 net new dwellings);
- Policy HS10: Land at Rock Lane (allocates 26 net new dwellings);
- Policy HS11: Cinque Ports Way (former Stamco Timber Yard and TA Centre; allocates 58 net new dwellings);
- Policy HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road (allocates 20 net new dwellings);
- Policy HS13: Land North-West of Winchelsea Lane (allocates 20 net new dwellings);
- Policy HS18: Land at Tilekiln Farm (allocates 75 net new dwellings);
- Policy HS20: Former West Hill Road Reservoir (allocates 30 net new dwellings);
- HS21: Land East of Rock Lane (allocates 20 net new dwellings);
- HS23: Land East of Beaney's Lane, The Ridge (allocates 18 net new dwellings);
- HS25: Former Convent of Holy Child Jesus, Magdalen Road (allocates 200 net new dwellings);
- HS26: Site of Four Courts, Stonehouse Drive (allocates 64 net new dwellings);
- HS27: My Way Lodge, The Ridge West (allocates 20 net new dwellings);
- HSS5: Land at Chiltern Drive (allocates 13 net new dwellings);
- Small site allocations HSS8, HSS13, HSS14, HSS16 (total allocation of 45 net new dwellings);
- Policy TP1: Land South of Crowhurst Road (allocates two net new permanent gypsy and traveller pitches); and
- Policy TP2: Land at Tilekiln Lane (allocates two net new permanent gypsy and traveller pitches)
- Policy ES1: Queensway North, Queensway (allocates 6,500 sqm of employment floorspace);
- Policy ES2: Site PX, Churchfields (allocates 1,800 sqm of employment floorspace);
- Policy ES3: NX2, Sidney Little Road, Churchfields Estate (allocates 800 sqm of employment floorspace);
- Policy ES4: NX3, Sidney Little Road, Churchfields Estate (allocates 280 sqm of employment floorspace);
- Policy ES5: Adjacent Unit C, 1-8 Brook Way (allocates 500 sqm of employment floorspace);
- Policy ES6: UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane (allocates 1,900sqm of employment floorspace);
- Policy ES7: Ivyhouse Lane, Northern Extension (allocates 2,800 sqm of employment floorspace);

- Policy ES8: Land at the Junction of Ridge West and Queensway (allocates 4,700 sqm of employment floorspace);
- Policy ES10: Marline Fields, Enviro21 Business Park, Land West of Queensway (allocates 550 sqm of employment floorspace).

6.4 Atmospheric Pollution

6.4.1 Pevensey Levels SAC / Ramsar

- 6.19 The supporting habitats of ram's-horn snail are the freshwater ditches across the Pevensey Levels SAC, which are predominantly phosphorus-limited. Phosphorus is not a pollutant that arises from the operation of combustion engines but originate from diffuse agricultural sources and treated sewage effluent. Nitrogen, NO_x and NO₃ (the principal air quality parameters that are considered in ecological assessments) are not a primary concern for freshwater Habitats Sites. This is corroborated by APIS, which does not provide a nitrogen Critical Load or NO_x / NH₃ Critical Levels for the SAC.
- 6.20 Notwithstanding this, for the 2021 Regulation 18 Local Plan Mott MacDonald were commissioned by HBC to model the expected 24 hour Annual Average Daily Traffic (AADT) flows arising from commuter traffic that will be generated by the HLP in the period to 2039. The A259 was identified as the most relevant commuter route within 200m of the SAC that could experience a material increase in commuter journeys. 2011 Census journey-to-work data for Hastings Borough were analysed at the Middle Super Output Layer (MSOA) to identify the proportion of trips that existing residents within each MSOA undertake along the A259. TEMPRO planning data was then utilised to provide the total number of current households and annual commuter journeys in each MSOA, which then enabled the calculation of a per-household AADT.
- 6.21 The most important commuter route linking Hastings Borough with the Pevensey Levels SAC / Ramsar is the A259, which runs westward from the authority and bisects the Habitats Site. The traffic modelling exercise undertaken for the Pevensey Levels SAC / Ramsar indicated that there will be an increase in 273.05 two-way commuting journeys along the A259 to 2039 (the modelling year at the time) due to the HLP. This equates to an AADT of 13.65, which is far below the traffic volume screening threshold that would result in material N deposition impacts or require air quality modelling. Moreover, since that modelling was undertaken the housing delivery target is much lower than that which was modelled for Regulation 18, notwithstanding the advance of the end date of the plan to 2041.
- 6.22 Overall, given the negligible increase in traffic volume due to the HLP on the identified A259 road link and that the SAC / Ramsar is primarily phosphorus-limited, it is concluded that there will be no LSEs of the HLP on the Pevensey Levels SAC / Ramsar regarding atmospheric pollution. The impact pathway is screened out from AA in relation to this site.

6.4.2 Lewes Downs SAC

- 6.23 The Lewes Downs SAC is designated for semi-natural dry grasslands and scrubland facies on calcareous substrates, which also represent important orchid sites. Generally, habitats of conservation importance tend to occur on low-nutrient soils and are less competitive than grasses. According to APIS, this habitat has an identified CL of 10-20 kg N/ha/yr, beyond which negative impacts on ecosystem competition can be expected. Calcareous grassland has low productivity and occur on shallow, well-buffered soils where N and phosphorus (P) availability is limited. Owing to their low productivity, calcareous grasslands tend to be very species-rich, containing many rare and / or endangered species. One of the main impacts of excess nitrogen deposition is the gradual replacement of lower plants (particularly lichens) by rough graminoids, such as *Brachypodium pinnatum*, resulting in reduced overall species richness, loss of rare / endangered species, loss of characteristic mosses / lichens / bryophytes and loss of annuals.
- 6.24 Mott MacDonald's traffic modelling for the Regulation 18 Local Plan encompassed two road links within 200m of the Lewes Downs SAC (one each on the A26 and A27 respectively). Overall, a total of 54.90 two-way commuter trips in the period to 2039 (the modelling year at the time) are expected along these two roads due to the HLP. This equates to an AADT of 2.75, which is far below the screening threshold for material ecosystem impacts and requirement for Air Quality Impact Assessment. Therefore, the HLP will not make a meaningful contribution to any potential air quality changes in the SAC. Moreover, since that

modelling was undertaken the housing delivery target is much lower than that which was modelled for Regulation 18, notwithstanding the advance of the end date of the plan to 2041.

- 6.25 Overall, given the negligible increase in traffic volume due to the HLP on the A26 and A27 road links, it is concluded that there will be no LSEs of the HLP on the Lewes Downs SAC regarding atmospheric pollution, alone or in-combination. The impact pathway is screened out from AA in relation to this site.

6.4.3 Ashdown Forest SAC

- 6.26 The botanical species in the Northern Atlantic wet heath with *Erica tetralix* and European dry heaths in the Ashdown Forest SAC are adapted to low nutrient conditions and, therefore, sensitive to atmospheric N deposition. APIS identifies N CLs of 10-20 kg N/ha/yr for both habitat types and highlights that the mid-year recorded background N deposition rates exceed the minimum CL across the entire site. Exceedance impacts in heathland habitats encompass a transition from heather to grass dominance, decline in lichen assemblage and an increase in sensitivity to abiotic stress. Furthermore, the supporting habitats of great-crested newt (ponds and canals) are also sensitive to excessive N deposition, although a N CL for these habitats has not been established because they are primarily phosphorus-limited.
- 6.27 Owing to the sensitivity of the qualifying habitats to air pollution, existing background deposition rates and a large proportion of the SSSI in unfavourable condition, atmospheric pollution is a well-established impact pathway for the SAC / SPA and represents a strategic cross-boundary issue in south-east England. This culminated in the preparation of a Statement of Common Ground by members of the Ashdown Forest Working Group, exercising their Duty to Co-operate regarding matters related to the Habitats and Species Regulations. Therefore, while Hastings Borough lies over 32km in straight-line distance from this Habitats Site, the increase in AADT from the emerging HLP was assessed.
- 6.28 The traffic modelling undertaken by Mott MacDonald for the initial draft of the Regulation 18 Local Plan indicated that growth allocated in the HLP would result in a total of 52.52 additional two-way commuting trips along the A22 and 11.17 additional trips along the A26 in the period to 2039 (the modelling year at the time). These constitute minor increases of 2.63 (A22) and 0.56 (A26) AADT within 200m of the Ashdown Forest SAC due to the HLP. This increase in AADT is far below the traffic threshold at which material ecological impacts are expected and air quality modelling is indicated. The resulting air quality impact from such a small change in AADT would be inconsequential even in-combination with other projects and plans for the following reasons:
- Daily traffic flows are not fixed numerals but fluctuate from day to day. The AADT for a given road is an annual average (specifically, the total volume of traffic for a year, divided by 365 days). It is this average number that is used in air quality modelling, but the 'true' flows on a given day will vary around this average figure. Small changes in average flow will lie well within the normal variation (known as the standard deviation or variance) and would not result in a statistically significant difference in the overall AADT; and
 - When converted to NO_x and NH₃ concentrations, or when determining overall N deposition rates, the experience of AECOM's air quality modelling team is that very small changes in AADT (tens of AADT) would only affect the third decimal place of modelled pollutants. The third decimal place is not normally reported in air quality modelling to avoid false precision. For this reason, pollution is generally not reported to more than two decimal places (0.01). Anything smaller is simply reported as less than 0.01 (< 0.01) i.e. probably more than zero but too small to model with precision.
- 6.29 This conclusion takes account of paragraph 48 of Advocate-General Sharpston's Opinion in European Court of Justice Case C-258/11, where she stated that: *'the requirement for an effect to be 'significant' exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.'* Moreover, since that modelling was undertaken the housing delivery target is much lower than that which was modelled for Regulation 18, notwithstanding the advance of the end date of the plan to 2041.
- 6.30 Overall, given the very small increases in AADT forecast on the A22 and A26, it is concluded that there will be no LSEs of the HLP on the Ashdown Forest SAC / SPA regarding atmospheric pollution, alone and in-combination. This impact pathway is screened out from AA in relation to this site.

6.5 Loss of Functionally Linked Habitat

6.5.1 Dungeness, Romney Marsh and Rye Bay SPA

- 6.31 The Dungeness, Romney Marsh and Rye Bay SPA is designated for a range of breeding and non-breeding bird species, all of which are mobile and could routinely travel beyond the designated site boundary. It is important to note that the boundary of the SPA was redefined in recent years, which means that many functionally linked habitats (e.g. an extensive area of grazing marsh) are now included in the site boundary. Therefore, it is considered that there are few, if any, material functionally linked habitat parcels outside the SPA. Notwithstanding this, the potential for the HLP to result in functionally linked habitat loss is appraised in the following paragraphs.
- 6.32 There are significant inter-species differences in the dependency on functionally linked habitats. For example, Mediterranean gull, a breeding species in the SPA, are opportunistic and generalist feeders, which are not associated with specific habitat types or foraging sources. Furthermore, little tern and sandwich tern forage on small fish species in shallow coastal waters (which are designated under the marine part of the SPA). For these reasons, LSEs of the HLP regarding the loss of functionally linked habitat for these species are excluded.
- 6.33 Several other qualifying species in the SPA (i.e. aquatic warbler, avocet, bittern, ruff and shoveler) are tightly linked to freshwater habitats (e.g. grazing marsh, ponds, standing water in canals / drains / dykes). While such habitats outside the SPA may be present in Hastings Borough, it is extremely unlikely that such habitats would be lost due to being allocated in the HLP. Generally, land that comprises permanently wet habitat features (e.g. ponds) or is at risk of pluvial flooding, is not considered for development for legal reasons (e.g. risk to property and / or life). Therefore, LSEs of the HLP regarding the loss of functionally linked habitat to aquatic warbler, avocet, bittern, ruff and shoveler are excluded.
- 6.34 The preservation of habitats that are functionally linked to the Dungeness, Romney Marsh and Rye Bay SPA is most important for Bewick's swan, golden plover, hen harrier and marsh harrier. Generally, overwintering Bewick's swan and golden plover have strong associations with arable fields outside designated site boundaries, a trend that is observed across the UK. Both hen harrier and marsh harrier often hunt within ecotonal habitats, such as the border between their roosting / breeding areas and adjoining open habitats, such as grassland and arable fields.
- 6.35 Natural England have published guidance on the maximum foraging ranges of SPA bird species. Non-breeding hen harrier are in Bird Group 2 with a maximum foraging distance of 500m from the designated site boundary. The guidance highlights that, while wintering hen harrier can forage tens of kilometres from their roosts, the extensive presence of farmland within this buffer zone and the low densities of this species mean that the standard distance of 500 m relating to Bird Group 2 is acceptable. Breeding marsh harrier (Bird Group 3) are thought to forage up to 4 km from designated site boundaries but owing to the large extent of farmland being available within this zone and the low population density of this species, a reduced distance of 2 km is acceptable. However, the closest part of the SPA with suitable supporting habitats for hen harrier and marsh harrier (i.e. grazing marsh to the south-west of Colonel Body Memorial Lakes) lies approx. 3.4 km from Hastings Borough, which is relatively far beyond the maximum foraging ranges for these species. Therefore, there is no potential for the HLP to result in the loss of functionally linked habitat for hen harrier and marsh harrier.
- 6.36 Both Bewick's swan and golden plover are associated with maximum foraging ranges that could involve farmland and / or wet grassland in Hastings Borough. For example, golden plover (Bird Group 5) may travel between 15-20 km from their roosts to lowland farmland, although it is unlikely that the loss of habitat parcels beyond 10km would significantly affect this species at the population-level. Bewick's swan (Bird Group 6) have a maximum foraging range of 10 km, which has been established using WeBS and BirdTrack data and has a high degree of confidence. Each residential and employment site allocated in the HLP was assessed for its potential to be functionally linked foraging habitat for designated Bewick's swan and golden plover (see Table 4).

Table 4: Assessment of sites allocated in the HLP for their potential to represent functionally linked habitat to the Dungeness, Romney Marsh and Rye Bay SPA.

Site Allocation	Site Area (ha)	Habitats	Approximate Distance to SPA (km)	Commentary	Potential Loss of Functionally Linked Habitat
HS1 Land adjacent to Sandrock Park, The Ridge	3.9	Semi-improved grassland, treelines	2.9	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA	No
HS2 Seaside Road, West St Leonards	2.2	Brownfield development, some degraded grassland	<0.1	Surrounded by housing and industrial development, but adjoins the foreshore of the SPA, open sight- and flightlines from / to SPA. However, this part of the SPA is primarily designated for its open water habitat, rather than intertidal roosting and foraging areas.	No
HS3 Former Westerleigh School, Hollington Park Close	2.7	Some brownfield development, amenity grassland, tree clusters	1.2	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA	No
HS5 Former West St Leonards Primary School, Bexhill Road	3.5	Semi-improved grassland, treelines	0.3	Situated amidst dense urban development (housing, railway line); interrupted sight- and flightlines from / to SPA.	No
HS6 Ore Valley (Former Power Station)	2.4	Primarily scrub, trees and rough grassland	1.4	Unsuitable habitat types	No
HS7 Former Post Office and University of Brighton Building	<0.1	Brownfield development	0.2	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA.	No
HS8 Mayfield E, Bodiam Drive	1.1	Semi-improved grassland, shrubs, tree clusters	2.4	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA.	No
HS10 Land at Rock Lane	1.2	, semi-improved grazing land	2.1	Situated amidst development with housing or other development surrounding most boundaries; interrupted sight- and flightlines from /	No

Site Allocation	Site Area (ha)	Habitats	Approximate Distance to SPA (km)	Commentary	Potential Loss of Functionally Linked Habitat
				to SPA due to dense tree lines or built development.	
HS11 Cinque Ports Way	0.7	Brownfield development	<0.1	Open sight- and flightlines from / to SPA, but no suitable habitat for bird species and site area under 2ha.	No
HS12 Gambier House, 111 West Hill Road and West House, 115 West Hill Road	0.6	Brownfield development	0.1	Relatively open sight- and flightlines from / to SPA, but no suitable habitat for bird species and site area under 2ha.	No
HS13 Land North-West of Winchelsea Lane	0.9	Predominantly semi-improved grassland	2.2	Relatively open sight- and flightlines from / to SPA, but site area under 2ha.	No
Policy HS18: Land at Tilekiln Farm	6.29	Predominantly semi-improved grassland	0.7	Relatively narrow strip (100 m wide) with tree-line along the Bourn Stream interrupting sightlines to the SPA. Land between this location and SPA has clearer sight-lines	No
Policy HS20: Former West Hill Road Reservoir	0.23	Predominantly scrub	0.1	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA.	No
Policy HS21: Land East of Rock Lane	0.72	Predominantly semi-improved grassland	2.3	Relatively open sight- and flightlines from / to SPA, but site area under 2 ha.	No
Policy HS23: Land East of Beaney's Lane, The Ridge	0.40	Predominantly semi-improved grassland, treelined to southeast	4	on the edge of dense urban development, a transition zone; interrupted sight- and flightlines from / to SPA, site under 2.0 ha	No
Policy HS25: Former Convent of Holy Child Jesus, Magdalen Road (Regeneration Area R2)	4.76	Semi improved grassland with existing developed land (buildings)	0.1	Situated amidst urban development; interrupted sight- and flightlines from / to SPA.	No

Site Allocation	Site Area (ha)	Habitats	Approximate Distance to SPA (km)	Commentary	Potential Loss of Functionally Linked Habitat
Policy HS26: Site of Four Courts, Stonehouse Drive	N/A	Currently a high rise estate which will be incrementally demolished and replaced.	2.1	Currently developed land amidst urban development; interrupted sight- and flightlines from / to SPA	No
Policy HS27: My Lodge Way, The Ridge	1.29	single dwelling surrounded by woodland	5.6	Site area less than 2 ha, habitats unsuitable for SPA birds and dense scrub provides poor sightline and flightlines to the SPA	No
HSS5: Land at Chiltern Drive	0.2	Building, shrubs and short grassland	1.5	Site area less than 2 ha, habitats unsuitable for SPA birds and dense scrub provides poor sightline and flightlines to the SPA	No
HSS8: Former Hollingsworth Garage, Braybrooke Road	0.4	Brownfield development, degraded grassland, tree cluster	0.7	Situated amidst dense urban development (housing and railway line); interrupted sight- and flightlines from / to SPA.	No
HSS13 The Green	0.11	Brownfield development	1.3	Situated amidst urban development; interrupted sight- and flightlines from / to SPA, site less than 2 ha.	No
HSS14: Former Hillesden Mansions 7-11 Chapel Park Road	0.11	Brownfield development	0.5	Situated amidst urban development; interrupted sight- and flightlines from / to SPA, site less than 2 ha.	No
HSS16: Mayfield Farm	0.48	Largely wooded area with semi improved grassland	2.4	Predominantly woodland with urban development surrounding it, interrupted flight- and sightlines to SPA	No
TP1 Land South of Crowhurst Road	0.2	Greenfield site	2.2	Too small in area to be of value and unsuitable habitat being made up from spoil from the development of the road (Queensway).	No
TP2 Land at Tilekiln Lane		Greenfield site	2.4	Woodland on the edge of urban development	No
D1 Land at Breadsell	Not determined	Farmland with woodland to the south	4.1	Land suitable habitat for Bewick's swan and golden plover; however, tree lines at the edge of the land	No

Site Allocation	Site Area (ha)	Habitats	Approximate Distance to SPA (km)	Commentary	Potential Loss of Functionally Linked Habitat
				parcel to the south impact sight lines and direct route to the SPA (coast) is covered by the settlement of Hastings itself. Moreover, while the allocation is 4.1km from the SPA boundary that boundary applies to the marine part of the SPA which was added mainly to protect marine foraging waters for terns. The nearest part of the SPA with a significant population of Bewick swan or golden plover is in the vicinity of Winchelsea more than 10km to the east.	
ES1 Queensway North, Queensway	4.7	Degraded grassland, shrubs, tree clusters, and some hardstanding	3.6	Wider context involves an industrial estate, the dense tree and scrub belts on the site render it unsuitable for SPA birds and interrupt sight- and flightlines from / to SPA.	No
ES2 Site PX, Churchfields	0.6	Grassland and trees	3.0	Unsuitable habitat	No
ES3 NX2 Sidney Little Road, Churchfields Estate	0.3	Degraded grassland, tree clusters	3.3	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA. No suitable habitat for birds and site area <2ha.	No
ES4 NX3 Sidney Little Road, Churchfields Estate	0.2	Degraded grassland, tree clusters	3.2	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA. No suitable habitat for birds and site area <2ha.	No
ES5 Adjacent Unit C, 1-8 Brook Way	0.2	Brownfield development	2.1	Situated amidst dense urban development; interrupted sight- and flightlines from / to SPA. No suitable habitat for birds and site area <2ha.	No
ES6 UK Power Networks,	1.6	Brownfield development	1.9	Situated amidst dense urban development;	No

Site Allocation	Site Area (ha)	Habitats	Approximate Distance to SPA (km)	Commentary	Potential Loss of Functionally Linked Habitat
Hastings Main, The Ridge / Ivyhouse Lane				interrupted sight- and flightlines from / to SPA. No suitable habitat for birds and site area <2ha. Overhead lines may make the site less suitable.	
ES7 Ivyhouse Lane, Northern Extension	5.4	Grassland and trees and scrub	2.5	Situated to the north-east of the Hastings borough interrupted sight- and flightlines from / to SPA. . Unsuitable habitat.	No
ES8 Land at the junction of Ridge West and Queensway	3	Degraded grassland, tree clusters	4.4	Situated amidst urban development at a wider scale; interrupted sight- and flightlines from / to SPA due to dense tree belts on most sides and with dense tree and scrub growth within parts of the parcel reducing sightlines.	No
ES10 Marline Fields, Enviro21 Business Park, Land West of Queensway	1.5	Semi-improved grassland, treelines	3.3	Situated to the north-west of the Hastings conurbation, surrounded by dense tree belts and with industrial development to the south, interrupted sight- and flightlines from / to SPA. Site area <2ha.	No

6.37 A suite of parameters influences the potential suitability of a development site as functionally linked habitat, including distance to the designated site boundary, habitat type, area (sites under 2ha are unlikely to be sufficiently large to harbour 1% of the designated population, the common threshold used in identifying functional linkage) and degree of openness (which affects sight- and flightlines to and from the site). As highlighted in Table 4, none of the allocated sites meet the criteria for functional linkage, due to 'failing' one or a combination of these parameters.

6.38 The conclusions reached in the above appraisal are unsurprising, given that the Borough of Hastings is a relatively small authority (29.72km²) with a high population density (3,300 people/km²). Sufficiently large tracts of agricultural land or wet grassland with the required degree of openness are, therefore, very scarce. The most suitable off-site foraging habitats within Hastings Borough are the Filsham Reedbeds Nature Reserve and Marline Valley Nature Reserve, both of which lie beyond the maximum foraging ranges of Bewick's swan and golden plover and would involve traversing a densely developed conurbation. Moreover, large tracts of suitable supporting habitat are available much closer to the SPA in Rother District, which are likely to be preferred by qualifying birds in an effort to reduce energy expenditure.

6.39 Overall, in light of the evidence presented in this section, it is concluded that there will be no LSEs of the HLP on the Dungeness, Romney Marsh and Rye Bay SPA regarding the loss of functionally linked habitat, alone and in-combination. This impact pathway is screened out from AA.

7. Appropriate Assessment

7.1 Recreational Pressure

7.1.1 Dungeness, Romney Marsh and Rye Bay SPA and Dungeness SAC

- 7.1 The Dungeness Complex is an extensive coastal area that comprises a range of qualifying SPA birds, their supporting habitats and qualifying SAC habitats. Natural England's SIP identifies public access / disturbance as a pressure and threat to the complex. In relation to the Dungeness SAC it states that *'public access throughout the SAC allows direct access to the vegetated shingle. The resultant trampling disturbs and damages the SAC habitats Annual Vegetation of Drift Lines (AVDL) and Perennial Vegetation of Stony Banks (PVSB) Annex 1 habitats (vegetation) all year round.'* Furthermore, SPA birds are at risk of disturbance during the breeding (Mediterranean gull, common tern, little tern) and overwintering (Bewick's swan, shoveler) seasons. The reproductive success of breeding birds can be significantly impacted by recreation through reduced egg incubation times, chick provisioning and, ultimately, nest abandonment. Public access onto feeding and roosting areas on the intertidal foreshore can result in increased energy expenditure and reduced foraging times, affecting the physical condition of birds prior to their spring migration back to summer breeding grounds. The SIP highlights off-lead dog walking, sand yachting, kite boarding and windsurfing as the recreational activities with the highest disturbance potential. Whether human disturbance causes a detrimental impact on SPA birds, especially at the population level, is a complex issue, with considerable inter-individual and inter-species differences in responses to disturbance.
- 7.2 For example, the area around Rye Harbour is very important for a range of designated overwintering species, as well as being the primary location in the Dungeness Complex for ground-nesting little tern, sandwich tern, common tern and Mediterranean gull. It has the highest most recent 5-year Wetland Bird Survey (WeBS) count in the complex and acts as an important refuge area for birds disturbed from other nearby areas (e.g. Winchelsea and Camber). Rye Harbour Reserve also includes areas of coastal vegetated shingle and Atlantic saltmarsh, both qualifying features of the Dungeness SAC. Four main locations provide access to this part of the Dungeness Complex, including the main car park at the end of Harbour Road (180 parking spaces), Winchelsea Beach, the track from Ternery Pools and Rye Harbour Caravan Park. Rye Harbour Reserve receives a high volume of 300,000 visitors each year, with most of these (64.8%) using the car park as their gateway to the site. Importantly, large areas within Rye Harbour Local Nature Reserve (LNR) have electric fencing in place that protects the breeding birds and saline lagoons. However, access to the foreshore area is unrestricted, resulting in recreational impacts to vegetated shingle and saltmarsh habitats (both SAC features), and foraging / roosting overwintering birds (SPA features).
- 7.3 To provide a baseline on recreation patterns in the Dungeness, Romney Marsh and Rye Bay SPA, a visitor survey was commissioned and undertaken in 2014 / 2015. This survey covered several key locations within SSSI sites underpinning the SPA designation, including Rye Harbour, Camber West, Camber Central / Main, Broomhill, RSPB Reserve, Dungeness Point, Lade and Greatstone. Overall, a total of 1,099 interviews were completed, complemented by an online survey to capture more specialist site users that may not be present on-site when the survey was undertaken.
- 7.4 Interviewees provided dog walking as the single most popular activity (29%; with dog walking not being permitted at Dungeness RSPB), followed by walking (22%). Dog walkers tended to visit more frequently (with approx. 50% frequenting the SPA once a week or more) than visitors undertaking other recreational activities. Marked seasonal differences in recreational patterns were also observed. The main summer activity provided by interviewees was 'visiting the beach' (23.7%), followed closely by dog walking (23%). In winter, a much larger proportion of interviewees visit the site for dog walking (48.3%).
- 7.5 The Sustainable Access and Recreation Management Strategy (SARMS) that has been developed jointly by Folkestone and Hythe District Council and Rother District Council is informed by data collected in the Phase 1 Visitor Survey. The SARMS divides the Dungeness Complex into different Sub-Areas, including the Pett Level and Pannel Valley (Sub-Area 1), Rye Harbour Reserve (Sub-Area 2), Camber and Broomhill (Sub-Area 3), Dungeness Point (Sub-Area 4), Romney Marsh and Lade Foreshore (Sub-Area 5)

and Romney Marsh (Sub-Area 6). The Pett Level and Pannel Valley comprises an area of low-lying grazing marsh north of the coast between Pett Level and Winchelsea Beach. Considering that the likelihood of visiting a site (particularly when considering frequent visitors) is primarily dictated by distance to home, it would be reasonable to assume that Sub-Area 1 is most likely to be visited by people living in Hastings Borough. While Sub-Area 1 adjoins Hastings Borough, Pett Level Car Park (the location most likely to be used as a stepping stone for visiting this part of the SPA) lies approx. 2.9km from the Hastings Borough boundary. However, since the Phase 1 Visitor Survey did not cover this Sub-Area, there are currently no data on the visitor number and origin in this part of the SPA. However, anecdotal evidence from the Pett Level Preservation Trust and locals indicates that visitor numbers within the Level are low (with ditches limiting any activities away from the Public Rights of Ways [PRoWs]) and slightly more visitors to the seawall / foreshore.

- 7.6 Visitor data indicate that there is considerable variability in the 'busyness' of the SPA. For example, Camber West and Camber Central (both in Camber and Broomhill Sub-Area 3) were the busiest survey points with 185 and 163 recorded interviews. In contrast, only 88 interviews were conducted at Broomhill, although it being located in the same Sub-Area. While Broomhill Car Park offers direct access onto the Camber to Broomhill Foreshore, the lower visitor number in this part of Sub-Area can most likely be explained by the absence of facilities (e.g. toilets, café). With 158 completed interviews, Rye Harbour Reserve (Sub-Area 2), the second most likely destination for Hastings Borough residents based on proximity to home, had intermediate levels of visitor pressure compared to the other survey points.
- 7.7 The work undertaken in the Phase 1 Visitor Survey also encompassed a delineation of a core recreational catchment. Its primary purpose is to identify the geographic area within which the delivery of new housing is expected to materially contribute to the recreational burden within a Habitats Site and likely to contribute to an in-combination adverse effect on the integrity of its qualifying features. Strategic mitigation schemes typically use the 75th percentile of interviewees (in terms of distance travelled from home) as a threshold to define a core catchment. However, there is considerable variability in the visitor pool that is included in the analysis, with some approaches excluding holiday makers (i.e. using visitors that are on a day trip from home only) or considering interviewees visiting at least once a week only (i.e. excluding interviewees that only visit occasionally). The Phase 1 Visitor Survey in the Dungeness, Romney Marsh and Rye Bay SPA used the 90th percentile of regular visitors visiting at least once a week in its analysis. This approach was adopted due to the very large recreational catchment of 90km when considering 75% of all visitors (many of which are likely to be on holidays and do not regularly visit the Dungeness Complex) and to account for the disproportionate negative ecological impact that regular visitors are likely to have compared to occasional holiday makers.
- 7.8 The maximum distance travelled by 90% of regular visitors was 20km, with particular concentrations of visitor origins from within 10km of key settlements. Moreover, 94.6% of these visitors lived in the Districts of Folkestone and Hythe or Rother (particularly in Greatstone, Lade and Lydd-On-Sea), with only a few, isolated postcodes from Hastings Borough. Overall, while Hastings Borough falls within the indicative 20km core recreational catchment of the SPA, its contribution to recreational pressure is exceedingly low and unlikely to materially contribute to any adverse in-combination effects on qualifying SPA birds. This is corroborated in the HRA of the Rother Local Plan, which also established that housing outside the authorities of Rother and Folkestone and Hythe would not meaningfully contribute to recreational disturbance impacts in the Dungeness Complex.
- 7.9 Given that Hastings Borough lies only approx. 2.3km to the south-west of the westernmost section of the Dungeness Complex, it is probable that the new housing to be allocated in the HLP will lead to a small in-combination increase in the recreational burden along the Dungeness coastline. Therefore, HBC liaised with Rother District Council over any potential need to become a signatory to the SARMS, which is the strategic approach to mitigating recreational pressure in the Dungeness Complex.
- 7.10 Following these discussions, it was agreed that it was not necessary to the effective implementation of the SARMS for HBC to participate. Given its exceedingly small contribution to recreational pressure within the Dungeness Complex (approx. 5% of all visitors), it was considered that placing a financial burden on housing development within Hastings Borough would be disproportionate to its relative impact. The SARMS is and continues to be overseen and delivered by the two authorities within which the Dungeness Complex lies, Rother and Folkestone and Hythe, with partner organisations such as Natural England and other third parties including landowners also being involved.

- 7.11 It is noted that Combe Valley Countryside Park (CVCP; renamed from Pebsham Countryside Park in 2012) constitutes a major recreational resource between Bexhill and Hastings. The CVCP is being managed by a not-for-profit community interest company (CIC) who are continually developing informal recreation and community engagement in the Combe Valley area. The CIC will continue to oversee the development and management of the CVCP over the HLP period. The CVCP will provide positively for the local economy and community, and for the health and wellbeing of individuals in Rother, Hastings and wider East Sussex. This will maximise its contribution as an environmental asset and is likely to further reduce the relatively small number of new visitors to the Dungeness Complex resulting from the HLP.
- 7.12 Overall, given the very small contribution of Hastings Borough to the in-combination recreational burden in the Dungeness Complex and the availability of other attractive recreational destinations within or adjoining the borough, it is concluded that the HLP will not result in adverse effects on the integrity of the Dungeness, Romney Marsh and Rye Bay SPA and Dungeness SAC regarding recreational pressure, alone and in-combination.

7.2 Water Quality

7.2.1 Dungeness, Romney Marsh and Rye Bay SPA

7.2.1.1 Sewage Effluent

- 7.13 Like all freshwater, estuarine and coastal Habitats Sites, the Dungeness, Romney Marsh and Rye Bay SPA is sensitive to negative water quality changes resulting from the discharge of treated sewage effluent from WwTWs. The qualifying non-breeding and breeding bird species in the SPA are predominantly indirectly sensitive to water pollution, via changes to the structure of their food webs. For example, elevated phosphorus and nitrogen concentrations in effluent can lead to macroalgal blooms, triggering reduced DO concentrations, as well as changes in the composition of plant and invertebrate communities. If DO concentrations reduce dramatically, this can result in the death of aquatic vertebrates (e.g. fish) that are the primary foraging resource of common tern and little tern.
- 7.14 Natural England's SIP lists water pollution as a general threat to the SPA. It states that '*across the site historically, there has been a reliance on soakaway facilities. Southern Water installed on-line sewage facilities in early 2000s. Private connection to the new system by householders has been slow in take up. Data gathered by the EA shows diffuse pollution moving landward from the housing at Greatstone. This could be impacting the SPA lakes, and requires further investigation.*' However, this particular issue relates to a section of the SPA that lies north of Dungeness and there is no potential for urban development in Hastings Borough to impact these lakes due to a lack of hydrological connectivity.
- 7.15 The Environment Agency Catchment Data Explorer identifies two main waterbodies that are relevant to Hastings Borough, the Combe Haven between Powdermill Stream confluence and Coast (a section of river in the Combe Haven Operational Catchment) and Sussex East (coastal waters in the East Sussex Coast Operational Catchment). Cycle 3 water quality data indicate that this section of the River Combe Haven has 'poor ecological status', due to a 'poor' classification in relation to macrophytes, fish and DO. Although these parameters are often linked to high phosphorus concentrations in freshwater systems, the river achieved a score of 'good' for phosphorus. The Sussex East coastal waters are classified as having 'moderate ecological status', with scores of 'high' for DO and 'good' for invertebrates. The primary reason for the moderate ecological status of the coastal waters is the low quality of water in tributaries flowing into the coastline. The water industry is not identified as a Reason for not achieving Good Status for either of the waterbodies. Notwithstanding this, due to the existing poor and moderate ratings for water quality, the discharge of treated sewage effluent is discussed further in this HRA as a precautionary measure.
- 7.16 The target of improving the quality of freshwater bodies and coastal waters inevitably means that protective policy mechanisms for emerging development plans are needed, particularly when considering the in-combination growth across the authorities of Hastings, Rother and Folkestone and Hythe. Numerous WwTWs along this coastline discharge into the English Channel (e.g. Hastings WwTW, Rye WwTW, Lydd WwTW, Littlestone WwTW and Hythe WwTW) and a substantial increase in the volume of nitrogen in treated wastewater could have a cumulative effect on basal communities in the marine food web. However, tidal mixing and dilution processes should also be taken into account, which help counteract eutrophication.

- 7.17 Consented discharges from WwTWs (both in terms of volume and concentration of pollutants) are regulated by the Environment Agency's Review of Consents (RoC) process, which aims to ensure that the quality of the aquatic environment is safeguarded and the Conservation Objectives of Habitats Sites are met. Provided that these water quality limits are not exceeded, each WwTW has an available headroom within which future housing development can be permitted without constraints. However, if the allocated headroom would be exceeded by Local Plan growth, then wastewater treatment infrastructure must be upgraded (typically in the form of secondary or tertiary water treatment) before further housing can be consented.
- 7.18 Sewage in the borough, including all residential and commercial effluent, is treated by the Hastings WwTW. The technological processes utilised in the WwTW include screening and grit removal facilities, lamella primary settlement tanks, aeration tanks, final settlement tanks, sludge thickening and digestion plant, and primary and secondary treatment stages. While no Water Cycle Study is available for the area covered by Hastings Borough, Southern Water have published a Drainage and Wastewater Management Plan (DWMP) for the Bexhill and Hastings wastewater system. The Hastings WwTW at present serves a population equivalent of 141,300, comprises 1,225.2km of sewerage pipes and discharges into the English Channel via two long sea outfalls. The Baseline Risk and Vulnerability Assessment (BRAVA) lists and rates the likelihood of water quality threats arising from the wastewater treatment infrastructure serving Hastings Borough. **Importantly, it identifies that there is no significant risk associated with WwTW water quality compliance failure by 2050. This confirms that there is sufficient available headroom to accommodate the growth allocated in the HLP, in-combination with the growth that will be delivered in Bexhill.** Moreover, there will also be investment in improving Beauport from the draft business plan when approved by Offwat.
- 7.19 A risk of water pollution also emanates from factors other than the technological capacity at WwTWs. For example, untreated sewage effluent may escape into the environment as a result of sewer collapse risk, sewer flooding in a 1 in 50-year storm and poor storm overflow performance. Southern Water's BRAVA identifies a 'very significant' risk of sewer collapse, with more than 9.44 collapse incidents per 1,000km per year. Sewer collapse is seen as an operational driver, because it occurs due to the old age and poor condition of the sewerage network. The Southern Water business plan identifies sewer resilience and infiltration reduction as one of the priority areas. A 'very significant' risk is also assigned to storm overflow performance, with the number of actual overflows exceeding the number of permissible annual storm discharges. Southern Water have assigned an investment strategy of 'improve' for the Hastings and Bexhill wastewater treatment network. For example, to reduce the risk of sewer collapse, the company is intending to implement a programme of targeted CCTV and electroscan surveys to identify and rehabilitate at-risk sections of the sewer network. To reduce the number and magnitude of storm overflows, further studies to explore improved storage options are identified at key locations, including the Hastings WwTW itself and several Combined Sewer Overflows (CSOs) across the sewerage network. It is considered that these interventions would reduce the occurrence of uncontrolled pollution events and better equip the wastewater treatment infrastructure to cope with the in-combination growth anticipated in its catchment.
- 7.20 Notwithstanding the above, it is considered important that the HLP comprises an adequate policy framework that protects the quality of waterbodies in Hastings Borough from impacts associated with the discharge of treated sewage effluent. It is understood that Hastings Council have been advised by Southern Water that they foresee no capacity issues. Nonetheless, following AECOM advice in the draft version of this HRA, the following protective policy wording has been incorporated into Policy SC18 (Pollution and Hazards) to ensure that appropriate wastewater infrastructure is in place prior to new residential developments being occupied: '...ensure that the necessary wastewater treatment infrastructure is in place prior to new development being occupied. Mitigation may be required to ensure the available headroom within necessary infrastructure is in place.
- 7.21 Following the inclusion of the above policy wording in the HLP, and ensuring that any emerging evidence in relation to water quality issues in the SPA and wastewater treatment infrastructure continues to be monitored, it is concluded that the emerging HLP will not result in adverse effects on the integrity of the Dungeness, Romney Marsh and Rye Bay SPA regarding water quality.

7.3 Water Quantity, Level and Flow

7.3.1 Dungeness, Romney Marsh and Rye Bay SPA

7.3.1.1 Surface Run-Off

- 7.22 All qualifying bird species in the Dungeness, Romney Marsh and Rye Bay SPA are sensitive to changes in the water quantity, level and flow within their supporting habitats. Fluctuations in the hydrological regime can have various, largely indirect, impacts on SPA / Ramsar birds, such as affecting the ecological integrity of saltmarsh used for grazing, changes in salinity gradient and / or turbidity, and the volume of available aquatic habitat. Ultimately, all significant alterations in hydrological regime may influence the ability of bird species to feed adequately, because this can affect the abundance and diversity of plant and invertebrate communities. For example, Bewick's swan, golden plover and shoveler all require damp conditions or standing water at their foraging sites and a change in these conditions are likely to decrease the suitability of supporting habitats.
- 7.23 The development allocated in the emerging HLP has the potential to alter the water supply to the SPA via two pathways. For example, an increase in the coverage of impermeable urban surfaces might result in higher volumes of surface run-off rates from development allocations in Hastings Borough. Generally, increased surface run-off is only considered to be a risk factor at distances of up to 500m between developed sites and ecological receptors. While the freshwater components of the SPA (i.e. the part of the SPA to the east of Hastings Borough) lie beyond this zone of impact, the coastal SPA waters adjoining the south of the borough lie in close proximity to some of the allocated sites. Therefore, unmitigated surface run-off due to the HLP may have the potential to impact habitat conditions in this part of the SPA, which would predominantly pose a risk for foraging common tern and little tern.
- 7.24 A review of sites allocated in the HLP, indicates that several are proposed within 500m of the coastline (see Table 5). Based on their proximity to the SPA, it is considered that these allocations are associated with the highest risk of surface run-off as a result of the proliferation of impermeable surfaces.

Table 5: Residential sites allocated within 500m of the Dungeness, Romney Marsh and Rye Bay SPA.

Policy	Allocation Name	Distance to Dungeness, Romney Marsh and Rye Bay SPA
HS2	Seaside Road, West St Leonards	<0.1
HS5	Former West St Leonards Primary School, Bexhill Road	0.3
HS7	Former Post Office and University of Brighton Building	0.2
HS11	Cinque Ports Way (former Stamco timber yard)	<0.1
HS12	Gambier House, 111 West Hill Road and West House, 115 West Hill Road	0.1

- 7.25 Typically, the primary means of mitigating hydrology-related impacts of urban development is the deployment of adequate on-site Sustainable Drainage Systems (SuDS). In the current version of the HLP, the policies for all above listed sites include some protective wording in relation to drainage. For example, the supporting text of **Policy HS11 (Cinque Ports Way)** acknowledges that the site lies within Zone 3 for tidal and fluvial flood risk and the policy states that '*supported by a Flood Risk Assessment and detailed drainage strategy that incorporates measures to address flood risk. This should include improvements to the sea wall and contributions to ongoing maintenance in light of tidal and fluvial flood risk which should be secured by legal agreement. This site has a high groundwater table and drainage design should be informed by onsite monitoring. Any improvements to sea defences should also take account of their impact upon Impact Risk Zones for Dungeness, Romney Marsh and Rye Bay SPA marine area and the Beachy Head East MCZ and mitigate any harms caused.*' The policy wording for other allocations in close proximity to the SPA make similar references to requirements for Flood Risk Assessments.

Notwithstanding this, there are no specific references to SuDS requirements in any of the allocation policies, particularly with regard to limiting run-off to greenfield rates.

- 7.26 However, important references to SuDS are included in **Policy SC16 (Flood Risk and Drainage)** and all sites, unless otherwise specified, are covered by this policy. The policy specifies that:

“Proposals must incorporate Sustainable Drainage Systems (SuDS) designed in line with National Standards for SuDS and manage surface water run off to ensure there is no increase to runoff rates and flood risk is not increased elsewhere.

Major developments should ensure that water management and drainage systems form an integral part of the built form and landscape design⁷⁹, and seek to safeguard existing natural or engineered surface water management measures and drainage routes.

Proposals involving the loss of existing water bodies, water storage or drainage systems will be resisted. To prevent the long-term impacts of cumulative loss:

- *New areas of hardstanding must include or be offset by appropriate compensatory drainage to keep runoff to greenfield rates;*
- *The council will only support applications for parking in front or rear gardens where at least 50% soft landscaping is retained.*

Drainage designs must consider the impact on flood risk and land stability from the earliest stage in development master planning following the National Standards for SuDS. Evidence, of a sufficient level of detail to the stage in planning, of the following will be required in support of any application:

- *Drainage designs should follow the National Standards for SuDS including the hierarchy standard when determining an appropriate means of surface water drainage. However, use of surface water drainage to ground (infiltration) will not usually be considered suitable within the borough due to local ground conditions and the risk of land instability. Use of any infiltration to manage surface water drainage must, at minimum, be supported by appropriate infiltration test results, ground condition surveys and land stability assessments which consider the impact increased ground saturation caused by infiltration drainage could have on and offsite; and,*
- *All drainage designs must provide evidence that all potential infiltration, including infiltration from source control assets and exceedance events, has been considered in relation to land stability impacts, both on and offsite; and,*
- *All drainage designs that propose discharge offsite must attenuate and release at predevelopment rates; and,*
- *Drainage to watercourses must only discharge into its natural drainage catchment.*

Drainage designs must consider discharge locations and any connection permissions from the earliest stage in development master planning. Evidence of the following will be required in support of any application:

- *That any proposed discharge locations have been identified, and those requiring third-party approval/ agreements have been identified, and,*
- *An agreement in principle to connect to the proposed discharge point(s) from the appropriate third-party has been obtained. This must be provided prior to the determination of planning, and,*
- *Drainage designs which propose to discharge to a public surface water sewer must also:*
- *Engage with the sewerage provider at the earliest opportunity to ensure there is available capacity, and the proposed connection point is acceptable, and,*
- *Provide evidence that the sewerage provider will accept the Greenfield 50% AEP runoff rate in line with national policy or has set a lower allowable discharge rate into the sewer.*

Proposals must not negatively impact on the functionality of the surface water drainage system, nor prevent future maintenance or enhancement work from taking place.”

⁷⁹ GBI study 6.5.4 (role of boundary treatments); and P46 ‘integrate water management systems’

- 7.27 Importantly, the policy also identifies that Change of Use applications that would result in a net increase of greywater should seek to capture equivalent volumes of surface water to preserve sewer capacity through the use of SuDS (e.g., detention basins, swales, tanks, rain gardens, blue roofs).
- 7.28 Overall, it is considered that the emerging HLP comprises an adequate protective policy framework to mitigate any impacts of development in relation to surface run-off. Therefore, there will be no adverse effects of the HLP on the integrity of the Dungeness, Romney Marsh and Rye Bay SPA regarding this aspect of water quantity, level and flow.

7.3.1.2 Water Abstraction

- 7.29 The second main way in which the HLP might alter the water level in the Dungeness, Romney Marsh and Rye Bay SPA is through the extraction of potable surface water and / or groundwater for the public water supply. If regional water resources were sufficiently depleted (which is the case across many parts of the UK), any additional abstraction would likely lead to a reduction in freshwater supply to the SPA, with potential knock-on effects on its plant and invertebrate communities, as well as the amount and quality of foraging habitat available to SPA birds. The HLP sets an at least housing target of 2,970 net new homes, with the potential for more homes to come through allocated sites (Further potential existing for housing delivery is provided through Regeneration Areas R1 and R3 and Development Potential Area D1) with an average occupancy of 2.4 people per household. Given that future water efficiency targets aim at a water consumption of 100 litres per person per day (lpppd), with a stretch target of 85 lpppd water efficiency to reduce the burden on water abstraction. The HLP is expected to result in an additional water consumption of 712,800 litres per day from residential uses alone (this being a baseline forecast).
- 7.30 Natural England's SIP for the SPA highlights inappropriate water levels as a threat to the integrity of the SPA. It states that '*Water levels across the grazing marsh areas potentially impact habitats supporting birds using the site. Feeding and roosting areas in winter. Breeding areas for waders, reedbed birds and sea birds. Infrastructure to help manage water levels in the complex ditch network, including the Royal Military Canal, across the grazing marsh habitat is critical for the fine balance of water levels and movement of water across the site. Great crested newt breeding ponds are scattered across the SAC designation and would be seriously impacted if water levels were reduced to the point of drying out ponds permanently.*' The SIP also discusses that the current Water Level Management Plan for the Walland Marsh Area should be reviewed with the potential to include Denge and Romney Warren. While some of the hydrological issues within the SPA and SAC appear to be caused by inadequate water management infrastructure, it is also evident that increased abstractions from freshwater resources in hydrological continuum with the Dungeness Complex are likely to further impact the hydrological balance within the site.
- 7.31 The volume of water available for abstraction is determined by the interplay of various factors, such as existing flow volumes, seasonality, variability in rainfall and specific ecological requirements in different hydrological catchments. The Environment Agency publishes Abstraction Licensing Strategies (ALS) for all catchments in England, which balances the needs of the environment (through the Ecological Flow Indicator, EFI) and the Fully Licensed (FL) scenario (which assumes that all abstraction licenses are utilised at full capacity and provides a current 'worst-case' permissible scenario). Resource availability in different catchments is calculated for flow scenarios Q95 (lowest), Q70, Q50 and Q30 (highest), which ensures that environmental needs are considered under different hydrological regimes. The ALS for the Rother catchment identifies that water across most of the catchment is not available for licensing in the Q70 and Q95 scenarios. Moreover, even under high flows (Q30) water is not available for licensing in the part of the catchment draining into the grazing marshes of the Dungeness, Romney Marsh and Rye Bay SPA. This is corroborated by data from Assessment Points (APs) in the River Brede and River Rother, which shows that consumptive abstraction may be available only 30% of the time and 200 days annually.
- 7.32 Southern Water is the company that is responsible for supplying potable water to homes and businesses in large parts of south-east England. The company's strategic approach to water management is outlined in the WRMP19, covering the years between 2020 and 2070. Southern Water provides water services to 2.6 million customers across an area of 4,450km². Water supplies are largely reliant on groundwater sources (70%) from the underlying chalk aquifer. River abstractions account for 23% of the total water supply, including the Western and Eastern Rother and River Brede (all of which permeate the freshwater habitats in the Dungeness Complex). Four surface water impounding reservoirs contribute the remaining 7% of the water supplies, including the Bewl Water, Darwell, Powdermill and Weir Wood. Southern Water's supply area is divided into 14 Water Resource Zones (WRZs; areas within which common water

resources are shared and customers have the same risk of loss of supplies). Hastings Borough lies within the Sussex Hastings WRZ, in which most of the water supply is derived from impounding reservoirs.

- 7.33 When considering the need for introducing new supply options (including, potentially, from freshwater sources in hydrological connectivity with the Dungeness Complex), the most important parameter that requires consideration is the supply-demand balance over the WRMP period. This identifies whether there is a shortage in the Water Available for Use, accounting for factors such as projected growth, climate change impacts on water sources and reductions in water abstraction for sustainability reasons (e.g. to protect the integrity of Habitats Sites). Data for the 1:500 Dry Year Annual Average (DYAA) scenario presented in the WRMP indicate that the supply-demand balance at company level is in deficit for the entire plan period, increasing from -206.87Ml/d in 2030 to -588.53Ml/d in 2075. This implies that options to address this water deficit will need to be executed by Southern Water to abide by its statutory requirement to provide all customers with adequate potable water supply.
- 7.34 To achieve this, Southern Water undertook a screening of a variety of options, ranging from unconstrained, feasible to constrained. At each level of assessment, options are under increased scrutiny regarding their environmental, societal and economic impacts. As mentioned above, the Sussex Hastings WRZ lies in the company's Eastern Area, for which a range of supply-side options are proposed (although all options are not necessarily implemented under all of the modelled scenarios). These options mainly comprise bulk imports from other water companies, inter-WRZ transfers, and water recycling at recycling centres and Water Treatment Works (WTWs). It is considered that these water supply solutions are not associated with negative hydrological impacts on Habitats Sites, including the Dungeness Complex. However, Southern Water also propose several options that may change hydrological regimes in freshwater / coastal habitats, including desalination in the Thames Estuary and East Thanet. Furthermore, a potential increase in water abstraction of 1.5Ml/d is proposed at the existing Rye Wells groundwater abstraction point.
- 7.35 The HRA accompanying Southern Water's WRMP assesses potential LSEs and adverse effects on integrity associated with the supply-side options. However, it concludes that, subject to standard mitigation measures being deployed, the Rye Wells groundwater option will not result in adverse effects on the integrity of any Habitats Sites. This would include any impacts on hydrological flows within the Dungeness Complex. For the East Thanet and River Thames desalination proposal (neither of which have the potential to impact the Dungeness Complex due to straight-line and flowpath distances), adverse effects on the integrity of Habitats Sites are also excluded. It is considered that construction and operational impacts can be reliably mitigated using best practice, design and operational practices. Furthermore, the assessment excluded significant impacts on the basis of outfall location and experience of effluent dispersal at other desalination plants (e.g. ambient salinity levels are reached within tens of metres). The HRA concludes that Southern Water's WRMP will not result in adverse effects on any Habitats Sites.
- 7.36 Overall, given the evidence provided above, it is concluded that growth allocated in the HLP will not result in negative hydrological impacts on the Dungeness Complex due to an increased potable water requirement within Hastings Borough. Adverse effects on the Dungeness Complex in relation to abstraction-related water quantity, level and flow impacts can be excluded.

7.3.2 Pevensey Levels SAC / Ramsar

- 7.37 The Pevensey Levels SAC / Ramsar is designated for various interest features that are critically dependent on adequate water levels. For example, the little whirlpool ramshorn snail floats on the surface of freshwater ditches and lessening hydrological regimes is known to be one of the primary threats to its populations. The Pevensey Levels Ramsar is designated for its assemblage of wetland plants and invertebrates (such as Coleoptera and Odonata), all of which are strongly linked to the aquatic environment over at least part of their life cycle.
- 7.38 Natural England's SIP for the Pevensey Levels SAC highlights inappropriate water levels as the primary threat to the integrity of the site. It states that *'the site is a complex managed hydrological system. Maintaining adequate water levels (0.3cm below ditch neck) is critical to the feature. This is currently being delivered through a Water Level Management Plan to achieve appropriate water levels, which should be adequately maintained and monitored. It is uncertain how water levels will be managed following the dissolution of the Internal Drainage Board (IDB), including who will be responsible and how it will be enforced. This is critical for the maintenance of the ram's-horn snail (Anisus vorticulus) habitat and control of pennywort.'* Water levels in the SAC / Ramsar are maintained by a complex network of ditches,

sluices and active pumps, and the SIP clearly implies that a large proportion of potential impacts relate to the upkeep of the water level infrastructure across the site. At the same time, reductions in freshwater supply to the site (due to factors such as increased abstraction rates) may further reduce the amount of suitable habitat available to little ramshorn snail. If severe, reduced freshwater flow rates could result in the drying up of entire ditches and canals, resulting in the loss of entire snail populations.

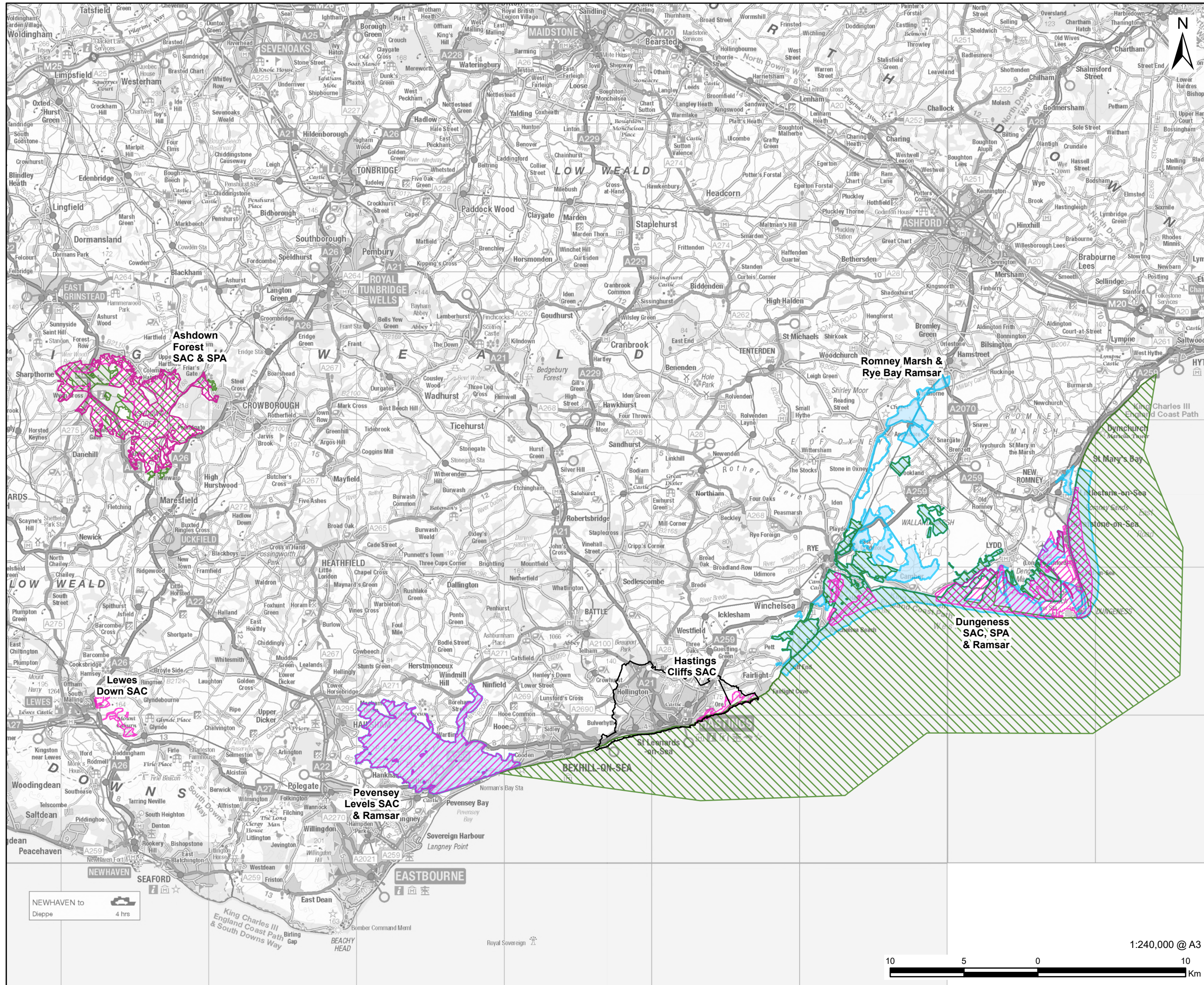
- 7.39 According to Natural England's SSSI condition assessment, all sub-units of the Pevensey Levels SSSI are in 'Unfavourable Recovering' condition. Generally, the comments for most units indicate that the SSSI provides good vegetation structure for dragonflies and other invertebrates, as well as supporting adequate hydrology through implementation of the Water Level Management Plan. Some key issues include infestations with floating pennywort in internal ditches and deficiencies in the operational water level management infrastructure. The Environment Agency ALS for the Cuckmere and Pevensey Levels catchment corroborates the importance of adequate hydrological flows for the Pevensey Levels SAC / Ramsar. While water is available for abstraction at high flows (Q95), a large proportion of the catchment has restricted water available at intermediate flow levels (Q50) and no water available at low flows (Q70 and Q95). Regarding permissible abstractions, the ALS states that *'summer levels are managed to provide water transfer around the ditch network, and low water levels are closely associated with low flows from the upstream catchments. In order to safeguard flow and prevent ecological deterioration, water availability in the Pevensey Haven has been over-ridden to match that of the feeder streams.'*
- 7.40 Due to the distance between Hastings Borough and the SAC / Ramsar boundary (5.2km), LSEs in relation to surface run-off from development allocations on hydrological flows within the Habitats Sites were excluded at the Screening stage. The primary mechanism through which the HLP could impact the designated fauna of the SAC / Ramsar is through abstraction of potable water. As highlighted in the previous section on the Dungeness Complex, potable water supply in Hastings Borough is supplied by Southern Water. The supply-demand forecast for the geographic areas served by Southern Water is forecast to be in deficit across the entire plan period, culminating in its highest deficit in 2075 (- 588.53Ml/d). Therefore, a range of supply and demand management options will need to be implemented to meet the anticipated water demand across the company's catchment.
- 7.41 Southern Water's WRMP has been subject to HRA, which considered the in-combination impact of WRMPs of other water companies and development plans of authorities adjoining Hastings Borough. However, the HRA does not identify the Pevensey Levels SAC / Ramsar to be at risk from any of the constrained options included in the WRMP. Importantly, the SAC / Ramsar lies in a different groundwater and surface water catchment to the supply-side options taken forward by Southern Water (desalination and groundwater abstraction). The River Rother and R. Arun are the primary surface water abstraction sources in the Eastern Area, neither of which are hydrologically connected to the Pevensey Levels. It should also be noted that all new water sources or increases to existing abstraction consents are considered under the Environment Agency's Review of Consents process. This acknowledges the Conservation Objectives and qualifying features, and sets abstraction volumes that will not lead to adverse effects on the integrity of Habitats Sites.
- 7.42 Overall, given the evidence presented above, it is concluded that there is no potential for an increased water demand in Hastings Borough to affect hydrological flows within the SAC / Ramsar. Therefore, the HLP will not result in adverse effects on the Pevensey Levels SAC / Ramsar regarding water quantity, level and flow.

8. Conclusions

- 8.1 This HRA assessed the potential impacts of the Reg.19 HLP on relevant Habitats Sites, including the Hastings Cliffs SAC, Dungeness Complex, Pevensey Levels SAC / Ramsar, Ashdown Forest SAC and Lewes Downs SAC. The considered impact pathways included recreational pressure, water quality, water quantity, atmospheric pollution and loss of functionally linked habitat.
- 8.2 While LSEs were excluded in relation to atmospheric pollution and loss of functionally linked habitat, the other impact pathways were taken forward to AA. However, following an assessment of the detailed scientific evidence available and with inclusion of the recommended policy wording (in relation to water quality) it was concluded that the HLP will not result in adverse effects on the integrity of the Dungeness, Romney Marsh and Rye Bay SPA, Dungeness SAC and Pevensey Levels SAC / Ramsar.

Appendix A Maps

Figure 4: Map of Habitats Sites within the Zone of Influence (Zol) of Hastings Borough.



Appendix B LSEs Screening Table of HLP Policies

Table 6: LSEs Screening assessment of policies included in the Reg.19 HLP. Where the LSEs Screening Outcome column is shaded orange, this indicates that impacts of the policy on Habitats Sites cannot be excluded and the policy is screened in for AA. Where this column is shaded green, there are no impact pathways present and the policy is screened out.

Policy Number / Name	Summary of Policy Content	Likely Significant Effects (LSEs) Screening Outcome
4. Strategic Policies		
SP1: Directing Growth	The Council's development strategy prioritises brownfield regeneration and seeks delivery of at least 2,970 net new homes over the plan period, requiring residential developments to maximise site capacity in line with density zones and resisting the underutilisation of land. It will also allocate land to provide for additional employment floorspace, promote the intensification and renewal of industrial areas, and resist the loss of viable industrial premises. Hastings Town Centre will be the main location for major office, leisure, visitor, cultural, retail and appropriate education uses, while smaller-scale development will be directed to District and Local Centres and visitor attractions focused within the designated resort area.	Likely Significant Effects (LSEs) of this policy cannot be excluded. The policy states that it will deliver at least 2,970 net new homes over the plan period and provide additional employment floorspace. The spatial distribution of development is likely to influence the magnitude and focal areas of impact pathways. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, Policy SP1 is screened in for AA.
SP2: New and Affordable Housing	The Plan seeks to deliver at least 2,970 net new homes between 2023 and 2041, with additional housing potential identified in Regeneration Areas and the Development Potential Area, while supporting policy-compliant windfall development and requiring schemes to maximise site capacity in line with density objectives. It also identifies a need for 8 permanent Gypsy and Traveller pitches, requires affordable housing of 25% on brownfield sites and 40% on greenfield sites, and expects affordable provision to be delivered on-site unless an alternative approach is agreed through viability or policy exceptions. Affordable housing should comprise 70% affordable/social rent and 30% affordable home ownership, with rented homes providing a mix of 30% one-bedroom, 35% two-bedroom, 30% three-bedroom and 5% four-bedroom-plus dwellings, while developments of 40 or more homes should support local construction jobs, training and procurement opportunities.	Likely Significant Effects (LSEs) of this policy cannot be excluded. This policy outlines that at least 2,970 net new dwellings will be delivered over the plan period, as well as additional potential arising from Regeneration Development Potential Areas. By delineating the extent of residential growth, the policy will influence several impact pathways, including the number of residents living within the core catchment of Habitats Sites (relevant to recreational pressure), the amount of sewage (relevant to water quality) and surface runoff (relevant to water quantity, level and flow) produced and extent of potential functionally linked habitat loss. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow

	Overall, Policy SP2 is screened in for AA.
SP3: Business Development – Office and Industrial The policy supports development that protects and strengthens employment land and premises, aiming to deliver 4,750 new jobs and 19,830sqm of business floorspace by 2041 on allocated employment sites within Strategic Industrial Employment Areas (SIEAs). It identifies four key SIEAs (Queensway Corridor, Ivyhouse Lane, Ponswood and Bulverhythe Estate) and promotes the retention, intensification and expansion of industrial, storage, distribution, waste management, training and ancillary office uses, while resisting the loss of employment land unless redundancy can be clearly demonstrated. Development should maximise site efficiency, provide high-quality, adaptable business space, be resilient to climate change, and support local jobs, training, and supply chain opportunities, with Hastings Town Centre remaining the primary location for new office development and workspace provision.	Likely Significant Effects (LSEs) of this policy cannot be excluded. This policy specifies that 4,750 new jobs and 19,830 sqm of business floorspace within SIEAs. The allocation of new employment development has the potential to affect environmental water quality (e.g. through surface runoff), increase runoff waters, and result in the loss of greenfield sites. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy SP3 is screened in for AA.
SP4: Business Development – Town Centres The policy establishes a hierarchy of centres with Hastings Town Centre as the primary centre, supported by three District Centres (St Leonards, The Old Town and Silverhill) and five Local Centres (Bohemia and Tower, Ore Village, Battle Road, Marine Court and Bexhill Road). New town centre uses should be focused within these centres, with larger-scale development directed to Hastings Town Centre, while development in district and local centres should enhance vitality, diversify services, make efficient use of land, and improve the quality, accessibility and attractiveness of centres. Proposals outside designated centres must satisfy the sequential test and demonstrate no significant adverse impact, with impact assessments required for retail schemes exceeding 300 sqm (convenience retail) or 200 sqm (comparison retail), while neighbourhood shops outside centres will be protected and new retail and leisure development encouraged to support local jobs, training and procurement opportunities.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a strategic policy that specifies the hierarchy of town centres in Hastings Borough. However, it does not allocate specific quanta for employment development. Overall, Policy SP4 is screened out from AA.
SP5: Meeting the Challenge of Climate Change The policy requires all development to support Hastings' goal of becoming carbon neutral before the UK's 2050 target, ensuring schemes minimise climate change impacts, incorporate adaptation and resilience measures, and prioritise the retrofit of existing buildings over demolition and rebuild wherever feasible. New developments must be fossil fuel free and demonstrate that refurbishment options have been fully explored before demolition is considered. All new buildings are expected to achieve Net Zero Carbon standards, including meeting energy demand limits, generating 100% of	Likely Significant Effects (LSEs) of this policy can be excluded. This is a strategic policy that addresses the Climate Emergency by targeting net zero emissions and stipulating proactive policy measures. While positive for the wider environment, the adaptation to climate change has no direct bearing on Habitats Sites. The policy does not allocate specific quanta for employment development.

	annual energy consumption from on-site renewable energy where feasible and viable, using efficient low-carbon design, and calculating and reporting their whole-life embodied carbon emissions.	Overall, Policy SP5 is screened out from AA.
SP6: Renewable and Low Carbon Technologies	The policy takes a positive approach to renewable energy generation, zero-carbon technologies and supporting infrastructure, supporting developments that help reduce emissions while minimising environmental impacts. It supports decentralised and community-led energy schemes, the development of area-wide low-carbon heating networks where feasible and affordable, and may use Local Development Orders to streamline planning approval for low- and zero-carbon technologies. The Council will also support improvements to existing utilities infrastructure to increase network capacity and facilitate the uptake of emerging low- and zero-carbon energy solutions	Likely Significant Effects (LSEs) of this policy can be excluded. This is a strategic policy that promotes renewable and low-carbon technologies across the borough. However, while positive in a general sense, the delivery of renewable energy solutions has little bearing on the condition of Habitats Sites. Overall, Policy SP6 is screened out from AA.
SP7: Protecting and Enhancing the Historic Environment	The policy places strong emphasis on conserving and enhancing Hastings' historic environment, requiring development to protect the significance, character and setting of heritage assets, with greater weight given to assets of higher heritage value. It seeks to safeguard listed buildings, conservation areas, historic parks and gardens, scheduled monuments, areas of archaeological potential, archaeological find sites, and non-designated heritage assets, while supporting the sensitive restoration and reuse of historic buildings to secure their long-term viability. The Council will give great weight to avoiding harm to designated heritage assets, requiring clear and convincing justification where harm is proposed, and will assess impacts on non-designated heritage assets through a balanced judgement that considers the asset's significance, the scale of harm and any public benefits.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a strategic policy that protects the historic environment of Hastings Borough. However, the protection of these assets has no bearing on the condition of Habitats Sites. Overall, Policy SP7 is screened out from AA.
SP8: Conserving and Enhancing the Natural Environment	The policy seeks to protect and enhance Hastings' landscape character, natural environment and opportunities for access to nature, recognising the value of natural capital and ecosystem services for biodiversity, health, wellbeing and climate change adaptation. It prioritises the conservation and enhancement of key environmental assets, including Ancient Woodland, the High Weald National Landscape, Hastings Country Park Local Nature Reserve, Combe Valley Countryside Park, undeveloped coastline, green spaces, and nationally and internationally important biodiversity and geodiversity sites, with particular protection for irreplaceable habitats. Development should deliver biodiversity net gain, strengthen ecological and green-blue infrastructure networks, improve public access where appropriate, and support the objectives of the East Sussex and Brighton & Hove Local Nature Recovery Strategy.	Likely Significant Effects (LSEs) of this policy can be excluded. This policy is the primary mechanism through which Habitats Sites potentially impacted by the HLP are protected. It specifically protects and enhances sites or habitats that are designated for their international importance. Furthermore, by promoting public access to green infrastructure, some of the future recreational burden within Habitats Sites (e.g. the Dungeness Complex) may be diverted to less sensitive outdoor spaces. Overall, Policy SP8 is screened out from AA.

SP9: Managing Coastal
Erosion and Flood Risk

The policy focuses on enhancing flood defence and drainage assets in Hastings, including Natural Flood Management for fluvial flooding, while safeguarding Flood Storage Capacity Improvement Areas to ensure public safety. Major growth will be directed away from high flood risk areas, allowing development in lower-risk zones only with effective mitigation or adaptations, and the council will collaborate with partners to review flood risks and storage needs over the Local Plan period, considering climate change. In the Fairlight Cliffs to Glyne Gap Coastal Change Management Area, development proposals must include avoidance, mitigation, and adaptation strategies, with additional planning controls to prevent hazardous impacts, while supporting adaptations to strengthen the resilience of key economic and heritage assets.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is strategic policy that manages coastal erosion and flood risk in Hastings Borough. Generally, avoidance of flooding is positive for Habitats Sites because it reduces the risk of polluted surface runoff from reaching sensitive receptors.

While flood defences may be associated with coastal squeeze (whereby intertidal habitats are lost between rising sea levels and hard defence structures), coastal defence structures are already in place along major stretches of the adjoining coastline. Therefore, an exacerbation of coastal squeeze due to the HLP will not occur.

Overall, Policy SP9 is screened out from AA.

SP10: Transport
Infrastructure

The council will collaborate with transport providers to enhance infrastructure and services that support development growth, focusing on active travel, public transport, and ultra-low and zero-emission vehicles, with funding from development contributions. Key rail improvements will include electrification of the Marshlink service, upgrades for high-speed connections to Eastbourne, and accessibility enhancements at Ore Station, alongside support for bus service improvements and prioritising walking, wheeling, and cycling infrastructure. Additionally, the council will safeguard land for road improvements, minimise car parking in high public transport areas, protect coach facilities, expand electric vehicle charging infrastructure, and promote sustainable freight solutions such as consolidation hubs and last-mile deliveries.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a strategic policy with a strong focus on sustainable and active travel modes. It expresses support to a wide range of projects and enhancements, although this does not represent their formal allocation. Where potential impacts to Habitats Sites may occur as a result of improvement works, these will need to be adequately assessed through project-level HRA.

Generally, this policy is positive for Habitats Sites that are sensitive to atmospheric pollution, because it will likely reduce the number of car-based commuter journeys within 200m of sensitive designated or supporting habitats. Having a well-connected network of active travel opportunities is also attractive as a recreational resource in itself, potentially reducing recreational pressure within Habitats Sites.

Overall, Policy SP10 is screened out from AA.

SP11: Healthy and Safe
Communities

The policy requires all development to promote health and wellbeing by creating healthy, inclusive communities that reduce health inequalities, address social and physical determinants, and enhance quality of life, as outlined in the East Sussex Joint Strategic Needs Assessment. Proposals involving 40 or more dwellings or at least 1,000 sqm of new commercial floorspace must undergo Health Impact Assessment (HIA) screening early in the design process, with recommendations integrated into the proposal before planning submission. Where harmful health impacts are identified, the policy mandates the inclusion of mitigation measures to address these issues.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a strategic policy that seeks to provide healthy and safe communities. However, while positive in a general sense, this has no bearing on the condition of Habitats Sites.

Overall, Policy SP11 is screened out from AA.

SP12: Infrastructure Delivery Strategy

The policy requires development proposals to assess existing infrastructure, engage early with providers, and provide or contribute to new or improved facilities and services (including maintenance plans) where growth creates additional needs. Infrastructure must be delivered at the right time—typically before operation or occupation, sometimes pre-commencement—with larger schemes phased as necessary, and secured through direct delivery or financial contributions such as s106/planning obligations. Utilities upgrades to meet needs from new development and existing communities will normally be permitted, and all proposals must align with the Infrastructure Delivery Plan (IDP), including any site-specific requirements.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a strategic policy that seeks to ensure appropriate infrastructure is provided either alongside development or prior to development.

Where potential impacts to Habitats Sites may occur as a result of infrastructure provision, these will need to be adequately assessed through project-level HRA.

Overall, Policy SP12 is screened out from AA.

SP13: Development Viability

The policy requires all proposals to deliver essential infrastructure first—meeting or exceeding water efficiency (SC3), providing a drainage strategy with SuDS, implementing flood risk measures (SC16), and making critical highway improvements—with refusal where these core obligations cannot be met. The policy also requires any essential site-specific infrastructure identified through allocations or site investigation; if these obligations prevent full affordable housing under SP2, we will accept a commensurate cascade adjustment (mix, tenure, number, or commuted sums) subject to the SP2 viability review mechanism. We will then seek other financial obligations in priority order (per ID1 thresholds): sustainable transport, healthcare, education (SEND), education (EYFS), offsite open space and equipped play, education (primary/secondary), and all other ID1 obligations.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a strategic policy that seeks to ensure appropriate infrastructure is provided either alongside development or prior to development.

Where potential impacts to Habitats Sites may occur as a result of infrastructure provision, these will need to be adequately assessed through project-level HRA.

Overall, Policy SP13 is screened out from AA.

Development Potential Areas

Development Potential Area Policy 1 (D1): Land at Breadsell

The policy allocates a 12.03 ha residential site for 200–300 net dwellings, contingent on an ecological assessment and agreed monitoring of the adjacent Marline Valley Woods SSSI with mitigation to replicate current conditions, and requires an agreed masterplan informed by technical evidence and the High Weald AONB Housing Design Guide.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

This policy allocates a quantum of residential growth at a geographic location.

The geographic distribution of growth has an important influence on several impact pathways. For example, it identifies whether housing growth is likely to occur within the core catchment of Habitats Sites, determines which WwTWs are responsible for treating sewage effluent and whether surface run-off impacts are likely to represent an issue.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality

	• Water Quantity, Level and Flow Overall, Policy D1 is screened in for AA.
Regeneration Areas	
Regeneration Area (R1): Hastings Central The policy promotes a vibrant, mixed-use Hastings Central by allowing employment-generating uses (retail, office, light industry, studios, leisure, cafés, restaurants, visitor facilities, education, and appropriate drinking establishments) and residential uses (including student accommodation) that do not compromise the area's commercial role, with residential permitted only at first floor and above in the Primary Shopping Area. Opportunity sites in the Station Area and Hastings Central Plaza are identified for intensification to enhance retail, leisure, tourism, and housing, potentially guided by a future Design Guide. The policy emphasizes high-quality design, efficient land use, improved connectivity within the centre and to the seafront, and the conservation of nearby heritage assets, while prioritizing upgrades to streets and public realm, new green and blue infrastructure, and better pedestrian and cycle access, with pre-application engagement encouraged to determine suitable uses.	Likely Significant Effects (LSEs) of this policy cannot be excluded. This policy proposes development of both residential and employment development, it identifies Hastings Central (and more specifically the Station Area and Hastings Central Plaza) as a focal area for employment-generating and residential uses. The geographic distribution of growth has an important influence on several impact pathways. For example, it identifies whether housing growth is likely to occur within the core catchment of Habitats Sites, determines which WwTWs are responsible for treating sewage effluent and whether surface run-off impacts are likely to represent an issue. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, Policy R1 is screened in for AA.
Regeneration Area Policy 3 (R3): St Johns Road This policy requires a comprehensive, master-planned redevelopment of Warrior Square Station and its surrounds, prepared with the Railway Authority, to improve accessibility, capacity, and design; respect the Kings Road Conservation Area and the site's gateway role; and be informed by land-stability and geotechnical reports, with a maintenance and management plan. The Council support mixed-use schemes with residential that meet Policy SC3 Net-Zero Carbon Homes (including shading and cooling), deliver 25% affordable housing, allow car-free or low-car options (subject to ID2), provide street-level and trackside commercial/community uses, retain or re-provide play space, and enhance connectivity to the station and District Centre. Proposals must account for topography, incorporate green and blue infrastructure with high-scoring urban greening features, and mitigate surface-water flooding to protect the railway and pedestrian access.	Likely Significant Effects (LSEs) of this policy cannot be excluded. This allocates the redevelopment of Warrior Square Station. The policy makes explicit reference to residential and commercial/community uses for their redevelopment. The geographic distribution of growth has an important influence on several impact pathways. For example, it identifies whether housing growth is likely to occur within the core catchment of Habitats Sites, determines which WwTWs are responsible for treating sewage effluent and whether surface run-off impacts are likely to represent an issue. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure

- Water Quality
- Water Quantity, Level and Flow

Overall, Policy R3 is screened in for AA.

Site Allocation Policies

Part One – Housing and Mixed Use Allocations

HA1: Housing and Mixed Use Allocations	The policy requires the Plan to be read as a whole, and proposals must address non-site-specific material considerations covering design and character, heritage, affordable housing and mix, residential amenity, sustainable and active transport, flood risk and SuDS, contamination and hazards (including agent of change), land stability, ecology and green/blue infrastructure with Biodiversity Net Gain, arboriculture/landscape, open/play space, waste and recycling, and contributions/legal agreements, while residential schemes meet strategic density and mix unless clearly justified otherwise. Allocated residential or residential-led sites on the Policies Map must deliver the Policy SP2 housing requirement, with site-specific allocation policies applied alongside these considerations and the council's validation checklist. For sites adjacent to Marline Valley Woods SSSI, the policy requires a SuDS-led, greenspace-maximising approach that avoids breaching the underlying sandstone and is informed by borehole and/or trial pit data to guide groundwater assessments.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HA1 is an overview policy which sets out how the residential and mixed use proposals must be set out and what aspects of the Plan must be read to ensure compliance of each site to the Plan. The Policy does not allocate a quantum of dwellings/development or a specific location Overall, this policy is screened out for AA.
HS1: Land adjacent to Sandrock Park, The Ridge	The HL140 allocation proposes at least 95 new homes on a 3.9 ha site (2.6 ha developable area), including affordable housing in line with Policy SP2, supported by sustainable drainage, flood risk assessment, groundwater monitoring, and any necessary sewerage infrastructure upgrades. Development must protect the site's environmental and heritage assets through archaeological investigation, ecological assessment and mitigation, retention and restoration of The Lodge (Lodge Cottage), and measures to safeguard nearby woodland, wildlife sites and the Ore Place Conservation Area. At least one-third of the site must be provided as open space, habitat creation and green-blue infrastructure, alongside enhanced walking and cycling connections, landscaped buffers, and suitable highway access.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS1 allocates 95 net new dwellings on land adjacent to Sandrock Park (a 3.9 ha site). This equates to 228 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality

	Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS2: Seaside Road, West St Leonards The HL9 allocation is a mixed-use site (residential, commercial and leisure) with a minimum capacity of 120 homes on a 2.22 ha site, requiring affordable housing and leisure/commercial uses that complement its seafront location. Development must provide strong walking, cycling and public transport connections, coordinate where possible with the adjacent Cinque Ports Way (HS11) site, protect the Grosvenor Gardens Conservation Area, and address infrastructure requirements, including sewerage upgrades, flood risk management and Southern Water easements. Ecological impacts on nearby coastal and marine habitats must be mitigated, while the scheme should enhance the seafront through improved public realm, beach access, open space, play provision, and a high-quality design that responds to flood risk and integrates existing infrastructure such as the electricity substation.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS2 allocates 120 net new dwellings at Seaside Road (a 2.22 ha site). This equates to 288 new residents over the HLP period to 2040. As a mixed-use site other non-residential development will also be accommodated. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: - Recreational Pressure - Water Quality - Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS3: Former Westerleigh School, Hollington Park Close The HL10 allocation is a residential site with a minimum capacity of 100 homes on a 2.15 ha site, to be developed at a density of 45-55 dwellings per hectare, including affordable housing in line with Policy SP2. Development must respond to the site's challenging topography through slope stability and geotechnical assessments, provide adoptable vehicular access, improve walking and cycling connections, and protect existing green infrastructure by retaining or replacing green corridors. The scheme must also address ecological and arboricultural considerations through detailed assessments, retain and integrate trees where possible, and accommodate Southern Water infrastructure through appropriate easements and site layout design	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS3 allocates 100 net new dwellings at Former Westerleigh School, Hollington Park Close (a 2.15 ha site). This equates to 240 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings/people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy:

		• Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS5: Former West St Leonards Primary School, Bexhill Road	The HL115 allocation is a residential site with a minimum capacity of 50 homes on a 3.5 ha site, although only 0.8 ha is considered developable, and affordable housing must be provided in line with Policy SP2. Development must be focused on the land north of the Public Right of Way (PROW) and be supported by detailed flood risk, drainage and hydrological assessments, with measures to manage flood risk associated with the Hollington Stream, including buffer zones, Natural Flood Management measures and long-term maintenance plans. The scheme must also protect and enhance ecological assets, deliver biodiversity net gain, retain and improve the PROW and wider walking and cycling connections, provide suitable highway access, and account for Southern Water infrastructure through appropriate easements and site design.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS5 allocates at least 50 net new dwellings at Former West St Leonards Primary School, Bexhill Road. This equates to a minimum of 120 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings/people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.

HS6: Ore Valley (Former
Power Station)

The HL39 allocation is a residential site with a minimum capacity of 78 homes on 2.36 ha, requiring affordable housing in line with Policy SP2 and the retention of approximately 0.85 ha of woodland in the northern part of the site.

Development must be supported by transport and travel assessments, improve walking and cycling links to Ore Station and local services, and provide highway-standard vehicular access. The scheme must also address flood risk and drainage, including the site's high groundwater levels and a proposed surface water storage pond, accommodate Southern Water infrastructure and any necessary sewerage upgrades, and assess and mitigate impacts on the adjacent Broomgrove Local Wildlife Site.

HS7: Former Post Office
and University of Brighton
building

The HL138 allocation is a mixed-use town centre site with a minimum capacity of 41 homes, requiring affordable housing alongside active ground-floor uses such as retail, leisure or other complementary town centre functions.

Development should enhance Priory Square through improved public realm, greening, seating and open space, support Priory Street as a key link to the town centre and Bohemia, and preserve the frontage of the former Post Office building. The scheme must also protect the conservation area and views to and from Hastings Castle, mitigate noise impacts on residents, create a safe and welcoming environment, and accommodate necessary infrastructure and sewer connections.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy HS6 allocates 78 net new dwellings at Ore Valley (Former Power Station) (a 2.36 ha site). This equates to 187 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy HS7 allocates 41 net new dwellings at the Former Post Office and University of Brighton building (a 0.01 ha site). This equates to 98 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality

		Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS8: Mayfield E, Bodiam Drive	The HL4 allocation is a residential site with a minimum capacity of 38 homes on 1.06 ha, requiring affordable housing and a development approach that prioritises active travel, improves connectivity to local services and public transport, and is supported by transport and travel assessments. Development must protect the setting of the Grade II listed Mayfield Farmhouse, including sensitive site layout, landscaping and screening, while retaining important trees and maintaining or replacing existing green corridors. The scheme must also incorporate sustainable drainage features, including retention of the existing depression on the site, provide noise and landscape buffers to Queensway, and accommodate Southern Water infrastructure through appropriate easements and design measures.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS8 allocates 38 net new dwellings at Mayfield E, Bodiam Drive (a 1.06 ha site). This equates to 91 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: - Recreational Pressure - Water Quality - Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS10: Land at Rock Lane	The HL63 allocation is a residential site with a minimum capacity of 26 homes on 1.2 ha, requiring affordable housing and a landscape-led design that conserves and enhances the High Weald National Landscape, including protection of its dark skies and adherence to the High Weald Housing Design Guide. Development must provide open and play space, ecological enhancement and long-term management, maintain required buffers to power lines and drainage features, and be supported by ecological, transport and travel assessments. The scheme should prioritise walking and cycling connections to local services, the wider National Landscape and the Ivyhouse Lane employment area, while delivering highway-standard access from Rock Lane and suitable pedestrian links to nearby bus stops.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS10 allocates 26 net new dwellings on Land at Rock Lane (a 1.2 ha site). This equates to 62 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: - Recreational Pressure - Water Quality

		Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS11: Cinque Ports Way	This residential allocation proposes a minimum of 58 homes on a 0.37 ha site at a density of 90 to 150 dwellings per hectare, with affordable housing provided in line with Policy SP2 and strong walking, cycling and public transport connections, including links to the A259 bus corridor, West St Leonards Station, and the adjacent cycle route and public right of way. Development must be designed to protect the setting of the Grosvenor Gardens Conservation Area, enhance the seafront public realm and promenade, and be supported by ecological assessments to avoid or mitigate impacts on nearby wildlife sites, including Bulverhythe Shingle Beach and Cliffs Local Wildlife Site. The scheme must also address significant flood risk and drainage constraints through a Flood Risk Assessment, sea wall improvements and long-term maintenance arrangements, while accommodating Southern Water infrastructure and ensuring the development remains safe from flooding over its lifetime	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS11 allocates 58 net new dwellings at Cinque Ports Way (a 0.37 ha site). This equates to 140 new residents over the HLP period to 2040. As a mixed use site other non-residential development will also be accommodated. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: - Recreational Pressure - Water Quality - Water Quantity, Level and Flow Overall, this policy is screened in for AA..
HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road	The HL111 allocation is a residential site with a minimum capacity of 20 homes on 0.55 ha, requiring affordable housing and the retention and restoration of Gambier House, with new development designed to complement the character of the surrounding conservation area. Development must carefully respond to heritage and land stability constraints, including maintaining key open spaces, protecting the cliff edge through landscaped buffer zones, and being supported by geotechnical, drainage and ecological assessments. The scheme should also provide sustainable walking and cycling connections, sensitive parking solutions, appropriate drainage and sewer connections, and measures to protect nearby wildlife sites while enhancing biodiversity.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS12 allocates 20 net new dwellings at Gambier House, 111 West Hill Road and West House, 115 West Hill Road (a 0.55 ha site). This equates to 48 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy:

		• Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.
HS13: Land North-West of Winchelsea Lane	The HL87 allocation is a residential site with a minimum capacity of 20 homes on 1.17 ha, requiring affordable housing and a landscape-led design that conserves and enhances the High Weald National Landscape, in accordance with the High Weald Housing Design Guide and Dark Skies guidance. Development must provide open and play space, retain and enhance existing green infrastructure, improve walking and cycling connections, and be supported by ecological assessments and mitigation measures to protect biodiversity and nearby sensitive habitats. The scheme must also address site constraints through flood risk, drainage, slope stability and geotechnical assessments to ensure the development is safe, sustainable and compatible with its landscape setting.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS13 allocates 20 net new dwellings at Land north-west of Winchelsea Lane (a 1.17 ha site). This equates to 48 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.
Policy HS18: Land at Tilekiln Farm	The HL148 allocation is a residential site with a minimum capacity of 75 homes on 6.29 ha (4.19 ha developable area), requiring affordable housing and a landscape-led design that protects the character of the High Weald National Landscape, including substantial landscaping, dark skies protection, and the provision of at least one-third of the site as publicly accessible open space in perpetuity. Development must safeguard and enhance environmental assets, particularly the Bourne Stream, through flood risk management, natural flood management measures, biodiversity net gain, ecological mitigation, riparian buffer zones, tree retention, and protection of nearby habitats and designated sites. The scheme must also address	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS23 allocates up to 75 net new dwellings at : Land at Tilekiln Farm (a 6.29 ha site). This equates to 180 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

	archaeological, transport and land stability considerations, retain and enhance public rights of way, improve walking and cycling connectivity, provide highway-standard access, and include long-term management plans for open space, drainage and any land stability measures.	The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.
Policy HS20: Former West Hill Road Reservoir	The HL151 allocation is a residential site with a minimum capacity of 30 homes on 0.21 ha, requiring affordable housing in line with Policy SP2 and development that responds to significant land stability constraints through geotechnical assessments and long-term management of any mitigation measures. Development must protect the setting of the Grosvenor Gardens Conservation Area, ensure existing buildings are appropriately recorded before demolition, and provide safe access from West Hill Road, while retaining or enhancing the existing bus stop and improving walking and cycling links to West St Leonards Station and National Cycle Route 2. The scheme must also be supported by ecological assessments and mitigation measures to avoid impacts on nearby sensitive habitats, including the Caves Road Cliffs Local Wildlife Site.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS23 allocates up to 30 net new dwellings at Former West Hill Road Reservoir (a 0.21 ha site). This equates to 72 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.
Policy HS21: Land East of Rock Lane	The HL153 allocation is a residential site with a minimum capacity of 20 homes on 0.72 ha (within a wider 1.72 ha site), requiring affordable housing and a landscape-led design that conserves and enhances the High Weald National Landscape, including protection of its dark skies. Development must be supported by land stability, flood risk, drainage, transport and ecological assessments, and should deliver sustainable walking and cycling links, particularly to Winchelsea Lane, alongside highway-standard access from Rock Lane. The scheme should also consider a comprehensive approach with adjoining land in Rother District, retain or compensate for existing trees, protect biodiversity, and	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy HS23 allocates up to 20 net new dwellings at: Land East of Rock Lane (a 0.72 ha site). This equates to 48 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

accommodate Southern Water infrastructure through appropriate easements and site design.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

Policy HS23: Land East of Beaney's Lane, The Ridge
The HL144b allocation is a residential site with a minimum capacity of 18 homes on 0.40 ha (forming part of a wider 7.60 ha site), to be developed at a density of 45 to 55 dwellings per hectare and provide affordable housing in line with Policy SP2.

Development must be informed by land stability, flood risk, drainage, landscape, ecological and hydrological assessments, including demonstrating no adverse impact on Maplehurst Wood SSSI, nearby Ancient Woodland, and the High Weald National Landscape. The scheme should be planned comprehensively with adjoining land in Rother District, incorporate sustainable and multi-modal travel options, provide highway-standard access from The Ridge, and maximise the retention and enhancement of trees and ecological connectivity.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy HS23 allocates up to 18 net new dwellings at: Land East of Rock Lane (a 0.40 ha site). This equates to 44 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WWTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

Policy HS25: Former
Convent of Holy Child
Jesus, Magdalen Road
(Regeneration Area R2)

The Former Convent of the Holy Child Jesus is allocated for a residential-led heritage regeneration scheme with an indicative capacity of 200 homes across a 4.76 ha site, where development must secure the repair, restoration, reuse and long-term management of the Grade II listed chapel, Grade II listed buildings, associated heritage assets and the Nuns' Cemetery.

The site must be delivered comprehensively through a full planning application in accordance with the approved masterplan, supported by extensive heritage, environmental, landscape, viability and management assessments. New residential development is acceptable where it enables the conservation of the heritage assets, protects the Magdalen Road Conservation Area, provides high-quality design, retains key landscape features and mature trees, and delivers connected open space, sustainable drainage, ecological enhancements and active travel links.

A key requirement is that the restoration and reuse of the listed buildings, particularly the Grade II chapel, is secured early in the development process, with occupation of new housing linked to the completion of agreed heritage works, while proposals that would undermine the comprehensive regeneration, heritage restoration or long-term stewardship of the site will not be supported.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy HS25 allocates up to 200 net new dwellings at: Former Convent of Holy Child Jesus (a 4.76 ha site). This equates to 480 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WWTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

Policy HS26: Site of Four Courts, Stonehouse Drive

The site is allocated for a residential-led renewal scheme on 4.44 ha, with a target of at least 450 dwellings (64 net new dwellings), making efficient use of this established high-density residential location through a comprehensive apartment-led redevelopment.

Development must deliver high-quality design, retain or replace the existing community centre and nursery with enhanced facilities, and create a new neighbourhood focused around a substantial central open space providing recreation, biodiversity benefits, sustainable drainage and integrated play areas. The scheme must be supported by assessments covering flood risk, ecology, arboriculture, land stability, groundwater, geotechnics and visual impact, while improving walking and cycling connections, providing well-designed parking and cycle storage, and securing the long-term management of open space, community facilities, landscaping and environmental mitigation measures.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy HS26 allocates up to 64 net new dwellings at: Site of Four Courts, Stonehouse Drive (a 4.44 ha site). This equates to 154 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WWTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

Policy HS27: My Lodge
Way, The Ridge

This residential allocation provides for a minimum of 20 homes on a 1.29 ha site (0.5 ha developable area), requiring affordable housing and a landscape-led design that respects the High Weald National Landscape, including dark skies protection, retention of trees, and substantial landscaping buffers.

The eastern half of the site must remain undeveloped as public open space in perpetuity, incorporating natural play space, biodiversity enhancements and ecological management, supported by ecological and arboricultural assessments. Development must also provide highway-standard access from The Ridge West, connections to walking and cycling networks, including Battle Station, appropriate sewer infrastructure, and ensure no adverse impacts on the neighbouring holiday park, while incorporating non-designated heritage assets into the site's public realm where possible.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy HS26 allocates up to 20 net new dwellings at: My Lodge Way, The Ridge (a 1.29 ha site). This equates to 48 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

HSS5: Land at Chiltern
Drive

The HL100 allocation is a residential site with a minimum capacity of 13 homes on a 0.24 ha site, requiring affordable housing in line with Policy SP2 and development that is informed by detailed land stability and geotechnical assessments to ensure the safety of both the site and adjacent properties.

The scheme must provide highway-standard vehicular access, improve walking and cycling links to Ore Railway Station and other local destinations, and accommodate Southern Water infrastructure through appropriate easements. It must also address ecological impacts through an ecological assessment and arboricultural plan, alongside long-term management arrangements for any land stability mitigation measures.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

This policy allocates up to 13 net new dwellings (0.24 ha site). This equates to 31 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

	Overall, this policy is screened in for AA.
HSS8: Former Hollingsworth Garage, Braybrooke Road This allocation policy identifies that up to 9 net additional dwellings will be delivered on this site. Further requirements for proposals within this site are provided, including affordable housing.	Likely Significant Effects (LSEs) of this policy cannot be excluded. This policy allocates up to 9 net new dwellings. This equates to 22 new residents over the HLP period to 2040. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WWTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, this policy is screened in for AA.

HSS13: 5 The Green This allocation policy identifies that up to 10 net additional dwellings will be delivered on this site. Further requirements for proposals within this site are provided, including affordable housing.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

This policy allocates up to 10 net new dwellings. This equates to 2 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

HSS14: Former Hillesden
Mansions, 7-11 Chapel
Park Road

This allocation policy identifies that up to 15 net additional dwellings will be delivered on this site. Further requirements for proposals within this site are provided, including affordable housing.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

This policy allocates up to 15 net new dwellings. This equates to 38 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WWTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

HSS16: Mayfield Farm This allocation policy identifies that up to 11 net additional dwellings will be delivered on this site. Further requirements for proposals within this site are provided, including affordable housing.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

This policy allocates up to 15 net new dwellings. This equates to 36 new residents over the HLP period to 2040.

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

Overall, this policy is screened in for AA.

TP1: Land South of Crowhurst Road The allocation provides a permanent Gypsy and Traveller site with capacity for 2 pitches on a 0.17 ha site, with development required to protect and enhance nearby environmental assets, including Ancient Woodland, a Local Wildlife Site and priority habitats, supported by ecological assessment, appropriate buffers and a long-term ecological management plan.

The scheme must retain and strengthen existing landscaping to provide screening from Queensway and the nearby railway, minimise light spill through a dedicated lighting strategy, and integrate existing trees wherever possible through an arboricultural plan. Development must also deliver safe access improvements at the Crowhurst Road/Queensway junction, provide suitable drainage and water quality measures, and connect to sewerage infrastructure with capacity for future maintenance and upgrades.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy TP1 allocates 2 new gypsy and traveller pitches and utilities block on Land South of Crowhurst Road (a 0.17 ha site).

By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites.

The following impact pathways on Habitats Sites are linked to this policy:

- Recreational Pressure
- Water Quality
- Water Quantity, Level and Flow

TP2: Land at Tilekin Lane This allocation provides a permanent Gypsy and Traveller site with capacity for 2 pitches on a 0.17 ha site, requiring a landscape-led design that respects the High Weald National Landscape, protects dark skies, and minimises impacts on nearby sensitive environmental designations, including a Local Wildlife Site, Local Nature Reserve, Country Park and SSSI. Development must be supported by ecological, environmental and archaeological assessments, retain and enhance existing trees, hedgerows and landscaping wherever possible, and incorporate appropriate conservation, mitigation and biodiversity measures. The scheme must also provide highway-standard access, suitable drainage and water quality management, and connections to sewerage infrastructure while safeguarding future maintenance access.	Overall, Policy TP1 is screened in for AA. Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy TP2 allocates 2 new gypsy and traveller pitches and utilities block on Land at Tilekin Lane. By specifying both the location and quantum of new dwellings, this policy contributes to the impact pathways identified in this HRA. For example, it determines how many new dwellings / people will be delivered in the core catchment of the Dungeness Complex, how much additional (if any) capacity will be needed at the relevant WwTWs and whether specific allocations will contribute to surface runoff to Habitats Sites. The following impact pathways on Habitats Sites are linked to this policy: • Recreational Pressure • Water Quality • Water Quantity, Level and Flow Overall, Policy TP2 is screened in for AA.
Part Two – Employment Allocations	
EA1: Employment Allocations The policy states that the Plan should be read as a whole, with development proposals taking account of all relevant policies and site-specific requirements, particularly Policy SP3 for employment development. Proposals should address key considerations including design, heritage, residential amenity, transport and active travel, flood risk and SuDS, contamination, land stability, ecology, biodiversity net gain, landscape, waste management, and planning contributions, while also accommodating constraints such as underground utilities, gas mains and overhead power lines. Employment allocations identified in the Plan will help meet the Borough's employment land requirements, with detailed requirements set out in the Council's Validation List. For sites adjoining Marline Valley Woods SSSI, commercial development must be SuDS-led, maximise green space, avoid breaching the underlying sandstone layer, and use borehole or trial pit information to inform groundwater assessments and protect the site's sensitive environmental features.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy EA1 is an overview policy for employment development as a whole. The policy requires employment allocations brought forward within the plan to comply with other policies within the plan. The policy does not allocate any quantum or location of Overall, Policy EA1 is screened out for AA.

ES1: Queensway North, Queensway within SIEA1 The employment allocation provides for a minimum of 6,500 sqm of employment floorspace on a 4.70 ha site, supporting the intensification of the Queensway Corridor Strategic Industrial Employment Area (SIEA1) while maximising on-site green space and sustainable development. Development must be SuDS-led and carefully manage hydrological, groundwater and environmental impacts, particularly in relation to the adjacent Marline Valley Woods SSSI, through ecological, arboricultural, contamination, land stability and drainage assessments, supported by appropriate mitigation and biodiversity enhancements. The scheme should also deliver improved vehicular access and sustainable transport infrastructure, provide landscape buffers and green-blue infrastructure, minimise pollution and light spill, and include measures to ensure impacts on traffic, neighbouring uses and sensitive environmental receptors are effectively managed.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy ES1 allocates 6,500 sqm of employment floorspace at Queensway North, Queensway (a 4.7 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy ES1 is screened in for AA.
ES2: Site PX, Churchfields within SIEA1 The employment allocation provides for a minimum of 1,800 sqm of employment floorspace on a 0.58 ha site, supporting the intensification of the Queensway Corridor Strategic Industrial Employment Area (SIEA1) while incorporating green and blue infrastructure and sustainable travel connections. Development must be supported by ecological, arboricultural, drainage, transport, contamination and land stability assessments, with particular attention given to protecting adjacent Ancient Woodland, Priority Habitat and nearby wildlife sites through appropriate buffers, landscaping, lighting controls and mitigation measures. The scheme should also include sustainable drainage informed by hydrological monitoring, provide walking, wheeling, cycling and public transport links, and ensure any environmental, pollution, access or ground condition impacts are appropriately managed.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy ES2 allocates 1,800 sqm of employment floorspace at Site PX, Churchfields (a 0.58 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy ES2 is screened in for AA.

ES3: NX2, Sidney Little Road, Churchfields Estate within SIEA1

The employment allocation provides for a minimum of 800 sqm of employment floorspace on a 0.32 ha site, supporting the intensification of the Queensway Corridor Strategic Industrial Employment Area (SIEA1).

Development must be supported by ecological, arboricultural, drainage, transport, contamination and land stability assessments, with particular emphasis on protecting adjacent Ancient Woodland and nearby wildlife sites through appropriate buffers, landscaping, lighting controls and mitigation measures. The scheme should incorporate SuDS, green and blue infrastructure, sustainable travel connections, and measures to manage pollution, groundwater and access impacts, ensuring the site is developed in an environmentally sensitive and sustainable manner.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy ES3 allocates 800 sqm of employment floorspace at NX2, Sidney Little Road, Churchfields Estate (a 0.32 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough.

The following impact pathways on Habitats Sites are linked to this policy:

- Water Quality
- Water Quantity, Level and Flow

Overall, Policy ES3 is screened in for AA.

ES4: NX3, Sidney Little Road, Churchfields Estate within SIEA1

The employment allocation provides for a minimum of 280 sqm of employment floorspace on a 0.17 ha site, supporting the continued intensification of the Queensway Corridor Strategic Industrial Employment Area (SIEA1).

Development must be supported by ecological, arboricultural, drainage, transport, contamination and land stability assessments, with particular regard to protecting nearby Ancient Woodland and other sensitive habitats through appropriate landscaping, lighting controls, buffers and mitigation measures. The scheme should incorporate SuDS, green and blue infrastructure, sustainable travel connections, and measures to manage pollution, groundwater and access impacts while ensuring the site is developed in a sustainable and environmentally sensitive manner.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy ES4 allocates 280 sqm of employment floorspace at NX3, Sidney Little Road, Churchfields Estate (a 0.17 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough.

The following impact pathways on Habitats Sites are linked to this policy:

- Water Quality
- Water Quantity, Level and Flow

Overall, Policy ES4 is screened in for AA.

ES5: Adjacent Unit C, 1-8 Brook Way within SIEA2

The employment allocation provides for at least 500 sqm of employment floorspace on a 0.16 ha site within Strategic Industrial Employment Area 2 (Ivyhouse Lane), supporting the intensification of employment uses while respecting its landscape setting.

Likely Significant Effects (LSEs) of this policy cannot be excluded.

Policy ES5 allocates 500 sqm of employment floorspace Adjacent Unit C, 1-8 Brook Way (a 0.16ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the

	Development must be supported by landscape, transport, drainage, contamination and land stability assessments, with particular attention to the site's relationship with the High Weald National Landscape, including controls on visual impact and light spill. The scheme should provide SuDS, green and blue infrastructure, improved walking and cycling links (including access to PROW HAS/234/1), highway access from Brook Way, and appropriate measures to manage environmental, groundwater and infrastructure constraints, including Southern Water assets crossing the site.	HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy ES5 is screened in for AA.
ES6: UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane within SEAI2	The employment allocation provides for a minimum of 1,900 sqm of employment floorspace on a 1.57 ha site within Strategic Industrial Employment Area 2 (Ivyhouse Lane), supporting the intensification of employment uses while ensuring development is compatible with its landscape and neighbouring residential setting. Development must be supported by landscape, ecological, transport, drainage, contamination and land stability assessments, with mitigation measures to address impacts on the wider landscape, environmental sensitivities, residential amenity and site constraints. The scheme should retain and enhance boundary landscaping, incorporate SuDS, green and blue infrastructure, sustainable travel measures, explore relocating the main access to Ivyhouse Lane, and accommodate overhead power lines and other infrastructure through appropriate easements and safety measures.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy ES6 allocates 1,900 sqm of employment floorspace at UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane (a 1.57 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy ES6 is screened in for AA.
ES7: Ivyhouse Lane, Northern Extension within SEAI2	The ES7 employment allocation provides for a minimum of 2,800 sqm of employment floorspace on a 3 ha site within Strategic Industrial Employment Area 2 (Ivyhouse Lane), supporting employment growth while requiring a landscape-led design that respects the High Weald National Landscape, retains the historic sunken lane as a wildlife corridor, and protects existing rights of way. Development must be supported by ecological, landscape, arboricultural, transport, drainage, contamination and land stability assessments, with particular attention to adjacent Ancient Woodland, landscape impacts, biodiversity, lighting, and environmental sensitivities. The scheme should provide SuDS, green and blue	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy ES7 allocates 2,800 sqm of employment floorspace at Ivyhouse Lane, Northern Extension (a 3.0 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough.

	infrastructure, sustainable travel connections, buffer landscaping, maintain easements for utility infrastructure and transmission lines, and ensure that adequate sewerage and water infrastructure is in place before development is occupied.	The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy ES7 is screened in for AA.
ES8: Land at the Junction of Ridge West and Queensway within SIEA1	The ES8 employment allocation provides for a minimum of 4,700 sqm of employment floorspace on a 2.95 ha site within the Queensway Corridor Strategic Industrial Employment Area (SIEA1), supporting employment growth while contributing positively to the intensification of the area. Development must be supported by comprehensive ecological, flood risk, transport, contamination and land stability assessments, with particular regard to nearby SSSIs, TPO trees, the High Weald National Landscape, local wildlife sites and waste management operations. The scheme should incorporate SuDS, green and blue infrastructure, sustainable travel links, landscaping buffers, improved pedestrian connections to surrounding communities, and any necessary highway improvements to The Ridge or A21, while ensuring adequate water and wastewater infrastructure is in place and environmental impacts are effectively mitigated.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy ES8 allocates 6,000 sqm of employment floorspace on Land at the Junction of Ridge West and Queensway (a 2.95 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow Overall, Policy ES8 is screened in for AA.
ES10: Marline Fields, Enviro21 Business Park, Land West of Queensway	The ES10 employment allocation provides for a minimum of 550 sqm of employment floorspace on a 1.48 ha site within the Queensway Corridor Strategic Industrial Employment Area (SIEA1), supporting employment growth while maximising on-site green space and ensuring development is led by sustainable drainage design. Development must be supported by ecological, flood risk, transport, contamination and land stability assessments, with particular attention to protecting the adjacent Marline Valley Woods SSSI, nearby Ancient Woodland, local wildlife sites and groundwater resources through appropriate mitigation, monitoring, landscaping and lighting controls. The scheme should incorporate SuDS, green and blue infrastructure, sustainable travel connections, improved pedestrian links to Napier Road and the SSSI, and measures to manage environmental, drainage and access impacts while ensuring the site remains resilient to flooding and pollution risks.	Likely Significant Effects (LSEs) of this policy cannot be excluded. Policy ES10 allocates 550 sqm of employment floorspace at Marline Fields, Enviro21 Business Park, Land West of Queensway (a 1.48 ha site). By identifying the geographic location and quantum of employment floorspace, the policy will contribute to several impact pathways that are relevant to the HLP. For example, employment sites within close proximity to Habitats Sites may contribute additional flow volumes and aquatic pollutants through surface runoff. They will also contribute to the overall potable water requirement in Hastings Borough. The following impact pathways on Habitats Sites are linked to this policy: • Water Quality • Water Quantity, Level and Flow

Overall, Policy ES10 is screened in for AA.

Development Policies

Part One - Housing

H1: Specialist Housing for Older People	The policy requires development to address the housing needs of older people, ranging from accessible and adaptable homes to specialist accommodation with care and support, and to demonstrate compliance with recognised good-practice design principles. New and expanded residential and nursing care homes (Use Class C2) must provide details of the minimum care package offered and be located where residents can access services by sustainable and active travel. Housing for older people should include appropriate amenity or garden space, will not be required to contribute towards equipped play space, and must provide suitable parking for residents, staff and visitors without harming local character; where proposals include Class C3 accommodation, affordable housing must be provided in accordance with Policy SP2.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that delivers adequate specialist housing for older people. However, a general support for such housing has no bearing on the condition of Habitats Sites. Any specialist housing for older people developed under this policy will require a project-level HRA to ensure there are no adverse effects on the integrity of Habitats Sites. Overall, Policy H1 is screened out from AA.
H2: Shared housing	This policy regulates the creation or conversion of properties into Houses in Multiple Occupation (HMOs), including Class C4 HMOs (3 to 6 occupants) and sui generis HMOs (more than 6 occupants), to help maintain balanced communities and an appropriate housing mix across the Borough. Proposals must provide a good standard of accommodation, including adequate communal living, cooking and bathroom facilities, as well as sufficient cycle, waste and recycling storage. They must also demonstrate that the use will not harm neighbouring amenity through noise, disturbance, parking or visual impacts, and that appropriate management or supervision arrangements are in place, which may be secured by planning condition. The policy does not apply to care homes, children's homes, bail hostels, student accommodation managed by educational institutions, or households hosting foreign students for a limited period.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that pertains the division of new and existing buildings into multiple occupancy. However, a general support for such development has no bearing on the condition of Habitats Sites. Any HMOs developed under this policy will require a project-level HRA to ensure there are no adverse effects on the integrity of Habitats Sites. Overall, Policy H2 is screened out from AA.

H3: Conversion of Existing Dwellings	The policy supports the subdivision of existing homes into multiple self-contained dwellings where it can be clearly demonstrated that the property can no longer reasonably be retained as a single-family dwelling. Any conversion must provide a high standard of accommodation, avoid creating poor-quality living spaces such as basements with inadequate light, low ceilings or poor outlook, and comply with the Council's housing mix, accessibility and adaptability requirements. Development must also provide adequate cycle, waste and recycling storage, suitable arrangements for waste collection, and sufficient car and cycle parking without excessive hardstanding dominating the site layout or character.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports the conversion of dwellings into multiple self-contained units across Hastings Borough. However, a general support for such conversions has no bearing on the condition of Habitats Sites. Overall, Policy H3 is screened out from AA.
H4: Self Build and Custom Housebuilding	The policy supports self-build and custom housebuilding proposals in suitable locations where there is demonstrable demand for plots and all other relevant planning policies are met. Developments seeking self-build or custom-build exemptions from planning obligations will be required to secure occupancy arrangements through a planning condition or legal agreement for an appropriate period to ensure the homes are used for their intended purpose.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports self-build and custom housebuilding across Hastings Borough. However, a general support for such development has no bearing on the condition of Habitats Sites. Overall, Policy H4 is screened out from AA.
H5: Accommodation for Traveller Communities	The policy supports the delivery of Gypsy and Traveller pitches to meet identified accommodation needs, provided sites are at least 0.05 ha, located outside Flood Zone 3, free from environmental hazards, and capable of managing flood risk and other constraints appropriately. Sites must provide good vehicular and pedestrian access, including for emergency services and waste collection, incorporate a minimum 3 m firebreak between pitches and caravan standings, and be capable of being securely enclosed without harming the amenity of residents or neighbouring communities. Development should also demonstrate that both residential living and small-scale business or employment activities can operate on the site without adverse impacts, and that there are no environmental or other constraints that would make residential or commercial use unsuitable.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports the provision of permanent traveller pitches across Hastings Borough. However, this policy does not allocate a specific quantum or location of such pitches. A general support for traveller accommodation has no bearing on the condition of Habitats Sites. The allocations for traveller pitches are assessed separately. Overall, Policy H5 is screened out from AA.

H6: Housing Renewal	The policy supports housing renewal schemes where they improve the quality, design and mix of housing, deliver wider public benefits, and comply with other Local Plan policies, including those relating to building retrofit. Proposals should be supported by a detailed masterplan showing how these objectives will be achieved and accompanied by a community consultation statement explaining how local engagement has influenced the scheme. Development resulting in a net loss of affordable housing will only be supported in exceptional circumstances. The Council will also support temporary housing, secured through time-limited permissions, where needed to facilitate housing renewal projects and where consistent with other planning policies.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports the regeneration of estates. However, the regeneration of estates has no bearing on the condition of Habitats Sites. Overall, Policy H6 is screened out from AA.
H7: Temporary Residential Uses	The policy supports Temporary Residential Uses where they meet a demonstrable need for temporary dwellings, Gypsy and Traveller stopping places, or accommodation for van dwellers without a permanent residence, while complying with wider planning policies. Permissions will normally be granted for a minimum of 6 months to 5 years (or up to 10 years where linked to a housing renewal scheme), provided proposals do not prejudice existing or allocated land uses, include appropriate site management, remediation, transport and construction plans, provide essential services, and address matters such as amenity, flood risk, contamination, land stability, environmental impacts, fire safety, access and green-blue infrastructure. Temporary residential development will not be permitted on Sports Fields, Playing Pitches, Local Green Spaces, Public Open Spaces, recreation grounds, highways, highway mitigation land or agreed receptor sites, ensuring these protected spaces remain available for their intended use.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a generic policy that supports the temporary residential uses. However, no specific allocations are made and a general support for temporary residential uses has no bearing on the condition of Habitats Sites Overall, Policy H7 is screened out from AA.

Part Two – Economic Development

E1: Protecting and Enhancing Employment Sites, Areas and Allocations	The policy supports the retention, intensification, redevelopment and enhancement of employment land and premises within Strategic and Local Employment Areas, including offices, research and development, industrial, storage and distribution uses. Mixed-use schemes will be supported where residential, commercial and employment uses are successfully integrated without harming residential amenity. The loss of employment land or premises will only be permitted in exceptional circumstances where robust evidence demonstrates there is no realistic prospect of continued employment use, including evidence of unsuccessful marketing and that redevelopment or refurbishment for employment purposes is not financially viable. Employment uses may be secured and retained through planning conditions where necessary.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that protects and enhances employment land and premises in SIEAs. However, no specific quanta or locations of employment development are provided. The provision of general criteria for employment development has no bearing on the condition of Habitats Sites. Overall, Policy E1 is screened out from AA.
E2: Skills, Employment and Supply Chain	For major developments of 1,000 sqm or more of new commercial floorspace and/or 40 or more dwellings or bed spaces, proposals must include measures to deliver local economic benefits. These should comprise local labour and procurement agreements to maximise local employment and sourcing opportunities, a local skills development plan, and a project completion statement demonstrating how these commitments have been delivered. All requirements will be secured through planning conditions.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that addresses skills, employment and supply chains in Hastings Borough. However, these requirements have no bearing on the condition of Habitats Sites. Overall, Policy E2 is screened out from AA.
E3: Primary Shopping Areas	The policy supports retail, commercial and other main town centre uses within designated Primary Shopping Areas, provided they maintain and enhance town centre vitality, encourage activity and footfall, and preserve the character and function of the centre. Flexibility will be allowed between retail and other Use Class E uses where this does not undermine the range of services and attractions available. Development should provide active ground-floor frontages that are publicly accessible and contribute to a vibrant town centre environment. The Council also supports bringing upper floors back into use, including for residential purposes, but ground-floor residential uses will not be permitted within Primary Shopping Areas.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that promotes employment proposals in Primary Shopping Areas. The provision of general support for such employment development has no bearing on the condition of Habitats Sites. Overall, Policy E3 is screened out from AA.

E4: Food, Drink, Entertainment and the Night-time Economy	The policy supports new cafés, restaurants, drinking establishments and hot-food takeaways where they do not cause unacceptable impacts on local amenity, highway safety or neighbouring businesses and residents. Proposals must include details of operating hours, seating, customer capacity, waste management and any delivery operations, and food businesses must provide grease traps. Outside designated centres, proposals will also be assessed against the sustainability of the location. New vape/tobacco retailers and off-licences as a primary use will only be permitted where delivery services are prohibited by condition.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports proposals for food and drink across the borough. However, no specific allocations are made and a general support for these types of development has no bearing on the condition of Habitats Sites. Overall, Policy E4 is screened out from AA.
E5: The Visitor Economy	The policy supports new and expanded visitor accommodation in Hastings Town Centre, the Resort Area and other established tourism locations, provided it is appropriate to its setting, offers good-quality accommodation, protects residential amenity, and does not result in the loss of permanent housing. The loss of existing visitor accommodation will only be supported where robust evidence demonstrates the business is no longer viable. New visitor attractions are supported in the Resort Area, while the conversion of residential homes to commercial short-term holiday lets beyond accepted thresholds will not be supported.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports the delivery of serviced visitor accommodation and attractions in the borough. However, no specific allocations are made and a general support for the development of the visitor economy has no bearing on the condition of Habitats Sites. Overall, Policy E5 is screened out from AA.
E6: Outdoor Visitor Accommodation	The policy supports the provision, expansion and improvement of caravan, chalet, camping and other outdoor visitor accommodation where proposals protect landscape character, avoid harm to residential amenity, provide good-quality accommodation, and have safe and sustainable access. Development should retain touring caravan and camper pitches, incorporate appropriate green and blue infrastructure, and avoid adverse impacts on the High Weald National Landscape. Occupancy will be restricted to seasonal use through planning conditions or legal agreements.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that supports the expansion or improvement of outdoor visitor accommodation across the borough, including caravan, chalet and camping sites. However, no specific allocations are made and a general support for the development of outdoor visitor accommodation has no bearing on the condition of Habitats Sites. Overall, Policy E6 is screened out from AA.

Part Three – Sustainable Communities

SC1: Key Design Principles	The policy supports high-quality development that reflects Hastings' character, topography and landscape setting, promotes walking and cycling, is accessible to all users, provides healthy living environments, and integrates biodiversity, climate adaptation and green-blue infrastructure into the overall design. Development should avoid harm to the amenity of neighbouring properties through impacts such as overlooking, noise, overshadowing, light pollution or crime, and should follow principles of crime prevention through environmental design. Taller buildings must demonstrate that they do not harm important views, heritage assets, the skyline, local microclimate or nearby residential amenity.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that requires high-quality development across Hastings Borough. However, while positive for the general population, design quality has no bearing on the condition of Habitats Sites. Overall, Policy SC1 is screened out from AA.
SC2: Housing Mix, Accessibility and Adaptability	The policy requires new residential development to provide a mix of housing types, sizes and tenures that meets current and future housing needs, with affordable housing integrated seamlessly alongside market housing in terms of design, layout, quality and access. All homes must meet Nationally Described Space Standards, provide usable private outdoor space where feasible, and be designed to be accessible and adaptable. New homes should meet M4(2) Accessible and Adaptable standards, while developments providing affordable housing must deliver 10% of affordable homes as M4(3) wheelchair-accessible dwellings where there is identified need, and buildings of three storeys or more must include accessible lift provision.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that sets out specific criteria for residential developments regarding housing mix and accessibility. However, these parameters have no bearing on the condition of Habitats Sites. Overall, Policy SC2 is screened out from AA.
SC3: Sustainable Design and Construction	The policy prioritises retrofit over demolition, requiring proposals involving partial or complete demolition to provide robust justification, including evidence that the existing building cannot be retained and details of how much of the structure and building envelope will be preserved. Major developments involving 50+ dwellings or 5,000 sqm+ of floorspace must also undertake a pre-demolition audit and assess opportunities to reuse materials. Major developments must be fossil fuel free, achieve stringent energy efficiency standards, generate renewable energy on-site to meet or exceed annual energy demand where possible, and demonstrate reductions in embodied carbon through an Energy Strategy Report. Residential development must be designed to achieve water consumption of no more than 100 litres per person per day, with lower usage	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that promotes sustainable design across Hastings Borough. Importantly, the policy specifies a water efficiency standard of 100 litres per person per day, which will help reduce the pressure on water resources in south-east England (including on Habitats Sites). Setting parameters on the delivery of sustainable design has no potential for a negative interaction with Habitats Sites. Overall, Policy SC3 is screened out from AA.

	encouraged, while larger schemes must also assess whole-life carbon impacts and circular economy opportunities.	
SC4: Alteration and Extension of Dwellings	The policy supports extensions and alterations to dwellings where they are in keeping with the original building, protect the character of the street scene, and avoid harmful impacts on neighbouring amenity, including overlooking, loss of privacy and overshadowing. Extensions should be proportionate in scale and design, with controls on front, side, rear and roof extensions, while incorporating biodiversity measures such as nesting features where appropriate. Proposals must also address flood risk, drainage, land stability and heritage considerations, ensuring they do not harm the character of the host building, surrounding area or any heritage assets.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that pertains alterations of and extensions to existing dwellings. However, the policy content has no direct relevance for the condition of Habitats Sites. Overall, Policy SC4 is screened out from AA.
SC5: Proposals Affecting the Significance and Setting of Heritage Assets	The policy supports development affecting heritage assets where it demonstrates an understanding of the asset's significance and setting, including the impact on key views and Hastings' distinctive topography. Proposals should respect the historic character of the area through their design, scale, layout, materials and landscaping, and must provide clear and convincing justification showing that any harm to heritage significance is avoided or minimised.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that sets out how designated and non-designated heritage assets will be protected. However, the protection of these assets has no bearing on the condition of Habitats Sites. Overall, Policy SC5 is screened out from AA.
SC6: Sustainable Development and Heritage Protection	The policy supports development that helps reduce carbon emissions while preserving the significance and long-term future of heritage assets. Proposals should use appropriate and, where possible, traditional local materials, adopt a whole-building approach to improving energy efficiency and on-site energy generation, and incorporate measures to improve resilience to flooding, land instability, increased rainfall and overheating. All sustainability measures must be designed so that they do not cause unacceptable harm to the character, appearance or significance of the heritage asset.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that sets out requirements for sustainable development proposals affecting heritage sites. However, the protection of these assets has no bearing on the condition of Habitats Sites. Overall, Policy SC6 is screened out from AA.

SC7: Changes to building elevations and roofs in Conservation Areas	This policy states that within conservation areas, original features such as windows, doors, roofs, chimneys and other architectural details should be retained, repaired or accurately reinstated, with replacement elements closely matching the original design, materials and appearance. New windows, doors, roof lights and dormers must be sympathetic to the building and conservation area, while uPVC and aluminium replacements are only acceptable in limited circumstances. There is a strong presumption in favour of retaining chimney stacks and other historic roof features, and any removal must be supported by clear and convincing justification.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that establishes requirements for changing doors, windows and roof lights in Conservation Areas. However, this policy content has no bearing on the condition of Habitats Sites. Overall, Policy SC7 is screened out from AA.
SC8: Shopfronts, Advertisements, and Commercial Frontages	The policy requires high-quality shopfront and commercial frontage design, particularly in Conservation Areas and on listed buildings, with historic frontages retained and repaired where they contribute to local character. New frontages should respect the building's architectural features, scale and materials, while signage, lighting and security measures must be discreet and integrated into the design. Proposals should minimise visual clutter, provide inclusive access, and avoid harm to heritage significance.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that establishes requirements for shopfront and commercial frontage proposals. However, this policy content has no bearing on the condition of Habitats Sites. Overall, Policy SC8 is screened out from AA.
SC9: The High Weald National Landscape and Other Areas of Landscape Value	The policy protects the High Weald National Landscape and other valued landscapes, including Combe Valley Countryside Park, requiring development to be limited in scale, height and extent and to respect the character and visual quality of these areas. Where development could affect a protected landscape, a Landscape Assessment will be required to identify impacts and mitigation measures. Within, or affecting the setting of, the High Weald National Landscape, development must conserve and enhance its natural beauty and demonstrate compliance with the objectives of the High Weald National Landscape Management Plan.	Likely Significant Effects (LSEs) of this policy can be excluded. This policy safeguards the character and scenic beauty of the High Weald National Landscape and Combe Valley Countryside Park. By maintaining or enhancing the appeal of outdoor space in the wider area surrounding Hastings Borough, the HLP will contribute to evenly distributing the recreational burden across the borough and potentially help reducing recreational pressure in sensitive Habitats Sites. Overall, Policy SC9 is screened out from AA.

SC10: Habitat Protection, Biodiversity and Net Gain	The policy supports development that enhances wildlife, habitats and biodiversity net gain, supported by appropriate ecological assessments and, where feasible, features such as swift and bird bricks. Where impacts on biodiversity cannot be avoided, proposals must demonstrate that harm has been minimised and that suitable mitigation or compensation is provided. Long-term ecological enhancement, management and biodiversity net gain may be secured through planning conditions or legal agreements.
SC11: Trees, Woodland and Hedgerows	The policy protects trees, woodland and hedgerows, particularly those covered by TPOs, located in Conservation Areas, designated as Ancient Woodland or Veteran Trees, within Historic Parks and Gardens, or forming part of important biodiversity areas. Their removal will only be permitted where justified, with replacement planting required at a 3:1 ratio where loss is unavoidable, and development causing the loss or deterioration of Ancient Woodland or Ancient/Veteran Trees will normally be refused except in wholly exceptional circumstances. Development adjacent to woodland must provide suitable buffer zones, follow BS 5837 standards during construction, and secure the long-term protection, enhancement and management of trees and hedgerows through planning conditions or legal agreements.
SC12: Green and Blue Infrastructure	The policy requires development within the core Green and Blue Infrastructure (GBI) network to retain, protect, restore and enhance existing green and blue infrastructure, delivering benefits for climate resilience, biodiversity, ecosystem services, sustainable drainage, urban cooling, and community wellbeing. Development outside the core network is encouraged where it creates new links or green corridors and supports priorities identified in the Council's Green and Blue Infrastructure Strategy and the Local Nature Recovery Strategy. All new or enhanced GBI must be multifunctional, designed to recognised standards, and supported by a long-term maintenance and management plan secured through planning conditions or legal agreements.

Likely Significant Effects (LSEs) of this policy can be excluded.

This policy protects biodiversity and habitats, while also ensuring Biodiversity Net Gain in new development proposals. While not specifically referring to Habitats Sites, this policy is positive for qualifying features of SACs, SPAs and Ramsars. For example, ensuring that EclAs are provided is important for the HRA process, since scientific data from EclAs often contribute to the assessment of impacts to Habitats Sites. The policy also makes reference to the hierarchy of impact assessment, which ranges from avoidance, mitigation to compensation.

Overall, Policy SC10 is screened out from AA.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a development management policy that protects trees and woodland in Hastings Borough. However, while positive for general environmental health, the protection of woodland has no direct implications for the Habitats Sites that are relevant to the HLP.

Overall, Policy SC11 is screened out from AA.

Likely Significant Effects (LSEs) of this policy can be excluded.

This policy safeguards green and blue infrastructure across Hastings Borough. Maintaining an extensive and resilient network of green and blue infrastructure is important for Habitats Sites that are sensitive to recreational pressure (e.g. the Dungeness Complex). Green and blue infrastructure in the vicinity of new housing will ensure that at least some future residents will undertake recreational activities locally, likely reducing the recreational burden in more sensitive SACs, SPAs and Ramsars.

Overall, Policy SC12 is screened out from AA.

SC13: Urban Greening Factor	Major developments must achieve an Urban Greening Factor (UGF) of at least 0.4 for residential and 0.3 for commercial development, with no net loss from the site's baseline greening score. Where targets cannot be fully met, applicants must demonstrate that the maximum achievable level of urban greening has been provided. Urban greening measures should be maintained for their lifetime, with major developments required to submit a long-term maintenance and management plan.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that ensures relevant Urban Greening Factor standards are met. However, the delivery of Urban Greening Factors has no direct implications for the condition of Habitats Sites. Overall, Policy SC13 is screened out from AA.
SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities	The policy supports the creation and improvement of sports, recreation, open space and play facilities, with new provision required to meet quality standards and have long-term maintenance arrangements. The loss of playing fields, sports facilities, play areas, allotments or important open spaces will only be permitted where equivalent or improved replacement facilities are provided or where the benefits clearly outweigh the loss. Development on Local Green Spaces, allotments and other protected open spaces will not normally be supported.	Likely Significant Effects (LSEs) of this policy can be excluded. This policy safeguards sports and recreation facilities across Hastings Borough. Maintaining or enhancing such facilities may have important positive implications for Habitats Sites that are sensitive to recreational pressure (e.g. the Dungeness Complex). The availability of sports and recreation facilities in the proximity of new homes will ensure that at least some future residents will spend recreational time locally, potentially reducing the recreational burden in more sensitive SACs, SPAs and Ramsars. Overall, Policy SC14 is screened out from AA.
SC15: Ground Behaviour, Geodiversity and Land Stability	The policy supports development in areas affected by poor ground conditions, slope instability or landslide risk where suitable assessments demonstrate the site can be developed and remain stable and safe over its lifetime. Development must be supported by land stability reports, geotechnical investigations, remediation measures where required, and a construction management plan, with all necessary mitigation completed before occupation. Planning permission will be refused where instability risks cannot be adequately addressed or where unacceptable impacts remain.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that provides for adequate land stability assessments, where necessary. However, the subject of land stability has no direct relevance for the condition of Habitats Sites. Overall, Policy SC15 is screened out from AA.

SC16: Flood Risk and Drainage	Flood Risk Assessments are required where specified by national policy and must assess flood risk, apply sequential testing where necessary, and follow Environment Agency guidance. Development must incorporate SuDS, ensure runoff does not increase flood risk elsewhere, protect existing water bodies and drainage systems, and discharge surface water at pre-development (greenfield) rates. All developments must consider flood risk, drainage and land stability from the outset, provide long-term maintenance arrangements for drainage systems, and include a construction management plan covering flood prevention, surface water management and pollution control.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that reduces the potential for flood risk across Hastings Borough. The incorporation of SuDS is associated with benefits for Habitats Sites, because it reduces the potential of contaminants reaching sensitive receptors (water quality) and helps maintain natural hydrological flow regimes (water quantity, level and flow). Overall, Policy SC16 is screened out from AA.
SC17: Coastal Change Management	The policy identifies the Fairlight Cliffs to Glyne Gap Coastal Change Management Area (CCMA) as an area at risk from coastal change and generally does not permit new residential development within it. Other development may be allowed where it can be shown to be safe for its lifetime, does not increase coastal change risks or harm coastal habitats, and does not require new coastal defences. The policy also supports the relocation of lawful development outside the CCMA, subject to site restoration and compliance with other planning policies.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that considers the Fairlight Cliffs to Glyne Gap CCMA in planning applications. However, the consideration of this CCMA has no direct relevance for the condition of Habitats Sites. Overall, Policy SC17 is screened out from AA.
SC18: Pollution and Hazards	The policy requires development to minimise pollution and protect air, water and land quality, with appropriate assessments and mitigation measures where needed. Major developments and schemes with significant air quality impacts must provide an Air Quality Impact Assessment. Development must include suitable drainage, SuDS and pollution controls, and all major and minor schemes must provide Construction Management Plans and long-term maintenance arrangements for mitigation measures.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that addresses the risk of pollution and hazards across Hastings Borough. It is positive for Habitats Sites that are sensitive to changes in air and water quality. For example, by making safe storage of pollutants and the provision of detailed drainage plans mandatory, the policy mitigates potential water quality impacts on Habitats Sites that are dependent on good water quality, such as the Dungeness Complex. Overall, Policy SC18 is screened out from AA.

SC19: Environmental
Nuisance

The policy requires development to minimise noise, vibration, odour and light pollution during both construction and operation, protecting the amenity of residents, businesses and wildlife. Proposals that could generate or be affected by noise, vibration or odour must provide appropriate assessments and mitigation measures before permission is granted.

Development should also minimise light pollution through low-impact lighting design, including limits on brightness and spill, with a lighting plan and construction management plan required for major and minor developments.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a development management policy that pertains the minimisation of environmental nuisance, such as noise, vibration and lighting. However, while the reduction of noise and lighting disturbance is important to some Habitats Sites, it had no direct implications for the Habitats Sites that are relevant to the HLP (both due to the sensitivity of their qualifying features and the distance to the designated site boundaries).

Overall, Policy SC19 is screened out from AA.

SC20: Community
Facilities

The policy supports the provision, improvement and extension of community facilities where they are appropriately located, accessible and compatible with the surrounding area.

The loss of community facilities will only be permitted where they are no longer needed or are replaced, and commercial facilities must demonstrate they are no longer viable. Shops and services outside designated commercial areas will generally be protected due to their importance to local communities.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a development management policy that relates to the enhancement, retention and provision of new community facilities. However, the provision of community facilities has no direct relevance for the condition of Habitats Sites.

Overall, Policy SC20 is screened out from AA.

Part Four – Infrastructure and Delivery

ID1: Planning Obligations
(Section 106)

The policy ensures the timely delivery of infrastructure through Section 106 agreements, including affordable housing and other mitigation measures required by development.

Developers must cover legal, monitoring and management costs, with contributions index-linked and subject to interest if paid late. Sites of 9 homes or fewer can meet affordable housing requirements through a financial contribution (commuted sum) rather than on-site provision.

Likely Significant Effects (LSEs) of this policy can be excluded.

This is a development management policy that secures S106 planning agreements for new development proposals in Hastings Borough. Such planning obligations may be important to the integrity of Habitats Sites, such as where they ensure that adequate wastewater treatment infrastructure is in place (avoiding negative water quality impacts)

Overall, Policy ID1 is screened out from AA.

ID2: Access and Parking	The policy requires development to provide safe, accessible and efficient access, parking and servicing, while prioritising walking, cycling and public transport. Major developments should create pedestrian-friendly streets, integrate green and blue infrastructure, and provide strong active travel connections. Residential schemes should generally provide no more than one parking space per dwelling, with parking heavily restricted within 400 m of Hastings railway station and bus interchange. Transport Assessments, Travel Plans and accessible parking may be required, and private roads may need upgrading to acceptable highway standards.	Likely Significant Effects (LSEs) of this policy can be excluded. This is a development management policy that addresses access and parking across the authority. In most instances, these areas of planning have no direct relevance for the condition of Habitats Sites. Increasing the availability of electric vehicle charging infrastructure may help reduce the proportion of the population owning fossil-fuelled vehicles and, as a result, atmospheric pollution levels (including in Habitats Sites). Overall, Policy ID2 is screened out from AA.
ID3: Open Space, Sports and Recreation	The policy requires development to contribute to open space, play and sports facilities where it creates additional demand. Financial contributions towards open space and equipped play will be sought from residential development (including HMOs and residential institutions) and employment developments of 2,500 sqm or more. Contributions towards sports facilities will be required from developments providing 40 or more dwellings or accommodating 40 or more residents, with contributions secured through legal agreements (Section 106).	Likely Significant Effects (LSEs) of this policy can be excluded. This policy secures that development proposals in Hastings Borough will make adequate financial contributions towards the upkeep of open space, sports and recreation facilities. Maintaining or enhancing such facilities may have important positive implications for Habitats Sites that are sensitive to recreational pressure (e.g. the Dungeness Complex). The availability of sports, open space and recreation facilities in the proximity of new homes will ensure that at least some future residents will spend recreational time locally, potentially reducing the recreational burden in more sensitive SACs, SPAs and Ramsars. Overall, Policy ID3 is screened out from AA.
ID4: Utilities Infrastructure and New Connections	The policy requires development to demonstrate that there is sufficient water, wastewater, surface water drainage, electricity, gas or alternative energy infrastructure capacity to support the proposal throughout its lifetime, with appropriate connections secured before development commences. The Council supports new and upgraded utilities infrastructure, particularly schemes that contribute to net zero carbon objectives, while protecting existing utility networks from adverse impacts. Development must provide suitable easements and access for maintenance and upgrades, with utility contributions and connection costs secured through legal agreements.	Likely Significant Effects (LSEs) of this policy can be excluded. This policy ensures that infrastructure capacity required for the developments are secured before the development commences. There is no linking impact pathways to any Habitats sites. Overall, Policy ID4 is screened out from AA.

[aecom.com](https://www.aecom.com)