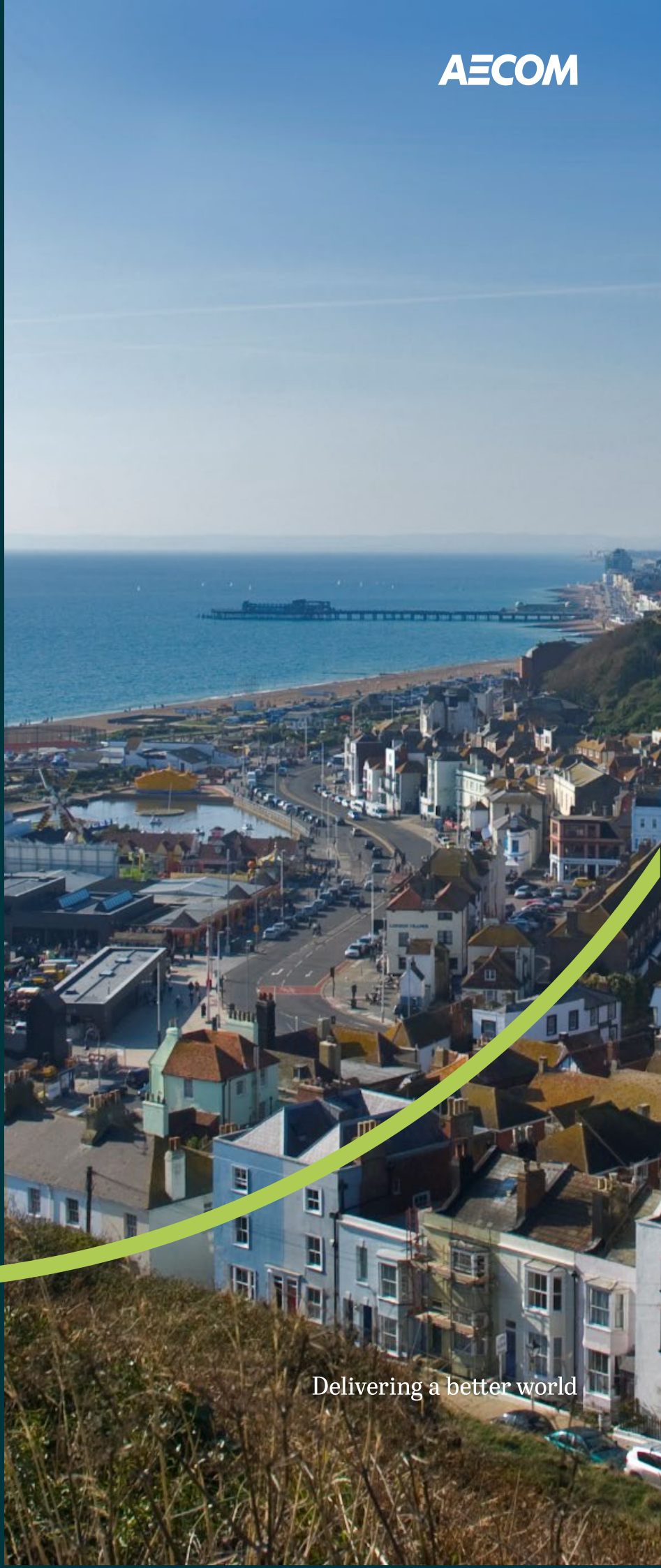
Sustainability Appraisal for the Hastings Local Plan

SA Report to accompany the Regulation 19 version of the Local Plan

Hastings Borough Council

September 2026



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Non-technical summary

The Hastings Local Plan

Hastings Borough Council is currently developing a Local Plan for Hastings Borough. This will replace the current Local Plan, which comprises the Hastings Planning Strategy (adopted February 2014) and the Hastings Local Plan Development Management Plan (adopted September 2015).

The Local Plan, which will cover the period to 2041, will when adopted be the key planning policy document for the borough and will guide decisions on the use and development of land. It will set out Hastings Borough Council's spatial strategy for growth and new development in Hastings. It will also include detailed development management policies setting out the form development in Hastings will need to take and any measures required to mitigate the impact of development.

What is Sustainability Appraisal?

Sustainability Appraisal (SA) is a process used to identify, assess and communicate the likely significant environmental, social and economic effects of a Local Plan, and alternatives. Its purpose is to help decision-makers understand the implications of different choices and to ensure that sustainability considerations are integrated into plan preparation.

SA of Local Plans is a legal requirement and is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations require an assessment of likely significant effects, a consideration of reasonable alternatives, and the identification of measures to avoid or reduce potential adverse impacts.

This SA Report

In line with the SEA Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*". The report must then be considered, alongside consultation responses, when finalising the plan.

This SA Report has been structured into three parts to address the key requirements stipulated by the SEA Regulations:

- **Part 1 (chapters 2 to 8)** provides an outline of plan making to date, in association with the parallel SA process (including in relation to 'reasonable alternatives').
- **Part 2 (chapters 9 to 12)** assesses the policies presented in the draft Regulation 19 'submission' version of the Local Plan, with which this SA Report accompanies.
- **Part 3 (chapter 13)** sets out the next steps for the Local Plan/SA process.

What is the scope of the SA?

The scope of the SA was established through a Scoping Report prepared in 2021 and consulted on with Natural England, the Environment Agency and Historic England. This presented the evidence base for the SEA and a framework of SA themes, objectives and assessment questions against which the Local Plan proposals and reasonable alternatives could be assessed. Each option and proposal in the plan identified for SA have been assessed against this framework.

The SA themes and objectives are presented below. **Chapter 3** of the main body of the SA Report presents the full SA Framework, including assessment questions.

Table NTS1: SA themes and SA objectives

SA theme	SA objective
Air Quality	• Reduce air pollution from transport and development and improve air quality.
Biodiversity	• Biodiversity is protected, conserved and enhanced.
Climate change adaptation, flooding and coastal change	• Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.
	• The risk of coastal erosion is managed and reduced, now and in the future.
Energy and water consumption	• The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)
	• Minimise water consumption.
Heritage	• Historic environment/ townscape is protected, enhanced and made more accessible.
Land and water quality	• The risk of pollution to land and soils is reduced and quality is improved.
	• Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.
	• The risk of pollution to water is reduced and water quality is improved.
Natural landscape	• Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.

SA theme	SA objective
Population, health and wellbeing	• The health and well- being of the population is improved and inequalities in health are reduced.
	• More opportunities are provided for everyone to live in a suitable home to meet their needs.
	• All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.
	• Safe and secure environments are created and there is a reduction in crime and fear of crime.
Skills, employment and economic development	• Economic performance is improved.
	• There are high and stable levels of employment and diverse employment opportunities for all.
	• Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.
	• Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.
Transport	• Road congestion levels are reduced and there is less car dependency and greater travel choice.

Appraisal of reasonable alternatives

A central requirement of the SA process is the identification and appraisal of reasonable alternatives.

The appraisal of reasonable alternatives provides an opportunity for the sustainability implications of different approaches for the Local Plan in meeting its objectives to be visualised. For the Local Plan, alternatives have been considered in relation to the overall spatial strategy and locations for growth in the borough and policy approaches for the Local Plan.

Alternatives considered at earlier stages of plan making

Alternatives considered at Regulation 18 Consultation (2021)

In February and March 2021, consultation was undertaken on an early draft of the Local Plan. The aim of the consultation was to present emerging policy ideas for the future development of Hastings. In this respect the consultation sought to gain stakeholders' views on the approach Local Plan policies can take on various key planning issues and on potential allocations in the borough.

To support this consultation, an Interim Sustainability Appraisal Report (2021) was prepared.

The Interim SA Report presented an appraisal of a series of high-level approaches and alternatives. This was with a view to presenting an evaluation of the relative sustainability merits of different broad approaches that could be taken for the Local Plan. This was for the benefit of stakeholders and plan-makers tasked with selecting preferred approaches for the Local Plan and for consideration alongside the representations received during the consultation.

The alternatives considered related to the following:

- Options for Ashdown House
- Options for the land east of Harrow Lane
- Options for housing delivery at Bohemia
- Options for Horntye
- Options for leisure provision
- Options for town centre parking zones
- Options for affordable housing provision
- Options for green infrastructure provision
- Options for biodiversity net gain
- Options for energy efficiency standards

Each option was considered against the SA Framework of objectives and assessment questions developed at scoping. Presenting the appraisal of these options, the following information was presented in the Interim SA Report:

- A description of the options appraised.
- An overview of the likely significant positive and negative effects of each option; and
- A ranking of the sustainability performance of each option relating to each SA theme to highlight their relative sustainability merits

The Interim SA Report also included an assessment of sites promoted through the plan-making process. The findings informed the ongoing development of the Local Plan and formed part of the evidence base considered alongside consultation responses and technical evidence.

Alternatives considered at Regulation 18 Preferred Options Consultation (February 2026)

Following further evidence gathering, changes in national planning policy and continued plan development, Hastings Borough Council prepared an updated Preferred Options version of the Local Plan for consultation under Regulation 18 in February 2026.

A further Interim Sustainability Appraisal Report accompanied the 2026 Preferred Options consultation. This reassessed the sustainability issues and opportunities facing the borough and considered a range of reasonable alternatives, including growth strategy options, approaches to meeting housing needs and alternative spatial distributions of development. The appraisal also included an assessment of sites proposed for allocation through the Local Plan.

The findings of the 2026 Interim Sustainability Appraisal informed the preparation of the Regulation 19 version of the Local Plan. Full details of the reasonable alternatives considered, and the appraisal findings, are presented in the 2026 Interim Sustainability Appraisal Report.

Site appraisal

To support the consideration of which sites to potentially allocate through the Local Plan, various site assessments have been undertaken through the Local Plan process. Following a 'call for sites' process, in the region of 200 potential housing, employment and traveller pitch sites have been considered for the Local Plan through the Strategic Housing and Employment Land Availability Assessment (SHELAA) process undertaken to support the development of the Local Plan. These sites have been assessed for their suitability, availability, achievability and deliverability to support the choice of housing and employment allocations taken forward through the Local Plan.

In addition, a separate appraisal of each of the sites assessed within Hastings - as documented in the SHELAA - has been undertaken through the SA process. This is with the aim of informing the proposed allocation of sites through the Local Plan.

As part of the SA, the constraints and opportunities associated with each site were identified using a set of criteria which were developed specifically for the SA process. Based on these criteria, a 'red/amber/green' (RAG) rating was then applied to each site for each criterion to provide an indication of site constraints and opportunities and the relative sustainability merits of the different sites. The site appraisal undertaken through the SA process is distinct from the assessments undertaken through HBC's SHELAA. Whilst distinct, the SA and the SHELAA both form part of the evidence base for the Local Plan, and, with other studies undertaken for the Local Plan and engagement with stakeholders, supports decision making on the choice of sites to allocate.

The findings of the appraisal of the sites undertaken through the SA process, accompanied by an explanation of the approach and criteria utilised for the appraisal, is presented in the Technical Annex accompanying this SA Report (**SA Report Technical Annex: GIS Site Assessment**).

Assessment of growth strategy options

A key component of the new Local Plan will be to present an overall spatial strategy for the borough during the plan period to 2041.

To support the development of the preferred approach for the new Local Plan (i.e., the spatial strategy), the SA process has considered a range of growth strategy options. This is with a view to understanding the relative sustainability merits of different potential spatial strategies for the Local Plan.

These growth strategy options have been developed based on strategic variables associated with the following two components:

- different scales of growth; and
- different locations of growth.

A description of the growth strategy options, and components, is presented below.

NTS2: Growth strategy options assessed as reasonable alternatives

Growth strategy options	Rationale
Option 1a and 1b: Constraint adjusted growth scenario	The approach has taken an evidence-led approach, which has focused on the suitability, availability, and achievability of sites for development, and the constraints present. Options 1a and 1b reflect lower and higher density numbers on some sites, respectively. These options would deliver in the region of 3,295 (Option 1a) to 3,779 homes over the plan period (Option 1b). This comprises 26.92% to 30.87% of local housing need (LHN) as established under the March 2026 standard methodology.
Option 2: Constraint adjusted growth plus opportunity areas	This option builds on Option 1a/b by adding two additional sources of potential housing delivery: (i) Hastings Central and the area around St Johns Road (ii) Land at Breadsell It assumes these sites will become available over the plan period and contribute to meeting housing needs. This option would deliver in the region of 4,332 to 4,816 homes over the plan period. This comprises 35.39% to 39.35% of LHN as established under the March 2026 standard methodology.
Option 3: Increase densification at Hastings Central & St Johns Road opportunity sites	This option focuses exclusively on the Hastings Central and St Johns Road opportunity sites. The option applies elevated density assumptions to these two locations beyond the standard site capacity assumptions to maximise housing delivery within the borough's most accessible urban areas. No additional growth is assumed at Breadsell or through other sources of housing delivery considered under the alternative options. This option would deliver in the region of 2,814 homes over the plan period. This comprises 22.99% of LHN as established under the March 2026 standard methodology.

Growth strategy options	Rationale
Option 4: Increase densification at Hastings Central and St Johns Road opportunity sites and increased densification assumptions on selected sites in the urban area	Focussing on the built up part of the borough, the Option applies densification at opportunity sites in Hastings Town centre and St Johns Road as well as selected sites in the wider urban area. It also increases densification in housing renewal areas. This option would deliver in the region of 4,697 homes over the plan period. This comprises 38.37% of LHN as established under the March 2026 standard methodology.
Option 5: Elevated density assumption at Breadsell and co-location housing employment option at the Ivyhouse Lane employment site	This option would seek to increase densities at Breadsell and deliver a co-location housing/employment option at the Ivyhouse Lane employment site. It would also include the delivery set out under Option 1b. The options set out an alternative to the urban focus of Option 4. This option would deliver in the region of 4,511 homes over the plan period. This comprises 36.85% of LHN as established under the March 2026 standard methodology.
Option 6: 100% LHN	This option seeks to deliver the full Local Housing Need (LHN) as calculated under the standard methodology. It combines all components from previous options, including densification, new delivery locations, and co-location opportunities, and applies the most optimistic assumptions for site capacity. The approach assumes that every suitable hectare of land identified for housing is utilised to address the projected shortfall. This option would deliver in the region of 10,108 homes over the plan period. This comprises 100% of LHN as established under the March 2026 standard methodology.
Option 7: 110% LHN	This option builds on the 100% scenario (Option 6) by introducing an additional uplift to provide contingency and flexibility in meeting future housing requirements. It includes all components and applies the highest feasible density assumptions across all sites. This option would deliver in the region of 13,464 homes over the plan period. This comprises 110% of LHN as established under the March 2026 standard methodology.

These options were assessed against the SA Framework. Full findings of the appraisal are presented in **Chapter 7** of the main body of the SA Report. A summary of appraisal findings is presented below.

Table NTS3: Summary of growth strategy options assessment

SA Theme		Option 1a /1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Air quality	Rank	2	4	1*	3	5	6	7
	Likely significant effects?	No	No	No	No	No	Yes - adverse	Yes - adverse
Biodiversity	Rank	1*	4	2	3	5	6	7
	Likely significant effects?	No	Yes - adverse	No	Yes - adverse	Yes - adverse	Yes – adverse	Yes - adverse
Climate change adaptation, flooding, and coastal change	Rank	1*	3	2	5	4	6	7
	Likely significant effects?	No	No	No	No	No	Uncertain	Uncertain
Energy and water consumption	Rank	2	=3	1*	=3	=3	6	7
	Likely significant effects?	No	No	No	No	No	No	No
Heritage	Rank	1*	3	4	5	2	6	7
	Likely significant effects?	Uncertain	Yes - adverse	Yes - adverse	Yes - adverse	Uncertain	Yes - adverse	Yes - adverse

SA Theme		Option 1a /1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Land and water quality	Rank	2	4	1	3	5	6	7
	Likely significant effects?	No	Yes - adverse	No	No	Yes - adverse	Yes - adverse	Yes - adverse
Natural landscape	Rank	1	4	2	3	5	6	7
	Likely significant effects?	No	Yes - adverse	No	No	Yes - adverse	Yes - adverse	Yes - adverse
Population, health, and wellbeing	Rank	4	2	5	1	3	6	7
	Likely significant effects?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes – positive and adverse	Yes - positive and adverse
Skills, employment and economic development	Rank	5	2	4	1	3	6	7
	Likely significant effects?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive and adverse	Yes - positive and adverse
Transport	Rank	2	4	1	3	5	6	7
	Likely significant effects?	Yes - positive	Uncertain	Yes - positive	Yes - positive	Uncertain	Uncertain	Uncertain

Meeting additional needs in Hastings

Growth strategy Options 6 and 7 considered the delivery of local housing need through delivering additional densification on the available sites in Hastings, including at Breadsell. They also, from a broad perspective, enabled an exploration of what the likely implications of the delivery of higher levels of growth in the borough would be in relation to the SA Framework.

Whilst it is recognised that the local housing needs figure comprises an unconstrained assessment of the number of homes needed in the area, and is intended to be the first step in the process of deciding how many homes need to be planned for through the Local Plan, it is useful to consider how local housing could potentially be delivered in the borough in full.

In addition to additional densification (which has already been considered through Options 6 and 7), there are a number of possible further approaches which could help contribute to the delivery in full of LHN in the borough. These are as follows:

- Land reclamation
- Development on publicly accessible open spaces and playing fields
- Urban extensions into the borough's hinterland.

In terms of the three possible approaches, **land reclamation** was not seen as a reasonable approach given the long-term timescales required in the planning and implementation of such an approach and its cost. It was also seen as not reasonable given the likely impacts on the environment and coastal processes, the economy (including associated with the leisure, tourism and fishing sectors), and shipping and logistics associated with the Dover Strait Traffic Separation Scheme.

Hastings has significant areas of **publicly accessible open space and playing fields**. Whilst these are important assets for community use and residents' health and wellbeing, these areas offer an opportunity for alternative uses, including housing and employment uses. Due to the significant local housing and employment need in the borough, the SA has considered the relative merits of different approaches to playing pitches and publicly accessible open space as reasonable alternatives. This is with a view to exploring the implications of re-configurating areas of open space and playing pitches for housing, mixed and employment uses. In response to this, the following three options have been considered through the SA process:

- Option OS1: Ensure no net loss of playing pitches and publicly accessible natural and semi natural greenspace for residential, mixed use and employment.
- Option OS2: Enable release of playing pitches for residential, mixed use and employment uses.
- Option OS3: Enable a 10% release of publicly accessible natural and semi natural greenspace for residential, mixed use and employment uses (recognising it is the greenspace typology the borough has the most of).

The findings of the appraisal of these options are presented in **section 8.3** of the main body of the SA Report.

A further possibility for delivering the homes required to meet local housing need is through one or more **urban extensions** of a significant size. In response to this, the SA process has undertaken a 'Points of the Compass' appraisal. The appraisal evaluates the relative sustainability merits of promoting larger strategic scale development at eight broad areas in the borough's hinterland. The analysis evaluated the key environmental constraints present in each of the broad areas proposed, including related to: biodiversity; flood risk; the historic environment; landscape quality; water; and agricultural land quality. The analysis also considers from a broader perspective socio-economic and accessibility issues.

Appendix A of the main body of the SA Report presents the Points of the Compass Appraisal. The findings of the appraisal indicate that opportunities for an outward expansion of the town through urban extensions would be heavily constrained by environmental considerations. The key considerations include as follows:

- The likely location of urban extensions within (or within the setting) of the High Weald National Landscape. This would particularly affect potential urban extensions which take place to the north, northeast and east of the town.
- The presence of internationally and nationally designated biodiversity sites. These include: (to the east of the town) the Hastings Cliffs SAC, the Dungeness, Romney Marsh and Rye Bay SPA and the Hastings Cliffs to Pett Beach SSSI; and (to the west of the town) the Combe Haven SSSI and Marline Valley Woods SSSI.
- The presence of significant areas of fluvial and coastal flood risk to the west and southwest of the town.

In this context, opportunities for the larger scale outward expansion of the town through urban extensions are likely to be limited by the presence of significant environmental constraints and the likelihood of major significant adverse impacts from such development on key designations.

Developing the preferred approach

The following overview presents HBC's reasons for selecting the preferred spatial strategy for the Hastings Local Plan, as set out in Strategic Policy 1 in the Local Plan:

'At the heart of our spatial strategy is the need to promote sustainable development as the framework for growth and change in Hastings. The Local Plan provides an ambitious and positive framework for addressing local housing and economic needs and other social and environmental priorities to better enable the council and other stakeholders to invest in housing, jobs communities and places, making the most of investment opportunities as they arise to effectively address spatial planning challenges over the plan period.

Growth in the first instance is directed to locations which are well supported by existing or planned sustainable transport infrastructure and other services. This approach will help minimise carbon emissions from travel and allow significantly increased development densities in appropriate locations. This in turn can also help to deliver much needed housing, alongside spaces for businesses to grow. This increased demand from new occupants can help bolster local shops and services and may help justify greater investment in infrastructure such as increased bus services and other sustainable transport initiatives.

The council has set an ambitious target for the town to work towards becoming carbon neutral ahead of the UK target of 2050. This target is consistent with and informs our development strategy for accommodating growth and change. Managing the pattern of development in this way, ensures it is sustainable, will lessen encroachment on the natural environment - including protecting soil, water, and vegetation that have an important role in carbon mitigation.

As a result, our growth strategy must focus on prioritising development on Previously Developed Land (Brownfield land) within the urban area, through renewal, regeneration and densification and lastly through suitable greenfield site development in order to maximise the number of new homes which can be delivered…'.

Appraisal of the current version of the Local Plan

The Regulation 19 version of the Local Plan has been appraised against the SA Framework. The following overview presents a summary of the appraisal findings.

Summary of appraisal findings

Long-term moderate positive effects are considered likely under the population, health and wellbeing SA theme, and long-term significant positive effects are considered likely under the skills, employment and economic development SA theme. With regard to population, health and wellbeing, this is because the spatial strategy delivers growth relatively evenly across Hastings, including in the most deprived areas of the borough. In addition, the policy framework seeks to deliver a suitable mix of housing, including provision for affordable housing, specialist housing for older people and gypsy and traveller accommodation. It also seeks to improve health and wellbeing by reducing health inequalities, improving accessibility, and protecting and enhancing sporting and recreational facilities, access to green infrastructure, and community facilities. With regard to skills, employment and economic development, this is because the promotion of new employment floorspace, alongside mixed-use development, through the spatial strategy will stimulate the economy and provide new jobs locally. In addition, the policy framework supports the protection and enhancement of employment land; the provision of local job opportunities and upskilling opportunities; and the ongoing vitality of the town centre.

Minor positive effects are predicted under the climate change adaptation, flooding and coastal change SA themes. Whilst growth through the spatial strategy will likely increase flood risk both on new and existing development, due to an increase in hard surfaces and associated increase in surface water flood risk, significant effects are not considered likely due to the requirement for sequential testing. In maximising the use of previously developed land and largely avoiding the areas of the borough at greatest risk of flooding, the spatial strategy further minimises the likelihood of flooding at new development areas. Moreover, the policy framework seeks to ensure that future development is resilient to the impacts of climate change, such as increasing flooding.

Broadly neutral to minor positive effects are considered likely across the air quality, biodiversity and transport SA themes. With regard to air quality, this is because existing air quality issues are currently being managed in the borough, and air quality will be supported by housing and employment delivery taking place in locations accessible by public transport and active travel. In addition, the policy framework

sets out air quality mitigation requirements and measures, including the requirement for an AQIA alongside certain types of development and support for sustainable transport. With regard to biodiversity, the spatial strategy maximises the use of previously developed land and largely directs development away from internationally, nationally, and locally designated sites. This is further strengthened by the policy framework, which seeks to protect and enhance biodiversity and supports delivery of the borough's green-infrastructure network. Where some allocations lie closer to sensitive habitats, including Hastings Cliffs SAC, the requirement for Ecological Constraints and Opportunities Plans (ECOPs) provides additional safeguards, helping to ensure that ecological sensitivities are identified early and that development incorporates appropriate avoidance, mitigation, and enhancement measures. With regard to transport, this is because the spatial strategy primarily directs growth to areas with the best access to public transport, services and facilities, and employment opportunities. In addition, the policy framework focuses on delivering enhancements to the existing public transport and active travel network.

Neutral effects are predicted under the energy and water consumption SA theme. Energy and water companies will need to be consulted at the planning application stage to ensure that energy and water infrastructure is sufficient to accommodate new development. In addition, the policy framework seeks to ensure that future development is energy and water efficient through the use of low carbon technologies and sustainable design.

Minor negative effects are predicted under the land and water quality SA theme. While growth will increase demand on land and water resources and lead to some loss of greenfield and potentially BMV land, this is largely unavoidable given local constraints. Mitigation provided through policies SC3, SC16, SC18, SC15, and site allocation-specific water-quality requirements helps to limit impacts, improve drainage performance, and ensure development incorporates appropriate water-efficiency, pollution-prevention and remediation measures.

Moderate negative effects are predicted under the natural landscape SA theme. The spatial strategy directs growth to locations within or near the High Weald National Landscape and the Brede Valley and Combe Haven LCAs, creating potential for adverse impacts on landscape character and the special qualities of designated areas. However, intrusion into the National Landscape is limited and the policy framework seeks to mitigate adverse effects and support landscape enhancement.

Uncertainty is noted under the heritage SA theme. This is given both minor positive and minor negative impacts are considered likely. Impacts are largely dependent on the design and layout of development, which is unknown at this stage. Whilst some site allocations have the potential to affect the significance and setting of heritage assets, development also provides opportunities to better reveal the special qualities of heritage assets and support heritage-led regeneration. In addition, the policy framework seeks to mitigate adverse impacts on heritage assets as a result of development and secure enhancements.

Cumulative and in combination effects

The SA has considered cumulative effects and interactions with other plans and programmes, including neighbouring Local Plans.

The appraisal has identified potential for in-combination effects relating to: increased traffic and transport movements; recreational pressure on designated biodiversity sites and green infrastructure assets; demand for water resources in an area of water stress; and pressure on health, education and community facilities.

Positive in-combination effects are also likely. These include enhanced connectivity arising from investment in public transport, walking and cycling infrastructure; improvements to green and blue infrastructure networks; biodiversity enhancement and habitat creation initiatives; and economic and regeneration benefits associated with coordinated investment across Hastings and the surrounding area.

Overall, significant adverse in-combination effects are not anticipated. The Local Plan contains a comprehensive framework of policies relating to biodiversity, flood risk, landscape, heritage, transport and infrastructure provision which, together with regulatory requirements and mitigation delivered through other plans and programmes, is expected to minimise adverse effects and support positive outcomes over the plan period.

Next steps

Following the Regulation 19 publication, the Council will review the representations received in relation to both the Local Plan and the SA and consider whether any changes are required.

The Local Plan, together with supporting evidence base documents including the SA Report, will then be submitted to the Secretary of State for Independent Examination.

At Examination, the Local Plan will be assessed for legal compliance and whether it satisfies the tests of soundness set out in the NPPF. The SA, consultation responses and supporting evidence base will form part of the material considered through the Examination process.

If the Examination concludes that the Local Plan is sound, subject to any main modifications considered necessary, Hastings Borough Council will proceed with adoption of the Local Plan.

Following adoption, the Council will publish a Sustainability Appraisal Adoption Statement in accordance with the SEA Regulations.

1. Introduction

1.1. Background

1.1.1 AECOM has been commissioned to undertake an independent sustainability appraisal (SA) in support of Hastings Borough Council's emerging Local Plan.

1.1.2 Hastings Borough Council (HBC) is currently developing a Local Plan for Hastings Borough. This will replace the current Local Plan, which comprises the Hastings Planning Strategy (adopted February 2014) and the Hastings Local Plan Development Management Plan (adopted September 2015).

1.1.3 The Local Plan, which will cover the period to 2041, will be the key planning policy document for the borough and will guide decisions on the use and development of land. It will set out the Council's spatial strategy for growth and new development in Hastings. It will also include detailed development management policies setting out the form development in Hastings will need to take and any measures required to mitigate the impact of development.

1.1.4 This SA Report accompanies the submission version of the Local Plan, which is being consulted on under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations in September 2026.

1.1.5 Key information relating to the new Local Plan is presented in **Table 1-1**.

Table 1-1: Key facts relating to the Hastings Local Plan

Name of Responsible Authority	Hastings Borough Council
Title of the strategy	Hastings Local Plan
Subject	Local Plan
Purpose	Replacing the Hastings Planning Strategy and the Hastings Development Management Plan, the Local Plan will, alongside Neighbourhood Plans and the Waste and Minerals Plans, comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed
Timescale	The Local Plan will guide future development and land use within Hastings Borough over the period up to 2041
Area covered by the Local Plan	Hastings Borough (**Figure 1-1**)
Summary of content	The Local Plan will set out the vision, strategy and policies to manage growth and development in Hastings Borough during the period to 2041

Figure 1-1: Map of Hastings Borough

1.2. Sustainability Appraisal explained

1.2.1 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution to sustainable development.

1.2.2 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). SA also widens the scope of the assessment from focusing generally on environmental issues to include social and economic issues.

1.2.3 The SEA Regulations require that a report is published for consultation alongside the draft plan that '*identifies, describes and evaluates*' the likely significant effects of implementing '*the plan, and reasonable alternatives'*. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.2.4 The 'likely significant effects on the environment', are those defined in the SEA Regulations as 'including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'. Reasonable alternatives to the plan need to take into consideration the objectives for the plan and its geographic scope. The choice of reasonable alternatives is determined by means of a case-by-case assessment and a decision.

1.3. This Sustainability Appraisal report

1.3.1 This SA Report incorporates the information required for Environmental Reports by the SEA Regulations.

1.3.2 At this current stage of the plan-making process, HBC is consulting on the Regulation 19 'Pre-Submission' version of their Local Plan. This SA Report has therefore been produced with the intention of informing this stage in the Local Plan's preparation.

1.3.3 Specifically, this SA Report has been structured into three parts to address the key requirements stipulated by the SEA Regulations:

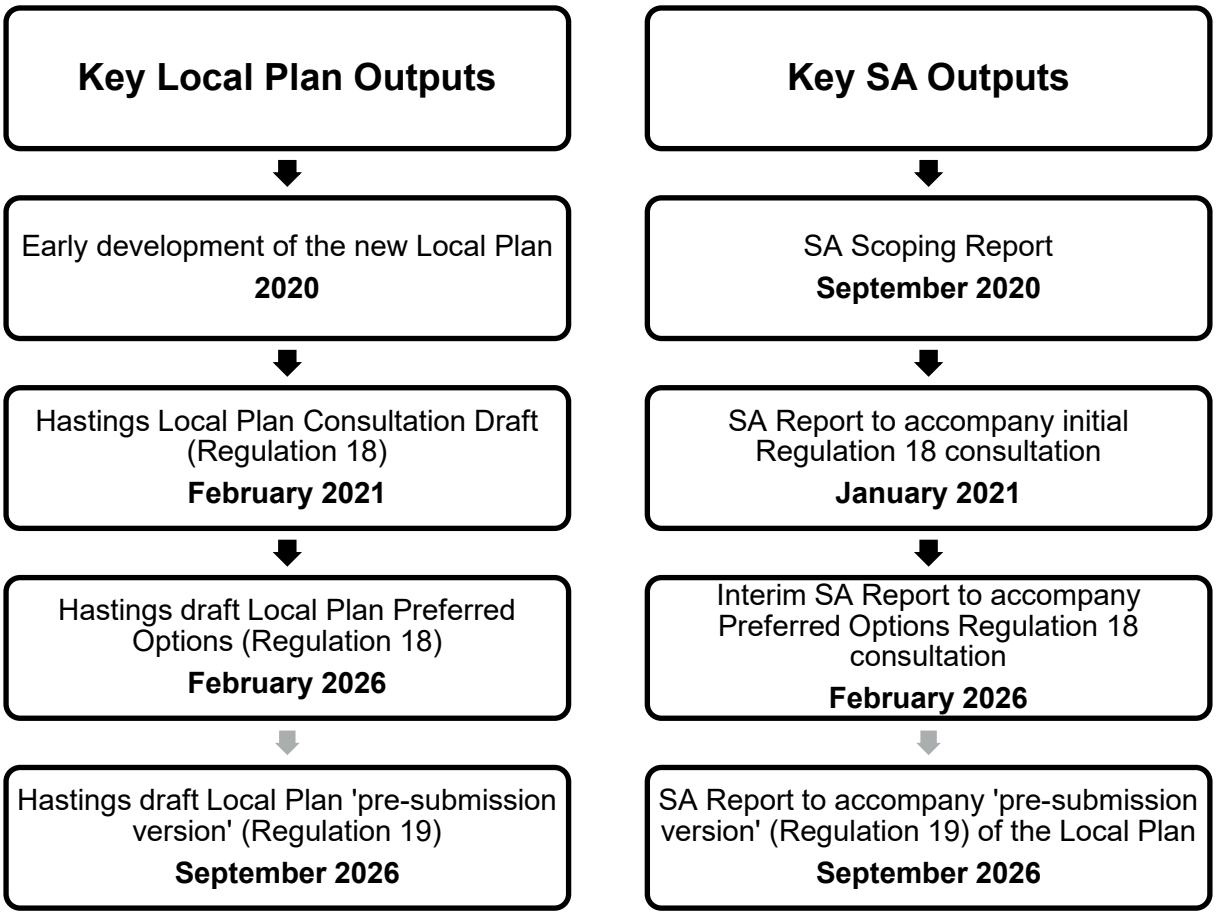
- **Part 1** (chapters 2 to 8) provides an outline of plan making to date, in association with the parallel SA process (including in relation to 'reasonable alternatives').
- **Part 2** (chapters 9 to 12) assesses the policies presented in the draft Regulation 19 'submission' version of the Local Plan, which this SA Report accompanies.
- **Part 3** (chapter 13) sets out the next steps for the Local Plan/SA process.

2. Stages of the Sustainability Appraisal undertaken to date

2.1. Overview of SA stages completed

2.1.1 A number of stages have been undertaken for the SA to date, with four main outputs. These stages are represented in **Figure 2-1**.

Figure 2-1: SA Work undertaken to date



3. The Sustainability Appraisal scope

3.1. The SA Scoping Report

3.1.1 The SEA Regulations require that: "*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England. These organisations were consulted on the scope of the SA for the Local Plan in August and September 2020 through an SA Scoping Report jointly prepared with Rother District Council.

3.1.2 The baseline information (including baseline data and context review) initially included in the SA Scoping Report (2021) provides the basis for the SA process and has been reviewed and updated in light of the responses received at scoping consultation.

3.2. Sustainability Appraisal Framework

3.2.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability issues that should be a particular focus of SA, ensuring it remains targeted on the most important issues. These issues were then translated into an SA 'framework' of objectives and appraisal questions.

3.2.2 The SA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach.

3.2.3 The SA Framework and the appraisal findings in this SA Report have been presented under ten SA Themes, reflecting the range of information being considered through the SA process. The selected SA themes incorporate the 'SEA topics' suggested by Schedule 2(6) of the SEA Regulations. These were refined to reflect a broad understanding of the anticipated scope of plan effects. These are:

- Air Quality
- Biodiversity
- Climate change adaptation, flooding and coastal change
- Energy and water consumption
- Heritage
- Land and water quality
- Natural landscape
- Population, health and wellbeing
- Skills, employment and economic development
- Transport

3.2.4 The SA Framework is presented in **Table 3-1**.

Table 3-1: SA framework

SA theme	SA objective	Appraisal questions. Will the option/proposal help to…
Air Quality	• Reduce air pollution from transport and development and improve air quality.	• Improve air quality? • Avoid locating development where air quality could negatively impact upon people's health? • Reduce the amount of Air Quality Management Areas? • Does it support the take up of low or ultra-low emission vehicles?
Biodiversity	• Biodiversity is protected, conserved and enhanced.	• Protect and enhance sites designated for their nature conservation interests? • Protect, conserve and enhance the town's priority species and habitats, and increase local biodiversity? • Achieve a net gain in biodiversity? • Protect and enhance ecological networks?
Climate change adaptation, flooding and coastal change	• Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	• Reduce the risk of flooding from rivers, watercourses and the coast to people and property? • Reduce the risk of surface water flooding? • Ensure that development does not increase flood risk to others? • Prevent inappropriate development in the flood plain? • Improve and extend green infrastructure networks? • Increase the resilience of the built and natural environment to the effects of climate change?
	• The risk of coastal erosion is managed and reduced, now and in the future.	• Protect land stability in designated vulnerable areas? • Protect coastal areas from deterioration?

SA theme	SA objective	Appraisal questions. Will the option/proposal help to…
Energy and water consumption	• The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	• Reduce energy consumption? • Reduce CO_2 to contribute to identified national targets? • Lead to efficient land use patterns that minimise the need to travel? • Lead to more sustainable travel including walking, cycling and public transport? • Does it enable the take up of low or ultra-low emission vehicles?
	• Minimise water consumption.	• Reduce water consumption? • Increase the use of water conservation and greywater recycling technologies? • Ensure water demand does not outstrip available supply?
Heritage	• Historic environment/ townscape is protected, enhanced and made more accessible.	• Protect, enhance and restore heritage assets? • Reduce the number of buildings at risk? • Encourage access to historic and cultural heritage? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Conserve and enhance archaeological remains, including those contributing to historic landscapes and townscapes?
Land and water quality	• The risk of pollution to land and soils is reduced and quality is improved.	• Reduce land contamination? • Minimise development on the best and most versatile agricultural land?
	• Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	• Minimise the production of household waste? • Reduce waste in the construction industry?

SA theme	SA objective	Appraisal questions. Will the option/proposal help to…
	• The risk of pollution to water is reduced and water quality is improved.	• Avoid water pollution due to contaminated runoff from development? • Support improvements to water quality consistent with the aims of the Water Framework Directive?
Natural landscape	• Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	• Conserve and enhance the High Weald AONB in line with the aims and objectives of the 2024-2029 Management Plan? • Protect and enhance the natural environment? • Encourage access to the natural environment (including parks, open spaces, recreational opportunities and the coast)? • Protect sensitive and special landscapes?
Population, health and wellbeing	• The health and well-being of the population is improved and inequalities in health are reduced.	• Reduce levels of childhood obesity? • Promote healthy living and active lifestyles? • Reduce health inequalities? • Improve access to high quality health facilities?
	• More opportunities are provided for everyone to live in a suitable home to meet their needs.	• Improve the quality of the housing stock and limit the number of non-decent homes? • Reduce homelessness and ensure the provision of housing for the homeless? • Encourage housing types that meet local needs?
	• All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	• Improve accessibility and affordability to essential local services (employment, public transport, education, open space, health services and shops)? • Promote compact development with good accessibility to local facilities and services? • Make access easier for those without a car?

SA theme	SA objective	Appraisal questions. Will the option/proposal help to…
		• Improve residential amenity and sense of place?
	• Safe and secure environments are created and there is a reduction in crime and fear of crime.	• Reduce actual levels of crime? • Reduce the fear of crime?
Skills, employment and economic development € $ £ ¥	• Economic performance is improved.	• Improve economic performance?
	• There are high and stable levels of employment and diverse employment opportunities for all.	• Reduce short and long-term unemployment? • Help to improve earnings? • Increase the number and range of employment opportunities?
	• Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	• Reduce poverty and social exclusion in those areas and communities most affected? • Reduce gap between least and most deprived areas?
	• Opportunities are available for everyone to acquire new skills, and the education and skills	• Improve the qualifications and skills of young people? • Improve the qualifications and skills of adults? • Address the skills gap and enable skills progression? • Contribute to meeting identified skills shortages?

SA theme	SA objective	Appraisal questions. Will the option/proposal help to…
	of the population improve.	• Improve access to high quality educational/training opportunities and facilities?
Transport	Road congestion levels are reduced and there is less car dependency and greater travel choice.	• Reduce the need to travel by private car? • Enable more sustainable transport patterns including walking, cycling and public transport? • Reduce the need to travel by car through the location and design of new development and places which provide more opportunities for active travel and for the provision and link to public transport infrastructure? • Support road safety?

4. Previous stages of plan-making and Sustainability Appraisal

4.1. Regulation 18 Consultation (2021)

Local Plan consultation draft (Regulation 18)

4.1.1 In February and March 2021, consultation was undertaken on an early draft of the Local Plan. The aim of the consultation was to present emerging policy ideas for the future development of Hastings. In this respect the consultation sought to gain stakeholders' views on the approach Local Plan policies can take on various key planning issues and on potential allocations in the borough.

4.1.2 The Local Plan Consultation Draft was the key output of the initial stage in developing the new Local Plan and was prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012.

4.1.3 To support this consultation, an Interim Sustainability Appraisal Report (2021) was prepared.

4.1.4 The Interim SA Report presented an appraisal of a series of high-level approaches and alternatives. This was with a view to presenting an evaluation of the relative sustainability merits of different broad approaches that could be taken for the Local Plan. This was for the benefit of stakeholders and plan-makers tasked with selecting preferred approaches for the Local Plan and for consideration alongside the representations received during the consultation.

4.1.5 The alternatives considered related to the following:

- Options for Ashdown House
- Options for the land east of Harrow Lane
- Options for housing delivery at Bohemia
- Options for Horntye
- Options for leisure provision
- Options for town centre parking zones
- Options for affordable housing provision
- Options for green infrastructure provision
- Options for biodiversity net gain
- Options for energy efficiency standards

4.1.6 Each option was considered against the SA Framework of objectives and assessment questions developed at scoping (Table 4-1).

4.1.7 Presenting the appraisal of these options, the following information was presented in the Interim SA Report:

- A description of the options appraised.
- An overview of the likely significant positive and negative effects of each option; and
- A ranking of the sustainability performance of each option relating to each SA theme to highlight their relative sustainability merits

4.1.8 The Interim SA Report also included a GIS-based assessment of sites promoted through the plan-making process. The findings informed the ongoing development of the Local Plan and formed part of the evidence base considered alongside consultation responses and technical evidence.

4.1.9 An updated site appraisal is presented in this SA Report (**Chapter 5** and the accompanying **Technical Annex**).

4.2. Regulation 18 Preferred Options Consultation (February 2026)

4.2.1 Following further evidence gathering, changes in national planning policy and continued plan development, Hastings Borough Council prepared an updated Preferred Options version of the Local Plan for consultation under Regulation 18 in February 2026.

4.2.2 A further Interim Sustainability Appraisal Report accompanied the 2026 Preferred Options consultation. This reassessed the sustainability issues and opportunities facing the borough and considered a range of reasonable alternatives, including growth strategy options, approaches to meeting housing needs and alternative spatial distributions of development. The appraisal also included an assessment of sites proposed for allocation through the Local Plan.

4.2.3 The findings of the 2026 Interim Sustainability Appraisal informed the preparation of the Regulation 19 version of the Local Plan. Full details of the reasonable alternatives considered and the appraisal findings are presented in the 2026 Interim Sustainability Appraisal Report.

5. Site appraisals

5.1.1 To support the consideration of which sites to potentially allocate through the Local Plan, various site assessments have been undertaken through the Local Plan process.

5.1.2 As a first stage in identifying the sites to be allocated in the Local Plan, developers, landowners and other interested parties were invited to submit sites for potential inclusion in plan through a “Call for Sites” process. This was undertaken in 2019, with additional sites and broad locations identified through the preparation of and consultation on the Regulation 18 Draft Local Plans in 2021 and 2026. Additional focused Calls for Sites for traveller pitch sites were undertaken between 2021-2026.

5.1.3 Subsequent to the “Call for Sites”, in the region of 200 potential housing, employment and traveller pitch sites have been considered for the Local Plan through the Strategic Housing and Employment Land Availability Assessment (SHELAA) process undertaken to support the development of the Local Plan. These sites have been assessed for their suitability, availability, achievability and deliverability to support the choice of housing and employment allocations taken forward through the Local Plan.

5.1.4 In addition, a separate appraisal of each of the sites assessed within Hastings - as documented in the SHELAA - has been undertaken through the SA process. This is with the aim of informing the proposed allocation of sites through the Local Plan.

5.1.5 As part of the SA, the constraints and opportunities associated with each site were identified using a set of criteria which were developed specifically for the SA process. Based on these criteria, a ‘red/amber/green’ (RAG) rating was then applied to each site for each criterion to provide an indication of site constraints and opportunities and the relative sustainability merits of the different sites.

5.1.6 The site appraisal undertaken through the SA process is distinct from the assessments undertaken through HBC’s Strategic Housing and Employment Land Availability Assessment (SHELAA). In this respect the SHELAA considers factors such as size, suitability, availability, and deliverability, whilst the SA site appraisal focuses on the constraints and opportunities associated with the sites. Whilst distinct, the SA and the SHELAA both form part of the evidence base for the Local Plan, and, with other studies undertaken for the Local Plan and engagement with stakeholders, supports decision making on the choice of sites to allocate.

5.1.7 The findings of the appraisal of the sites undertaken through the SA process, accompanied by an explanation of the approach and criteria utilised for the appraisal, is presented in the Technical Annex accompanying this SA Report (**SA Report Technical Annex: GIS Site Assessment**).

6. Assessment of growth strategy options

6.1. Development of growth strategy options

6.1.1 A key component of the new Local Plan will be to present an overall spatial strategy for the borough during the plan period to 2041.

6.1.2 To support the development of the preferred approach for the new Local Plan (i.e., the spatial strategy), the SA process has considered a range of growth strategy options. This is with a view to understanding the relative sustainability merits of different potential spatial strategies for the Local Plan.

6.1.3 These growth strategy options have been developed based on strategic variables associated with the following two components:

- different scales of growth; and
- different locations of growth.

6.1.4 A description of the growth strategy options, and components, is presented in **Table 6-1**.

6.1.5 **Table 6-2** below provides a breakdown of the growth scenario options.

Table 6-1: Growth scenario options considered as reasonable alternative

Growth scenario options	Rationale
Option 1a and 1b: Constraint adjusted growth scenario	The approach has taken an evidence-led approach, which has focused on the suitability, availability, and achievability of sites for development, and the constraints present. Options 1a and 1b reflect lower and higher density numbers on some sites, respectively. These options would deliver in the region of 3,295 (Option 1a) to 3,779 homes over the plan period (Option 1b). This comprises 26.92% to 30.87% of local housing need (LHN) as established under the March 2026 standard methodology.
Option 2: Constraint adjusted growth plus opportunity areas	This option builds on Option 1a/b by adding two additional sources of potential housing delivery: (i) Hastings Central and the area around St Johns Road (ii) Land at Breadsell It assumes these sites will become available over the plan period and contribute to meeting housing needs. This option would deliver in the region of 4,332 to 4,816 homes over the plan period. This comprises 35.39% to 39.35% of LHN as established under the March 2026 standard methodology.
Option 3: Increase densification at Hastings Central & St Johns Road opportunity sites	This option focuses exclusively on the Hastings Central and St Johns Road opportunity sites. The option applies elevated density assumptions to these two locations beyond the standard site capacity assumptions to maximise housing delivery within the borough's most accessible urban areas. No additional growth is assumed at Breadsell or through other sources of housing delivery considered under the alternative options. This option would deliver in the region of 2,814 homes over the plan period. This comprises 22.99% of LHN as established under the March 2026 standard methodology.
Option 4: Increase densification at Hastings Central and St Johns Road opportunity sites and increased densification assumptions on selected sites in the urban area	Focussing on the built up part of the borough, the Option applies densification at opportunity sites in Hastings Town centre and St Johns Road as well as selected sites in the wider urban area. It also increases densification in housing renewal areas. This option would deliver in the region of 4,697 homes over the plan period. This comprises 38.37% of LHN as established under the March 2026 standard methodology.

Growth scenario options	Rationale
Option 5: Elevated density assumption at Breadsell and co-location housing employment option at the Ivyhouse Lane employment site	This option would seek to increase densities at Breadsell and deliver a co-location housing/employment option at the Ivyhouse Lane employment site. It would also include the delivery set out under Option 1b. The options set out an alternative to the urban focus of Option 4. This option would deliver in the region of 4,511 homes over the plan period. This comprises 36.85% of LHN as established under the March 2026 standard methodology.
Option 6: 100% LHN	This option seeks to deliver the full Local Housing Need (LHN) as calculated under the standard methodology. It combines all components from previous options, including densification, new delivery locations, and co-location opportunities, and applies the most optimistic assumptions for site capacity. The approach assumes that every suitable hectare of land identified for housing is utilised to address the projected shortfall. This option would deliver in the region of 10,108 homes over the plan period. This comprises 100% of LHN as established under the March 2026 standard methodology.
Option 7: 110% LHN	This option builds on the 100% scenario (Option 6) by introducing an additional uplift to provide contingency and flexibility in meeting future housing requirements. It includes all components and applies the highest feasible density assumptions across all sites. This option would deliver in the region of 13,464 homes over the plan period. This comprises 110% of LHN as established under the March 2026 standard methodology.

Table 6-2 : Breakdown of the growth scenario options

	Option 1a: Constraint adjusted growth scenario (lower density)	Option 1b: Constraint adjusted growth scenario (higher density)	Option 2: Constraint adjusted growth plus opportunity areas	Option 3: Increase densification at Hastings Central & St Johns Road opportunity sites	Option 4: Option 3 + increased densification assumptions on selected sites in the urban area	Option 5: Elevated density at Breadsell and co-location housing employment option at Ivyhouse Lane	Option 6: 100% LHN	Option 7: 110% LHN
Commitments, completions and windfall								
Commitments (sites under construction and sites with planning permissions not yet built)	408	408	408	408	408	408	408	408
Completions	1,049	1,049	1,049	1,049	1,049	1,049	1,049	1,049
Windfall sites	675	675	675	675	675	675	675	675
Variables								
Options	1,163	1647	2,200 to 2,684	682	2,565	2,379	10,108	11,332
	3,295	**3,779**	**4,332 to 4,816**	**2,814**	**4,697**	**4,511**	**12,240**	**13,464**
Local Housing Needs (current standard methodology - May 2025, 686x18)	**12,240**	**12,240**	**12,240**	**12,240**	**12,240**	**12,240**	**12,240**	**12,240**
Percent of need met through option	**26.68%**	**30.6%**	**35.08% to 39.00%**	**22.79%**	**38.04%**	**36.53%**	**100.00%**	**110.00%**

7. Growth scenarios appraisal

7.1. Introduction

7.1.1 The aim here is to appraise the reasonable alternative growth scenarios introduced above under the SA framework (**Table 3-1**).

7.2. Appraisal methodology

7.2.1 The growth scenario options presented in **Table 6-2** have been appraised against the SA Framework developed during scoping. The purpose of the appraisal is to compare how each scenario performs across a wide range of environmental, social and economic considerations, and to highlight the implications of different levels and patterns of growth for Hastings.

7.2.2 The appraisal is carried out in two stages. First, each scenario is considered before any Local Plan policies or mitigation are applied, to understand its inherent impacts. Findings for each SA theme are presented in the following subsections, including a brief commentary on likely effects, a numerical ranking of options (with 1 being most favourable), and identification of any significant positive or negative effects. An asterisk (‘1*) is used to highlight the best performing option.

7.2.3 Then, in **Chapter 11**, the appraisal considers the preferred option and how these effects may change once reasonable policy measures and mitigation are introduced, reflecting how the Local Plan would operate in practice.

7.3. Appraisal

Air quality

	Option 1a / 1b	**Option 2**	**Option 3**	**Option 4**	**Option 5**	**Option 6**	**Option 7**
Rank	2	4	1*	3	5	6	7
Likely significant effects?	No	No	No	No	No	**Yes - adverse**	**Yes - adverse**

Appraisal

7.3.1 There are no Air Quality Management Areas (AQMAs) within the borough, and overall air quality is generally good. Hastings benefits from four railway stations and a comprehensive bus network, providing opportunities to deliver growth in locations that support sustainable travel and reduce reliance on private cars.

7.3.2 The borough's road network includes two primary routes: the A259 (coastal route) and the A21 (north-south corridor). Development located close to these roads may experience localised air quality issues due to traffic emissions and congestion. While all growth scenarios could involve development near these corridors, the scale and distribution of growth will influence the extent of potential impacts.

7.3.3 All growth options have the potential to increase traffic and congestion, which could lead to adverse effects on local air quality. However, options that have lower growth rates, and options that focus growth in accessible locations or near public transport hubs, are likely to perform more favourably by limiting car dependency. Conversely, options that maximise growth across the borough are likely to have greater adverse effects.

7.3.4 Option 3 and 1a/1b, which represent the lowest overall levels of growth, are likely to perform most favourably with regard to air quality because they would generate the least additional traffic. Options that focus additional growth in Hastings Central and St Johns Road locations (Options 3 and 4) will also support air quality by concentrating additional development in areas with good public transport accessibility (including proximity to railway stations and frequent bus services) thereby limiting reliance on private cars. Option 2 will also deliver growth at these accessible locations; however, the inclusion of additional growth at Breadsell, which is relatively less accessible than central locations, could increase traffic flows and associated emissions.

7.3.5 Option 5, which seeks to deliver higher density development at non-town centre locations at Breadsell and Ivyhouse Lane is likely to have adverse effects relating to air quality. While co-location may reduce the need for some commuting trips by enabling people to live and work in the same area, the overall level of growth and focus on locations outside the town centre is likely to result in increased vehicle movements and associated emissions. Consequently, Option 5 is expected to perform less favourably than growth scenarios focussed on the most accessible urban locations.

7.3.6 Options 6 and 7, which aim to deliver 100% and 110% of Local Housing Need respectively, are expected to perform least favourably. The scale of growth under these scenarios has the potential to significantly increase emissions across the borough, including from the delivery of high levels growth at locations less well connected to key services and amenities by sustainable transport modes. In addition, these options assume that every suitable hectare of land identified for housing is utilised, including through the application of very high-density assumptions. This could place increased pressure on open space and green infrastructure that contribute to air quality regulation and help mitigate the effects of traffic-related emissions. As a result, these options have the potential to result in significant adverse effects on air quality.

Conclusion

7.3.7 Overall, all growth scenarios have the potential for adverse effects on air quality. The magnitude of these effects increases with the scale of growth and the extent to which development is located in areas that are less accessible by sustainable transport modes. Option 3 performs most favourably as it combines the lowest level of growth with a focus on highly accessible locations, while Option 1a and Option 1b also perform relatively well due to their lower overall housing numbers. Option 4 performs more favourably than Option 2 because its additional growth is concentrated within accessible urban locations, whereas Option 2 includes development at the less accessible Breadsell location. Options 6 and 7 perform least favourably and could result in significant adverse effects on air quality without robust mitigation measures. The options would require investment in and promotion of sustainable transport infrastructure and services, particularly where growth is directed towards more peripheral locations.

Biodiversity

	Option 1a / 1b	**Option 2**	**Option 3**	**Option 4**	**Option 5**	**Option 6**	**Option 7**
Rank	1*	4	2	3	5	6	7
Likely significant effects?	No	**Yes - adverse**	No	**Yes - adverse**	**Yes - adverse**	**Yes – adverse**	**Yes - adverse**

Appraisal

7.3.8 All options have the potential to affect biodiversity through land take, habitat loss, fragmentation, and disturbance during construction and operation. The scale and distribution of growth are key determinants of the likely significance of these effects. Options that deliver lower levels of development and focus growth within the existing urban area are likely to perform most favourably, as they reduce the need for greenfield development and limit encroachment into sensitive habitats. Conversely, options that maximise growth across the borough, including in more sensitive locations, have the potential to lead to increased adverse effects on biodiversity.

7.3.9 Options 1a / 1b, which represent constraint-adjusted growth scenarios, are likely to perform most favourably. These options assume a limited overall quantum of development and are based on an evidence-led approach that considers suitability and achievability. This has the potential to minimise direct impacts on habitats and species and reduce pressure on designated sites and ecological networks.

7.3.10 Option 3 delivers the lowest level of growth through densification in the Hastings Central and St Johns Road. An increased focus on these locations can reduce the need for outward expansion and associated habitat loss and fragmentation. However, concentrating development within existing urban areas may increase pressure on brownfield habitats, many of which can support species of local biodiversity value. As a result, whilst Option 3 performs favourably overall, it performs slightly less favourably than Options 1a/1b, which apply a more constraint-led approach across a broader range of sites.

7.3.11 Option 2, which introduces additional opportunities in central areas but also includes development at Breadsell, is likely to perform less favourably than Options 1a/1b, 3 and 4. While concentrating development in urbanised locations can limit biodiversity impacts, the inclusion of growth at the borough's edge introduces potential risks of habitat fragmentation and disturbance near sensitive ecological areas, including Marline Valley Woods SSSI. The additional development proposed at Breadsell may also reduce the function of areas at the urban edge that contribute to ecological connectivity between habitats. The option also delivers more growth than Options 1a/1b and 3.

7.3.12 Options 4 and 5 introduce higher growth assumptions through increased densities within the urban area and at selected sites. Option 4 focuses growth primarily within the existing built-up area, including Hastings Central, St Johns Road and selected urban sites. Whilst this may increase pressure on urban and brownfield habitats, it is less likely to result in direct impacts on habitats at the borough edge than Option 2. Option 5 performs less favourably than Option 4, as it builds on this approach by increasing densities at sites at the borough's periphery, including Breadsell, thereby increasing the potential for direct and indirect impacts on biodiversity. These areas often act as buffers between the built-up area and designated sites, so development here has the potential to increase fragmentation and reduce ecological connectivity between key habitats. Option 5, which seeks to deliver co-located housing and employment at Ivyhouse Lane, may have impacts on biodiversity from an expansion of the existing employment area in this location.

7.3.13 Options 6 and 7, which seek to deliver 100% and 110% of LHN respectively, are likely to perform least favourably in relation to biodiversity. These options assume that every suitable hectare of land identified for housing is utilised and apply the most ambitious density assumptions across the borough. While they offer the greatest opportunities for biodiversity net gain (BNG) and strategic habitat creation, the scale of development proposed has the potential to significantly increase direct and indirect impacts on habitats and species, particularly where development extends into greenfield areas or areas of ecological value.

7.3.14 All options will be subject to the requirement to deliver at least 10% BNG under the Environment Act 2021, which will help mitigate negative effects and provide opportunities for enhancement, although the effectiveness of this will depend on site-specific design and implementation, and the size of sites being developed.

Conclusion

7.3.15 Overall, Options 6 and 7 perform least favourably for biodiversity due to the scale of growth proposed and the increased likelihood of habitat loss, fragmentation and disturbance. Although these options could provide opportunities for biodiversity net gain and habitat creation, a precautionary approach suggests that the potential adverse effects associated with the amount and distribution of development are likely to outweigh these benefits. Option 7 performs least favourably overall as it proposes the highest level of development.

7.3.16 Options 2, 4 and 5 are likely to result in adverse effects on biodiversity. Option 4 performs more favourably than Options 2 and 5 as it largely focuses growth within the existing urban area, reducing pressure on habitats at the edge of the borough. By contrast, Options 2 and 5 include development at Breadsell, which has greater potential to affect ecological connectivity and habitats close to designated biodiversity sites. Option 5 performs less favourably than Option 2 due to its higher density assumptions at peripheral locations.

7.3.17 Options 1a/1b and 3 perform most favourably. Option 3 directs development to previously developed urban locations and delivers the lowest overall level of growth, reducing the need for expansion into undeveloped land. However, it may increase pressure on brownfield habitats of local ecological value. Options 1a/1b perform best overall as they combine relatively low levels of growth with a constraint-led approach that takes account of ecological sensitivities, thereby minimising the risk of adverse effects on habitats, species and ecological networks.

Climate change adaptation, flooding and coastal change

	Option 1a / 1b	**Option 2**	**Option 3**	**Option 4**	**Option 5**	**Option 6**	**Option 7**
Rank	1*	3	2	5	4	6	7
Likely significant effects?	No	No	No	No	No	Uncertain	Uncertain

Appraisal

Climate Change Adaptation

7.3.18 All options have the potential to support climate change adaptation through measures such as green infrastructure provision, sustainable drainage systems, and climate adapted buildings. However, the ability to deliver significant new green infrastructure is likely to vary according to the scale and nature of development. Options that involve larger-scale development, such as Options 2, 5, 6 and 7, may offer greater opportunities to enhance strategic green infrastructure networks, which can help mitigate the effects of flooding and overheating. Conversely, these same options also have the potential to result in greater loss of existing greenfield land, which could negatively affect climate resilience.

Flooding

7.3.19 Hastings generally has a relatively low risk of fluvial flooding due to it's ghyll-type watercourses, although areas of the borough are within Flood Zones 2 and 3, particularly along watercourses such as the Combe Haven Main River. Coastal flooding is also an issue along the seafront. All options have the potential to include development in areas subject to some degree of flood risk, including surface water flooding, which is the most widespread across the borough and particularly prevalent in low-lying urban areas. Areas of the borough also have complex interactions between multiple sources of flood risk.

7.3.20 Options 3, 1a and 1b are likely to perform most favourably in relation to flood risk, as these options propose the lowest overall quantum of growth over the fewest number of sites and therefore have the potential to minimise exposure to areas of flood risk. Options 1a and 1b perform slightly more favourably than Option 3 as their constraint-adjusted approach provides greater flexibility to avoid areas affected by flood risk, whereas Option 3 focuses development within Hastings Central and St Johns Road, where there are localised areas of fluvial, tidal and surface water flood risk. Conversely, Options 6, and 7, which seek to utilise every available hectare of land identified for housing, perform least favourably as they would require the highest level of development across the borough, increasing the likelihood that sites in areas of flood risk or affecting flood risk would need to be utilised to deliver the growth.

7.3.21 Options 2, 4 and 5 perform moderately, with the potential for increasing exposure to flood risk as densities and overall growth levels rise. Option 2 performs more favourably than Options 4 and 5 due to its lower overall quantum of development. These options are also likely to deliver additional growth in town centre locations, with the potential for development to affect, or be affected by, areas of fluvial flood risk (for example around Priory Meadow) and surface water flood risk. Option 5 will deliver additional growth at Breadsell, which has some limited areas of fluvial flood risk, and the Ivyhouse Lane employment area, which has some surface water flood issues. These are not significant constraints to development in these areas however as areas of flood risk can be readily avoided through a sequential approach to development. As a result, Option 5 is considered to perform slightly more favourably than Option 4, as it delivers a lower overall quantum of development and is not considered to introduce significant additional flood risk constraints.

7.3.22 It is noted that all options would be subject to the application of the sequential and exception tests and provision of SuDS, which are likely to mitigate significant effects. However, as the scale of development increases, so does the potential for cumulative impacts on surface water run-off and drainage capacity, which could affect both new and existing development.

Coastal Change

7.3.23 The Hastings coastline is heavily managed and protected, as set out in the South Foreland to Beachy Head Shoreline Management Plan, which seeks to maintain defences along the urban frontage. All options have the potential to include development in proximity to the coast, where risks associated with coastal flooding and erosion may increase over the plan period due to sea level rise and climate change.

7.3.24 Options proposing higher levels of growth in coastal and low-lying parts of the borough (Options 2 and 4 to 7) perform least favourably as they may require more extensive adaptation measures. In contrast, lower growth options (Options 3, 1a and 1b) perform most favourably, as they reduce the likelihood of significant additional development in areas vulnerable to the effects of coastal change. Of the lower growth options, Option 3 performs slightly less favourably than Options 1a and 1b because its focus on only Hastings Central and St Johns Road has the potential to increase the concentration of development in locations that may be affected by current and future coastal flood risk.

7.3.25 While existing coastal defences are expected to provide a high level of protection, ongoing maintenance and potential upgrades will be essential to manage future risks under all options.

Conclusion

7.3.26 Overall, all options provide opportunities to incorporate climate change adaptation measures, including green infrastructure, sustainable drainage systems, urban greening, resilient building design and alignment with the objectives of the coastal change management area. However, the likelihood of adverse effects relating to flooding and coastal change generally increases with the scale of growth proposed and the number of sites required to accommodate development.

7.3.27 Options 1a/1b and 3 perform most favourably. These options deliver the lowest levels of growth and are therefore less likely to require development in areas affected by flood risk or coastal change. Options 1a and 1b perform best overall due to their constraint-led approach, while Option 3 performs slightly less favourably because of its concentration of development within Hastings Central and St Johns Road, where localised flood risk constraints exist.

7.3.28 Options 2, 4 and 5 perform moderately. Option 2 performs more favourably than Option 4 due to its lower overall quantum of development. Option 5 performs slightly more favourably than Option 4 due to its lower overall level of growth and because flood risk constraints at Breadsell and Ivyhouse Lane are not considered significant barriers to development.

7.3.29 Options 6 and 7 perform least favourably as they seek to maximise housing delivery across the borough and are therefore most likely to require development on sites affected by flood risk, coastal change or drainage constraints. While these options may provide greater opportunities to deliver strategic adaptation measures, the scale of growth proposed creates increased uncertainty regarding the ability to avoid and mitigate impacts through the sequential approach.

Energy and Water Consumption

	Option 1a / 1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Rank	2	=3	1*	=3	=3	6	7
Likely significant effects?	No	No	No	No	No	No	No

Appraisal

7.3.30 Energy and water consumption are directly related to the scale of development. Whilst it depends on the application of energy and water efficiency measures within new development, as the overall quantum of growth increases, so does demand for these resources. Options that deliver lower levels of growth are therefore likely to perform most favourably, while options that maximise growth across the borough are likely to perform least favourably.

7.3.31 Option 3 is likely to perform most favourably, as it delivers the lowest overall level of development and therefore the lowest additional demand for energy and water resources. Options 1a / 1b also perform favourably due to their relatively low level of development and associated resource demand. Options 2, 4 and 5 perform similarly, as although they take different approaches to accommodating growth, they all propose moderate levels of development that would result in increased demand for energy and water resources when compared with Options 1a/1b and 3. Options 6 and 7, which seek to deliver 100% and 110% of LHN, are likely to perform least favourably, as they assume the highest levels of development and therefore the greatest resource demand. Option 7 performs least favourably overall due to the additional level of growth proposed.

Conclusion

7.3.32 Overall, the ranking for this theme reflects the quantity of development proposed under each option and the associated demand for energy and water resources.

7.3.33 While all options will need to incorporate energy and water efficiency measures, and larger development sites (such as proposed under some options for Breadsell) may offer opportunities for renewable energy and district-scale solutions, these benefits are unlikely to fully offset the increased consumption associated with higher growth levels.

Heritage

	Option 1a / 1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Rank	1*	3	4	5	2	6	7
Likely significant effects?	Uncertain	**Yes - adverse**	**Yes - adverse**	**Yes - adverse**	Uncertain	**Yes - adverse**	**Yes - adverse**

Appraisal

7.3.34 Hastings has a rich historic environment, including a large number of listed buildings, scheduled monuments, conservation areas and areas of archaeological interest. The town centre, central St Leonards and the seafront are particularly sensitive due to their concentration of heritage designations and historic character. Development in these locations, especially through densification, has the potential to lead to adverse effects not only through direct impacts but also indirectly by altering the setting and character of heritage assets. In this respect increased development intensity and taller buildings could affect the key components of heritage significance, including the fabric and setting of heritage assets, and views, townscape character and sense of place.

7.3.35 While the significance of effects will ultimately depend on detailed design and layout, a higher level of housing growth generally increases the likelihood and potential magnitude of negative effects on heritage assets. Options that deliver lower levels of growth and avoid the most constrained areas are likely to perform most favourably. Option 1a/1b, which assumes the lowest level of development, is based on a constraint-led approach, meaning heritage sensitivities will already be considered in determining site suitability and capacity. As a result, these options are expected to avoid the most sensitive locations and minimise potential impacts on the historic environment.

7.3.36 Option 3, despite delivering the lowest level of growth overall, increases densification at Hastings Central and St Johns Road opportunity sites. Given the concentration of designated and non-designated heritage assets within these locations, increased development intensity and associated cumulative effects have the potential to adversely affect their significance, including through impacts on setting, townscape character and important views. Similarly, Option 4 also directs growth to these locations through densification (as well as other locations in the urban area), and therefore has the potential for significant negative effects. Given the wider distribution and greater scale of development proposed, Option 4 is likely to perform less favourably than Option 3.

7.3.37 Option 2 also delivers additional growth at Hastings Central and St Johns Road. Whilst development in these locations has the potential to affect the significance, setting and character of heritage assets, the option is less reliant on intensification within these heritage-sensitive locations than Options 3 and 4. As a result, Option 2 is likely to perform more favourably than these options in relation to the historic environment.

7.3.38 Option 5 introduces higher growth through intensification at the borough's edge, at locations that are disconnected from the historic core and seafront and are not rich in heritage assets. This means that while the option delivers more homes, its potential for adverse heritage impacts is likely to be lower than Options 2,3 and 4, which include increased growth in central and urban areas.

7.3.39 Options 6 and 7, which seek to deliver 100% and 110% of LHN, respectively, are likely to perform least favourably overall. These options assume that every suitable hectare of land identified for housing is utilised, which markedly increase the potential for significant direct and indirect adverse effects on heritage assets and their settings, particularly in sensitive town centre and St Leonards locations. This includes through densification and wholescale changes in townscape character.

Conclusion

7.3.40 Options 6 and 7 perform least favourably due to the scale of growth and likely requirement for significant growth to be delivered in sensitive locations for the historic environment.

7.3.41 Options 2, 3, and 4 also perform relatively poorly because they direct growth to the historic core of Hastings and St Leonards, which is highly constrained in heritage terms. Of these options, Option 2 performs most favourably as it is less reliant on intensification within heritage-sensitive locations. Option 3 performs less favourably due to its focus on Hastings Central and St Johns Road, whilst Option 4 performs least favourably due to the wider distribution of intensification across the urban area.

7.3.42 Option 1a/1b performs most favourably overall given the more limited growth requirements and potential to avoid the most sensitive areas, followed by Option 5, which directs additional growth to less sensitive parts of the borough.

7.3.43 All options however have the potential for adverse effects without appropriate avoidance, mitigation, and enhancement measures; in this respect robust heritage-led planning will be important to minimise harm and maximise opportunities for enhancement.

Land and water quality

	Option 1a / 1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Rank	2	4	1	3	5	6	7
Likely significant effects?	No	**Yes - adverse**	No	No	**Yes - adverse**	**Yes - adverse**	**Yes - adverse**

Appraisal

7.3.44 The efficient use of land is an important consideration for sustainable development. Options that focus growth within the existing urban area and on previously developed land are likely to perform most favourably, as they minimise the loss of greenfield land and reduce potential impacts on soil quality and agricultural resources. In this respect, Option 3 is likely to perform most favourably as it delivers the lowest level of growth and focuses development within Hastings Central and St Johns Road. Option 1a/1b is also likely to perform well due to its constraint-led approach and relatively limited quantum of growth, while Option 4 also performs favourably through its focus on brownfield sites and urban intensification.

7.3.45 Options 2 and 5 include elements that prioritise brownfield regeneration and the efficient use of previously developed land, however, they also include development at Breadsell, meaning there remains greater potential for adverse effects on soil resources and agricultural land when compared with Options 1a/1b, 3, and 4.

7.3.46 Options 6 and 7, which seek to deliver 100% and 110% of LHN, respectively, perform least favourably in relation to this SA theme. These options assume that every available hectare of land identified for housing is utilised, and therefore have the greatest potential to result in increased loss of open space and increased pressure on geodiversity and associated soils resources.

7.3.47 In relation to water resources, Hastings is located in an area of serious water stress. All options will increase demand for water supply, but the scale of impact will correspond to the level of growth proposed. Option 3, followed by Option 1a/1b, is likely to have the least impact, while higher growth options (Options 6 and 7, and to a lesser extent Options 2, 4 and 5) have the potential to place greater pressure on water resources. However, it is anticipated that Water Resource Management Plans will help address long-term supply issues.

7.3.48 Similarly, waste generation is an inevitable consequence of development and will broadly align with the scale of growth. While higher growth options will generate more waste, including both refuse and sewerage, they also present opportunities to incorporate innovative waste management practices. Lower growth options will generate less waste overall but offer fewer opportunities for strategic waste solutions.

Conclusion

7.3.49 Overall, the potential for adverse effects on land and water quality generally increases with the scale of growth proposed and the extent to which development is directed onto greenfield land. Option 3 performs most favourably as it delivers the lowest level of growth and focuses development within the existing urban area. Option 1a/1b also performs well due to its constraint-led approach and limited requirement for greenfield development. Option 4 performs relatively favourably through its focus on urban intensification and brownfield regeneration. Options 2 and 5 perform less favourably due to their inclusion of the Breadsell greenfield site, which increases the risk of agricultural land loss and places greater pressure on water resources. Option 5 performs less favourably of these options due to its greater reliance on greenfield development. Options 6 and 7 perform least favourably, as delivering 100% and 110% of LHN introduces the greatest potential for widespread open space loss, soil degradation, and water stress, despite offering opportunities for strategic waste management and brownfield reuse.

Natural landscape

	Option 1a / 1b	**Option 2**	**Option 3**	**Option 4**	**Option 5**	**Option 6**	**Option 7**
Rank	1	4	2	3	5	6	7
Likely significant effects?	No	**Yes - adverse**	No	No	**Yes - adverse**	**Yes - adverse**	**Yes - adverse**

Appraisal

7.3.50 The northern and eastern edges of Hastings are within the High Weald National Landscape (NL), which is a nationally designated area valued for its scenic quality and distinctive character. The western edge of Hastings is within the Combe Valley Countryside Park, which is part of the Combe Haven and Glyne Gap Landscape Character Area and performs an important function, maintaining a physical and visual gap between the built up areas of St Leonards and Bexhill. Development within or close to these locations has the potential to adversely affect their special qualities, particularly where growth is directed to greenfield land on the settlement edge. The extent of potential impacts will depend on the scale and distribution of development, as well as the design and mitigation measures applied.

7.3.51 Options that focus growth within the existing urban area and on previously developed land are likely to perform most favourably in relation to this theme, as they have the potential to limit encroachment into sensitive landscapes and reduce effects on the setting of the designated landscapes. In this respect, Option 1a / 1b, which applies a constraint-led approach and deliver a lower quantum of growth, is likely to lead to the most limited impacts on landscape character, although there are likely to be some impacts from some smaller-scale allocations under these options on the High Weald National Landscape. Similarly, Option 3, which focusses on Hastings Central and St Johns Road opportunity sites, is likely to perform relatively favourably as it limits pressure on the High Weald National Landscape and the urban fringe. Option 4, which builds on this approach through additional growth in housing renewal areas and sites in the wider urban area, will also help limit impacts on the special qualities of the National Landscape. However, by extending intensification across a wider area than Option 3, it has greater potential to affect townscape character. Increased densification offered by these options however also has the potential to impact on townscape character in central locations.

7.3.52 Options 2 and 5 are likely to perform less favourably. These options introduce increased densities on greenfield land on the settlement edge, which have the potential to significantly alter the character of surrounding landscapes and affect the setting of the High Weald NL and CVCP. In particular, the inclusion of the Breadsell Lane site under these options, which is outside, but within the setting of the designation, may lead to significant changes to the borough's landscape character, although the significance of effects will depend on detailed design and mitigation. Option 5 is likely to perform less favourably than Option 2 due to the increased density assumptions at Breadsell.

7.3.53 Options 6 and 7, which seek to deliver 100% and 110% of LHN, respectively, perform least favourably in relation to the Natural Landscape theme. These options assume that every available hectare of land identified for housing is utilised, and therefore have the greatest potential to result in widespread and significant changes to the character and quality of Hastings's landscapes and townscapes. This includes increased pressure on the setting of the High Weald NL and the urban fringes, where landscape sensitivity is high.

Conclusion

7.3.54 Overall, options that focus development within the existing urban area and on previously developed land perform most favourably, as they reduce impacts on the setting of sensitive landscapes, such as the High Weald National Landscape. Option 1a/1b performs most favourably due to its constraint-led approach, followed by Options 3 and 4, which focus growth within the existing urban area. It should be noted though that these options will have some impacts on the National Landscape due to smaller scale allocations within the designated area.

7.3.55 Options 2 and 5 perform less favourably due to the inclusion of development at Breadsell and increased growth at the settlement edge, which has the potential to affect landscape character and the setting of the National Landscape. Option 5 performs less favourably than Option 2 due to the higher density assumptions proposed at Breadsell.

7.3.56 Options 6 and 7 perform least favourably as they deliver the highest levels of growth and therefore have the greatest potential to result in widespread landscape and townscape change. Option 7 performs least favourably overall due to the additional scale of development proposed.

Population, health and wellbeing

	Option 1a / 1b	**Option 2**	**Option 3**	**Option 4**	**Option 5**	**Option 6**	**Option 7**
Rank	4	2	5	1	3	6	7
Likely significant effects?	**Yes - positive**	**Yes - positive**	**Yes - positive**	**Yes - positive**	**Yes - positive**	**Yes – positive and adverse**	**Yes - positive and adverse**

Appraisal

7.3.57 All options have the potential to deliver significant positive effects by providing new homes, including a mix of types, sizes, and tenures, with a proportion of affordable housing. This will help meet existing and future housing needs and support improvements in health and wellbeing through better living conditions. However, the significance of these effects depends not only on the quantum of growth but also on its location. Options that concentrate development in accessible areas with good links to services and amenities are likely to perform more favourably, while options that focus growth in peripheral or disconnected locations have the potential to limit these benefits.

7.3.58 Options 1a/1b and 3, which assume the lowest levels of development, are likely to perform less favourably as they provide the most limited contribution to addressing housing need. Option 3 performs least favourably of these options as it delivers the lowest overall level of housing growth. Options 2 and 4 perform more favourably by introducing additional growth opportunities, particularly in accessible locations in Hastings Central and St Johns Road, which can support regeneration and improve access to services. Option 4 performs most favourably overall as it combines a significant level of housing delivery with a strong focus on accessible urban locations. Option 4 also offers additional benefits through densification in the town centre, which is the most accessible part of the town to services, facilities and borough-wide public transport networks.

7.3.59 Option 5 also performs relatively well by delivering a high level of housing growth; however, a large proportion of the growth would be delivered in Breadsell, a peripheral location with limited access to existing services and amenities. This is likely to reduce the health and wellbeing benefits associated with access to services, facilities and opportunities for active travel. Nevertheless, Option 5 performs more favourably than Options 1a/1b and 3 as it makes a greater contribution towards meeting housing needs and supporting economic activity.

7.3.60 Options 6 and 7, which seek to deliver 100% and 110% of LHN, respectively, will contribute the most to meeting housing needs and supporting regeneration. However, given the scale of growth proposed, the options would also be likely to place significant pressures on existing services and facilities, requiring substantial investment in infrastructure to avoid adverse effects on the quality of life of residents and health and wellbeing. While developer contributions and planning obligations can help mitigate these pressures, the scale of growth proposed under these options introduces uncertainty around timely delivery of supporting infrastructure. A further drawback of delivering this level of growth is the likelihood that development at this scale will have significant adverse effects on the quality and liveability of existing neighbourhoods. This includes through the likely delivery of inappropriately scaled and sited development, and delivery of development of unsuitable types and tenure for specific locations. Whilst these options provide the greatest housing benefits, there is considerable uncertainty regarding the ability of infrastructure, services and facilities to accommodate this scale of growth. This has the potential to lead to significant adverse effects which could outweigh the benefits of enhanced housing delivery.

Conclusion

7.3.61 Overall, all options are likely to deliver significant beneficial effects for this SA theme through the provision of additional housing and support for population growth. However, performance is influenced not only by the amount of housing delivered, but also by the accessibility of development and its ability to support regeneration, services, facilities and healthier patterns of living.

7.3.62 Option 4 performs most favourably as it combines substantial housing delivery with a focus on accessible urban locations, supporting regeneration and access to services, facilities and public transport. Option 2 also performs favourably due to the delivery of additional growth in accessible locations within Hastings Central and St Johns Road.

7.3.63 Option 5 performs relatively well, providing a significant contribution towards housing delivery while also supporting employment opportunities through the co-location approach at Ivyhouse Lane. However, its greater emphasis on peripheral locations means it performs less favourably than Options 2 and 4. Options 1a/1b and 3 perform less favourably due to their more limited contribution towards meeting housing needs. Of these options, Option 1a/1b performs more favourably due to its greater flexibility and broader distribution of growth, whilst Option 3 delivers the lowest level of housing growth overall.

7.3.64 Options 6 and 7 have the greatest potential to meet housing needs and support regeneration. However, the scale of development proposed could place significant pressure on infrastructure, services, facilities and existing communities. Given the physical and environmental constraints affecting the borough, there is uncertainty as to whether these impacts could be successfully mitigated. As a result, these options perform least favourably overall for this SA theme.

Skills, employment and economic development

€ $ £ ¥	Option 1a / 1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Rank	5	2	4	1	3	6	7
Likely significant effects?	**Yes - positive**	**Yes - positive**	**Yes - positive**	**Yes - positive**	**Yes - positive**	**Yes - positive and adverse**	**Yes - positive and adverse**

Appraisal

7.3.65 Hastings has a lower employment rate than the South East average, and economic regeneration remains a key priority for the borough. Housing growth can support skills, employment and economic development by increasing the local labour force, supporting spending in the local economy, and helping to sustain investment in town and district centres. However, the economic benefits of growth are influenced not only by the amount of development proposed, but also by its location. Options that direct growth towards the borough's main employment areas and locations with good access to jobs, services and public transport are likely to perform most favourably. Conversely, growth that is less well integrated with existing economic centres, or that is delivered at a scale that places pressure on the quality and attractiveness of the borough, may limit these benefits.

7.3.66 Option 4 is likely to perform most favourably as it focuses growth in the key employment areas of Hastings town centre and St Leonards and applies higher densities, which could strengthen town centre vitality and support economic activity. Option 2 also performs strongly, offering similar benefits to Option 4, but with a lower level of growth. Option 3 also supports growth in Hastings Central and St Johns Road and is therefore likely to contribute positively to regeneration and economic activity. However, due to the lower overall level of growth proposed, the scale of economic benefits is likely to be more limited than for Options 2 and 4.

7.3.67 Option 5 also performs positively in terms of supporting borough-wide economic vitality through the delivery of additional housing growth. While its reliance on peripheral growth means that some benefits are less directly aligned with the borough's main employment areas, the option includes a co-location approach at Ivyhouse Lane which could support opportunities for people to live and work in close proximity. However, the reconfiguration of part of a key employment location for housing has the potential to reduce employment capacity at the site, creating some uncertainty regarding overall economic benefits.

7.3.68 Options 6 and 7 deliver significant growth across the borough. Their very high levels of growth offer substantial economic potential through construction activity, labour force growth and increasing demand for local services. However, the options include a high level of peripheral growth and extensive densification, which introduces uncertainty around integration with existing employment areas. The scale of growth would also likely have significant impacts on local neighbourhoods, the historic environment and local distinctiveness and potentially further reduce the jobs density, at least in the short term, resulting in either worsening social outcomes or a more unsustainable pattern of out-commuting. This has the potential to undermine key economic assets of the borough, including those associated with the visitor and tourism economy.

7.3.69 In this respect it is also worth noting that tourism, a key contributor to the local economy, is likely to benefit from investment and regeneration under all options, particularly where growth supports the vitality of the town centre, the Old Town and St Leonards and enhances the quality of the public realm. Conversely, over-densification or poor design could adversely affect town centre character and heritage and the setting of the borough's sensitive landscapes, tempering potential gains to the visitor economy. Mitigation through design quality, townscape enhancement and place-making is likely to be important to secure positive effects.

7.3.70 The relatively limited scales of growth taken forward through Options 1a and 1b offer only modest economic benefits compared to the other options. These are, however, likely to be more certain and easier to deliver due to better spatial integration and lower delivery risk. However, the lower level of growth proposed means they are less likely to support wider economic regeneration, labour force growth and town centre vitality than Options 2, 3, 4 and 5.

Conclusion

7.3.71 Overall, Option 4 performs most favourably as it combines a significant level of housing growth with a strong focus on Hastings town centre and St Leonards, supporting regeneration, labour force growth and access to employment opportunities. Option 2 also performs strongly through the delivery of additional growth in accessible locations that support the borough's main employment areas.

7.3.72 Option 5 also performs favourably due to the scale of growth proposed and its potential contribution to economic activity, although benefits are moderated by its greater focus on peripheral locations and uncertainty regarding the effects of growth at Ivyhouse Lane. Option 3 performs relatively well as it focuses growth in the borough's key economic locations, supporting regeneration and town centre vitality, but the lower level of growth proposed limits the scale of benefits. Options 1a/1b perform less favourably due to their more limited contribution towards economic growth, labour force expansion and regeneration.

7.3.73 Options 6 and 7 provide substantial opportunities for economic growth and investment. However, the scale of development proposed creates significant uncertainty regarding infrastructure delivery, quality of place, the visitor economy and the ability of the borough to accommodate growth without adverse effects. As a result, these options perform least favourably overall, with Option 7 performing worst due to the additional scale of development proposed.

Transport

	Option 1a / 1b	**Option 2**	**Option 3**	**Option 4**	**Option 5**	**Option 6**	**Option 7**
Rank	2	4	1	3	5	6	7
Likely significant effects?	**Yes - positive**	Uncertain	**Yes - positive**	**Yes - positive**	Uncertain	Uncertain	Uncertain

Appraisal

7.3.74 Hastings benefits from a relatively strong public transport network, including four railway stations providing regional and London connections, together with a comprehensive bus network. Opportunities for walking and cycling are also supported by a network of local routes and rights of way. As a result, development located within Hastings town centre, St Leonards and other well-connected urban areas has greater potential to support travel by sustainable modes and reduce reliance on the private car.

7.3.75 Options that focus growth within the most accessible parts of the borough are likely to perform most favourably. In this respect, Option 3 performs most favourably as it concentrates development within Hastings Central and St Johns Road, where access to rail services, bus routes, employment opportunities and local facilities is greatest. This approach is likely to maximise opportunities for walking, cycling and public transport use whilst minimising car dependency.

7.3.76 Options 1a/1b and 4 also perform well. Option 1a/1b avoids significant peripheral growth and focuses on sites that are generally well integrated with existing transport networks. Option 4 builds on the approach taken through Option 3 by directing additional growth to accessible urban locations and housing renewal areas. However, the higher level of development proposed is likely to generate more trips overall and increase pressure on the transport network when compared with Option 3.

7.3.77 Option 2 also directs a significant proportion of growth towards accessible locations within Hastings Central and St Johns Road. However, unlike Options 3 and 4, it also includes development at Breadsell, a more peripheral location with limited accessibility by sustainable transport modes. This is likely to result in a greater proportion of journeys being made by private car and reduces the overall transport performance of the option.

7.3.78 Options 5, 6 and 7 also include significant growth at Breadsell, increasing the potential for car dependency and placing greater pressure on the local road network. Whilst the scale of development proposed under these options may provide opportunities to secure improvements to public transport, active travel infrastructure and wider transport networks, the extent to which such measures could offset increased travel demand remains uncertain. Option 5 performs less favourably than Option 2 due to its greater reliance on growth in peripheral locations.

7.3.79 Options 6 and 7 perform least favourably overall. The scale of development proposed has the potential to generate significant increases in travel demand and traffic congestion across the borough, placing pressure on existing transport infrastructure and potentially affecting journey times and network performance. Whilst substantial transport investment may accompany development under these options, there remains uncertainty as to whether such improvements would be sufficient to accommodate the scale of growth proposed. Option 7 performs least favourably due to the additional level of development proposed.

Conclusion

7.3.80 Overall, options that focus growth in accessible urban locations perform most favourably, as they maximise opportunities for travel by walking, cycling and public transport while limiting reliance on the private car. Option 3 performs most favourably in this respect, followed by Options 1a/1b, and 4.

7.3.81 Options 2 and 5 perform less favourably due to the inclusion of development at Breadsell, which is less well connected to the borough's public transport network and key services.

7.3.82 Options 6 and 7 perform least favourably due to the scale of growth proposed and the associated potential for significant increases in traffic and congestion. Whilst these options may facilitate investment in transport infrastructure, uncertainty remains regarding the extent to which such improvements could mitigate the effects of development.

7.4. Summary of appraisal findings

Table 7-1: Summary of growth scenarios assessment rankings

SA Theme		Option 1a /1b	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Air quality	Rank	2	4	1*	3	5	6	7
	Likely significant effects?	No	No	No	No	No	Yes - adverse	Yes - adverse
Biodiversity	Rank	1*	4	2	3	5	6	7
	Likely significant effects?	No	Yes - adverse	No	Yes - adverse	Yes - adverse	Yes – adverse	Yes - adverse
Climate change adaptation, flooding, and coastal change	Rank	1*	3	2	5	4	6	7
	Likely significant effects?	No	No	No	No	No	Uncertain	Uncertain
Energy and water consumption	Rank	2	=3	1*	=3	=3	6	7
	Likely significant effects?	No	No	No	No	No	No	No

Heritage	Rank	1*	3	4	5	2	6	7
	Likely significant effects?	Uncertain	Yes - adverse	Yes - adverse	Yes - adverse	Uncertain	Yes - adverse	Yes - adverse
Land and water quality	Rank	2	4	1	3	5	6	7
	Likely significant effects?	No	Yes - adverse	No	No	Yes - adverse	Yes - adverse	Yes - adverse
Natural landscape	Rank	1	4	2	3	5	6	7
	Likely significant effects?	No	Yes - adverse	No	No	Yes - adverse	Yes - adverse	Yes - adverse
Population, health, and wellbeing	Rank	4	2	5	1	3	6	7
	Likely significant effects?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes – positive and adverse	Yes - positive and adverse
Skills, employment and economic development	Rank	5	2	4	1	3	6	7
	Likely significant effects?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive and adverse	Yes - positive and adverse
Transport	Rank	2	4	1	3	5	6	7
	Likely significant effects?	Yes - positive	Uncertain	Yes - positive	Yes - positive	Uncertain	Uncertain	Uncertain

8. Meeting additional needs in Hastings

8.1. Introduction

8.1.1 Growth strategy Options 6 and 7 considered the delivery of LHN through delivering additional densification on the available sites in Hastings, including at Breadsell. They also, from a broad perspective, enabled an exploration of what the likely implications of the delivery of higher levels of growth in the borough would be in relation to the SA Framework.

8.1.2 Whilst it is recognised that the LHN figure comprises an unconstrained assessment of the number of homes needed in the area, and is intended to be the first step in the process of deciding how many homes need to be planned for through the Local Plan, it is useful to consider how LHN could potentially be delivered in the borough in full.

8.1.3 In this context, in addition to additional densification (which has already been considered through Options 6 and 7), there are a number of possible further approaches which could help contribute to the delivery in full of LHN in the borough. These are as follows:

- Land reclamation
- Development on publicly accessible open spaces and playing fields
- Urban extensions into the borough's hinterland.

8.1.4 Each of these elements has been considered in turn below.

8.2. Land reclamation

8.2.1 In terms of land reclamation, given the long-term timescales required in the planning and implementation of such an approach, significant delivery in the current plan period would be unlikely through this mechanism. In addition, given its cost, the viability of such an approach is doubtful, particularly in the context of land values in the borough and the need to deliver a range of housing types and tenures to meet the borough's needs.

8.2.2 There are also significant issues relating to this approach's likely impacts on coastal processes, the economy and flood risk, biodiversity (including Beachy Head East Marine Conservation Zone) and geodiversity assets (including Hastings Cliffs Special Area of Conservation), and the historic environment and seascape resource of the seafront. Local industry, including fishing, leisure and tourism uses within the Inshore Traffic Zone, and international shipping and logistics through the Dover Strait Traffic Separation Scheme (TSS) Westbound Lane – the busiest international shipping lane in the world – would also be impacted by such an approach.

8.2.3 For this reason, consideration of land reclamation as an alternative for this current plan period is not reasonable.

8.3. Development on open spaces and playing fields

8.3.1 Hastings has significant areas of publicly accessible open space and playing fields. Whilst these are important assets for community use and residents' health and wellbeing, these areas offer an opportunity for alternative uses, including housing and employment uses.

8.3.2 Due to the significant local housing and employment need in the borough, there is the potential for the SA to consider the relative merits of different approaches to playing pitches and publicly accessible open space as reasonable alternatives. This is with a view to exploring the implications of re-configurating areas of open space and playing pitches for housing, mixed and employment uses.

8.3.3 In light of the above, the following three options have been considered through the SA process:

- **Option OS1**: Ensure no net loss of playing pitches and publicly accessible natural and semi natural greenspace for residential, mixed use and employment.
- **Option OS2**: Enable release of playing pitches for residential, mixed use and employment uses.
- **Option OS3**: Enable a 10% release of publicly accessible natural and semi natural greenspace for residential, mixed use and employment uses (recognising it is the greenspace typology the borough has the most of).

8.3.4 The following sub-section presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes and use the SA Framework.

8.3.5 For each SA theme, a commentary on the likely significant effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking. In addition, whether the option is likely to lead to significant negative or positive effects is highlighted.

Appraisal

Air quality

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	Yes - negative	Yes - negative

8.3.6 The borough's green infrastructure networks, including natural and semi-natural open space and playing fields, are key contributors to good air quality. In this respect trees and vegetation provide a role in filtering atmospheric pollutants such as nitrogen dioxide and sulphur dioxide. They are also particularly effective at removing particulate matter through dispersion and dilution, and through deposition, as well as providing a barrier to dust and similar airborne pollutants. High quality green infrastructure also has indirect effects on air pollution through lowering temperatures, decreasing the risk of pollutants such as ground level ozone.

8.3.7 Option OS2 and OS3 therefore, through facilitating the loss of key green key infrastructure assets in the borough, have the potential to lead to significant negative effects on air quality. This is likely to particularly affect locations with poorer air quality, such as adjacent to main roads. Given natural and semi-natural open space tends to perform an increased role in supporting good air quality when compared to playing pitches (due to an increase in vegetation and trees within these typologies) an additional focus on natural and semi-natural open space through Option OS3 has the potential to lead to additional significant negative effects.

Biodiversity

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	Yes - negative	Yes - negative

8.3.8 High quality green infrastructure brings a range of benefits for habitats and soils, species and ecological networks. This includes: increased habitat area and diversity; increased populations of species, including rare and protected species; increased opportunities for longer-distance movement of species; improved ecological connections increasing the resilience of biodiversity networks, including to climate change; and indirect benefits related to aspects such as water purification, air quality enhancements, climate change mitigation and improved management of recreational activities. Through these approaches, if designed well, green infrastructure can help deliver local biodiversity and geodiversity objectives.

8.3.9 Natural and semi natural open space is a key contributor the borough's biodiversity networks. In this respect the loss of this typology to housing, mixed use and employment uses through Option OS3 has the potential to have significant negative effects. This is particularly pertinent given many of the areas of publicly accessible natural and semi-natural open space are also nationally and internationally designated biodiversity and geodiversity sites, for example a large proportion of Hastings Country Park is covered by the Hastings Cliffs SAC and the Hastings Cliffs to Pett Beach SSSI. To the west of the borough, Combe Haven is an SSSI that interacts with the footprint of the Combe Valley Countryside Park. A number of other areas are SSSIs and/or contain significant areas of important habitats such as ancient woodland (such as Marline Valley Woods in the west). In addition, many areas of publicly accessible open space are designated as Local Wildlife Sites, for example St Helens Woods, Castle Hill and Summerfields Woods.

8.3.10 Whilst playing pitches are typically less biodiverse than natural and semi-natural open space, the loss of these areas can have adverse impacts on habitats and species. This includes through contributing to cumulative and synergistic impacts on biodiversity networks, such as for example along floodplains when many playing fields are located.

Climate change adaptation, flooding and coastal change

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	Yes - negative	Yes - negative

8.3.11 Green infrastructure in the borough, including natural and semi natural open space and playing fields, is of key importance to helping adapt to and manage the risks of climate change, including increased flood risk and extreme heat events.

8.3.12 Green infrastructure supports flood risk management through the provision of permeable surfaces and helping to reduce localised flooding by capturing and absorbing stormwater into the ground. Alluvial soils (e.g., floodplains) make a valuable and sustainable contribution to carbon sequestration as they accumulate depth with each flood event. GBI can also support climate change adaptation through shading and temperature regulation. The increased shade and evaporative cooling (evapotranspiration) provided by trees and vegetation can lower ambient temperatures and the surface temperatures of impervious areas. This is particularly effective in more built-up urban areas where it can limit the urban heat island effect where urban areas have higher temperatures compared to surrounding rural areas. In addition, green infrastructure supports climate change mitigation through enhancing natural features which act as carbon sequesters and carbon sinks.

8.3.13 Many playing pitches and public open spaces in the borough overlap with fluvial flood zones and surface water pathways; in this respect they play a key role in flood risk management. Controlling the flow and permeation of water in the borough also makes a valuable contribution to protecting the integrity of soft, wet and weak soils and preventing unwanted ground movement.

8.3.14 As key components of green infrastructure networks in the borough, the loss of playing pitches (Option OS2) and natural and semi-natural greenspace (Option OS3) therefore has the potential for significant negative effects on climate adaptation and flooding.

Energy and Water Consumption

	Option OS1	**Option OS2**	**Option OS3**
Rank	N/A	N/A	N/A
Likely significant effects?	No	No	No

8.3.15 The options are unlikely to directly impact on energy and water consumption.

Heritage

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	Yes - negative	Yes - negative

8.3.16 Natural and semi natural greenspace is an important component of the borough's townscapes which support the fabric and setting of the historic environment. In this regard open space can be an integral component of the historic setting of localities and the historic significance of important assets and areas of heritage interest present locally. In areas of significant heritage interest, it helps reinforce the significance of localities as important heritage resources, and complements the setting of key features of heritage interest, for example, those in distinctive historic townscapes. In addition, many areas of open space are themselves also important heritage assets for the borough. For example, Alexandra Park is a Grade II* listed Registered Park and Garden, St Leonard's Gardens is a Grade II listed Registered Park and Garden, and a number of open spaces are locally listed, such as White Rock Gardens. In this respect, the loss of open space through Option OS3 has the potential to have significant impacts on the fabric and setting of both designated and undesignated heritage assets.

8.3.17 Whilst the loss of playing pitches will be less significant than the loss of natural and semi-natural open space, such provision can also contribute to the setting of the historic environment. As such OS2 has the potential to have some significant negative effects.

Land and Water Quality

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	Yes - negative	Yes - negative

8.3.18 Natural and semi-natural open spaces, and to a lesser extent, playing pitches, deliver a range of ecosystem services which will support soil and water resources. This includes through soil formation (including alluvial), flood and erosion protection and soil and water quality regulation. Many pitches and natural and semi-natural greenspaces are close or adjacent to pollution-sensitive receptors. The loss of natural and semi-natural open space through Option OS3, and playing pitches through Option OS2 therefore has the potential to have significant negative effects relating to soil and water quality.

Natural Landscape

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	Yes - negative	Yes - negative

8.3.19 Natural and semi natural open space is an important contributor to landscape character in the borough, including its special qualities and sense of place. For example, key habitats (including areas that show greater diversity and abundance of vegetation) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. Green infrastructure can also play a role in contributing positively towards local distinctiveness and a sense of place, both in urban areas and more rural areas, particularly if it shows key local features such as those associated with local geodiversity.

8.3.20 In this respect the loss of natural and semi natural open space through Option OS3 has the potential to lead to a range of significant effects on landscape character. In addition, whilst contributing less to landscape character, the loss of playing pitches to development can also lead to adverse impacts on setting and a sense of place, which are important components of landscape character. For example, the playing pitches at Bulverhythe contribute to the setting of the Coombe Valley Countryside Park, and those at Tackleway at Barley Lane and Sandhurst Recreation Ground contribute to the setting of the National Landscape. As such, negative effects also have the potential to take place through Option OS2, although these are anticipated to be less significant than Option OS3.

Population, health and wellbeing

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	3	2
Likely significant effects?	No	Yes - mixed, but negative overall	Yes - mixed, but negative overall

8.3.21 The reconfiguration of open space and playing pitches for alternative uses through Options OS2 and OS3 has the potential to support the additional delivery of housing and employment in the borough. This will bring benefits relating to this SA theme. However, in the Hastings context, this is likely to be outweighed by the potential impacts on the health and wellbeing and quality of life of residents by these options. This is given Hastings is the most deprived lower tier local authority in Sussex and the 3rd most deprived in England. Residents within deprived communities experience higher rates of long-term illness, disability, cancer, lung disease, heart problems, lower overall life expectancy and significant health inequalities compared with the rest of England.

8.3.22 Attractive multifunctional green spaces enhance the quality of neighbourhoods, often supporting a high-quality public realm. ‘Green’ neighbourhoods are also more desirable places to live, with access to open space found to markedly increase the quality of life and health and wellbeing of residents. Green infrastructure, whether found in urban or more semi-rural greenspaces in the borough, can also bring substantial socio-economic value through leisure and tourism.

8.3.23 With regards to publicly accessible open space in the borough, these are often multifunctional, and operate as locations for informal recreation, act as amenity buffers, provide forest school locations to deliver against curriculum for local education providers and community groups, and act as locations for both formal and informal sports and play. Publicly accessible, local open spaces are also free to access, removing financial and physical access barriers to recreational spaces for the most deprived communities. In this respect the loss of such space through Option OS3 has the potential to lead to significant impacts on health and wellbeing and the quality of life of residents.

8.3.24 Similarly, the loss of playing pitches through option OS2 has the potential to lead to significant impacts. Playing pitches within the borough are often multifunctional. Examples include operating as school pitches within school grounds during school hours and formal sports pitches outside of these times. A number of schools in the borough do not currently meet the recommended minimums for access to outdoor PE space set out in national guidelines for mainstream schools, and some school playing pitches are in addition shared between multiple schools (despite being in the formal ownership of only one, for example at Sacred Heart Catholic Primary School). Due to the compact size of the borough, spaces identified as playing pitches may provide pitches across a range of sports. For example, a single site could operate as two 11-aside football pitches, one rugby pitch, three hockey pitches, one American football pitch and a cricket pitch within the same year. Hastings' playing pitches also provide facilities for clubs and teams from neighbouring Rother District. Given the limited availability of playing pitches in the borough, the loss of pitches to development would be significant for the physical and mental health and wellbeing and the quality of life of residents; these impacts have the potential to be more significant than for Option OS3.

Skills, employment and economic development

€$ £¥	**Option OS1**	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	**No**	**Yes - mixed**	**Yes - mixed**

8.3.25 Options OS2 and 3 have the potential to deliver additional housing and employment land. This will support the economic vitality of the borough, and help increase employment opportunities. The facilitation of additional growth therefore has the potential to bring significant positive effects in relation to this SA theme.

8.3.26 However publicly accessible natural and semi-natural open space are important economic attractors for the borough, including associated with the visitor and tourism economy. For example, the open space at the West Hill and East Hill are key components of the tourism offer of the area, and Hastings Country Park Nature Reserve is a key attractor for visitors from both within and outside of the borough. More broadly, natural and semi-natural greenspace are important contributors to what makes the borough special, including in terms of local distinctiveness. As such, the loss of natural and semi natural open space through Option OS3 has the potential undermine key economic attractors of the borough.

8.3.27 The loss of playing pitches through Option OS2 also has the potential to impact on the quality of life and health and wellbeing of residents. This has the potential to indirectly impact on the wider economic vitality of the borough, particularly given existing poor levels of health in the area. In addition, the loss of playing pitches through the option has the potential to lead to the loss of paid sports coaching roles in the borough, with implications for employment in this sector.

Transport

	Option OS1	**Option OS2**	**Option OS3**
Rank	1	2	3
Likely significant effects?	No	No	No

8.3.28 Open spaces and playing pitches can form important components of the public rights of way network. The loss of these spaces through Options OS2 and OS3 therefore has the potential to impact on active travel networks. The significance of these impacts however has the potential to be limited if replacement footpaths and cycle paths are provided within new development. As such, impacts are unlikely to be significant.

8.4. Urban extensions

8.4.1 A further possibility for delivering the homes required to meet LHN is through one or more urban extensions of a significant size. In response to this, the SA process has undertaken a 'Points of the Compass' appraisal. The appraisal evaluates the relative sustainability merits of promoting larger strategic scale development at eight broad areas in the borough's urban hinterland.

8.4.2 The eight broad areas are as follows (see Figure 6 1).

- HA1: The Ridge West
- HA2: The Ridge East
- HA3: Land at Martineau Lane
- HA4: Hastings Country Park and Nature Reserve
- HA5: Combe Valley Countryside Park
- HA6: Crowhurst Road South
- HA7: Queensway
- HA8: Breadsell

8.4.3 The analysis evaluates the key environmental constraints present in each of the broad areas proposed, including related to: biodiversity; flood risk; the historic environment; landscape quality; water; and agricultural land quality. The analysis also considers from a broader perspective socio-economic and accessibility issues.

8.4.4 Whilst a number of the eight broad areas identified in the 'Points of the Compass' appraisal include sites that are being taken forward within the draft Plan (including a cross boundary approach with Rother District Council) and the potential offered by Breadsell, the Local Plan call for sites and SHELAA process has not identified land which could be assembled for urban extension purposes. Nonetheless, given it is a longer-term possibility for meeting LHN in full, the SA process has sought to further consider what the likely significant effects of such an approach might be.

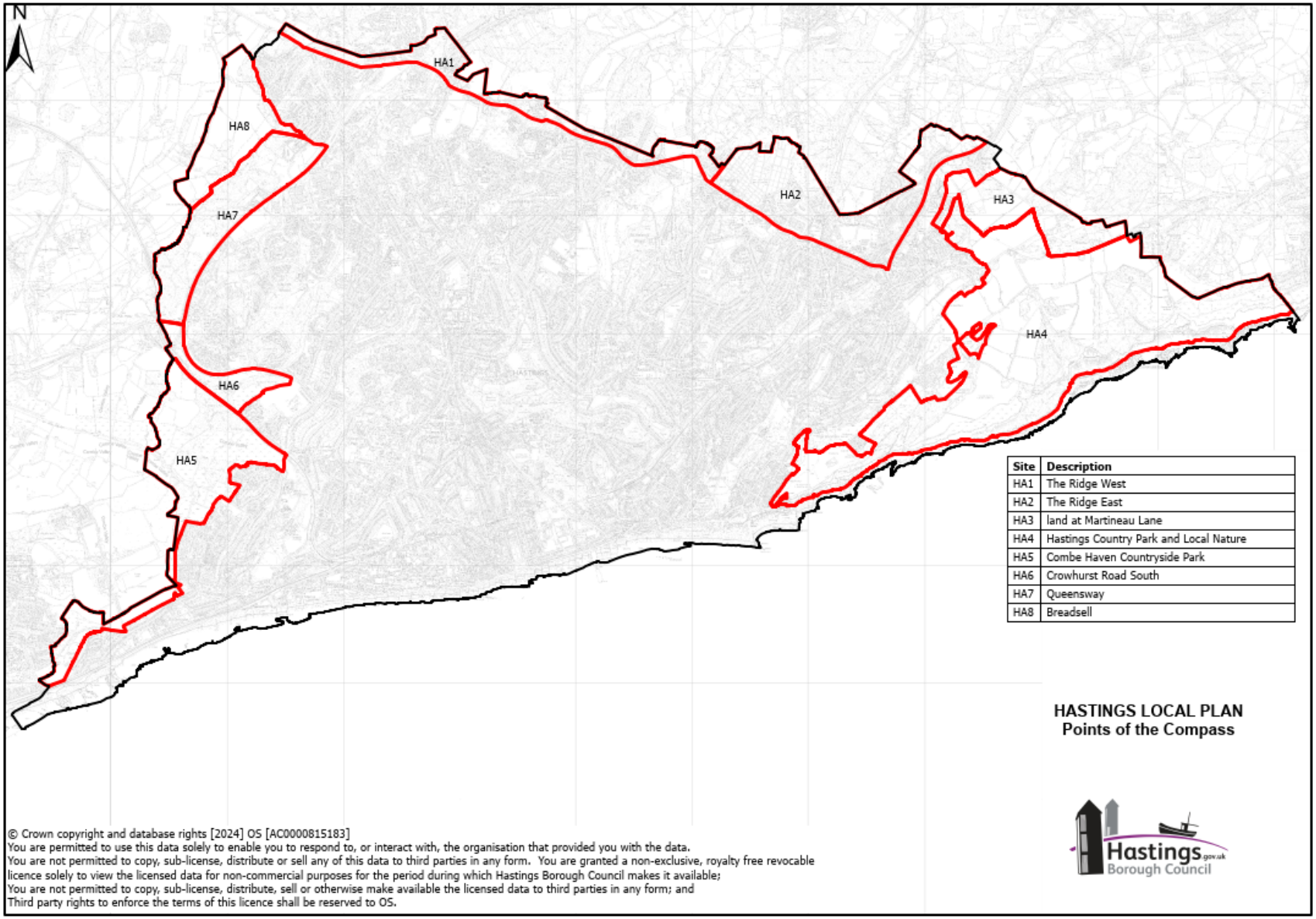
8.4.5 **Appendix A** presents the Points of the Compass appraisal.

8.4.6 The findings of the appraisal indicate that opportunities for an outward expansion of the town through urban extensions would be heavily constrained by environmental considerations. The key considerations include as follows:

- The likely location of urban extensions within (or within the setting) of the High Weald National Landscape. This would particularly affect potential urban extensions which take place to the north, northeast and east of the town.
- The presence of internationally and nationally designated biodiversity sites. These include: (to the east of the town) the Hastings Cliffs SAC, the Dungeness, Romney Marsh and Rye Bay SPA and the Hastings Cliffs to Pett Beach SSSI; and (to the west of the town) the Combe Haven SSSI and Marline Valley Woods SSSI.
- The presence of significant areas of fluvial and coastal flood risk to the west and southwest of the town.

8.4.7 In this context, opportunities for the larger scale outward expansion of the town through urban extensions are likely to be limited by the presence of significant environmental constraints and the likelihood of major significant adverse impacts from such development on key designations.

Figure 8-1: Points of Compass Appraisal areas



9. Developing the preferred approach

9.1.1 The following presents an overview of HBC's reasons for selecting the preferred approaches for the Hastings Local Plan.

9.1.2 Strategic Policy 1 in the emerging Local Plan outlines HBC's approach to their spatial strategy:

At the heart of our spatial strategy is the need to promote sustainable development as the framework for growth and change in Hastings. The Local Plan provides an ambitious and positive framework for addressing local housing and economic needs and other social and environmental priorities to better enable the council and other stakeholders to invest in housing, jobs communities and places, making the most of investment opportunities as they arise to effectively address spatial planning challenges over the plan period.

Growth in the first instance is directed to locations which are well supported by existing or planned sustainable transport infrastructure and other services. This approach will help minimise carbon emissions from travel and allow significantly increased development densities in appropriate locations. This in turn can also help to deliver much needed housing, alongside spaces for businesses to grow. This increased demand from new occupants can help bolster local shops and services and may help justify greater investment in infrastructure such as increased bus services and other sustainable transport initiatives.

The council has set an ambitious target for the town to work towards becoming carbon neutral ahead of the UK target of 2050. This target is consistent with and informs our development strategy for accommodating growth and change. Managing the pattern of development in this way, ensures it is sustainable, will lessen encroachment on the natural environment - including protecting soil, water, and vegetation that have an important role in carbon mitigation.

As a result, our growth strategy must focus on prioritising development on Previously Developed Land (Brownfield land) within the urban area, through renewal, regeneration and densification and lastly through suitable greenfield site development in order to maximise the number of new homes which can be delivered…'

10. Approach to the assessment of the Hastings Local Plan

10.1. Overview

10.1.1 **Chapters 10 and 11** present an appraisal of the Local Plan, as currently published under Regulation 19 of the Planning Regulations.

10.2. Methodology

10.2.1 The appraisal identifies and evaluates the 'likely significant effects' of the Hastings Local Plan on the baseline, drawing on the ten SA objectives identified through scoping (see **Table 3-1**) as a methodological framework.

10.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Hastings Local Plan in more general terms.

10.2.3 Within the appraisal narrative below specific policies are referred to only as necessary and relevant to each SA theme (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

10.2.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

10.3. Policies

10.3.1 There are 86 policies in the draft Local Plan, which are listed in **Table 10-1**.

Table 10-1: Policies in the Hastings Local Plan

Policy reference	Policy name
Strategic policies	
SP1	Directing Growth – a Spatial Strategy
SP2	New and Affordable Housing
SP3	Business Development – Office and Industrial
SP4	Business Development – Town Centres
SP5	Meeting the Challenge of Climate Change
SP6	Renewable and Low Carbon Technologies
SP7	Protecting and Enhancing the Historic Environment
SP8	Conserving and Enhancing the Natural Environment
SP9	Managing Coastal Erosion and Flood Risk
SP10	Transport Infrastructure
SP11	Healthy and Safe Communities
SP12	Infrastructure Delivery Strategy
SP13	Development Viability
Development potential areas and regeneration areas	
D1	Land at Breadsell
R1	Hastings Central
R3	St Johns Road
Site allocation policies	
HA1	Applications for Housing and Mixed-Use Proposals
HS1	Land adjacent to Sandrock Park, The Ridge
HS2	Seaside Road, West St Leonards

Policy reference	Policy name
HS3	Former Westerleigh School
HS5	Former West St Leonards Primary School, Bexhill Road
HS6	Ore Valley (Former Power Station)
HS7	Former Post Office and University of Brighton building
HS8	Mayfield E, Bodiam Drive
HS10	Land at Rock Lane
HS11	Cinque Ports Way
HS12	Gambier House, 111 West Hill Road and West House, 115 West Hill Road
HS13	Land North-West of Winchelsea Lane
HS18	Land at Tilekiln Farm
HS20	Former West Hill Road Reservoir
HS21	Land East of Rock Lane
HS23	Land East of Beaney's Lane, The Ridge
HS25	Former Convent of Holy Child Jesus, Magdalen Road
HS26	Site of Four Courts, Stonehouse Drive
HS27	My Way Lodge, The Ridge
HSS5	Land at Chiltern Drive
TP1	Land South of Crowhurst Road
TP2	Land at Tilekiln Lane
Employment allocations	
EA1	Applications for Employment Uses
ES1	Queensway North, Queensway
ES2	Site PX, Churchfields
ES3	NX2, Sidney Little Road, Churchfields Estate
ES4	NX3, Sidney Little Road, Churchfields Estate
ES5	Adjacent Unit C, 1-8 Brook Way

Policy reference	Policy name
ES6	UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane
ES7	Ivyhouse Lane, Northern Extension
ES8	Land at the junction of The Ridge West and Queensway
ES10	Marline Fields, Enviro21 Business Park, Land West of Queensway
Housing	
H1	Specialist Housing for Older People
H2	Shared Housing
H3	Conversion of Existing Dwellings
H4	Self build and Custom Housebuilding
H5	Accommodation for Traveller Communities
H6	Housing Renewal
H7	Temporary Residential Uses
Economic development	
E1	Protecting and Enhancing Employment sites, areas and allocations
E2	Skills, Employment and Supply Chain
E3	Primary Shopping Areas
E4	Food, Drink, Entertainment and the Night-time Economy
E5	The Visitor Economy
E6	Outdoor Visitor Accommodation
Sustainable communities	
SC1	Key Design Principles
SC2	Housing Mix, Accessibility and Adaptability
SC3	Sustainable Design and Construction
SC4	Alteration and Extension of Dwellings

Policy reference	Policy name
SC5	Proposals Affecting the Significance and Setting of Heritage Assets
SC6	Sustainable Development and Heritage Protection
SC7	Changes to building elevations and roofs in Conservation Areas
SC8	Shopfronts, Advertisements and Commercial Frontages
SC9	The High Weald National Landscape and Other Areas of Landscape Value
SC10	Habitat Protection, Biodiversity and Net Gain
SC11	Trees, Woodland and Hedgerows
SC12	Green and Blue Infrastructure
SC13	Urban Greening Factor
SC14	Provision, Enhancement and Retention of Sports and Recreation Facilities
SC15	Ground Behaviour, Geodiversity and Land Stability
SC16	Flood Risk and Drainage
SC17	Coastal Change Management
SC18	Pollution and Hazards
SC19	Environmental Nuisance
SC20	Community Facilities
Infrastructure and Delivery	
ID1	Planning Obligations
ID2	Access, Services and Parking
ID3	Open space, Sports and Recreation
ID4	Utilities Infrastructure and new connections
Annex	
Annex 1	Masterplan and Development Brief for the Former Convent of the Holy Child Jesus, Magdalen Road

11. Appraisal of the Local Plan

11.1. Local Plan Overview

11.1.1 The pre-submission Local Plan guides future development across the borough up to 2041. The vision of the plan is as follows:

"*Our vision is for Hastings by 2041 to be a town that is a great place to live, work and visit. Hastings will be a town which is taking responsibility for tackling the climate and nature crises; where housing is available, affordable, energy-efficient and secure; where there is access to active and sustainable transport, where everyone can live healthy, fulfilling lives; and which has a thriving, sustainable economy attracting greater investment from businesses and organisations as well as strengthening its cultural and destination offer. Hastings will protect and enhance its natural and historic environment*"

11.1.2 The plan aims to deliver at least 2,970 net new homes over the plan period.. However, the nationally calculated local housing need (LHN) for Hastings is 686 homes a year, equating to significantly more homes than currently planned for. This essentially means that the Local Plan is generating unmet needs in the longer term.

11.1.3 The Council's view is that there is potential to deliver more homes through Regeneration Area Opportunity Sites and a Development Potential Site that cannot be allocated in the plan at this time (due to suitability, achievability or availability issues that need overcoming). In this respect, the delivery of 2,970 new homes is an 'at least' supply forecast, and the Local Plan creates the conditions to exceed this.

11.1.4 Around 1,140 new homes are expected to be delivered at new sites allocated in the plan – with the remaining supply formed of completions, existing commitments, and a small site windfall allowance.

11.1.5 The Development Potential and Regeneration Areas (as broad locations for future growth) include Land at Breadsell, Hastings Central and St Johns Road.

11.1.6 The Plan identifies four Strategic Industrial employment Areas (SIEAs) and two Local Industrial Employment Areas (LIEAs), identified for their potential for intensification to deliver against employment floorspace needs. Within the four SIEAs, 9 site allocations have been identified that are capable of delivering entirely new employment floorspace without the need for site remediation or regeneration. Whilst the evidence suggests a need for 70,400sqm, the plan provides a land supply of 19,830sqm, again generating unmet needs, but potentially more aligned with a lower housing supply forecast. It is also of note that most of the allocated employment sites were previously identified as allocations in the Hastings Development Management Plan 2015. At this point in time, the SIEAs benefit from recent provision of strategic road infrastructure that is expected to increase the investment potential of these sites.

11.1.7 In delivering the vision, and alongside the allocation site policies, the plan has identified 13 Strategic Policies (with an 'SP' prefix) and 37

Development Management policies. The Development Management Policies are split into four themes, with 7 policies relating to housing, 6 policies relating to economic development, 20 policies relating to sustainable communities, 4 policies relating to infrastructure and delivery and a detailed Masterplan and Design Brief.

11.2. Appraisal of the Local Plan

Air quality

Spatial strategy

11.2.1 There are currently no Air Quality Management Areas (AQMAs) within the borough. In addition, there is generally good accessibility within the borough, with four railway stations and numerous bus services serving different parts of the town as well as providing connections to other key work and leisure locations, like Bexhill, Eastbourne and Rye. This provides opportunities for delivering growth in locations which facilitates travel by public transport.

11.2.2 Hastings contains two primary roads: the A259, which largely runs parallel to the coastline, and the A21, which runs north to south through the centre of the borough. Development that is located in immediate proximity to these roads is likely to be impacted by more localised air quality issues caused by pollution from traffic and congestion.

11.2.3 There are several allocated sites that are in immediate proximity (<50 m) of a primary road and in this respect, the spatial strategy takes forward sites that have the potential to be affected by pollution from traffic and congestion on primary roads in the borough. Notably, there are also allocations which are located in close proximity to Bexhill Road, which is part of the A259 and where historically there have been significant air quality issues (including before the Bexhill to Hastings Link Road was online).

11.2.4 However, it is recognised that the allocations are unlikely to lead to increased exposures to air pollutants beyond national objectives for air quality.[1] Therefore, no significant adverse effects are anticipated for the Air Quality SA theme.

[1] National Air Quality Objectives

Development management policies

11.2.5 Air quality is primarily addressed through Policy SC18 (Pollution and Hazards), which sets out that development will minimise and mitigate pollution and improve air quality during both the construction and operation phases of development. The policy states that an Air Quality Impact Assessment (AQIA) must be provided alongside proposals for major development, development within or with the potential to impact on an AQMA, and in areas close to exceeding the air quality objectives (note, there are currently no AQMAs in the borough, however the policy accounts for the potential for them to be identified in the future).

11.2.6 The draft Local Plan also places a strong emphasis on sustainable transport through Policy SP10 (Transport Infrastructure), which prioritises active travel and public transport, as well as Policy SC1 (Key Design Principles), which supports development that maximises opportunities for active travel. Policy ID2 also supports low car development where possible including within a designated 'Low Car Parking Zone' which forms a 400m radial from the main railway station in Hastings Town Centre, and encourages the use of car clubs where private vehicle use is necessary. The exception to this is disabled parking. These policies will have knock-on positive effects for air quality.

11.2.7 Notably, all future development will need to conform to these policy provisions, including at the sites proposed through the draft Local Plan. With the majority of growth focused in the most accessible areas of the borough (e.g. the town centre), opportunities to maximise access to sustainable transport modes are bolstered. Given most of the borough is relatively well served by public transport, it is considered that development has good potential to avoid significant effects arising in relation to air quality.

11.2.8 As a baseline, without intervention, traffic and congestion is set to increase across the borough. The results of the Spatial Strategy will be to increase, albeit modestly, traffic and congestion unless mitigation measures are put in place. To support this the plan advocates a 'monitor and manage approach' to transport impacts. However, existing air quality issues are currently being managed in the borough, and air quality management will be supported by housing and employment delivery taking place in locations accessible by public transport and active travel. In addition, the policy framework sets out air quality mitigation requirements and measures, including the requirement for an AQIA alongside certain types of development and support for sustainable transport. Hence, the pre-submission Local Plan is predicted to lead to broadly **neutral to minor positive effects** under this SA theme.

Biodiversity

Spatial strategy

11.2.9 In terms of internationally designated sites for biodiversity, Hastings contains the Hastings Cliffs Special Area of Conservation (SAC). In terms of nationally designated sites for biodiversity, Hastings contains the Hastings Cliffs to Pett Beach; Combe Haven; and Marline Valley Woods Sites of Special Scientific Interest (SSSIs). It is also in proximity to, and within the Impact Risk Zone of, the Maplehurst Wood SSSI in Westfield Civil Parish. With a focus on marine designations, the southwest of the borough overlaps with the Beachy Head East Marine Conservation Zone (MCZ). The borough contains both Areas of Priority Importance to Biodiversity (APIB) and Areas that Could be of Importance to Biodiversity (ACIB) with mapped measures for improvement as identified through the East Sussex and Brighton and Hove local Nature Recovery Strategy. In addition, Hastings contains several areas of ancient woodland, as well as Biodiversity Action Plan (BAP) priority habitats of maritime cliff and slope, coastal vegetated shingle, good quality semi-improved grassland, wet woodland, lowland meadows, coastal and floodplain grazing marsh, purple moor grass and rush pastures, lowland heathland, lowland fens, reedbeds, traditional orchards, and deciduous woodland. There are also several Local Nature Reserves (LNRs) and Local Wildlife Sites (LWSs) in the borough.

Internationally and Nationally Designated Sites

11.2.10 Sites that are allocated within 1.0 km of Hastings Cliffs SAC are largely located within the settlement (built-up) area (except for the Land at Tilekiln Farm). Urban sites are considered less likely to lead to significant impacts on the SAC. In addition, for these allocations, the requirement to prepare Ecological Impact Assessment including Ecological Constraints and Opportunities Plans (ECOPs) (as identified within the site allocation policies) will ensure that site-specific ecological sensitivities are identified early and that appropriate avoidance and mitigation measures are embedded in scheme design, further reducing the potential for adverse effects on the SAC.

11.2.11 Several allocations are also located within proximity of the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA). However, these sites are all situated within the existing built-up area of Hastings and therefore have limited potential to give rise to functionally-linked land or disturbance pathways to the SPA. As such, significant adverse effects are unlikely.

11.2.12 Effects in relation to internationally designated sites have been investigated in more detail in the supporting Habitat Regulations Assessment (HRA), which assessed the potential impacts of the draft Local Plan 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.

11.2.13 While Likely Significant Effects were excluded in relation to atmospheric pollution and loss of functionally linked habitat, the other impact pathways were taken forward to Appropriate Assessment. 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 Local Plan 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.

11.2.14 Whilst several allocated sites are within, adjoining, or in proximity to (<1 km) a SSSI, most these sites are for employment uses, with lesser negative impacts arising from matters more closely associated with residential uses, such as pet predation and increased recreational pressure. They will also require Ecological Impact Assessment including ECOPs (as identified within the site allocation policies) alongside hydrological and groundwater management and monitoring to fully understand and avoid or mitigate impacts on water sensitive locations.

11.2.15 SSSI Impact Risk Zones (IRZs) are a GIS tool / dataset which map zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types and scale of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. Multiple site allocations are captured under IRZs and continue to be the subject of consultation with Natural England through the plan process. While some of these sites are brownfield, which reduces the likelihood of direct habitat loss, this does not in itself rule out significant effects (particularly where the proposed use change is to residential). Residential development can introduce new pathways for disturbance, such as increased recreational pressure, lighting, noise and the presence of domestic pets. However, because most sites are within the existing built-up area of Hastings and are physically separated from SSSIs by established development and infrastructure (the notable exception to this is Land at Breadsell), the potential for direct effects remains limited. Any remaining risks (including those relating to recreational disturbance or domestic pets) will be considered at the pre-planning application stage and addressed through appropriate mitigation.

11.2.16 Notably, many of the site allocation policies require potential impacts on biodiversity to be avoided or mitigated. For example, Policies HS18, ES1 and ES10, outline that proposals for development should include an Ecological Impact Assessment (EcIA) and an Ecological Constraints and Opportunities Plan (ECOP) incorporating appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the adjacent SSSI and to other areas of wildlife sensitivity nearby. Site policies, where appropriate, also make reference to the use of the HWNL Dark Skies Technical Advice Note to inform the design of lighting schemes.

11.2.17 There are also allocated sites that are within, adjoining, or in proximity (<100 m) to the Beachy Head East MCZ. In this respect, the spatial strategy takes forward sites that have the potential to impact this designation. It will be important that this is taken into consideration during site design, and notably the site allocation policies require that any improvements to sea defences should also take account of their impact upon the MCZ and mitigate any harms caused.

11.2.18 Many of the allocated sites contain, adjoin or are in proximity (<50 m) to a BAP priority habitat. In this respect, the spatial strategy takes forward sites that have the potential to lead to impacts on BAP priority habitats. Impacts include loss of habitat or disturbance to the habitat from factors such as noise, light pollution or trampling from enhanced access. However, the site allocation policies identify ecological mitigation measures that are expected in development proposals which includes measures such as an Arboriculture Plan, sustainable drainage schemes, Ecological Impact Assessment including an ECOP, and a lighting plan.

Locally Designated Sites for Biodiversity

11.2.19 There are multiple allocated sites that contain (either wholly or in part), adjoin, or are in close proximity (<50 m) to a LNR and/or LWS. These sites have the potential to lead to impacts, but the site allocation policies provide adequate mitigation (as noted above).

11.2.20 More broadly speaking, it is noted that larger developments can offer opportunities to deliver landscape-scale biodiversity enhancement measures such as habitat creation and enhancements in ecological connections and networks including through mapped measures as set out in the LNRS. As such, larger sites (for example Land at Tilekiln Farm, Queensway North and Queensway) provide significant opportunities in this regard.

Development management policies

11.2.21 Biodiversity is a focus throughout the policy framework. To begin with, Policy SC10 (Habitat Protection, Biodiversity, and Net Gain) outlines that development proposals will be expected to, amongst other things, demonstrate BNG and be accompanied by appropriate ecological appraisals showing the potential impact of the proposed development on habitats and species.

11.2.22 With regard to BNG, the Environment Act 2021 places a legal requirement on sites to deliver at least 10% BNG. This will help mitigate potential negative effects and facilitate enhancements to ecological networks. It also has the potential to deliver net positive effects for biodiversity in the longer term, depending on the sensitivity of the site, the habitats and species present, and success in application of BNG. Policy SC10 also has regard to the role of the planning process to deliver the priorities set out in the East Sussex and Brighton and Hove LNRS.

11.2.23 With a focus on green infrastructure, Policy SC12 (Green and Blue Infrastructure) sets out that all major development will be expected to identify, protect, and enhance existing green and blue infrastructure on-site to deliver benefits to wildlife, habitats, and ecosystem services. In addition, Policy SC13 (Urban Greening Factor) outlines that major development must demonstrate that a) the proposal will meet or exceed an Urban Greening Factor of 0.4 (for residential) or 0.3 (for commercial development); and b) there is no net loss against the baseline undeveloped site score.

11.2.24 Trees, woodland and hedgerows are protected through Policy SC11 (Trees, Woodland and Hedgerows), including where they are protected by a Tree Preservation Order (TPO), ancient woodland, or within an area recognised for its biodiversity importance. Policy SC12 and SC13 also incentivise the retention of existing mature trees and hedgerow due to their contribution to the wider infrastructure network and their high-value contribution to meeting the Urban Greening Factor (UGF) minimum score. Management plans are also a requirement of these policies, ensuring that trees, woodland and hedgerow on development sites are appropriately managed once development is occupied.

11.2.25 Policy SP8 (Conserving and Enhancing the Natural Environment) sets out the Council's plan to protect and enhance the town's distinctive landscape character and natural environment. This includes by protecting and enhancing the soils, sites or habitats designated or identified of local, national and international importance for biodiversity or geodiversity and providing net gains for biodiversity, including by establishing coherent ecological networks, amongst other things.

11.2.26 More broadly, Policy SC19 (Environmental Nuisance) states that development should minimise and mitigate environmental nuisance during both the temporary and permanent condition of development. To achieve this, development will be required to control and mitigate noise and vibration and minimise and mitigate light intrusion. In addition, SP8 (Conserving and Enhancing the Natural Environment) seeks to protect and enhance areas that have been designated for their natural environment.

11.2.27 Policy SC16 (Flood Risk and Drainage) and SC18 (Pollution and Hazards) seek to prevent harm through pollution or contamination of water (including groundwater), soils and air and seek to protect sensitive receptors.

11.2.28 Some site policies, such as HS18 Land at Tilekiln Farm and HS1 Land adjacent to Sandrock Park, seek to improve on existing levels of pollution, in this instance through the use of interceptors or similar to prevent polluted surface waters entering the Bourne Stream (HS18) or downstream locations (HS1).

11.2.29 Overall, the Plan is predicted to lead to **broadly neutral to minor positive effects** under this SA theme. It is noted that development has the potential to result in direct effects on biodiversity, such as from land take, disturbance or the loss of key features of ecological value. There is also potential for indirect effects, such as from a reduction of ecological connectivity and changes in land use patterns. However, the risk of significant negative effects is reduced by the spatial strategy, which prioritises the reuse of previously developed land and limits growth in areas that could adversely affect designated biodiversity sites at the international, national, or local level. This strategic approach, combined with a policy framework requiring the protection, enhancement and long-term management of habitats and green and blue infrastructure, provides a strong safeguard against potential impacts. As a result, while some localised effects on habitats and species may still arise, the plan-wide policy measures are expected to offset these and support opportunities for ecological enhancement across the borough.

Climate change adaptation, flooding and coastal change

Spatial strategy

11.2.30 Hastings largely has a relatively low risk of fluvial flooding due to the majority of watercourses confinement to ghyll valleys, with the exception of the coastal Combe Haven area. However, the borough still contains some areas within Flood Zone 2 / 3 associated with the network of current and former waterbodies that intersect with the borough, as well as the coast, and some allocation sites intersect these areas. In this respect, the spatial strategy takes forward sites that have the potential to exacerbate existing fluvial flood risk at these locations.

11.2.31 However, it is noted that the site allocation policies take into account this elevated risk. For example, Policies HS2, HS11, and HS18, which cover Seaside Road, West St Leonards and Cinque Ports Way (former Stamco timber yard), and Land at Tilekiln Lane, respectively, outline that proposals should be supported by a Flood Risk Assessment and detailed drainage strategy that incorporate measures to address flood risk and provide site specific guidance on how this should be undertaken.

11.2.32 Surface water flood risk is more widespread across Hastings and certain areas in the town centre are particularly prone to surface water flooding. Multiple allocation sites contain areas of high or medium surface water flood risk with the potential to exacerbate existing conditions at these locations or downstream. However, similar to the above, the site allocation policies (supported by Policy SC16 – Flood Risk and Drainage) take into account this risk and outline appropriate mitigation measures.

11.2.33 The South Foreland to Beachy Head Shoreline Management Plan (SMP) (2006), which covers the stretch of coastline in Hastings, outlines that a long history of intervention has resulted in a heavily managed shoreline protecting the almost continuously developed coast.

11.2.34 Hastings is described as a dense urban area that is developed to the edge of the low coastal slope and fronted by a shingle beach of amenity and tourism importance. The coastline here has been protected since the 14th Century and the SMP seeks to continue protecting the frontage of this regionally important town. This will include maintenance of the harbour arms that provide a base and protection for the beach launched local fishing fleet and helps maintain the beach to the west, where it impedes longshore drift, thereby assisting in the maintenance of the beach here. It will prevent erosion of the seafront and its associated assets and will aim to reduce the flooding risks. Ongoing sea level rise is likely to result in a significant narrowing of intertidal areas unless beaches are artificially built up. This has the potential to impact upon the tourism economy of the town, as beaches along this section of the coast are an important asset and include areas of Priority Habitat.

11.2.35 Between Fairlight Cove and Hastings is an area of undefended cliffs of international environmental, geological and ornithological importance, with high landscape value and no significant cliff top developments; this area experiences relatively frequent cliff falls. The SMP seeks to allow natural cliff retreat, which will maintain the landscape and environmental quality of the frontage, part of which includes the Hastings Country Park. Maintenance of shoreline access associated with the Country Park should be acceptable provided it does not impact upon the environmental value of the site. There will be some loss of agricultural land, along with part of the Country Park (which also includes the scheduled 'Iron Age Cliff Castle' site'). In the long term, there will also be a need to re-route sections of the coastal footpath. This approach will maintain an input of beach forming sediment to the shoreline which will benefit this area and the coast to the east; it is not intended to be publicly accessible at the shoreline.

11.2.36 In relation to the above, whilst none of the allocated sites are located between Fairlight Cove and Hastings, some are near the coastline in Hastings. In this respect, the spatial strategy takes forward sites that are at risk of coastal flooding. However, it is noted that the site allocation policies consider this risk. For example, Policies HS2 and HS11, which cover Seaside Road, West St Leonards and Cinque Ports Way (former Stamco timber yard) respectively, outline that proposals should be supported by a Flood Risk Assessment and detailed drainage strategy that incorporate measures to address flood risk. With regard to Seaside Road, West St Leonards, this should include improvements to the sea wall and contributions to ongoing maintenance in light of tidal and fluvial flood risk (Zone 3) which should be secured by Section 106.

11.2.37 More broadly, growth presents an opportunity to support climate resilience by providing improvements to green infrastructure networks that reduce the impacts of flooding and extreme heat events, including through the Natural Flood Management Measures as set out in Policy SP9.

11.2.38 Larger sites (such as Land at Tilekiln Farm, Land at Breadsell, Queensway North and Queensway) offer greater potential to incorporate strategic green infrastructure that can contribute to climate change adaptation, for example through multifunctional open space, ecological corridors and SuDS. However, development at these locations would also entail substantial greenfield land loss, which reduces existing natural resilience and limits the ability of these areas to absorb climate impacts. On balance, the opportunities for new green infrastructure provision partially offset these concerns, but the overall effect is mixed and will depend on the extent to which adaptation measures are integrated into site design. The safeguarding of Flood Storage Capacity Improvement Areas through Policy SP9 also designates space and directs the location of improvements to or introduction of flood management interventions to reduce flood risk overall, both as locations for natural and engineered flood management including river restoration.

Development management policies

11.2.39 Flooding is primarily addressed through Policy SC16 (Flood Risk and Drainage), which states that a Flood Risk Assessment will be required as part of a planning application for any development in Flood Zone 2 or 3. Sequential and exception tests will also be applied when required. The policy also outlines that development should incorporate SuDS and manage surface water run off to ensure there is no increase to runoff rates and flood risk is not increased elsewhere either during construction or after development and includes management responsibilities for drainage assets.

11.2.40 Policy SP9 (Managing Coastal Erosion and Flood Risk) supports the development and improvement of flood defence infrastructure and drainage assets in Hastings. In line with Policy SP1 (Directing Growth), the policy directs major growth and change away from areas with the highest flood risk, and in areas of lesser flood risk, development will only be permitted where this risk can be mitigated or suitable adaptations provided, considering all sources of flooding. The policy states that within the Fairlight Cliff (east of Coastguard Lane) to Glyne Gap Coastal Change Management Area (CCMA), development proposals must be able to demonstrate mitigation and adaptation strategies to manage risk associated with coastal change.

11.2.41 In relation to the above, Policy SC17 (Coastal Change Management) outlines that new residential development, including changes of use, will not be permitted in the CCMA. However, essential infrastructure may be permitted in the CCMA provided that there are clear plans to a) manage any impact on coastal change arising from the development; and b) ensure it is safe over its planned lifetime. Other development may be permitted in the CCMA where it is supported by an agreed coastal change vulnerability assessment.

11.2.42 More broadly, Policy SP5 (Meeting the Challenge of Climate Change) sets out that all development within the borough will recognise the Climate Emergency and be supportive of the Council's aim to work towards making Hastings carbon neutral by 2030. This will in part be achieved by implementing proactive policy on climate change adaptation (e.g. the use of SuDS). In addition, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it ensures that climate adaptation measures have been incorporated into the design. Policy SC15 Ground Behaviour, Geodiversity and Land Stability' also makes specific reference to the need to incorporate climate change impacts into calculations.

11.2.43 Also of relevance, Policy SC12 (Green and Blue Infrastructure) sets out that all major development, and where feasible other forms of development, will be expected to identify, protect, and enhance existing green and blue infrastructure on-site to support climate change adaptation.

11.2.44 Where relevant, site policies such as HS18 (Land at Tilekiln Farm) and HS1 Land adjacent to Sandrock Park include site-specific requirements to reduce the overall risk of flooding to residential areas downstream in comparison to the undeveloped state of the site.

11.2.45 Overall, the Plan is predicted to lead to **minor positive effects** with regards to this SA theme. While growth through the spatial strategy will introduce additional hard surfaces and therefore increase potential surface-water run-off, the combined effect of the plan's policies (particularly Policy SC16) is to improve drainage capacity and reduce flood risk over time. Requirements for SuDS, surface-water management, and long-term maintenance and management plans mean that new development will be expected to deliver drainage systems that perform better than the existing baseline and can be adaptively managed if conditions change. By maximising the use of previously developed land, applying the sequential test, and largely avoiding areas at greatest flood risk, the spatial strategy further reduces the likelihood of increased flooding. Taken together, these measures support the delivery of development that is more resilient to climate change and, in many locations, results in a net improvement in local drainage and flood-risk conditions.

Energy and water consumption

Spatial strategy

11.2.46 By delivering growth the spatial strategy will ultimately lead to an increase in energy and water consumption. However, it is noted that the sustainability performance of development partially depends on energy and water efficiency during operation, known as operational carbon. This could include the inclusion of elements such as energy efficient design (i.e. taking a fabric-first approach), the provision of renewable energy on-site, and water-saving measures such as rainwater harvesting. Whilst it is considered that this can only be assessed on a site-by-site basis, it is noted that there are generally more opportunities to integrate low carbon and renewable energy into large-scale developments. For example, large-scale photovoltaic systems can be combined with community heating schemes to support renewable energy and increased energy efficiency. In this respect, larger sites (for example Land at Tilekiln Farm, Land at Breadsell, Queensway North and Queensway) could lead to additional opportunities.

Development management policies

11.2.47 Policy SP6 (Renewable and Low Carbon Technologies) outlines the Council's support for decentralised energy generation and distribution and community led initiatives; low and zero carbon technologies (e.g. roof mounted solar and air source heat pumps); area-wide low carbon heating solutions; and the enhancement of existing energy infrastructure to increase network capacity.

11.2.48 Focusing on design, Policy SC3 (Sustainable Design and Construction) sets out that all major development should be supported by an Energy Strategy Report that demonstrates the proposal is fossil fuel free, meets Space Heating Demand and Energy Use Intensity standards, considers upfront embodied carbon, has a lean design and generates an appropriate level of renewable energy onsite. Proposals must also be capable of achieving maximum residential water use of 100l/pp/pd or better. In addition, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it ensures that climate adaptation measures have been incorporated into the design. Policy SP3 also sets out a position on the retrofit of existing buildings, prioritising the reuse over demolition.

11.2.49 More broadly, Policy SP5 (Meeting the Challenge of Climate Change) sets out that all development within the borough will recognise the Climate Emergency. This will in part be achieved by effective spatial planning (e.g. reducing the need to travel) and implementing proactive policy on climate change mitigation (e.g. low carbon design and construction) and adaptation (e.g. improving the efficiency of water use).

11.2.50 Of relevance to water consumption, Policy SC16 (Flood Risk and Drainage) sets out that proposals should follow the drainage hierarchy, with the preference being to store rainwater close to the point of collection, ideally in conjunction with urban greening interventions, either for reuse onsite or attenuation.

11.2.51 Policy E2 (Skills, Employment and Supply Chain) encourages the use of Local Labour and materials, to ensure that the overall energy consumption embodied in the delivery of schemes is as low as possible.

11.2.52 Overall, the draft Local Plan is predicted to lead to **broadly neutral effects** with regards to this SA theme. Close engagement with energy and water providers will be required to ensure that network capacity keeps pace with new development. The policy framework promotes reductions in energy demand, supports low-carbon technologies, and sets clear expectations for water efficiency, including the 100-litre per person per day or better standard for new homes. Collectively, these measures provide a strong basis for ensuring that future development is resource-efficient and resilient to climate change.

Heritage

Spatial strategy

11.2.53 Hastings contains over 900 listed buildings (comprising one grade I listing; 23 grade II* listings and 545 grade II listings); six scheduled monuments; one protected wreck; and two parks and gardens (one grade II* and one grade II). Note that whilst there are over 900 listed buildings in the borough, there only 569 listings, because many listings comprise more than one building. The borough also contains 18 conservation areas. The potential impacts of the spatial strategy on features of cultural, built and archaeological heritage assets are discussed below.

11.2.54 With a wide spread of listed buildings there are naturally many site allocations that contain, adjoin or are in proximity (<50 m) to a listed building. In this respect, the spatial strategy takes forward sites that have the potential to impact the setting of listed buildings. However, the level of impact will depend on the detailed design, scale and positioning of new development, and the extent to which it respects or avoids intrusion into the setting of the listed buildings.

11.2.55 Former Convent of Holy Child Jesus, Magdalen Road is evidently one of the most constrained sites from a heritage standpoint. However, it is recognised that many of the listed buildings on the site have been underused for many years and have lacked regular maintenance and repair. Of key concern is the grade II* listed chapel which is on Historic England's national Heritage at Risk Register. In this respect, development provides an opportunity to improve the condition of the listed buildings on this site. This will require well thought out and sympathetic design.

11.2.56 In relation to the above, the site allocation policy (Policy HS25) and accompanying Masterplan and Development Brief supports the repair, restoration, active reuse, and on-going care and maintenance of the former Convent buildings and cemetery as part of a comprehensive heritage, landscape and residential-led regeneration scheme. The provisions for the site also require that any new development is informed by a clear understanding of the site's significance and is designed to be locally distinctive and of high quality. Proposals must minimise harm to the listed buildings, the character and appearance of the conservation area, and wider townscape views, and should integrate landscaped green spaces and pedestrian and cycle connections to the surrounding area.

11.2.57 Furthermore, the Land adjacent to Sandrock Park (Policy HS1) includes policy requirements for an appropriate programme of archaeological investigation secured by conditions, owing to its location within an Archaeological Notification Area. This measure will help ensure that any previously unrecorded archaeological remains are identified, documented and, where necessary, appropriately mitigated.

11.2.58 None of the site allocations lie in close proximity (<50 m) to a registered park or garden, but multiple allocations are either within, adjacent to, or in close proximity (<50 m) to a conservation area. In this respect, the spatial strategy includes several sites that have the potential to affect the setting and character of conservation areas. However, many of these sites currently accommodate uses or buildings that detract from the significance of the conservation area, meaning redevelopment may offer opportunities for improvement. The site allocation policies also require proposals to demonstrate how harm will be avoided or minimised.

11.2.59 More broadly, for the Hastings Town Centre Conservation Area, Policy R1 recognises the high concentration of heritage assets and requires development to conserve, and where appropriate enhance, their significance and setting. This provides an important policy safeguard against potential adverse effects arising from increased development pressure in the town centre.

11.2.60 A small number of allocation sites are within, adjoining or in proximity (<50 m) to a scheduled monument, and several sites lie within an Archaeological Notification Area - all with the potential to disturb associated archaeological remains. However, impacts are likely to be limited by the existing uses at these sites and the relevant site allocation policy mitigation. With appropriate investigation, evaluation and mitigation secured through the development management process, effects can be managed, and development may in some cases enable the recording and better understanding of archaeological interest.

Development management policies

11.2.61 The draft Local Plan supports development that further reveals and celebrates the built heritage of Hastings, protects the significance of heritage assets, and promotes the history of the town through. In this respect Policy SP7 (Protecting and Enhancing the Historic Environment) is the key overarching strategic policy for the Local Plan relating to the historic environment. The policy also encourages owners and developers to restore and reuse historic buildings and seeks to protect the significance and setting of both designated and non-designated heritage assets.

11.2.62 In terms of the other policies of the Local Plan, one of the focuses for heritage is Policy SC5 (Proposals Affecting the Significance and Setting of Heritage Assets), which sets out criteria which proposals that would affect the significance or setting of designated or non-designated heritage assets will be assessed against. This includes historic context, street patterns, scale, height, massing, materials and finishes, and topography. Archaeology is also considered through this policy.

11.2.63 In addition to the above, Policy SC6 (Sustainable Development and Heritage Protection) supports the on-going use, care, maintenance, repair and where necessary, the re-purposing of heritage assets. The policy supports proposals involving climate change mitigation and adaptation measures in relation to heritage assets providing they meet the criteria set out within the policy.

11.2.64 With a focus on conservation areas, Policy SC7 (Changes to Building Elevations and Roofs in Conservation Areas) seeks to maintain the form and appearance of original features in conservation areas, including windows, doors and roof lights where this contributes to the character of the building and the significance of the wider conservation area.

11.2.65 With a focus on design, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it preserves and enhances existing heritage assets, including protecting their setting and key historic views across the borough. In addition, the policy expects development impacting heritage assets to be in harmony with and sympathetic to local historic character and be of an appropriate scale and siting, of high-quality design, and use appropriate materials and finishes.

11.2.66 Policy SC1 also considers the impact of taller buildings on heritage assets. Specifically, the policy sets out that proposals for taller buildings should avoid negative impacts on the skyline and any views to and from heritage assets or on the setting of heritage assets.

11.2.67 More broadly, Policy SC8 (Shopfronts, Advertisements and Commercial Frontages) requires a high standard of commercial frontage design, particularly for proposals in conservation areas and/or affecting listed buildings. In addition, alterations and extension of dwellings is covered by Policy SC4 (Alteration and Extension of Dwellings), which states that they should reflect the scale, proportions, materials, roof line and detailing of the original building.

11.2.68 Overall, it is difficult to predict effects as impacts on heritage are largely dependent on the detailed design and layout of development, which is unknown at this stage. Due to this, **uncertainty** is noted under this SA theme but both **minor positive and minor negative effects** are predicted as most likely. Whilst the spatial strategy directs a significant level of growth to the town centre, which is the most constrained part of the borough from a heritage standpoint, it is also recognised that development has the potential to better reveal the special qualities of heritage assets. In addition, the policy framework seeks to mitigate adverse impacts on heritage assets as a result of development and secure enhancements.

Land and water quality

Spatial strategy

11.2.69 This theme considers impacts of land and water quality in respect of introduction or release of pollution and/ or contaminants, waste and minerals processing and agricultural uses. The majority of the borough comprises the urban area of Hastings. Nevertheless, there are multiple allocation sites that are either wholly or partially greenfield land. However, it is recognised that this is largely unavoidable given the limited number of brownfield sites in the borough and the high housing and employment requirement figures. In addition, the site allocation policies largely include the provision of green infrastructure and require publicly accessible open space be secured on larger sites, including Land at Tilekiln Farm, Land adjacent to Sandrock Park and Seaside Road. Due to the history of land use in Hastings, and the shared overland water flows of greenfield sites with polluting sources, the condition of greenfield sites can vary and potential for the presence of pollution exists in many cases.

11.2.70 According to the East Sussex, South Downs and Bright & Hove Waste and Minerals Local Plan (2013), there are currently four active clay sites in East Sussex, one of which – Hastings Brickworks – is just outside of the borough in Guestling. This is designated as a Minerals Safeguarding Area (MSA). In addition, there is a safeguarded concrete batching plant at Sedlescombe Road North. However, none of the allocation sites overlap with these. There are waste consultation areas in Ponswood, Sedlescombe Road North and Ridge West. The Ridge West and Ponswood overlap with SIEA 1 and SIEA 3 respectively.

11.2.71 The key considerations in terms of supporting the efficient use of land in the borough are the need to avoid unnecessary loss of the highest quality ‘best and most versatile’ (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus ‘non-agricultural’ and ‘urban’), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Not all locations in Hastings have had recent detailed ALC undertaken; due to this, there is a reliance on less detailed pre-1988 national classifications for agricultural land. Under this older classification, subdivision of Grade 3 agricultural land into 3a (BMV land) and 3b (poorer quality land) is not available.

11.2.72 In relation to the above, the majority of the land surrounding the built-up area of Hastings is underlain by Grade 4 ('poor') agricultural land, with some Grade 3 ('good to moderate') agricultural land. The only sites underlain by Grade 3 agricultural land are Land at Breadsell and Ivyhouse Lane, Northern Extension. Hence, development at these locations could lead to the loss of productive agricultural land.

11.2.73 The East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (last updated in 2024) identifies Hastings as an 'Area of Focus' for strategic waste recycling and recovery facilities. Waste generation is an inevitable consequence of development, including both waste generated by construction and waste generated during occupation. With reference to the relevant policies of the WMLP with regard to reuse, recycling and disposal, the management of waste, including the minimisation of waste generation in the first instance and the encouragement of the re-use, recycling and recovery of waste materials, would all be undertaken on a site-by-site basis. It is therefore considered that individual development is unlikely to have a significant negative impact on waste generation. In this context, it is reasonable to assume that the level of waste generated will correspond to the scale of development. However, it is recognised that larger schemes can present an opportunity to incorporate innovative waste management practices and technologies. Therefore, it is noted that larger sites (such as Land at Tilekiln Farm, Land at Breadsell, Queensway North and Queensway) have the most potential to support sustainable waste management within new development areas.

11.2.74 In addition, the Land at the junction of Ridge West and Queensway lies within a Waste Consultation / Notification Area associated with existing and planned waste management facilities. Residential development in this location would likely be sensitive to potential amenity issues such as noise, odour and vehicle movements associated with waste operations. As a result, the site has been allocated for employment rather than residential use, ensuring greater compatibility with the operational characteristics of nearby waste infrastructure.

11.2.75 Hastings is within the supply area of Southern Water and is located within a wider area of serious water stress. It will be important to consider the emerging Local Plan's effects on water resources. In this respect, it is considered that growth through the spatial strategy will place a greater demand upon the already stressed supply. However, this will be predominantly addressed through Water Resources Management Plans (WRMPs), which set out long-term strategies for maintaining supply. In addition, the Local Plan includes design-led requirements to reduce consumption (such as the 100 litres per person per day or better water efficiency standard in Policy SC3 – Sustainable Design and Construction) and the emphasis on SuDS, recycling and reuse within Policy SC16 (Flood Risk and Drainage) which will help to moderate increased demand arising from new development. Further information on the WRMP including new infrastructure can be found in the Infrastructure Delivery Plan that accompanies the Plan.

11.2.76 Source Protection Zones (SPZs) are zones which show the level of risk to groundwater sources from contamination. There are no SPZs within the borough. However, the majority of the borough falls within the Pevensey and Cuckmere Levels Water Management Board area. This means that surface water drainage, water level management and the operation of local drainage infrastructure are important considerations for development within this catchment, and proposals will need to accord with the requirements and guidance of the Board to ensure effective and sustainable water management. Clear site specific requirements for sites in the PCLWMB area are set out in site policies for locations within the Board area

Development management policies

11.2.77 With regard to land quality, Policy SC15 (Ground Behaviour, Geodiversity and Land Stability) sets out that development proposals for major and minor applications will be supported in areas with suspected poor ground conditions, where the proposal meets the criteria set out within the policy including in relation to remediation, mitigation and management measures.

11.2.78 With regard to both land and water quality, Policy SC18 (Pollution and Hazards) sets out that development is required to a) improve water quality and incorporate appropriate pollution control measures where necessary to protect ground and surface waters; and b) incorporate appropriate measures where necessary to remediate or protect land from pollution or contamination.

11.2.79 In addition, the policy sets out that development proposals should undertake site investigation for contaminants in all cases. To prevent contamination of watercourses and local drainage infrastructure, development proposals must provide detailed foul and surface-water drainage strategies, incorporate multifunctional SuDS, phase occupation of development to align with any reinforcement of the sewer network, clearly identify flow routes and demonstrate that contaminated materials, including any wash-waters generated during construction or operation, will not enter the drainage system and install a watertight foul system in areas with high groundwater tables.

11.2.80 Related provisions in Policy SC16 (Flood Risk and Drainage) further reinforce these requirements by ensuring that construction-phase drainage, temporary SuDS and pollution-prevention measures are in place to protect water quality, and by requiring the design of surface-water systems that avoid the risk of polluted or inappropriate flows entering surface-water sewers and that capacity of combined sewers is not reduced through silting, leading to release of contaminated sewer waters through breach. Policy SC3 (Sustainable Design and Construction) further helps manage water resources by requiring water-efficient development, helping to limit additional demand on local water supplies and reducing pressure on water infrastructure again, reducing the risk of sewer capacity exceedance.

11.2.81 Additionally, several allocation policies set out water-quality-specific requirements. Policies HS1, HS5 and HS18 include measures to protect nearby watercourses, including hydrological and groundwater monitoring, provision of buffer zones, careful design of SuDS, and controls to ensure that polluted runoff cannot enter sensitive streams or groundwater pathways. These allocations also require appropriate drainage strategies to safeguard water quality during construction and operation.

11.2.82 Overall, the draft Local Plan is predicted to lead to **minor (non significant) negative effects** under this SA theme as it will ultimately place a growing demand on land and water resources. Whilst the spatial strategy maximises the use of previously developed land, it will still result in the loss of greenfield, and potentially BMV land. However, it is recognised that this is largely unavoidable given the high housing and employment need figures for Hastings and the largely built-up nature of the borough. In mitigation, the policy framework (including but not limited to Policies SC3, SC16, SC186-2, SC15 and the site-specific requirements of Policies D1, HS1, HS18, HS24 and HS5) provides a comprehensive set of measures to protect and conserve land and water quality, reduce pollution risks, and manage water resources more efficiently.

Natural landscape

Spatial strategy

11.2.83 The northern boundary and eastern extent of Hastings overlap with the High Weald National Landscape and there are multiple allocation sites that lie within, or in close proximity to the designated landscape – thereby in its setting. In this respect, the spatial strategy takes forward sites that have the potential to lead to impacts on the High Weald National Landscape, either directly through development within the National Landscape or indirectly through impacting the setting of the National Landscape. However, it is noted that some of these are brownfield sites within the built-up part of the borough, and therefore these sites are less likely to lead to any significant impacts.

11.2.84 The site allocation policies consider impacts on the National Landscape. For example, Policy ES7, which covers Ivyhouse Lane, Northern Extension, states that proposals for development on this site should include a) an ECOP which makes specific reference to the presence of the High Weald National Landscape; b) a landscape impact assessment, taking into account both the site's setting and long-range views across the National Landscape; and c) a lighting plan to minimise light spill within the National Landscape.

11.2.85 In addition, Policy HS10, which covers Land at Rock Lane, states that proposals for development on this site should relate well to the frontage along Rock Lane and demonstrate the conservation and enhancement of the National Landscape showing how adverse impacts will be avoided. Policy HS18, which covers Land at Tilekiln Farm, states that land should be retained as open space and boundary landscaping retained which reflects the character and purpose of its inclusion in the National Landscape. Finally, Policy HS13, which covers Land North-West of Winchelsea Lane, Policy HS21, which covers Land East of Rock Lane, Policy HS23, which covers Land East of Beaneys Lane, and Policy TP2, Land at Tilekiln Lane, state that proposals for development on these sites should propose a lower density development owing to the sensitive surrounding landscape.

11.2.86 East Sussex County Council's Landscape Character Assessment shows that the land to the north of the built-up area of Hastings falls within the Brede Valley Landscape Character Area (LCA). The key landscape characteristics of this LCA include a) to the south west of the main valley a belt of undulating countryside extends to the Battle to Hastings ridge; and b) urban fringe intrusions around the edges of Battle and Hastings including pylons, industrial units, housing and horticultural developments. It is highlighted that "*pressures for expansion of Battle and Hastings may impact on the parts of the character area which border the towns*" and that "*a priority should be to identify opportunities to enhance the degraded and poorly managed parts of the character area on the Hastings urban fringes*". The sites that fall within this LCA are Ivyhouse Lane, Northern Extension (Policy ES7), Land East of Rock Lane (Policy HS21), Land at Rock Lane (Policy HS10) and Land North-West of Winchelsea Lane (HS13).

11.2.87 The land to the east of the built-up area of Hastings falls within the High Wealden Coast LCA. The key landscape characteristics of this LCA include a) the Hastings to Battle Ridge, which reaches the sea to form a distinctly unique coastline; b) Hastings Country Park with internationally important wildlife designations; c) the urban fringes of Hastings, including the dominating masts at North Seat, which form the western boundary to the area; d) the A259 between Hastings and Rye, which follows the ridge and forms the boundary on the North West side of the area; and e) virtually continuous ribbon development along Pett Road from Hastings to Cliff End. Land at Tilekiln Lane (Policy HS18) falls within this LCA.

11.2.88 The land to the west of the built-up area of Hastings falls within the Combe Haven Valley LCA. The key landscape characteristics of this LCA include a) urban fringe intrusions around the edges of Bexhill and Hastings; and b) the Hastings to London railway line, which cuts across the eastern part of the area. It is highlighted that "*a priority should be to identify opportunities to enhance the degraded and poorly managed parts of the character area on the Hastings urban fringes*". The only sites that fall within this LCA are Land at Breadsell (Policy D1) and Marline Fields, Enviro21 Business Park, Land West of Queensway (Policy ES10).

11.2.89 Several of the site allocations also fall within the local Landscape Character Context Areas (LCCAs) identified in the Landscape Sensitivity to Residential, Commercial and Solar Development within Hastings (2024). These areas include a range of sensitivity ratings to development. Sites within areas of high sensitivity include Land at Breadsell (Policy D1), while Land at Tilekiln Farm (Policy HS18) is identified as having moderate–high sensitivity to development. However, the policy framework provides important mitigation at these locations: Policy D1 for Land at Breadsell requires landscape buffer zones and a landscape-sensitivity analysis, while Policy HS18 for Tilekiln Farm includes the preparation of an Ecological Constraints and Opportunities Plan (ECOP) and landscape-led design measures. These site-specific requirements will help ensure that development responds appropriately to local landscape character and reduces the potential for adverse effects.

11.2.90 Overall, while the spatial strategy takes forward several sites that have the potential to affect the Brede Valley, High Wealden Coast, and Combe Haven Valley LCAs, its focus on directing most growth to brownfield land within the built-up area of Hastings helps to limit wider landscape impacts. Several allocations also fall within the local LCCAs, which confirms high sensitivity at Land at Breadsell and moderate–high sensitivity at Land at Tilekiln Farm. Taken together, these findings highlight the need for development to be landscape-led, with careful attention to siting, design and the retention of valued landscape features. While the overall spatial approach performs relatively well, localised effects on landscape and townscape remain possible, and the extent of these will ultimately depend on detailed design and layout at the application stage. For larger strategic sites such as Land at Breadsell, there may also be opportunities to coordinate mitigation and enhancement measures across administrative boundaries, helping to support landscape, biodiversity and green infrastructure objectives at a wider scale.

Development management policies

11.2.91 The natural landscape is primarily addressed through Policy SP8 (Conserving and Enhancing the Natural Environment), which sets out the Council's plan to protect and enhance the town's distinctive landscape character and natural environment. This includes by a) recognising the intrinsic character and beauty of the countryside; b) protecting and enhancing the town's distinctive landscapes, including woodlands, open green space, the undeveloped coastline, the High Weald National Landscape, and the Combe Valley Countryside Park; and c) supporting projects that protect and enhance the network of green and blue infrastructure across the borough.

11.2.92 Also of relevance is Policy SC9 (The High Weald National Landscape and Other Areas of Landscape Value), which seeks to protect the inherent visual qualities and distinctive character of the High Weald National Landscape and other areas of landscape value, including the Combe Valley Countryside Park. The policy outlines that development affecting these areas should be limited in scale and extent, in terms of the proposed footprint, height and massing, and appropriate in terms of its nature and location.

11.2.93 Policy SC9 outlines that within the High Weald National Landscape specifically, the scale and extent of development should be limited and designed in a way that reflects its nationally designated status as landscape of the highest quality. In addition, development should conserve and enhance the landscape and scenic beauty of the area, with reference to the components of natural beauty set out in the High Weald National Landscape Management Plan. Finally, development proposals should be supported by a Landscape Assessment demonstrating how the scheme makes a positive contribution to the objectives set out within the Management Plan.

11.2.94 In terms of design, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it responds to a) the existing character; b) has regard to the complex topography of Hastings considering the impact from key viewpoints; and c) enhances the landscape character of the area.

11.2.95 Policy SC1 also considers the impact of taller buildings on landscape character. Specifically, the policy sets out that proposals for taller buildings should avoid negative impacts on the skyline and any landscape views.

11.2.96 Important landscape or town trees are protected through Policy SC11 (Trees, Woodland and Hedgerows). The policy states that the removal of trees and hedges will only be considered acceptable where it is in the interests of good arboriculture practice, or the proposed development outweighs the landscape and amenity value of trees or hedges affected. Policies SC12 (Green and Blue Infrastructure) and SC13 (Urban Greening Factor) also incentivise the retention of existing mature trees and hedgerow due to their contribution to the wider infrastructure network and their high-value contribution to meeting the Urban Greening Factor minimum score. Management plans are also a requirement of these policies, ensuring that trees, woodland and hedgerow on development sites are appropriately managed once development is occupied.

11.2.97 Policy SC14 (Provision, Enhancement and Retention of Sports and Recreation Facilities) also plays a role in protecting the natural landscape by safeguarding existing public open spaces, parks, and recreation areas unless alternative provision is secured. This contributes to maintaining the openness, character and recreational value of key landscape areas across the borough.

11.2.98 More specifically, Policy E6 (Outdoor Visitor Accommodation) sets out that proposals for the expansion of or improvement to existing lawful caravan, chalet and camping sites and other forms of outdoor visitor accommodation will be supported providing they have an acceptable impact on landscape character, particularly in relation to the impact on the High Weald National Landscape.

11.2.99 Overall, the draft Local Plan is considered likely to lead to **moderate negative effects** with regards to this SA topic. Whilst it is recognised that impacts on the natural landscape are largely dependent on the design and layout of development, which is unknown at this stage, ultimately the spatial strategy directs growth to sites within and in proximity to the High Weald National Landscape, as well as the Brede Valley and Haven Valley LCAs. In doing so, it has the potential to adversely impact the special qualities of the National Landscape and the landscape character of the LCAs. Nevertheless, it is recognised that intrusion into the National Landscape is limited, and the policy framework seeks to mitigate adverse impacts on landscape character as a result of development, and secure enhancements.

Population, health and wellbeing

Spatial strategy

11.2.100 As noted at the start of this chapter, the housing supply target of 2,970 is around a quarter of LHN. The Council views that there is potential to deliver more homes through mixed-use regeneration opportunities in Hastings Town Centre. In this respect, the housing supply target of 2,970 is an ‘at least’ target but the expectation is that significant unmet needs will be generated. The plan identifies two regeneration areas, the first being Hastings Central (Policy R1). Here, six opportunity sites are identified. Policy R1 provides supports a variety of land uses in Hastings Central to encourage a mixed-use vibrant town centre.

11.2.101 The second regeneration area is St Johns Road (Policy R3), which comprises land in and around Warrior Square Station. The policy supports residential led, mix-use development, which will also incorporate improvements to the accessibility, capacity and design of Warrior Square Station.

11.2.102 In light of the above, whilst the spatial strategy does not meet the identified housing need for the borough, it will still deliver a significant number of new homes (including a mix of types, sizes and tenures, with a proportion of affordable housing), with the potential for significant positive effects. In addition to new development, the plan also seeks to maximise the contribution of the existing housing stock through Policy H6 (Housing Renewal), which seeks to secure improvements to the housing mix, quality of design and deliver other public benefits including retrofit. Furthermore, the delivery of housing and other growth will be supported by Policy SP12 (Infrastructure Delivery Strategy), which sets out the overall strategic approach to the identification and delivery of strategic infrastructure needs and Policy ID1 (Planning Obligations), which sets out how planning obligations will ensure that the necessary infrastructure is secured and delivered at the right time. Together, these approaches recognise that the borough is highly constrained (being largely built-up with much of the undeveloped land covered by biodiversity, landscape or heritage designations) while still providing opportunities to increase housing supply and improve existing neighbourhoods in a sustainable manner.

11.2.103 In terms of the distribution of growth, the spatial strategy delivers growth over a wide area and performs positively in this respect. By focusing a significant proportion of growth in the central areas, the spatial strategy supports development in the part of the borough with the best access to services and facilities, employment opportunities and key transport links.

11.2.104 According to the Index of Multiple Deprivation (IMD) (2025), Hastings is more deprived than 99% of local authority districts nationally. Most of the site allocations lie within an area amongst the 10% most deprived neighbourhoods in the country and in this respect, the spatial strategy will deliver housing and employment growth, and the associated benefits, in the most deprived parts of the borough. This will have positive implications for equalities.

11.2.105 Hastings contains a total of 25 schools, which are relatively well distributed across the borough and several doctor / health centres and the Conquest Hospital on the Ridge. Despite this, multiple allocation sites are not within walking distance (<800 m) of these facilities. However, it is recognised that all the sites (except for Land at Breadsell) are within walking distance (<800 m) of a bus stop.

11.2.106 Although dependent on existing pressures on services and facilities, the spatial strategy has the potential to place increasing demands on services and facilities, with potential to affect the quality of services and facilities used by existing residents. On the other hand, due to the requirements for developers to support infrastructure and services, through Section 106 agreements / payments, there is also potential for the spatial strategy to support the provision of new and enhanced services and facilities, as well as transport links. This will support accessibility to services and facilities in Hastings. None of the allocated sites would result in the permanent loss of existing services and facilities through development, and the spatial strategy performs well in this respect.

Development management policies

11.2.107 In terms of affordable housing, Policy SP2 (New and Affordable Housing) sets out that brownfield sites will need to deliver 25% affordable housing and greenfield sites will be required to deliver 40% affordable housing. In these circumstances, the Council will expect the following tenure mix: 70% affordable rent / social rent and 30% affordable home ownership.

11.2.108 Policy SC2 (Housing Mix, Accessibility and Adaptability) requires new residential development to make provision for a mix of housing types and tenures to support a range of household sizes, ages and incomes to meet both current and projected housing needs. In addition, the policy sets out that affordable housing should be well-integrated with market housing in terms of site layout, appearance, detailed design, build quality and materials. The policy also states that development should ensure that it is accessible and adaptable for occupiers at different life stages, allowing ease of access to everyone including those with disabilities and mobility impairments. This will contribute to inclusivity, and the policy framework performs well in this respect.

11.2.109 Specialist housing for older people is addressed through Policy H1 (Specialist Housing for Older People), which states that development proposals should have regard to meeting the housing needs of older people, ranging from accessible and adaptable general needs housing to specialist housing with high levels of care and support. The policy proposes to increase the supply and range of housing and accommodation suitable for older people (use class C3) and supports proposals for new residential care homes and nursing homes, as well as extensions to existing care homes (use class C2). Where specialist housing is brought forward as private provision, including within a residential care setting, Policy SP2 (New and Affordable Housing) outlines that the Council will take into account the characteristics of the scheme when determining proposals to ensure that the type, tenure and level of care offered align with identified local need and contribute to creating a balanced housing offer for an ageing population.

11.2.110 With regard to Gypsy and Traveller need, Policy SP2 (New and Affordable Housing) outlines that a net need for 8 permanent pitches is required over the plan period. Policies TP1 (Land South of Crowhurst Road) and TP2 (Land at Tilekiln Lane) allocate two sites that should contribute a minimum of 4 of these pitches, with the remainder expected to be met through windfall proposals. Adding to this, Policy H5 (Accommodation for Traveller Communities) supports proposals that address the permanent pitch need set out in the most recent Gypsy and Traveller Accommodation Assessment, providing it meets the criteria set out within the policy.

11.2.111 Shared housing is addressed through Policy H2 (Shared Housing), which seeks to support mixed and balanced communities and maintain an appropriate housing mix within the borough. The policy sets out criteria for houses in multiple occupation (class C4), including communal living space and cooking and bathroom facilities appropriate in size to the expected number of occupants.

11.2.112 Policy H7 (Temporary Residential Uses) sets out the circumstances in which temporary residential accommodation may be appropriate on underused or vacant sites, including where development is phased, where sites are waiting for redevelopment, or where short-term accommodation needs arise. The policy outlines requirements to ensure that temporary residential uses provide suitable living conditions, including appropriate management arrangements, access to essential services, and measures to mitigate impacts on amenity, safety and the surrounding community. The policy also seeks to ensure that proposals do not prejudice the intended or planned use of sites or locations, and sets out considerations relating to site access, flood risk, ground conditions and transport. The policy is clear that it does not apply to public open spaces, recreation grounds and highway land.

11.2.113 Other policies relevant to housing include Policy H3 (Conversion of Existing Dwellings), which supports conversions providing it meets the criteria set out within the policy; Policy H4 (Self Build and Custom Housebuilding), which supports proposals for self and custom housebuilding and community housebuilding on residential development sites in locations where there is demonstrable demand for plots and other relevant planning policies are satisfied; and Policy H6 (Housing Renewal), which supports proposals for social housing regeneration providing they do not result in a net loss in affordable housing.

11.2.114 Health and wellbeing is primarily addressed through Policy SP11 (Healthy and Safe Communities), which outlines that development should help to create healthy, inclusive, and safe places which reduce health inequalities, and help to address the social and physical determinants of health and create prosperity. The policy sets out the Council's approach to using health impact assessment screening to inform the design process.

11.2.115 Also of relevance, Policy SC14 (Provision, Enhancement and Retention of Sports and Recreation Facilities) supports development which seeks to provide new, maintain or enhance existing sports and recreation spaces. Finally, Policy ID3 (Open Space, Sports and Recreation) sets out that development will be required to contribute to the capacity, quality, usability and accessibility of existing open space, sports and recreation facilities where development will increase demand.

11.2.116 Access to green infrastructure is addressed through Policy SP8 (Conserving and Enhancing the Natural Environment), which supports projects that improve public access to the network of green infrastructure across the borough, including publicly accessible open spaces and 'urban fringe' areas. Also of relevance, Policy SC12 (Green and Blue Infrastructure) sets out that all major development will be expected to identify, protect, and enhance existing green and blue infrastructure on-site to support the health and wellbeing of the local community.

11.2.117 Accessibility is covered under Policy SC1 (Key Design Principles), which outlines that the Council will support high quality development providing that it provides people-friendly streets and public spaces which enable people, including wheelchair users, those with pushchairs / buggies and those with disabilities and mobility impairments, to move around safely and comfortably.

11.2.118 Community facilities are addressed through Policy SC20 (Community Facilities), which supports proposals for the provision of new community facilities or enhancement and/or extension of existing facilities provided that the development is acceptable in terms of location, design, access and impact on the locality.

11.2.119 Planning obligations are covered by Policy ID1 (Planning Obligations), which outlines the Council's intention to ensure that the right infrastructure is in place at the right time to provide the additional infrastructure capacity required to support new development. This includes through Section 106 agreements.

11.2.120 Overall, the draft Local Plan is considered likely to lead to long-term **moderate positive effects** under this SA theme. This is because the spatial strategy delivers growth relatively evenly across Hastings, including in the most deprived areas of the borough. In addition, the policy framework seeks to deliver a suitable mix of housing, including provision for affordable housing, specialist housing for older people and gypsy and traveller accommodation. It also seeks to improve health and wellbeing by reducing health inequalities, improving accessibility, and protecting and enhancing sporting and recreational facilities, access to green infrastructure, and community facilities. Reflecting the generation of unmet needs in the borough though (which will include reduced delivery of affordable housing), significant positive effects are considered less likely.

Skills, employment and economic development

Spatial strategy

11.2.121 Policy SP1 (Directing Growth) outlines that the supply of industrial floorspace will be increased and delivered through the development of new floorspace on allocated sites and through the effective use of existing employment land and premises in the Council's Strategic and Local Industrial Employment Areas (SIEAs and LIEAs). In these locations intensification and renewal of existing industrial premises will be promoted. The policy also states that the primary location for a range of uses including larger scale office functions, leisure offers, visitor accommodation, cultural and retail development, and education facilities will be Hastings Town Centre. Smaller scale development, appropriate to its context and the character of area, will be directed to District and Local Centres.

11.2.122 As noted at the start of this chapter, the plan identifies a need for 70,400 sqm business floorspace and 4,750 full time equivalent jobs by 2041. Policy SP3 (Business Development – Office and Industrial) outlines that approximately 19,830sqm of floorspace will be delivered through employment allocations located within the SIEAs. Policy EA1 (Applications for Employment Uses) sets out that approximately 14,630sqm of this floorspace will be delivered on allocated sites within SIEA1 (Queensway Corridor), whilst the remaining 5,250sqm will be delivered on allocated sites within SIEA2 (Ivyhouse Lane). A total of 9 sites are allocated for business (office / industrial) use through Policy EA1; these are detailed in Policies ES1-8 and ES10. A further two sites are allocated for mixed-use development. It is also anticipated all Opportunity sites in R1 and R3 could provide a mix of uses. The spatial strategy performs well in this respect and whilst the strategy does not meet the identified needs in full, this could be aligned with the housing supply (which similarly does not meet LHN in full).

11.2.123 One contributing factor to unemployment is accessibility; if residents who rely on public transport and / or active travel cannot access employment opportunities via these modes then it can act as a barrier to employment. There are number of residential / mixed-use allocation sites that are not within walking distance (<800m) of the nearest town, district or local centre, which are often hubs for employment or contain key transport links that can be used to access employment opportunities further afield, including the industrial estates across the borough. However, it is recognised that the borough contains a substantial bus network, and all sites (except for Land at Breadsell) are within walking distance (<800 km) of a bus stop.

11.2.124 A large contributor to the borough's economy is tourism and the visitor economy. The spatial strategy will deliver housing growth to the borough, which has the potential to lead to infrastructure improvements locally, which in turn has the potential to support tourism. Tourism may also be supported through enhancing the vitality of the town centre, the resort area and wider borough. In addition, high quality development has the potential to improve the visual amenity of a locality, including that associated with the town's rich and diverse heritage resource, thereby supporting tourism. However, it is also recognised that inappropriate development or over densification may have the opposite effect.

Development management policies

11.2.125 Policy SP3 (Business Development – Office and Industrial) sets out that within SIEAs and other sites currently or last in employment use, the Council will support development that maintains, and where appropriate, intensifies or expands industrial floorspace to accommodate a) industrial processes; b) storage or distribution; c) waste management uses; d) vocational training facilities; and e) office use.

11.2.126 Policy SP3 also outlines that Hastings Town Centre is the primary location for new office development and renewal, including affordable, flexible and shared workspace. In relation to this, Policy SP4 (Business Development – Town Centres) sets out the hierarchy of town centres, placing Hastings Town Centre at the top of the hierarchy above district and local centres. The policy outlines that Hastings Town Centre should be the focus for larger scale office development. Meanwhile, proposals which diversify the provision of facilities in district and local centres will be supported where they are of an appropriate scale in relation to the role of the centre.

11.2.127 Policy E1 (Protecting and Enhancing Employment Sites, Areas and Allocations) seeks to protect and enhance employment land and premises, including SIEAs, by only supporting development proposals which would result in the retention, intensification, conversion, redevelopment and/or extension of employment generating uses. In addition, in areas that will accommodate mixed use development, development proposals will be supported which promote the successful integration of residential, commercial and employment space.

11.2.128 Policy E2 (Skills, Employment and Supply Chain) sets out that proposals incorporating 1,000sqm or more gross new commercial floorspace and/or 40 dwellings or bed spaces should include a) local labour and procurement agreements setting out how local employment and goods will be secured where possible; b) a local skills development plan; and c) a project completion statement for a) and b). Hence, the draft Local Plan supports local employment and upskilling and performs well in this respect.

11.2.129 Primary Shopping Areas are defined for all town centres under Policy E3 (Primary Shopping Areas). Within the Primary Shopping Areas, the Council will support proposals for retail and main town centre uses and commercial, business and services falling within Planning Use Class E, providing that they a) maintain and enhance the vitality of these centres; and b) enable the interchange between town centre uses and uses falling within Use Class E where they would not harm the vitality and range of uses.

11.2.130 More specifically, Policy E4 (Food, Drink, Entertainment and the Night-Time Economy) supports development proposals for new cafes, restaurants, drinking establishments and hot food takeaways in Town, District and Local Centres provided amenity and safety criteria can be met, including relating to the use of delivery services. In addition, Policy E5 (The Visitor Economy) supports new and extended serviced visitor accommodation, including hotels and bed and breakfast. Finally, Policy E6 (Outdoor Visitor Accommodation) supports proposals for the expansion of or improvement to existing lawful caravan, chalet and camping sites and other forms of outdoor visitor accommodation.

11.2.131 Overall, the draft Local Plan is considered likely to lead to long-term **significant positive effects** under this SA theme. This is because the delivery of new employment floorspace, alongside mixed-use development, supported through the spatial strategy will stimulate the economy and provide new jobs locally. In addition, the policy framework supports the protection and enhancement of employment land; the provision of local job opportunities and upskilling opportunities; and the ongoing vitality of the town centres.

Transport

Spatial strategy

11.2.132 Hastings contains four railway stations (Hastings, St Leonards, West St Leonards and Ore). These link London Charing Cross, London Cannon Street and London Victoria; Battle, Tunbridge Wells, Tonbridge and Sevenoaks to the north; Bexhill, Eastbourne, Lewes and Brighton to the west; and Rye, Ashford and High Speed 1 to the east. It is also served by a comprehensive bus network providing connections both within and outside of the borough. The borough contains two primary roads: the A259 linking Bexhill, Eastbourne and Rye, which largely runs parallel to the coastline, and the A21, which runs north to south through the centre of the borough and links Tunbridge Wells, Tonbridge, Sevenoaks, the M25 and London. In terms of active travel, Hastings overlaps with several local / regional cycle network and rights of way networks.

11.2.133 Policy SP1 (Directing Growth) of the draft Local Plan outlines that development will be directed to locations which are well supported by existing or planned sustainable transport infrastructure. There are multiple allocation sites that are not in walking distance (<800 m) of a railway station, but all but one of the sites are within walking distance (<800 m) of a bus stop. Therefore, residents should be able to access railway stations via local bus services. The exception to this is Land at Breadsell, which is 1.0-1.1 km from the nearest bus stop on Stainer Road. However, it is recognised that any future development at Land at Breadsell would likely be supported by transport and connectivity enhancements, including improvements to walking, cycling and public transport links, potentially delivered in coordination with adjoining areas in Rother District.

11.2.134 Additionally, most allocation sites are not connected to the local / regional cycle network, which could reduce opportunities for active travel unless mitigation is secured. Some sites (particularly those located on the northern and western fringes of the borough) would require new or upgraded cycling links to enable safe and direct access to key destinations. While larger sites (such as Land at Tilekiln Farm, Land at Breadsell, Queensway North, Queensway and Ivyhouse Lane, Northern Extension) may be better placed to deliver such infrastructure, improvements will also be necessary at smaller and more centrally located sites to ensure that active travel is a viable option across the wider network.

11.2.135 Hastings has a comprehensive rights of way network given it is a largely built-up borough. The draft Local Plan sets out that where possible, new development will be linked to the rights of way network. Notably, the site allocation policies seek to preserve and where possible, improve, existing rights of way within the sites.

Development management policies

11.2.136 Transport is primarily addressed through Policy SP10 (Transport Infrastructure), which outlines that over the lifetime of the plan, the Council will deliver infrastructure which supports development growth, economic connectivity, and the prioritisation of active travel and public transport.

11.2.137 The Council supports enhancements that will enable increased rail capacity and high-speed services to London, as well as increased rail capacity on all routes, through Policy SP10. This is in addition to railway station improvements that support inclusive journeys and enable better integration with bus services, cycle and pedestrian networks.

11.2.138 In terms of bus services, Policy SP10 sets out that the Council supports bus service improvements and infrastructure as identified in the county's Bus Service Improvement Plan, including enhanced routes to connect to new development where these will lead to more sustainable transport patterns.

11.2.139 Policy SP10 also outlines that walking, wheeling and cycling infrastructure will be prioritised. This includes through the delivery of a network of walking, wheeling and cycling improvements identified in East Sussex County Council's Local Cycling and Walking Infrastructure Plan, and, subject to the County Council and their partners securing funding, through implementation of the County Council's transport strategy, Local Transport Plan (LTP4).

11.2.140 Whilst Policy SP10 focuses on public transport and active travel provision, it also supports local and strategic road improvements; measures that minimise car parking; and the uptake of ultra-low and zero-emission vehicles. SP10 also provides for the protection of existing coach parking and drop-off points.

11.2.141 Policy ID2 (Access, Services and Parking) states that all development should ensure access, car parking and servicing has been efficiently and creatively integrated into the scheme, minimising land occupancy and ensuring a safe and attractive pedestrian environment. The policy states that car parking provision should not dominate or unduly shape the design of new development, and also introduces heightened restrictions in the Low Car Parking Area and supports the use of Car Clubs

11.2.142 Also of relevance to design, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it maximises opportunities for active travel that supports and encourages walking and cycling where development is at a scale that allows this.

11.2.143 Overall, the draft Local Plan is predicted to lead to **broadly neutral to minor positive effects** under this SA theme. While it is recognised that overall growth will increase private car use to some extent, the spatial strategy generally focuses new development in locations with comparatively good access to public transport, services, and employment opportunities. It is noted that a small number of sites (such as those on the edge of the urban area – like Land at Breadsell) have more limited sustainable transport accessibility; however, the policy framework places strong emphasis on improving public transport and active travel connections, which will help to mitigate these location-specific constraints. Taken together, the strategy and supporting policies are expected to encourage a gradual shift towards more sustainable travel behaviours.

Conclusions

11.2.144 **Long-term moderate positive effects** are considered likely under the population, health and wellbeing SA theme, and long-term significant positive effects are considered likely under the skills, employment and economic development SA theme. With regard to population, health and wellbeing, this is because the spatial strategy delivers growth relatively evenly across Hastings, including in the most deprived areas of the borough. In addition, the policy framework seeks to deliver a suitable mix of housing, including provision for affordable housing, specialist housing for older people and gypsy and traveller accommodation. It also seeks to improve health and wellbeing by reducing health inequalities, improving accessibility, and protecting and enhancing sporting and recreational facilities, access to green infrastructure, and community facilities. With regard to skills, employment and economic development, this is because the promotion of new employment floorspace, alongside mixed-use development, through the spatial strategy will stimulate the economy and provide new jobs locally. In addition, the policy framework supports the protection and enhancement of employment land; the provision of local job opportunities and upskilling opportunities; and the ongoing vitality of the town centre.

11.2.145 **Minor positive effects** are predicted under the climate change adaptation, flooding and coastal change SA themes. Whilst growth through the spatial strategy will likely increase flood risk both on new and existing development, due to an increase in hard surfaces and associated increase in surface water flood risk, significant effects are not considered likely due to the requirement for sequential testing. In maximising the use of previously developed land and largely avoiding the areas of the borough at greatest risk of flooding, the spatial strategy further minimises the likelihood of flooding at new development areas. Moreover, the policy framework seeks to ensure that future development is resilient to the impacts of climate change, such as increasing flooding.

11.2.146 **Broadly neutral to minor positive effects** are considered likely across the air quality, biodiversity and transport SA themes. With regard to air quality, this is because existing air quality issues are currently being managed in the borough, and air quality will be supported by housing and employment delivery taking place in locations accessible by public transport and active travel. In addition, the policy framework sets out air quality mitigation requirements and measures, including the requirement for an AQIA alongside certain types of development and support for sustainable transport. With regard to biodiversity, the spatial strategy maximises the use of previously developed land and largely directs development away from internationally, nationally, and locally designated sites. This is further strengthened by the policy framework, which seeks to protect and enhance biodiversity and supports delivery of the borough's green-infrastructure network. Where some allocations lie closer to sensitive habitats, including Hastings Cliffs SAC, the requirement for Ecological Constraints and Opportunities Plans (ECOPs) provides additional safeguards, helping to ensure that ecological sensitivities are identified early and that development incorporates appropriate avoidance, mitigation, and enhancement measures. With regard to transport, this is because the spatial strategy primarily directs growth to areas with the best access to public transport, services and facilities, and employment opportunities. In addition, the policy framework focuses on delivering enhancements to the existing public transport and active travel network.

11.2.147 **Neutral effects** are predicted under the energy and water consumption SA theme. Energy and water companies will need to be consulted at the planning application stage to ensure that energy and water infrastructure is sufficient to accommodate new development. In addition, the policy framework seeks to ensure that future development is energy and water efficient through the use of low carbon technologies and sustainable design.

11.2.148 **Minor negative effects** are predicted under the land and water quality SA theme. While growth will increase demand on land and water resources and lead to some loss of greenfield and potentially BMV land, this is largely unavoidable given local constraints. Mitigation provided through policies SC3, SC16, SC18, SC15, and site allocation-specific water-quality requirements helps to limit impacts, improve drainage performance, and ensure development incorporates appropriate water-efficiency, pollution-prevention and remediation measures.

11.2.149 **Moderate negative effects** are predicted under the natural landscape SA theme. The spatial strategy directs growth to locations within or near the High Weald National Landscape and the Brede Valley and Haven Valley LCAs, creating potential for adverse impacts on landscape character and the special qualities of designated areas. However, intrusion into the National Landscape is limited and the policy framework seeks to mitigate adverse effects and support landscape enhancement.

11.2.150 **Uncertainty** is noted under the heritage SA theme. This is given both minor positive and minor negative impacts are considered likely. Impacts are largely dependent on the design and layout of development, which is unknown at this stage. Whilst some site allocations have the potential to affect the significance and setting of heritage assets, development also provides opportunities to better reveal the special qualities of heritage assets and support heritage-led regeneration. In addition, the policy framework seeks to mitigate adverse impacts on heritage assets as a result of development and secure enhancements.

11.3. Cumulative and In-Combination Effects

11.3.1 Cumulative and in-combination effects refer to the combined impacts of multiple policies, proposals, or developments:

- Cumulative effects arise when several policies or developments affect the same environmental receptor or issue over time; and
- In-combination effects occur when the Local Plan's impacts interact with those from other plans or projects, potentially leading to greater overall effects.

Cumulative Effects

11.3.2 Although the Local Plan covers only Hastings Borough, growth and infrastructure delivered in Rother District (through its adopted and emerging Local Plan) has the potential to combine with new development in Hastings, giving rise to cross-boundary cumulative effects.

11.3.3 Other strategic plans across East Sussex, such as the East Sussex Local Transport Plan 2024–2050 and the Waste and Minerals Plans, may introduce proposals that overlap spatially or thematically with Local Plan policies, again generating potential cumulative impacts.

11.3.4 In addition, wider initiatives and projects in the surrounding area may interact with Local Plan growth. For example, rail network enhancements (including Network Rail's work exploring improved connectivity along the East Coastway and options for high-speed services between Ashford and Eastbourne) may alter travel patterns and development pressures, contributing to in-combination effects.

11.3.5 Potential cumulative effects arising from these interactions may include:

- Transport impacts, where growth and infrastructure schemes combine to increase traffic flows, congestion, and associated noise and air quality pressures. Conversely, enhancements to public transport, walking and cycling networks may help counterbalance these effects.
- Effects on ecological networks, where development and new infrastructure could lead to the incremental loss or fragmentation of habitats and biodiversity corridors.

11.3.6 However, the Local Plan's emphasis on green infrastructure, alongside similar initiatives in neighbouring areas, has the potential to support and strengthen ecological networks at a wider spatial scale.

11.3.7 Wider transport initiatives across East Sussex (including junction upgrades, highway improvements and corridor-based strategies) may also contribute to cumulative effects. These schemes could improve accessibility and reduce congestion, but in combination with Local Plan growth may increase pressure on sensitive routes or receptors if not supported by appropriate design and mitigation.

11.3.8 Minerals extraction sites and related transport activity identified in the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan may also contribute to cumulative effects. Although located outside Hastings, their traffic, landscape and ecological impacts may combine with development in the borough, particularly along shared transport corridors or cross-boundary environmental assets.

11.3.9 Strategic initiatives to enhance the visitor economy (such as cultural investments, seafront improvements and heritage-led regeneration) could generate positive economic effects. Nevertheless, increased visitor numbers may cumulatively increase pressure on transport networks, coastal environments and heritage assets, particularly during peak seasons.

11.3.10 Cumulative effects may also arise in relation to housing demand, especially where unmet needs in neighbouring areas place additional development pressure on Hastings.

11.3.11 In relation to flood risk, cumulative effects may occur through the combined impacts of new development and other planned growth. Measures provided through the NPPF and relevant Local Plan policies will, however, help reduce the significance of these impacts.

11.3.12 Positive cumulative effects may also result from combined investment in sustainable transport, improving accessibility through enhanced public transport, walking and cycling networks.

11.3.13 Overall, while a number of cumulative effects may arise, the Local Plan's policy framework is designed to reduce or mitigate many of these impacts. Ongoing monitoring will remain essential to identify any unforeseen adverse effects and allow for corrective action where possible.

In-Combination Effects

11.3.14 Potential in-combination effects are most likely to arise in relation to transport, biodiversity, water resources, landscape character, and community infrastructure. Growth proposed through the Local Plan, when considered alongside development proposed in neighbouring authorities, infrastructure investment programmes and other strategic initiatives, may lead to increased pressure on shared environmental assets and infrastructure networks.

11.3.15 In particular, there is potential for in-combination effects relating to increased traffic and transport movements; recreational pressure on designated biodiversity sites and green infrastructure assets; demand for water resources in an area of water stress; and pressure on health, education and community facilities. There is also potential for combined effects on landscape character and the setting of heritage assets where growth and regeneration initiatives occur across a wider geographic area.

11.3.16 Positive in-combination effects are also likely. These include enhanced connectivity arising from investment in public transport, walking and cycling infrastructure; improvements to green and blue infrastructure networks; biodiversity enhancement and habitat creation initiatives; and economic and regeneration benefits associated with coordinated investment across Hastings and the surrounding area.

11.3.17 Overall, significant adverse in-combination effects are not anticipated. The Local Plan contains a comprehensive framework of policies relating to biodiversity, flood risk, landscape, heritage, transport and infrastructure provision which, together with regulatory requirements and mitigation delivered through other plans and programmes, is expected to minimise adverse effects and support positive outcomes over the plan period.

12. Overall Conclusions

12.1.1 The appraisal indicates that the draft Local Plan performs strongly across several SA themes, with **moderate long-term positive effects** anticipated for population, health and wellbeing, and **significant long-term positive effects** anticipated for skills, employment and economic development. This reflects the provision of new homes, including affordable and specialist accommodation, and the potential for regeneration in areas of deprivation. The delivery of new employment floorspace and mixed-use development is expected to stimulate the local economy and broaden access to job opportunities. Growth is largely directed to sustainable and accessible locations, particularly within and around the town centre where access to services, facilities, public transport and employment opportunities is greatest. The main exception to this is Land at Breadsell, which performs less favourably in accessibility terms due to its more isolated location and limited sustainable transport connectivity.

12.1.2 **Minor positive effects** are expected for climate change adaptation, flooding and coastal change due to strong policy requirements for flood risk management, SuDS, and climate-resilient design, alongside a focus on previously developed land. **Broadly neutral to minor positive effects** are likely for air quality, biodiversity and transport, supported by policies on sustainable transport, biodiversity net gain and integrated green and blue infrastructure. **Neutral effects** are expected for energy and water consumption, **minor negative effects** are predicted for land and water quality, and m**oderate negative effects** are predicted for the natural landscape due to the unavoidable loss of greenfield land and development near sensitive areas. Effects on heritage remain uncertain as impacts are dependent on future design proposals, although the policy framework seeks to minimise harm and secure enhancements.

12.1.3 Overall, the draft Local Plan is assessed as capable of delivering sustainable, balanced growth for Hastings, provided that policy safeguards are robustly applied and monitored.

13. Plan finalisation and monitoring

13.1. Plan finalisation

13.1.1 This SA Report accompanies the Regulation 19 version of the Hastings Local Plan and has informed the preparation of the Plan proposed for publication.

13.1.2 Following the Regulation 19 publication, the Council will review the representations received in relation to both the Local Plan and the SA and consider whether any changes are required.

13.1.3 The Local Plan, together with supporting evidence base documents including the SA Report, will then be submitted to the Secretary of State for Independent Examination.

13.1.4 At Examination, the Local Plan will be assessed for legal compliance and whether it satisfies the tests of soundness set out in the NPPF. The SA, consultation responses and supporting evidence base will form part of the material considered through the Examination process.

13.1.5 If the Examination concludes that the Local Plan is sound, subject to any main modifications considered necessary, Hastings Borough Council will proceed with adoption of the Local Plan.

13.1.6 Following adoption, the Council will publish a Sustainability Appraisal Adoption Statement in accordance with the SEA Regulations.

13.2. Monitoring

13.2.1 It will be important to monitor delivery of the plan, with a view to not only flagging where sites are not coming forward in accordance with the anticipated trajectory (i.e. sites are delayed or are not delivering to the anticipated capacity), but also where sites are coming forward with compromises made in terms of policy objectives. It could be the case that a selection of key sites are identified to be a focus of monitoring.

13.2.2 Considerations for future monitoring might include:

Air quality

- Air quality monitoring results and any locations approaching or exceeding national air quality objectives.
- Delivery of sustainable transport measures and low-car development initiatives associated with major schemes.

Biodiversity

- Delivery of biodiversity net gain.
- Delivery of site-specific ecological mitigation and enhancement measures, including requirements identified through ECOPs.
- Condition of designated biodiversity sites within the borough.

Climate change adaptation, flooding and coastal change

- Completion of Flood Risk Assessments and implementation of identified mitigation measures.
- Delivery and performance of SuDS.
- Whether flood risk or coastal change constraints are affecting the delivery of allocated sites.
- Delivery of climate adaptation measures through new development.

Energy and water consumption

- Delivery of renewable and low-carbon technologies within new development.
- Compliance with Local Plan requirements relating to sustainable design and water efficiency.
- Water resource and wastewater infrastructure capacity constraints affecting development delivery.

Heritage

- Delivery of heritage-led regeneration schemes.
- Implementation of site-specific measures intended to conserve or enhance the significance and setting of heritage assets.
- Progress in addressing heritage assets identified as being at risk.

Land and water quality

- Loss of greenfield and agricultural land through development.
- Delivery of pollution prevention, remediation and water quality protection measures.
- Development impacts on water resources and wastewater treatment capacity.

Natural landscape

- Delivery of landscape mitigation, green infrastructure and planting measures.
- Effects of development on the High Weald National Landscape and local landscape character areas.
- Compliance with site-specific landscape requirements.

Population, health and wellbeing

- Net housing completions and progress against housing supply targets.
- Delivery of affordable housing, specialist housing and Gypsy and Traveller accommodation.
- Delivery of community infrastructure, public open space, sports facilities and healthcare provision associated with development.

- Delivery of place-making and accessibility objectives through major developments

Skills, employment and economic development

- Employment floorspace completions and take-up rates.
- Delivery of allocated employment sites and mixed-use schemes.
- Progress in delivering local labour, skills and training initiatives associated with major developments.

Transport

- Delivery of public transport, walking, wheeling and cycling improvements associated with development.
- Traffic and congestion trends on key routes.
- Accessibility of new development to public transport, services and facilities.

Appendix A : Points of compass appraisal

Appendix A: Points of the Compass Appraisal

Delivering a better world

1. Introduction

1.1. The Points of Compass Appraisal

1.1.1 To inform the development of the Hastings Local Plan, HBC has considered potential locations for allocating sites for housing, employment, and mixed uses through the Local Plan.

1.1.2 As discussed in the main body of the SA Report, to meet local housing need in full (as established through the NPPF), there would likely be a need for significant strategic scale growth in Hastings through urban extensions. Whilst the calls for sites, SHELAA process and joint working with Rother District Council have not identified land which could be assembled for this purpose, the SA process has undertaken a Points of the Compass appraisal.

1.1.3 The Points of the Compass appraisal presented in this appendix has therefore considered the likely implications of larger strategic scale development at eight broad areas in the borough's urban hinterland. This seeks to provide an overview of the relative merits of promoting development at various broad areas, should land become available for strategic extensions to the town.

1.2. Approach to the Appraisal

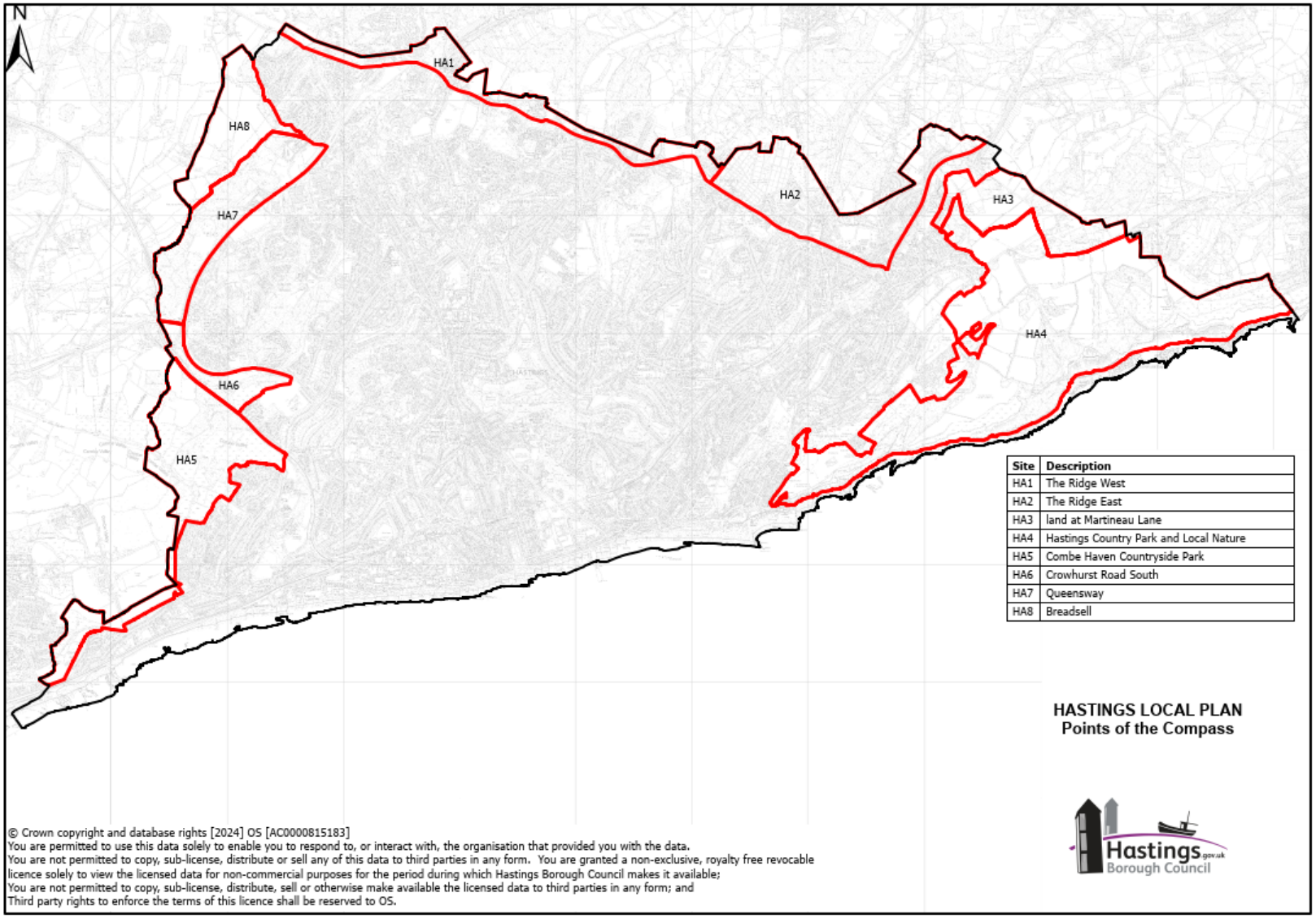
1.2.1 Eight broad areas have been identified. Loosely reflecting the various 'points of the compass', these broad areas represent potential locations for development in the vicinity of the following:

- HA1: The Ridge West
- HA2: The Ridge East
- HA3: Land at Martineau Lane
- HA4: Hastings Country Park and Nature Reserve
- HA5: Combe Valley Countryside Park
- HA6: Crowhurst Road South
- HA7: Queensway
- HA8: Breadsell

1.2.2 The analysis evaluates the key environmental constraints present in each of the broad areas proposed, including related to: biodiversity; flood risk; the historic environment; landscape quality; water; and agricultural land quality. In addition, accessibility to key facilities and services are considered.

1.2.3 **Figure A-1** represents the locations of the broad areas.

Figure A-1: Appraisal Areas



1.3. Glossary of constraints

1.3.1 **Table A-1** provides a glossary of the constraints considered through this analysis.

Table A-1: Glossary

Term	Definition
Agricultural Land Classification	The Agricultural Land Classification (ALC) classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' land.
BAP Priority Habitat	UK BAP priority habitats are those that have been identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). They cover a wide range of semi-natural habitat types.
Conservation Area	Conservation areas are designated at the local level to protect the special architectural and historic interest of an area through protecting the features that make it unique and distinctive.
Flood Zone 3	Flood zone 3s are classified as functional floodplains and are deemed to be the most at-risk land of flooding from rivers or the sea. Local planning authorities have classified areas at significant risk of flooding to be within flood zone 3. This classification is usually classified as land which had a 5% probability of flooding/a 1:20 chance. Flood Zones are used to apply the sequential test, which seeks to steer new development to areas with the lowest probability of flooding.
Landscape Character Area	Landscape Character Areas (LCA) are geographically defined parts of the landscape that display a recognisable and consistent combination of natural and human-made features. They are identified through landscape character assessment and are used as a descriptive framework to understand how different elements (such as landform, vegetation, settlement patterns, and land use) combine to create distinctive landscape patterns.
Marine Conservation Zone	A Marine Conservation Zone (MCZ) is a type of marine protected area designated to protect nationally important, rare, or threatened habitats and species within UK waters. These zones aim to conserve the biodiversity of marine ecosystems and can include features of geological or geomorphological interest.

Term	Definition
National Landscape	A National Landscape (NL) is an area of high scenic quality which has statutory protection in order to conserve and enhance the natural beauty of its landscape. NLs are designated solely for their landscape qualities, for the purpose of conserving and enhancing their natural beauty (which includes landform and geology, plants and animals, landscape features and the history of human settlement over the centuries). Since November 2023 all protected landscapes previously designated as Areas of Outstanding Natural Beauty (AONBs) have been referred to National Landscapes. This change was initiated by the Government to reflect the national importance of these areas, with a view to highlighting their equal place alongside National Parks in helping to achieve wider aims associated with health and wellbeing, sustainable public access, climate change and nature recovery. The Countryside and Rights of Way Act (2000) confirmed that NLs have the same status as National Parks in terms of landscape and scenic beauty. The Act places responsibility on local authorities to ensure protection for designated landscapes.
Scheduled Monuments	A historic building or site that is included in the Schedule of Monuments kept by the Secretary of State for Culture, Media and Sport. The regime is set out in the Ancient Monuments and Archaeological Areas Act 1979.
Site of Special Scientific Interest	Sites of Special Scientific Interest (SSSI) are those areas considered to best represent the UK's natural heritage, such as through the site's diversity of plants, animals and habitats, rocks, and landforms, or through combinations of such natural features. Nationally designated, SSSIs are deemed to be the UK's best wildlife and geological sites.

1.4. Constraints analysis findings

1.4.1 This analysis provides the following for each of the eight broad areas which are used to help determine development compatibility:

- A map denoting biodiversity designations. These include SPAs, SACs, SSSIs, Priority Habitats and LNRs.
- A map denoting built environment designations. These include scheduled monuments, conservation areas, registered parks and gardens and listed buildings.
- A map denoting other significant constraints: Agricultural land classification and flood zones.
- A map denoting doctors surgeries, schools, railway stations, key roads, and bus stops.
- An analysis of the constraints and opportunities present in the vicinity of the broad areas.

1.5. HA1: The Ridge West area assessment

Figure A-2: Ecological Constraints

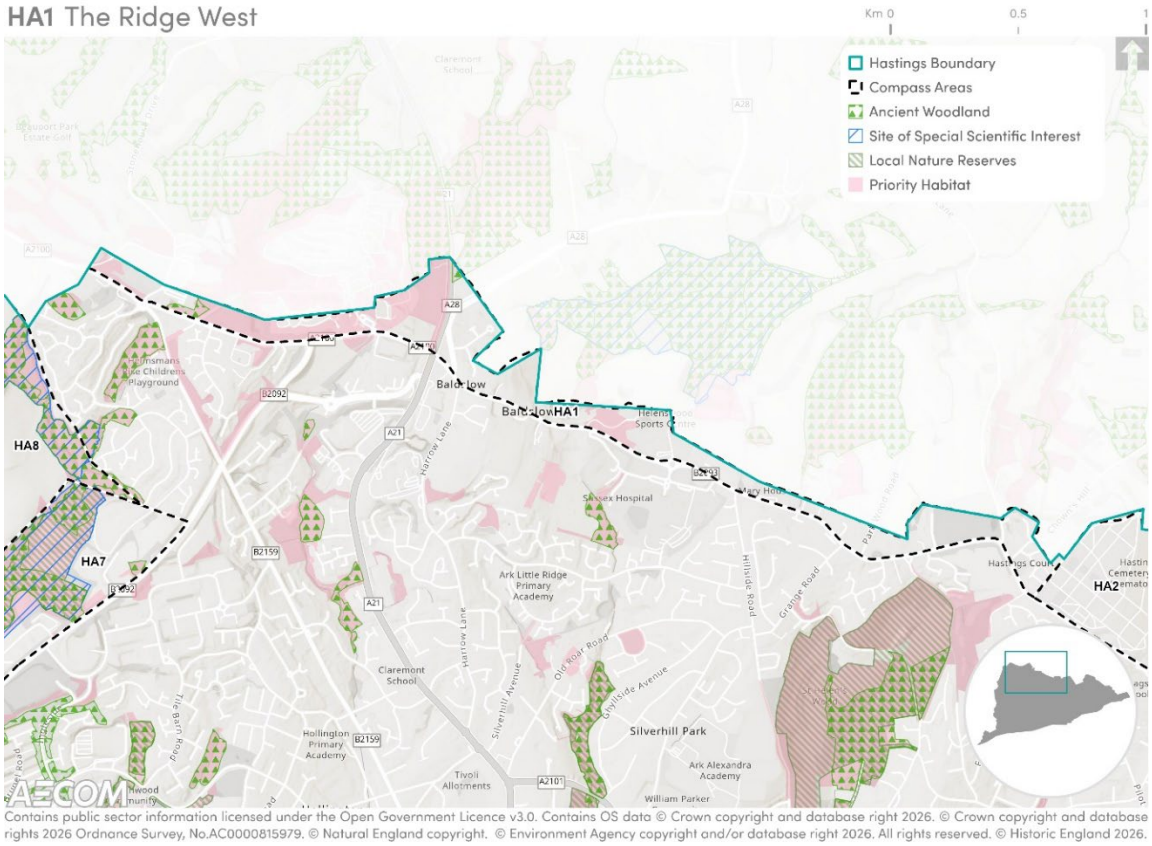


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Figure A-3: Heritage Constraints

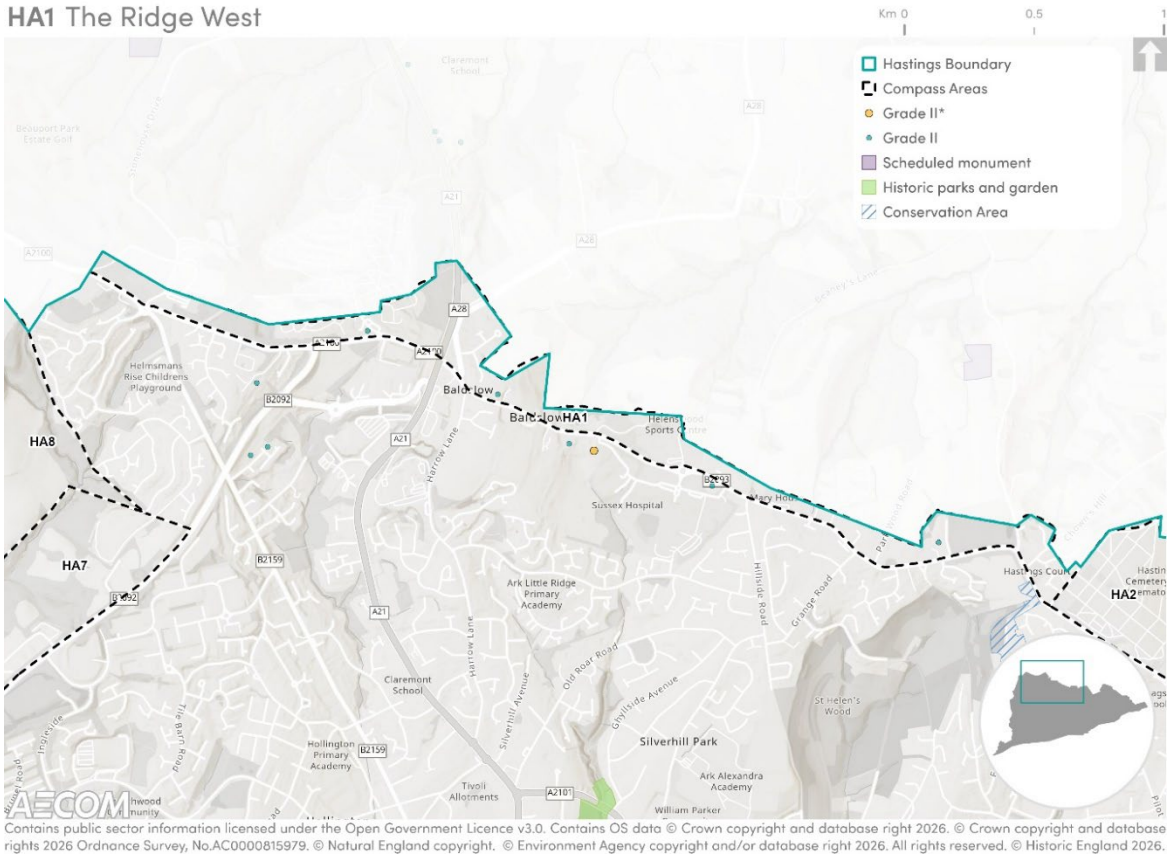

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Figure A-4: Flooding and Soil Constraints

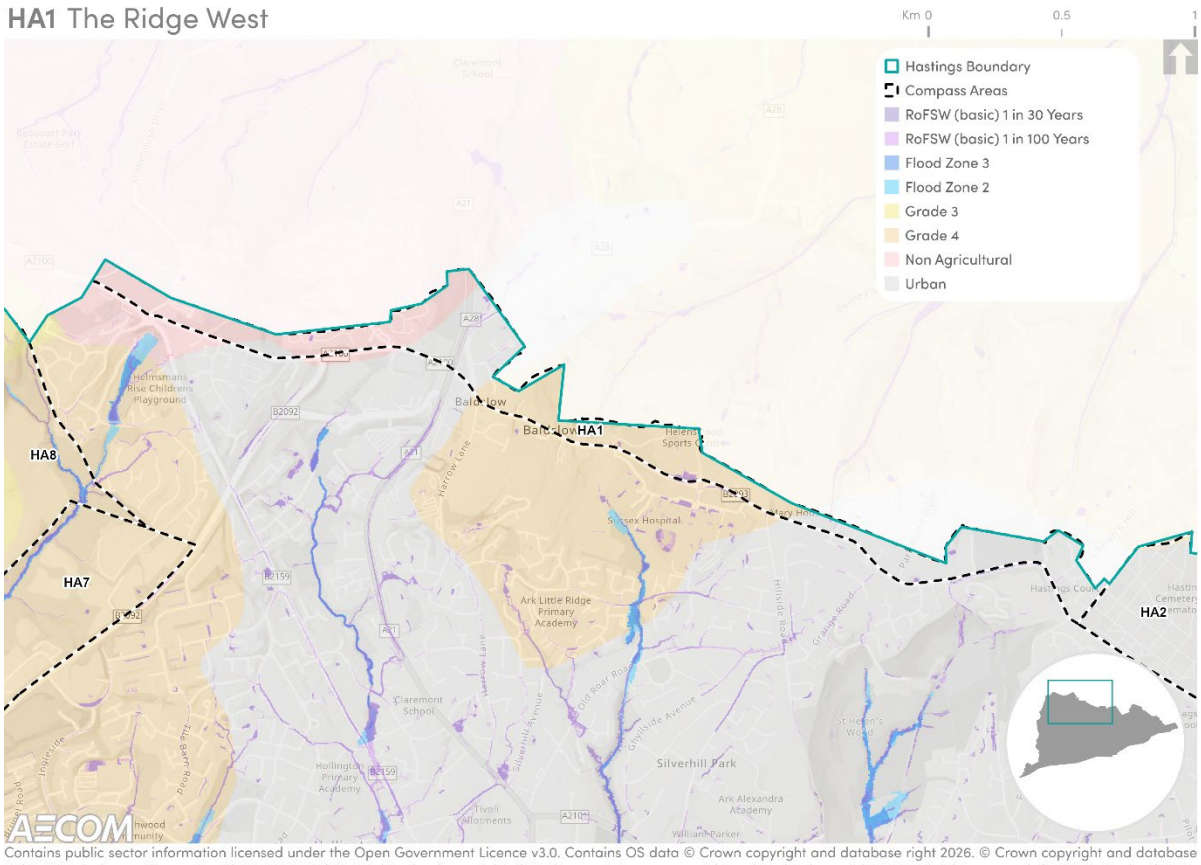

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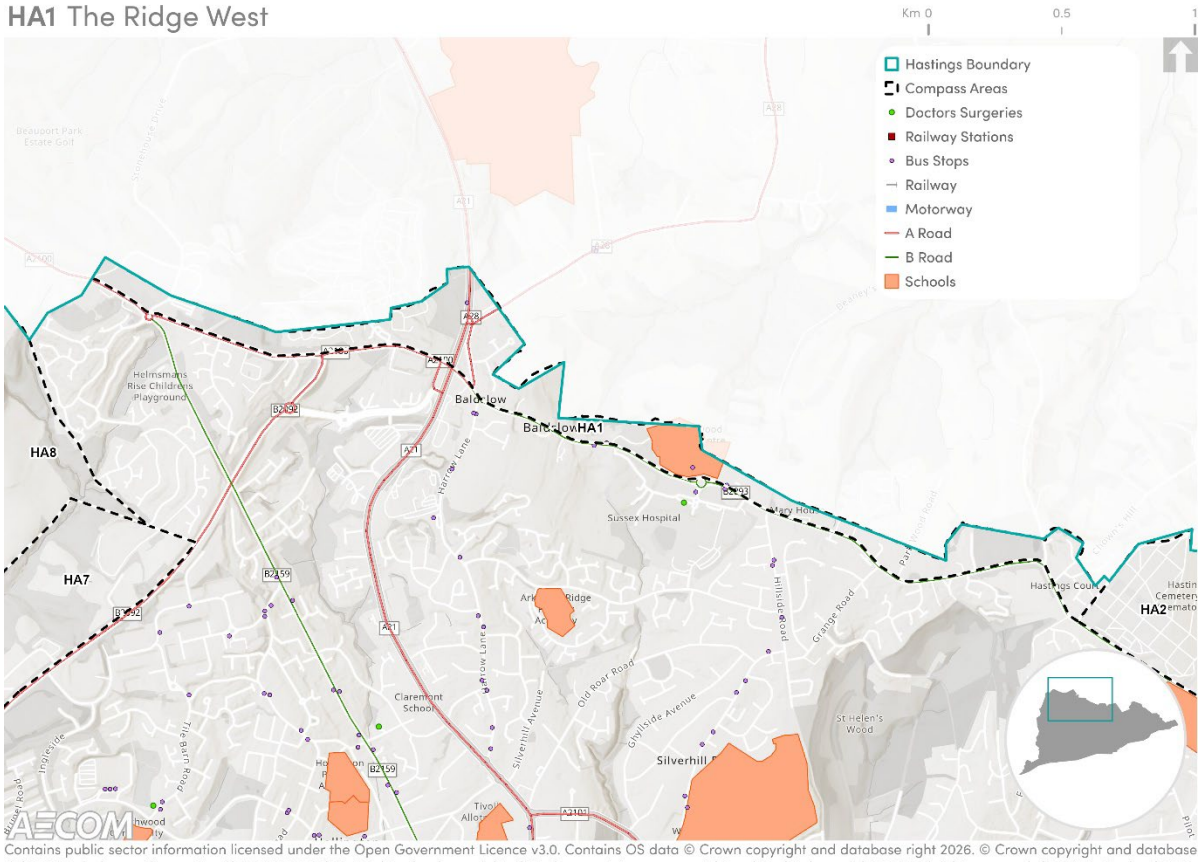
Figure A-5: Local Facilities and Amenities



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Analysis: HA1, The Ridge West area

Category	Key constraints and opportunities
Biodiversity	HA1 is not significantly constrained with regard to statutorily designated biodiversity sites. However a large proportion of the western third of the broad area is covered by deciduous woodland BAP Priority Habitat, with a smaller area in the centre. There is also a small area ancient woodland in the west of the area.
Historic Environment	There are no significant historic environment constraints in this area. A small part of the eastern edge of the area however adjoins the Ore Place Conservation Area.
Landscape	The majority of HA1 lies within the High Weald NL, largely covering the east and centre of the area. HA1 sits within the East Sussex LCA 11: Brede Valley. The LCA is defined by a broad, flat valley floor bordered by steep, well-wooded slopes. The wider area (including beyond the borough's boundary) is tranquil, with wide vistas from the ridges overlooking the river and marshes, which are crisscrossed by reed-lined ditches. Historic villages, farmsteads, and orchards dot the landscape, along with notable features such as Powdermill Reservoir and ancient woodlands. The valley retains much of its rural character, although some areas have been impacted by suburban expansion, agricultural change, and tourism developments
Soils	HA1 is made up of urban land, 'poor' quality Grade 4 land (located in the centre of the broad area) and non-agricultural land (located in the west).
Water	There is no fluvial or coastal flood risk within the area. There are some very limited areas of medium level surface water flood risk, which are not associated with the drainage pattern of the area.

Accessibility to Services and Facilities	The Ark Alexandra Academy (Helenswood Campus) is within the HA1 area. Ark Little Ridge Primary School and The Flagship School are within 1.0 km. The Ark Alexandra Academy William Parker Campus is 1.2 km away and Silverdale Primary Academy and Sandown Primary are 1.3 km away. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services. The Conquest Hospital is located directly adjacent to HA1; however other than this, the closest doctors surgery (high Glades Medical Centre) is approximately 2 km away. Hastings railway station is located 5.3 km from the area, with Ore railway station located marginally closer at approximately 4.4 km. The area is served by a number of bus services which link to Hastings town centre and Bexhill.

1.6. HA2: The Ridge East area assessment

Figure A-6: Ecological Constraints

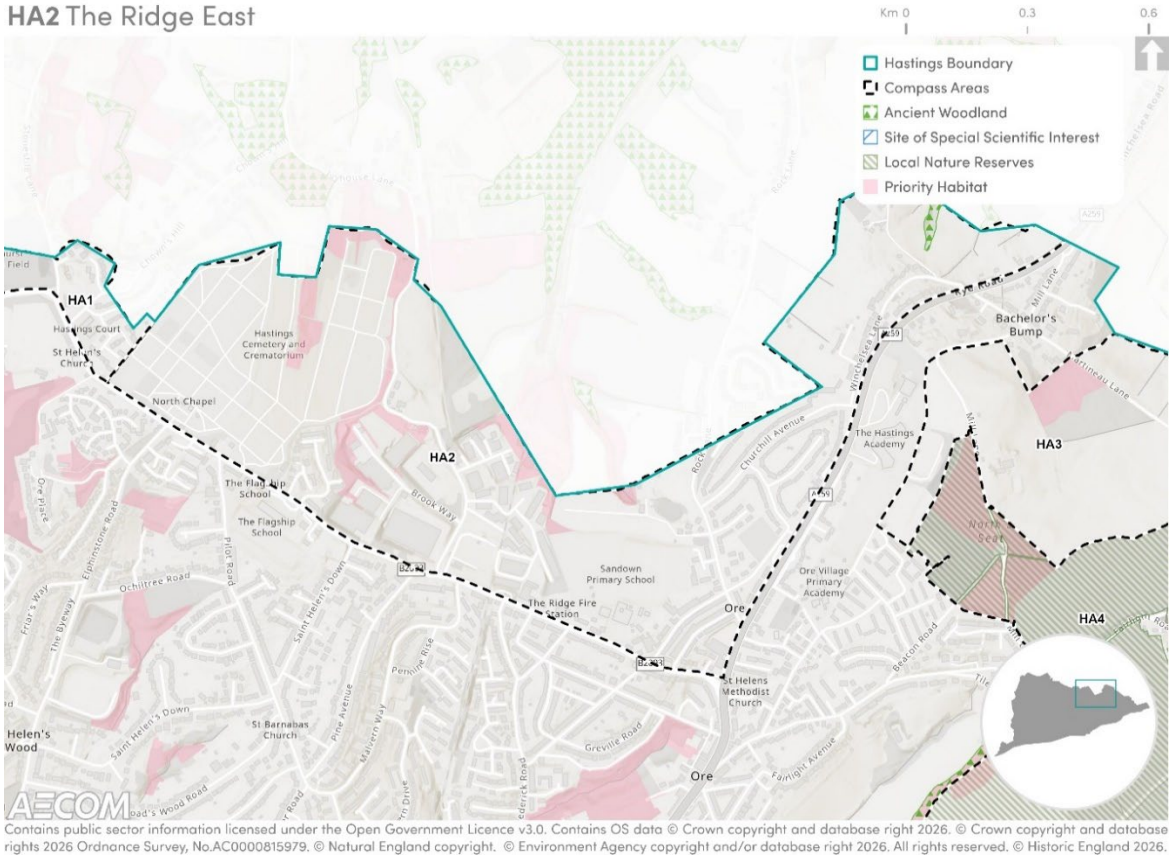

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Figure A-7: Heritage Constraints

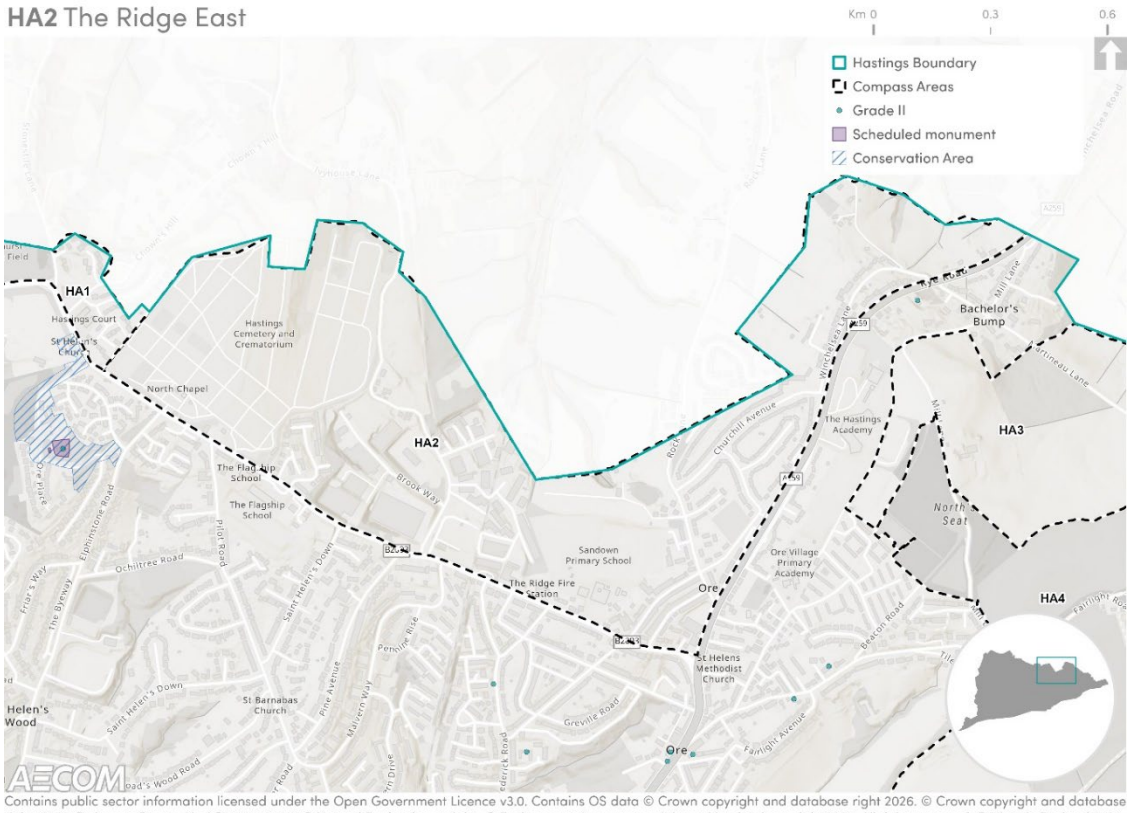

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Figure A-8 : Flooding and Soil Constraints

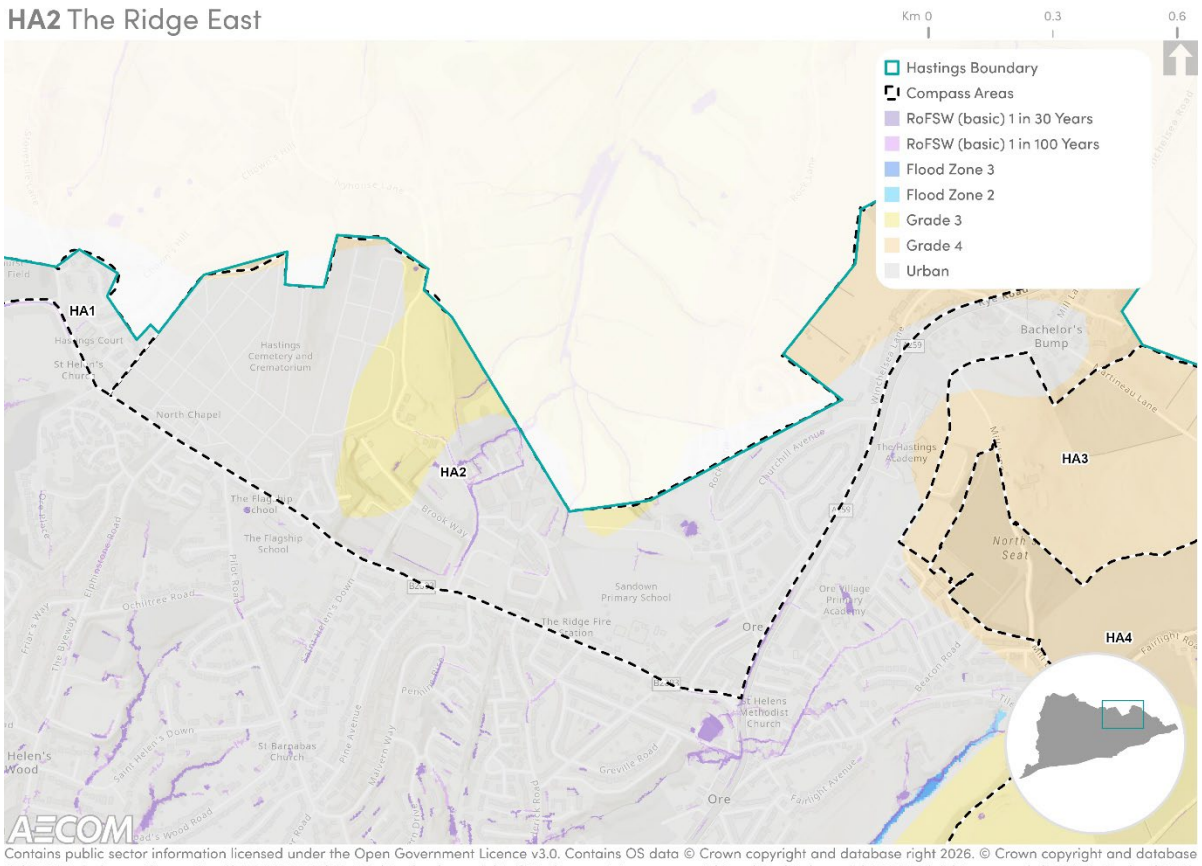

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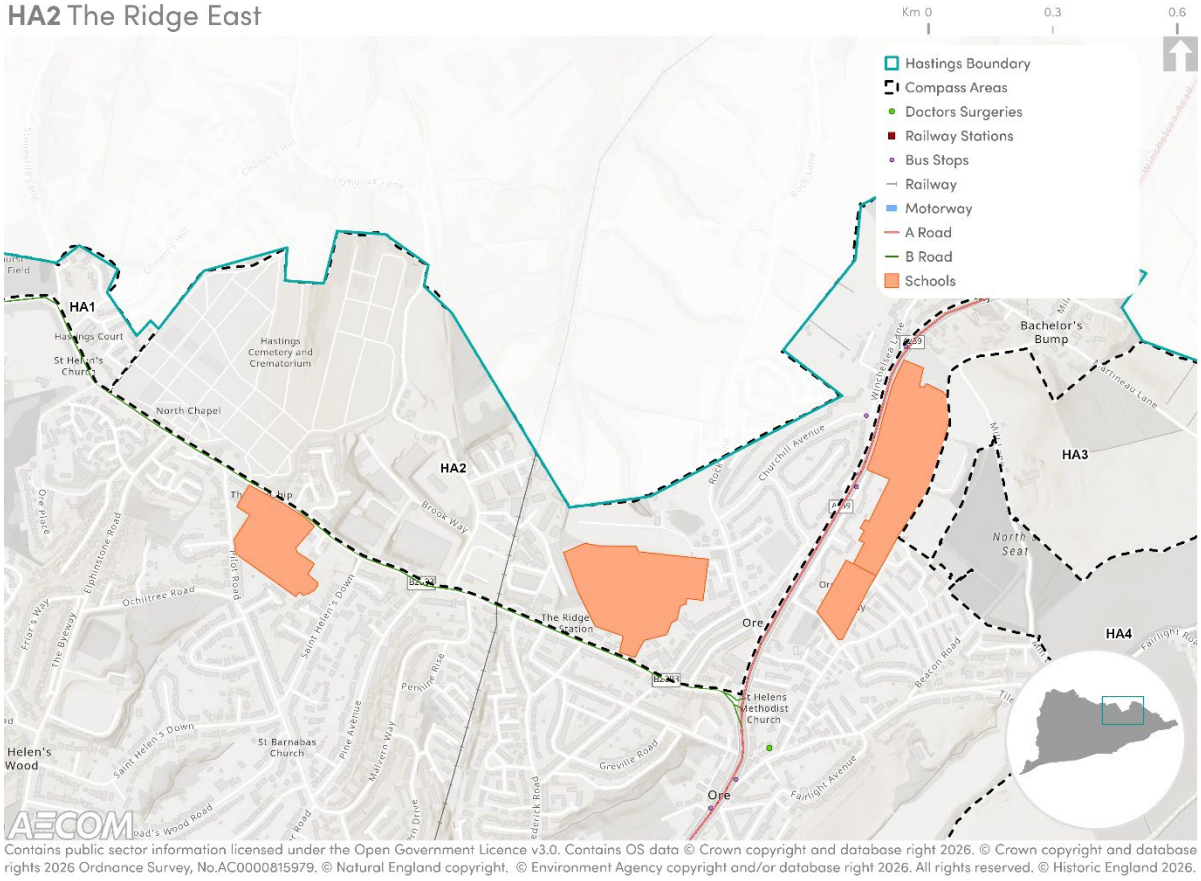
Figure A-9: Local Facilities and Amenities



Analysis: HA2, The Ridge East area

Category	Key constraints and opportunities
Biodiversity	HA2 is not significantly constrained with regard to statutorily designated biodiversity sites. There are small areas of deciduous woodland BAP Priority Habitat. There is also a small part of ancient woodland in the northeast of the area, which extends further outside the boundary.
Historic Environment	There are no historic environment constraints in this area.
Landscape	HA2 lies partially within the High Weald NL. This is specifically in the north of the area, and more largely in the northeast of HA2. HA2 sits within East Sussex LCA 11: Brede Valley. Brede Valley LCA (which covers a significant area outside of the borough) is defined by the broad, flat valley of the River Brede, enclosed by steep, wooded slopes. The landscape is tranquil and largely unspoilt, featuring scattered farmsteads, reed-fringed marshes, and ancient woodlands. Historic villages such as Brede and Udimore overlook the valley, with oast houses and orchards contributing to the rural character. Despite modern pressures like suburbanisation and development, the area retains its

Category	Key constraints and opportunities
	distinctiveness with wide vistas across the floodplain and significant biodiversity.
Soils	HA2 primarily has been classified as urban land, however there is some Grade 3 agricultural land in the eastern half of the area. It is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken. There is also a limited area of Grade 4 agricultural land in the north east of the area, adjacent to the northern boundary, which is classified as poor quality.
Water	There is no fluvial or coastal flood risk within the area. There are however some very small areas of surface water flood risk in the central part of the area, as well as some surface water flood risk associated with the drainage pattern of the area.
Accessibility to Services and Facilities	HA2 is located well with regards to accessibility. Sandown Primary School and Nursery are present within the HA2 area, and the Flagship School, Ore Village Primary Academy and the Hastings Academy are all within walking distance of HA2. Additional educational facilities in central Hastings such as East Sussex College (accessible via the 321 bus service) and in Rye such as Rye College (accessible via the 100 bus service) can be reached easily by car or by direct public transport. In terms of doctors surgeries, Beaconsfield Road Surgery (Ore site) is located within walking distance, and the Conquest Hospital are within relative proximity to the area. Ore railway station is located 1.5 km away and Hastings station is also easily accessible from the HA2 area. The area is served by a number of bus services which link to Ore, through to Bexhill, and Hastings town centre.

1.7. HA3: Land at Martineau Lane

Figure A-10: Ecological Constraints

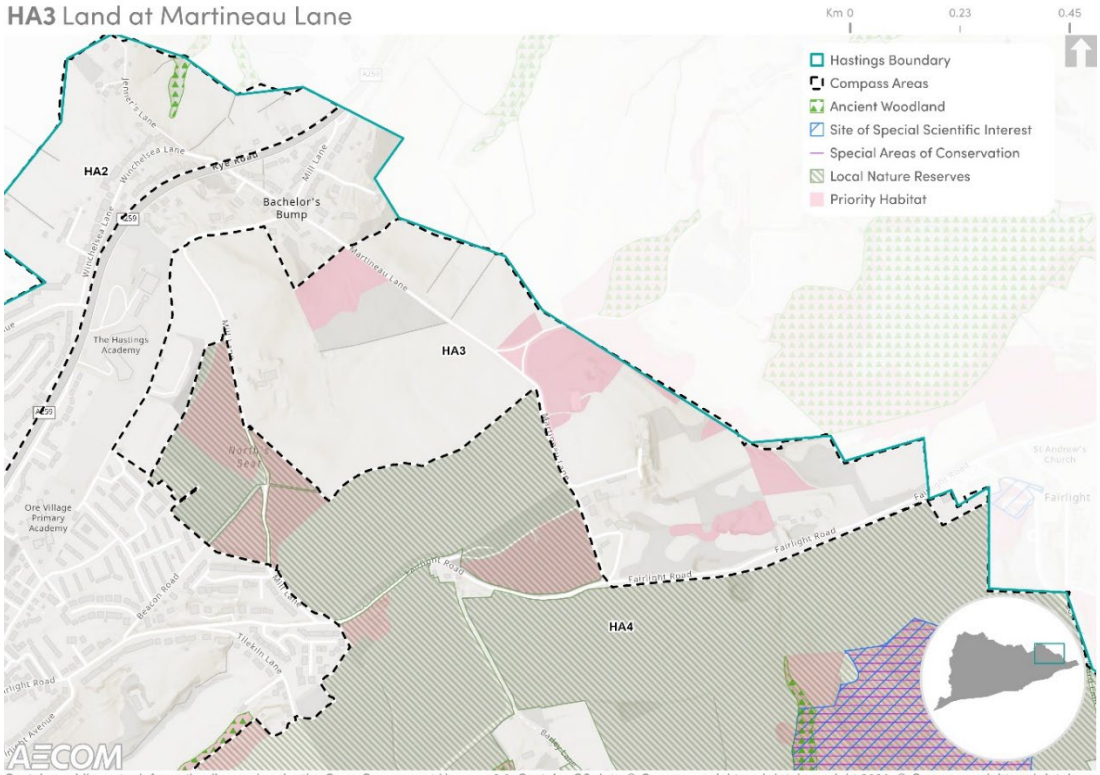


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Figure A-11: Heritage Constraints

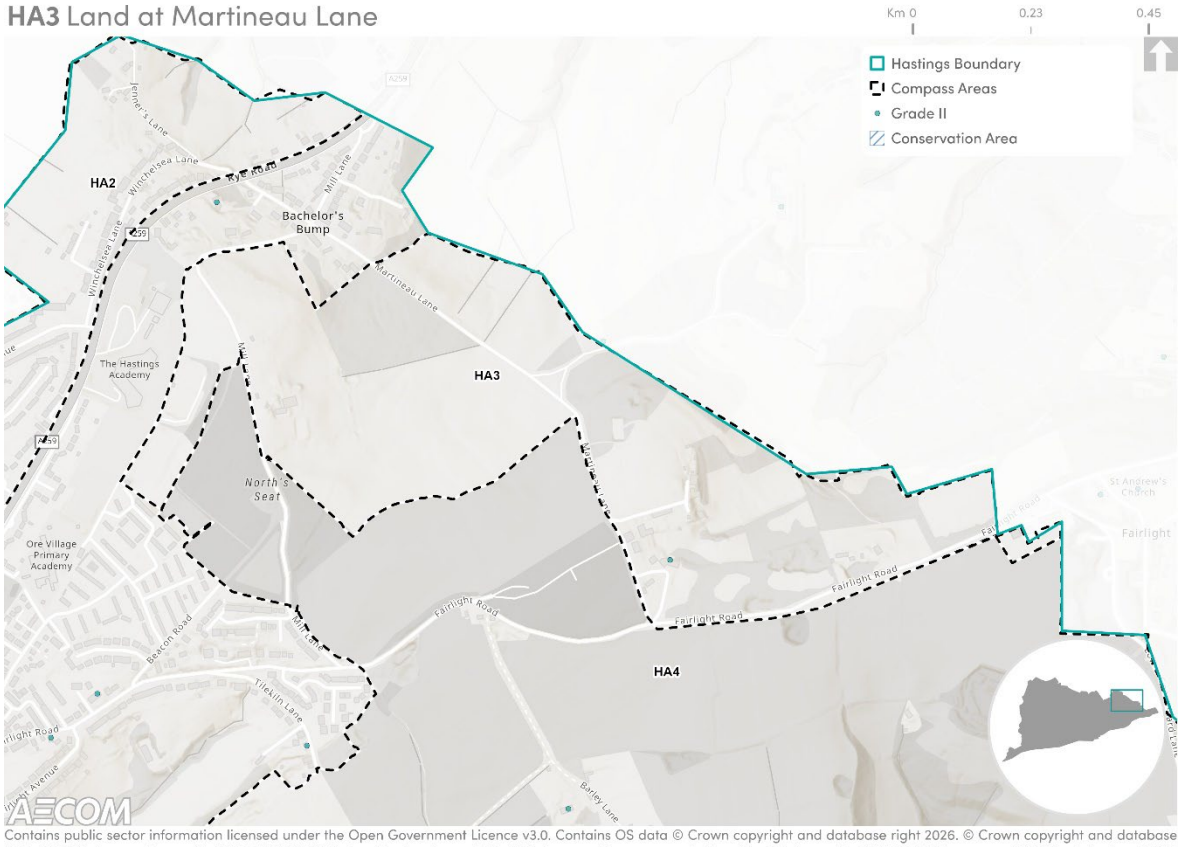

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Figure A-12: Flooding and Soil Constraints

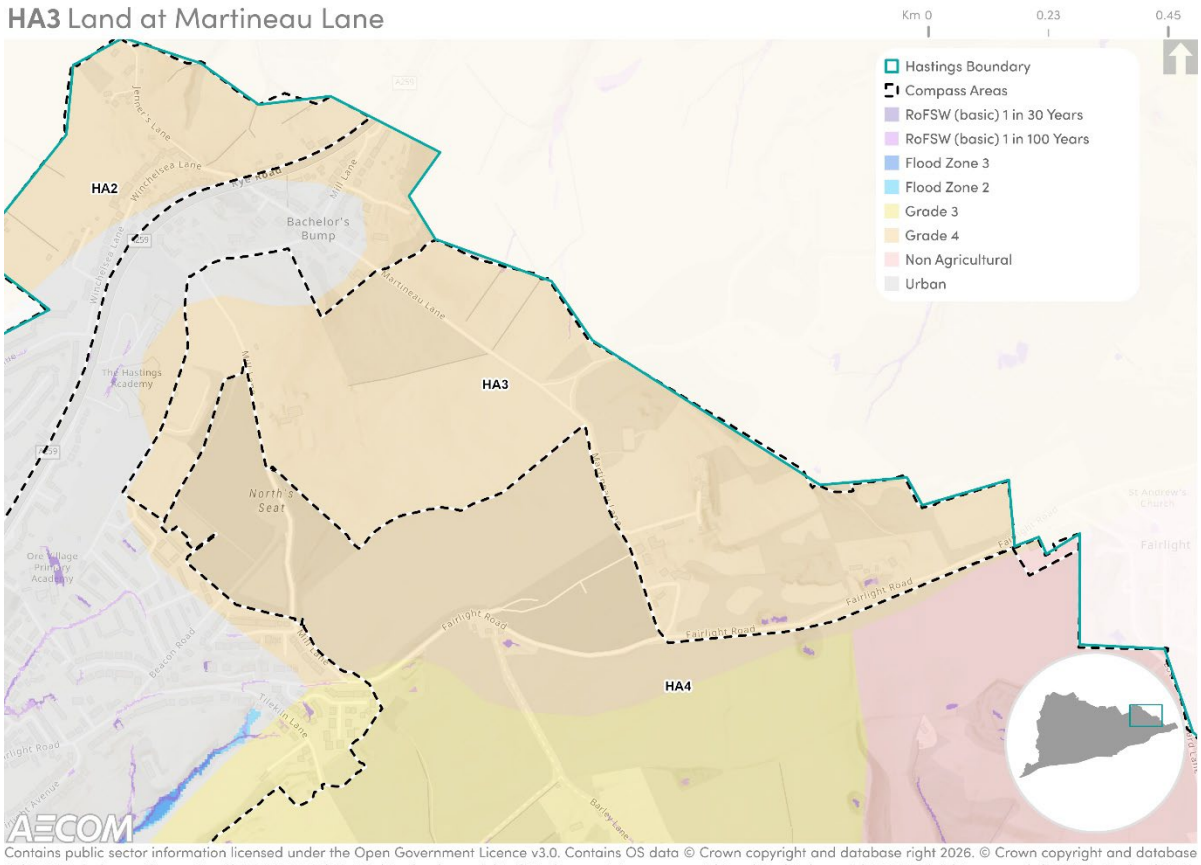

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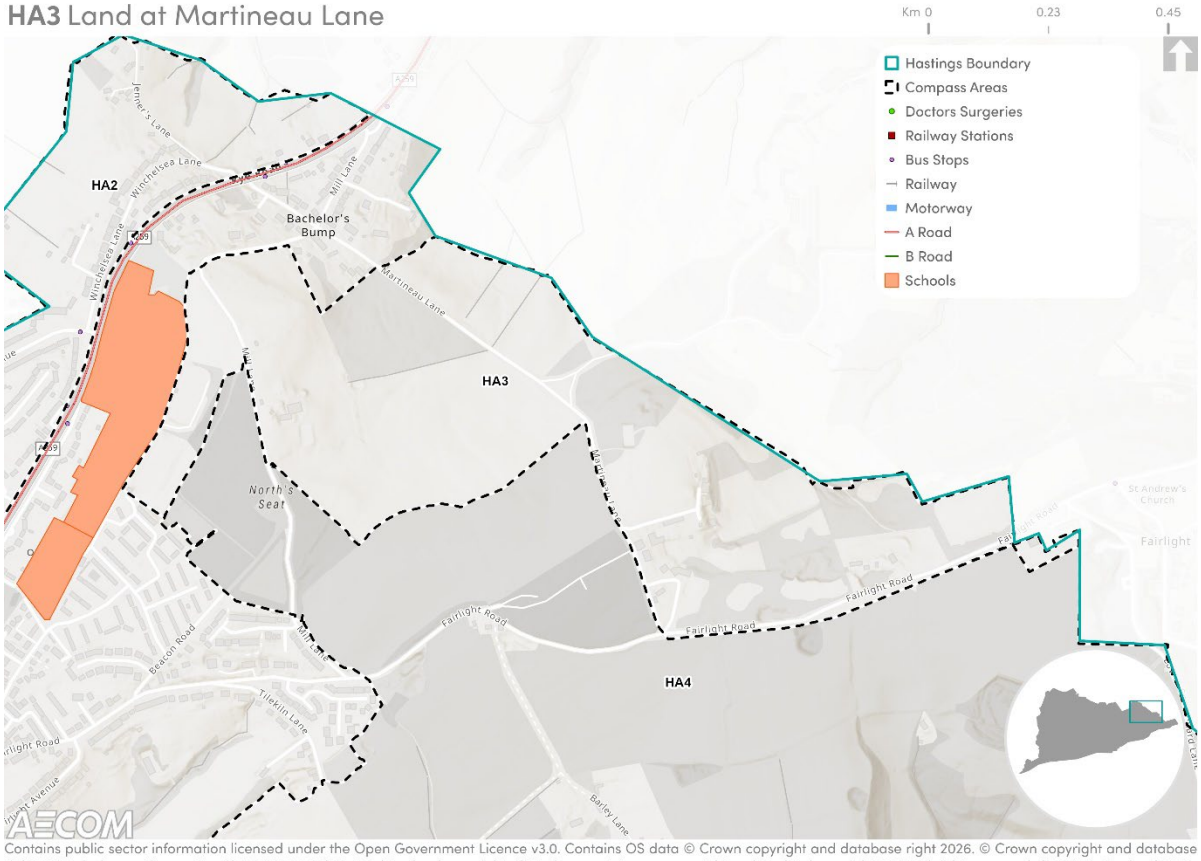
Figure A-13: Local Facilities and Amenities



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Analysis: HA3, Land at Martineau Lane

Category	Key constraints and opportunities
Biodiversity	HA3 is located directly adjacent to the Hastings Country Park Nature Reserve. There are a number of areas of BAP Priority Habitat in HA3 including a larger area of deciduous woodland located centrally in the area to the south of Martineau Lane with smaller sections in the western and eastern part of the area. The area also adjoins an extensive area of woodland to the east, linking to Mallydams Wood, which is a Local Nature Reserve.
Historic Environment	There is one Grade II listed building in HA3. This is the Fairlight Lodge Hotel (located in the south of the area). The area is also within the setting of the Grade II listed Belswaine's Lodge, located just outside of the area to the north east.
Landscape	HA3 lies entirely within the High Weald NL. HA3 also sits within East Sussex LCA 12: High Wealden Coast. The LCA features a dramatic coastline of crumbling sandstone cliffs, deep ghylls, and a hinterland typical of the High Weald. The area includes ancient woodlands, wind-sculpted fields, and historic farmsteads, with long views across the Brede Valley and beyond. While largely rural and tranquil, the LCA in this area faces pressures, expanding suburban development, and increasing tourism.
Soils	HA3 is underlain by Grade 4 (poor quality) agricultural land.
Water	There is a generally low risk of both fluvial flooding and surface water flooding across the HA3 area.
Accessibility to Services and Facilities	HA3 has relatively good access to primary and secondary schools. The Hastings Academy is directly adjacent to the west of the area, while the neighbouring Ore Village Primary Academy is within walking distance. In terms of doctors' surgeries, the Ore Clinic site is approximately 0.6 km away from the area. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services. Ore railway station is located 3.5 km from the HA3 area, with Hastings and Three Oaks railway stations slightly further distances. Bus routes which serve the area include the 70, running from Rye, through Hastings town centre, to Bexhill College and Rye College; the 100, which runs from Conquest Hospital through the town centre through Rye and up to New Romney in the east; and the 347 that runs from Pett to Hastings. These services provide access to the town centre, as well as surrounding settlements.

1.8. HA4 Hastings Country Park and Nature Reserve

Figure A-14: Ecological Constraints

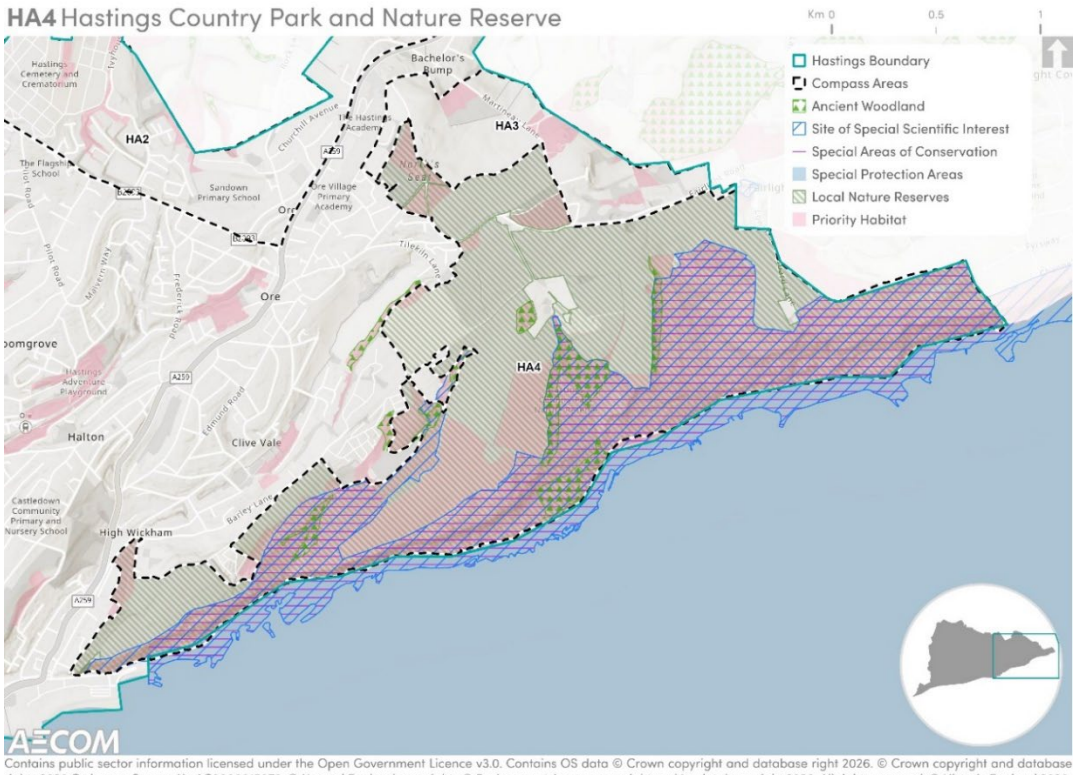

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Figure A-15: Heritage Constraints

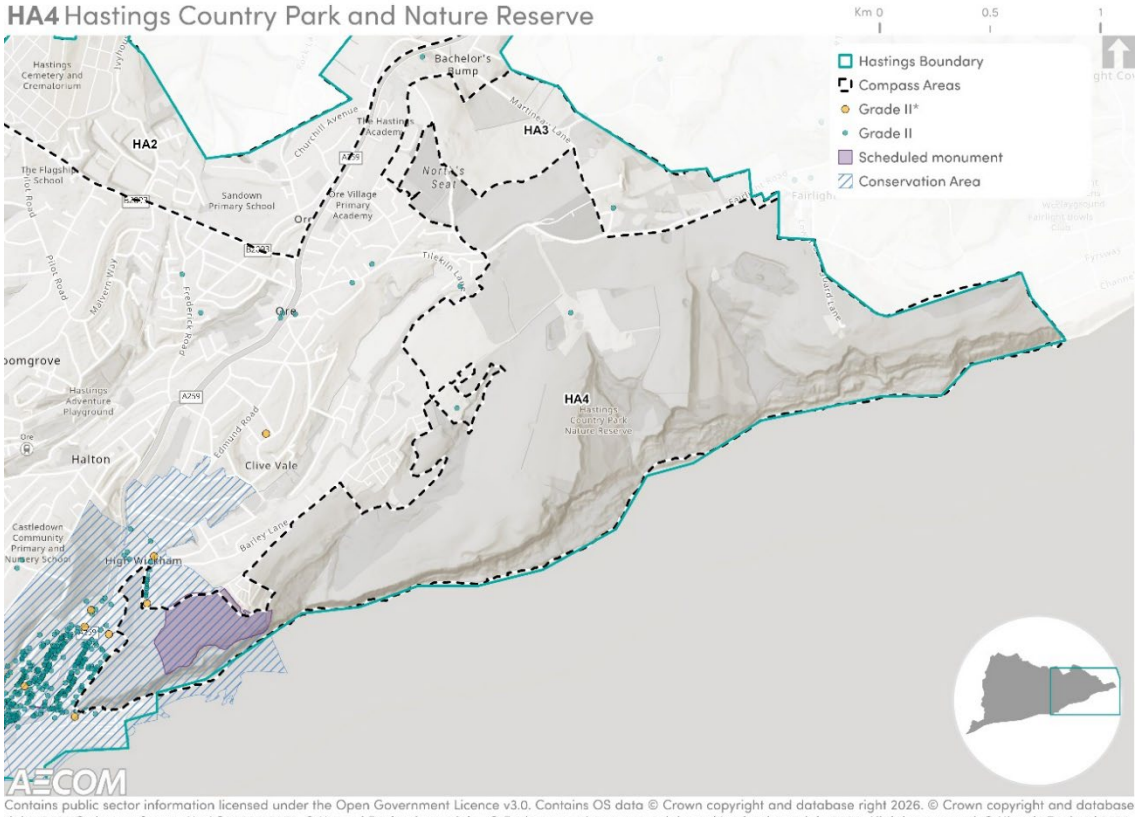

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Figure A-16: Flooding and Soil Constraints

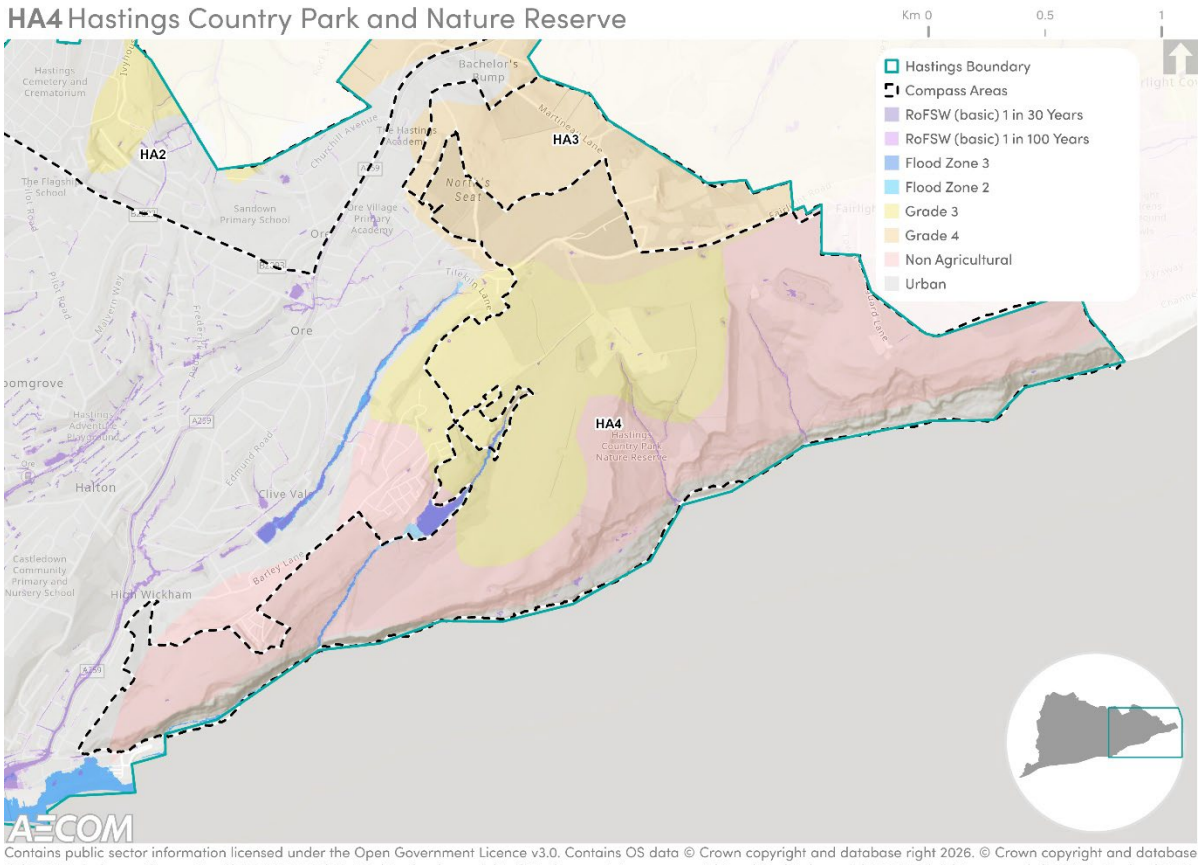

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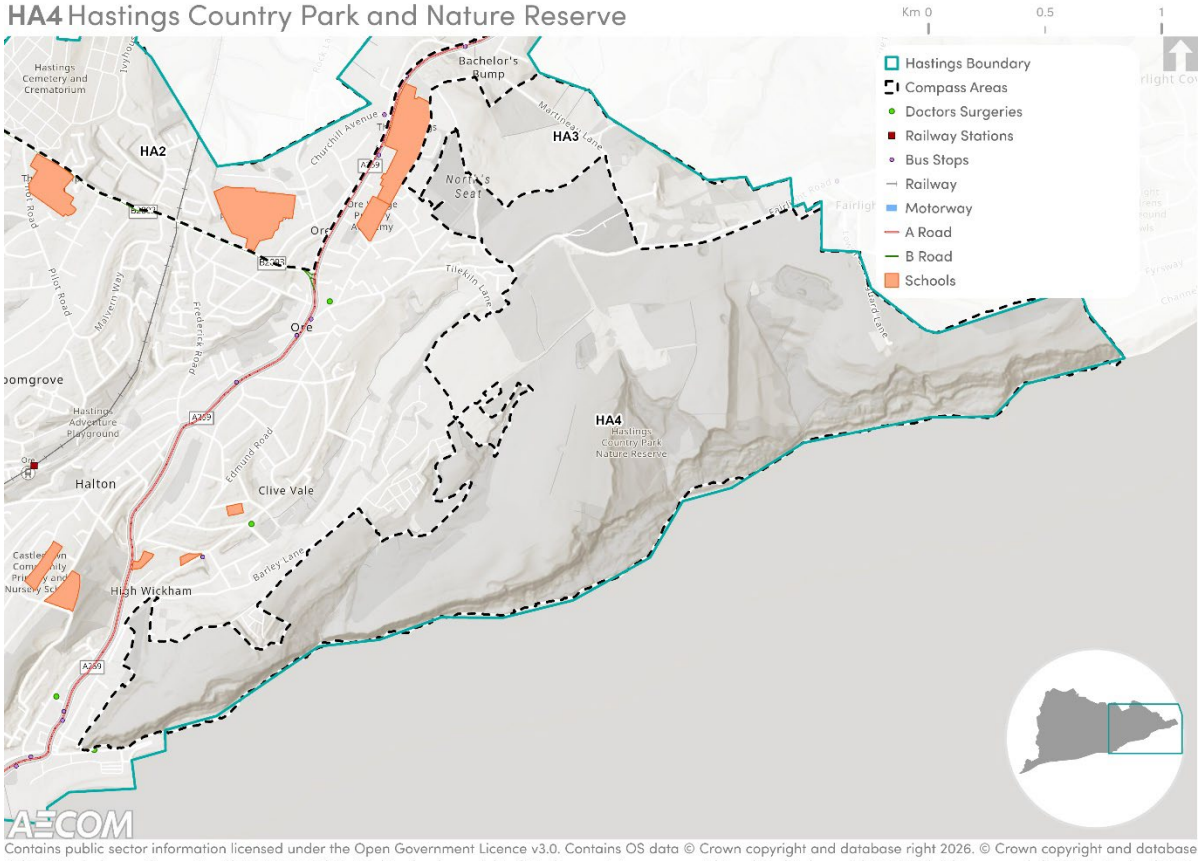
Figure A-17: Local Facilities and Amenities



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Analysis: HA4, Hastings Country Park and Nature Reserve

Category	Key constraints and opportunities
Biodiversity	HA4 is highly constrained with regards to biodiversity. The land adjacent to the southern boundary, and much of the east of the area is designated as part of the Hastings Cliffs SAC. The area is also directly adjacent to the Dungeness, Romney Marsh and Rye Bay SPA to the south. Much of the area is also part of the designated Hastings Cliffs to Pett Beach SSSI. The entire HA4 area is within a designated LNR, Hastings Country Park. Much of the area is constrained by BAP Priority Habitat, especially across the south of the area. The majority of this is maritime cliffs and slopes Priority Habitat, however there are also some smaller sized areas of good quality semi-improved grassland adjacent to this. There are also multiple areas of ancient woodland in HA4, the two largest of which are in the centre of the area, with one adjacent to the southern boundary.
Historic Environment	There is a large scheduled monument at the southwestern tip of the area. This is the Iron Age cliff castle and site of St George's churchyard on East Hill and is entirely within the HA4 area. There are also various listed buildings (Grade II and Grade II*) adjacent to the HA4 area boundary. HA4 is also partially within the Hastings Old Town Conservation Area in the southwest of the area.
Landscape	HA4 lies entirely within the High Weald NL. The broad area sits within East Sussex LCA 12: High Wealden Coast. The LCA is defined by its distinctive coastline where the Hastings-Battle Ridge meets the sea, featuring crumbling sandstone cliffs and steep ghylls. Inland, the area is a mix of fields, woodlands, and historic ridge-top villages such as Pett and Fairlight. The landscape is largely rural and tranquil, but coastal erosion, suburban expansion, and recreational pressures pose challenges. The area includes important natural habitats, such as ancient woodlands and wetlands, and offers long coastal views, making it a significant location for both biodiversity and recreation.
Soils	The majority of the land in HA4 is considered to be non-agricultural land. The land in the centre of HA4 is Grade 3; however it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken.

Category	Key constraints and opportunities
	The northern tip of HA4, adjacent to the northern boundary, has been evaluated to be Grade 4 'poor' agricultural land.
Water	Overall, HA4 is not constrained by fluvial flood risk. There is limited flood risk from fluvial flooding adjacent to a small tributary in the southwest of the area that runs to the sea. There are also two very small areas of surface water flood risk in the south of the area, associated with drainage to the sea. The coastline of the area is subject to coastal erosion.
Accessibility to Services and Facilities	There are a number of schools within walking distance to parts of HA4, including Ore Village Primary Academy, Sandown Primary School and Nursery, All Saints Church of England Junior Academy, Dudley Infant Academy, and Sacred Heart Catholic School. The Hastings Academy is within walking distance of the northern part of the area. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services. There are a number of doctors surgeries within proximity of the area. These include Hastings Old Town Surgery to the west of HA4, with, Beaconsfield Road Surgery (Ore site) and Ice House Practice all within walking distance to the western part of the area. Ore railway station is the closest station to HA4, approximately 900m from the area, with Hastings railway station approximately 1.6 km distant. There are also various bus stops in walking distance to the area, with services to the Ore area, the town centre and the Conquest Hospital. There are also services to Rye, Lydd and New Romney and Rye College and Bexhill College.

1.9. HA5: Combe Valley Countryside Park

Figure A-18: Ecological Constraints

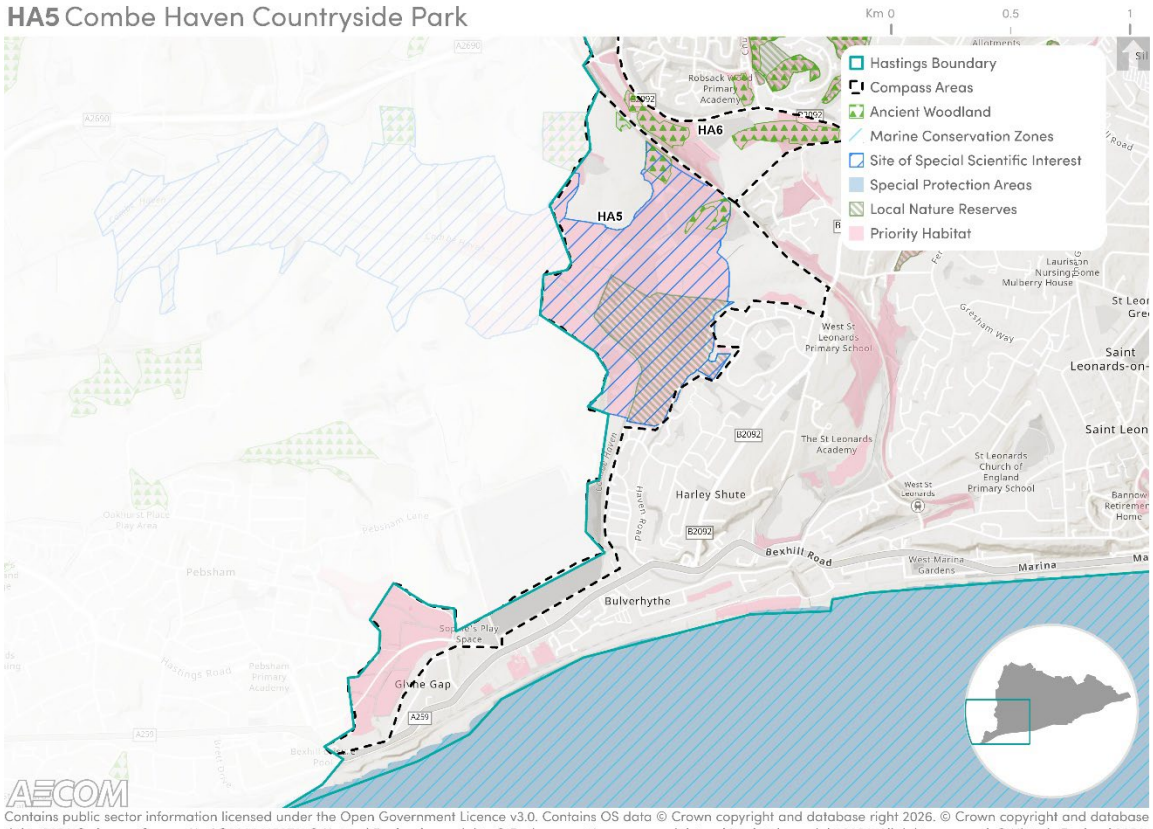

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Figure A-19: Heritage Constraints

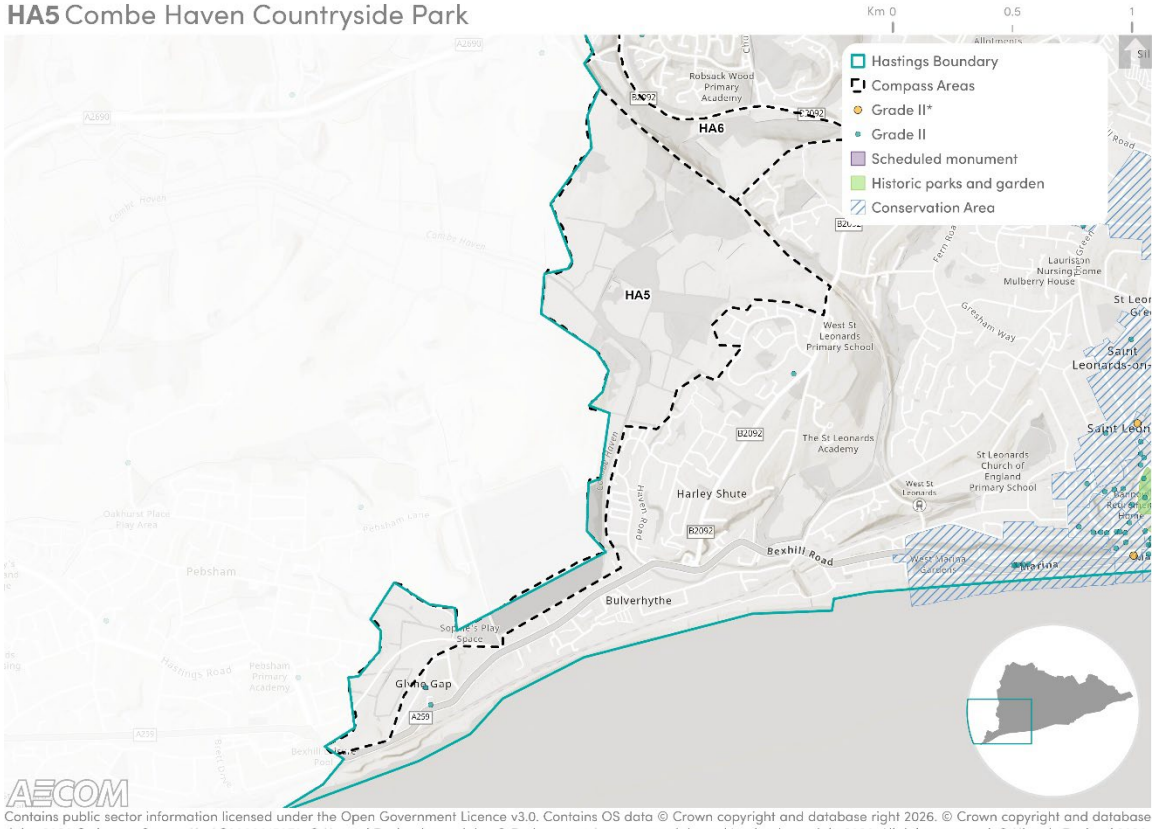

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Figure A-20: Flooding and Soil Constraints

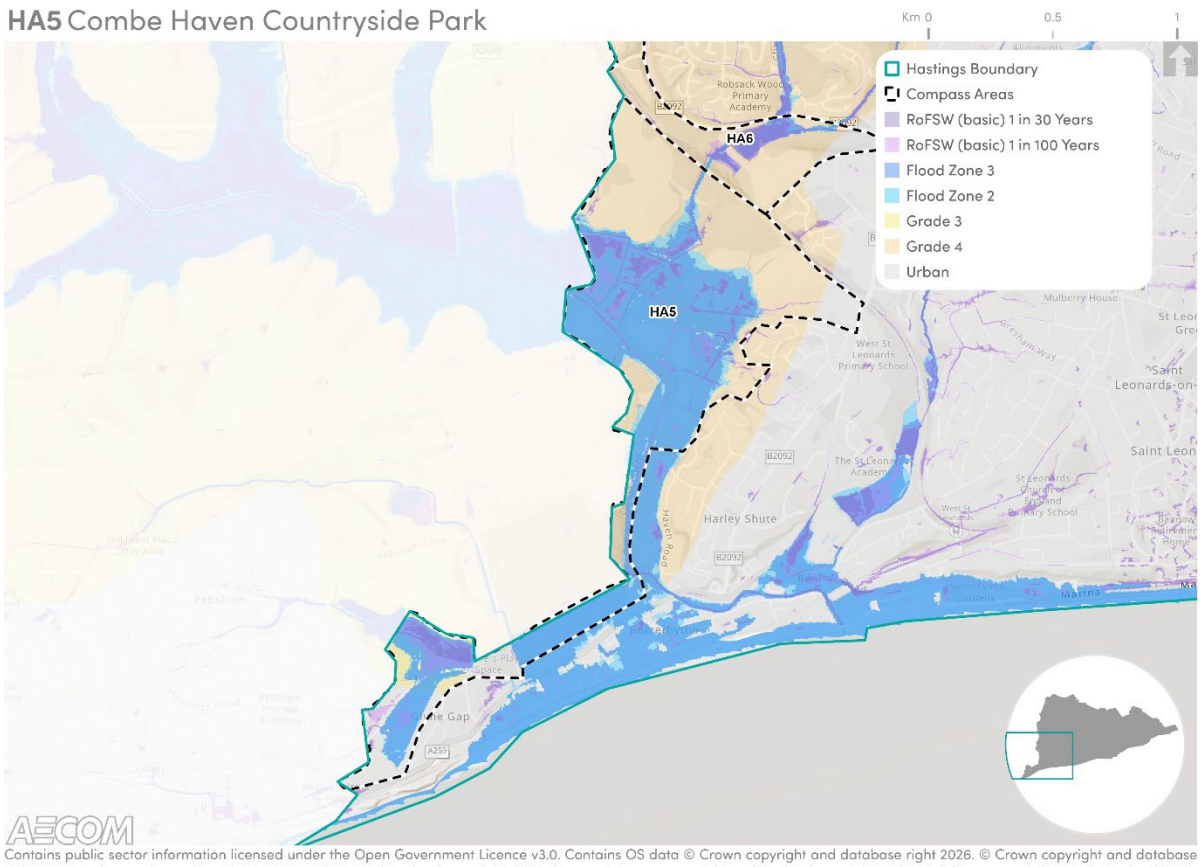

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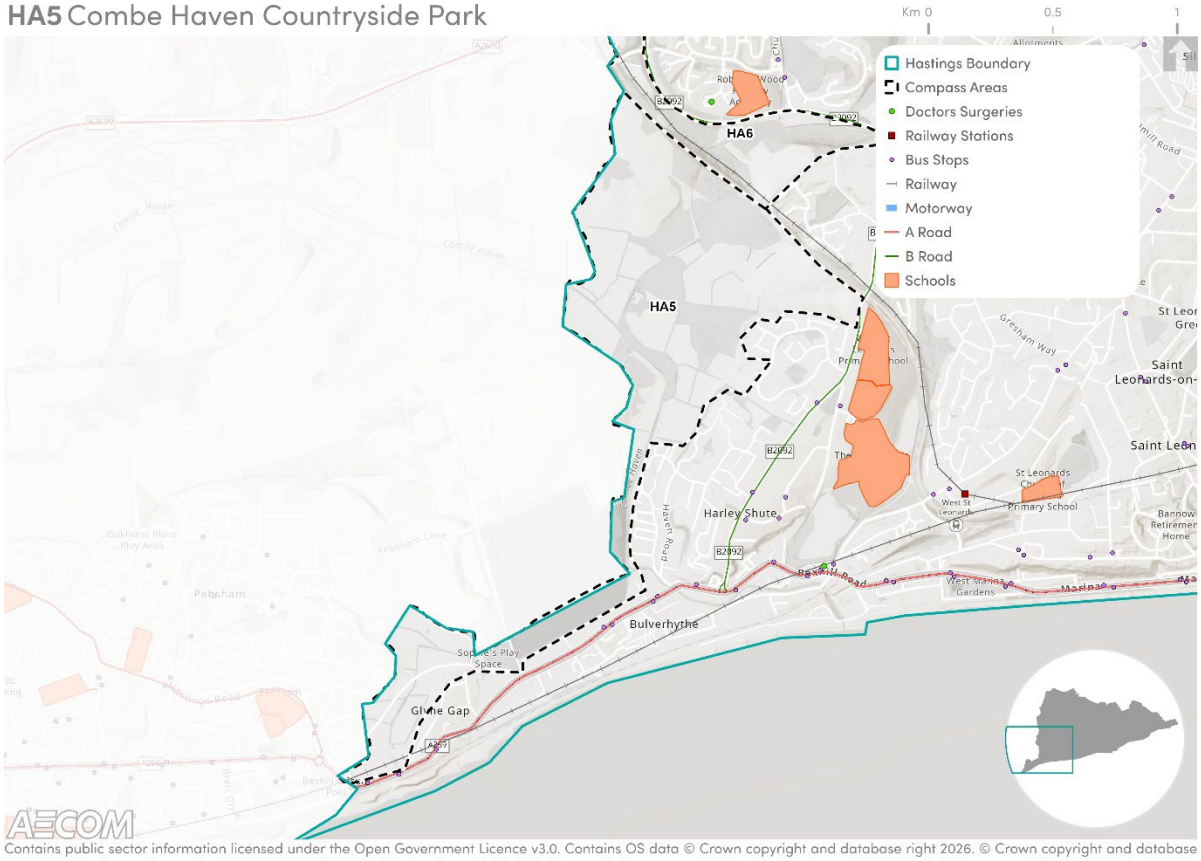
Figure A-21 : Local Facilities and Amenities



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Analysis: HA5, Combe Valley Countryside Park

Category	Key constraints and opportunities
Biodiversity	The HA5 area is relatively constrained with regards to biodiversity. The Combe Haven SSSI is partially within the area, covering a large section of the north west of HA5. The area that is within the SSSI is also partially covered by the Filsham Reed Bed LNR. The LNR covers the southeastern part of the SSSI and lies centrally to the HA5 area. There are also small areas of ancient woodland in the north of the area, close to the boundary and some within the SSSI area. The southern part of the HA5 area is also in proximity to the Beachy Head East MCZ. The SSSI and LNR area also comprises BAP Priority Habitat, with reedbeds making up the LNR area. There are also small areas of purple moor grass and rush pastures directly adjacent to this area to the north, as well as a small area of this on the north western part. The rest of the SSSI is made up of primarily lowland heathland, but also some areas of coastal and floodplain grazing marsh closer to the HA5 boundary, as well as to the north of the SSSI. There is also a small area of good quality semi-improved grassland adjacent to the LNR to the west. Other areas of BAP Priority Habitat cover the HA5 area, with smaller, however more frequent areas of deciduous woodland in the east of the area. There are also some smaller areas of coastal and floodplain grazing marsh in the far south of the area, as well as some lowland heathland at the tip of the area.
Historic Environment	HA5 is relatively less constrained with regard to the historic environment, however in the south western tip of the area is a scheduled monument, the remains of St Mary's Chapel, and two Grade II listed buildings, the Bull Inn and the Ruin of St Mary's Chapel.
Landscape	HA5 is located within East Sussex LCA 10: Combe Haven Valley. This area is defined by its small, winding High Weald valleys, ancient woodlands, and a central wetland in the Combe Haven Basin. Bordered to the north by the Battle Ridge, it features the Filsham reed beds and historic farmsteads. Despite some urban fringe development, the area maintains a tranquil and remote character.
Soils	The majority of HA5 is underlain by Grade 4 Agricultural Land, which is considered to be poor quality land for agriculture. This area is in the north and west of HA5, with the land adjacent to the eastern border being urban land, and a small area of the land at the southern tip of HA5 being Grade 3 agricultural land. It is not possible to differentiate between Grade 3a land (which is land

Category	Key constraints and opportunities
	classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken.
Water	With regards to flooding in the area, the Combe Haven River runs through the west of the area, adjacent to the boundary and then through the area to the coast. This means that a large proportion of the HA5 area is at a high level of flood risk. The majority of the east of the area is in Flood Zone 3 for river and sea flood risk, as well as a large part of the south of the area, and centrally in the north of HA5. There is also a large area of surface water flood risk at the southern tip of the area, as well as centrally in the north.
Accessibilities to Services and Facilities	HA5 is a large area, with good accessibility to services and facilities. There are four schools within walking distance of the HA5 area, with West St. Leonards Primary Academy, and Robsack Wood Primary Academy being the primary school options. There are also two secondary schools, Saxon Mount School and the St. Leonards Academy. There are also a number of other schools within walking distance. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services. There are two doctors surgeries in close proximity of the area, South Saxon House Surgery and St Leonards Medical Centre. The area is relatively well served by public transport, with Bexhill railway station located 2.3 km from the area, and West St Leonards railway station located 3.3 km from HA5. There are a number of bus services and bus stops in close proximity of the area, with various buses servicing the area. running to Bexhill and Sidley through to Eastbourne. These buses mean that the HA5 area has relatively good public transport connections, and is fairly accessible, particularly if services were expanded.

1.10. HA6: Crowhurst Road South area assessment

Figure A-22: Ecological Constraints

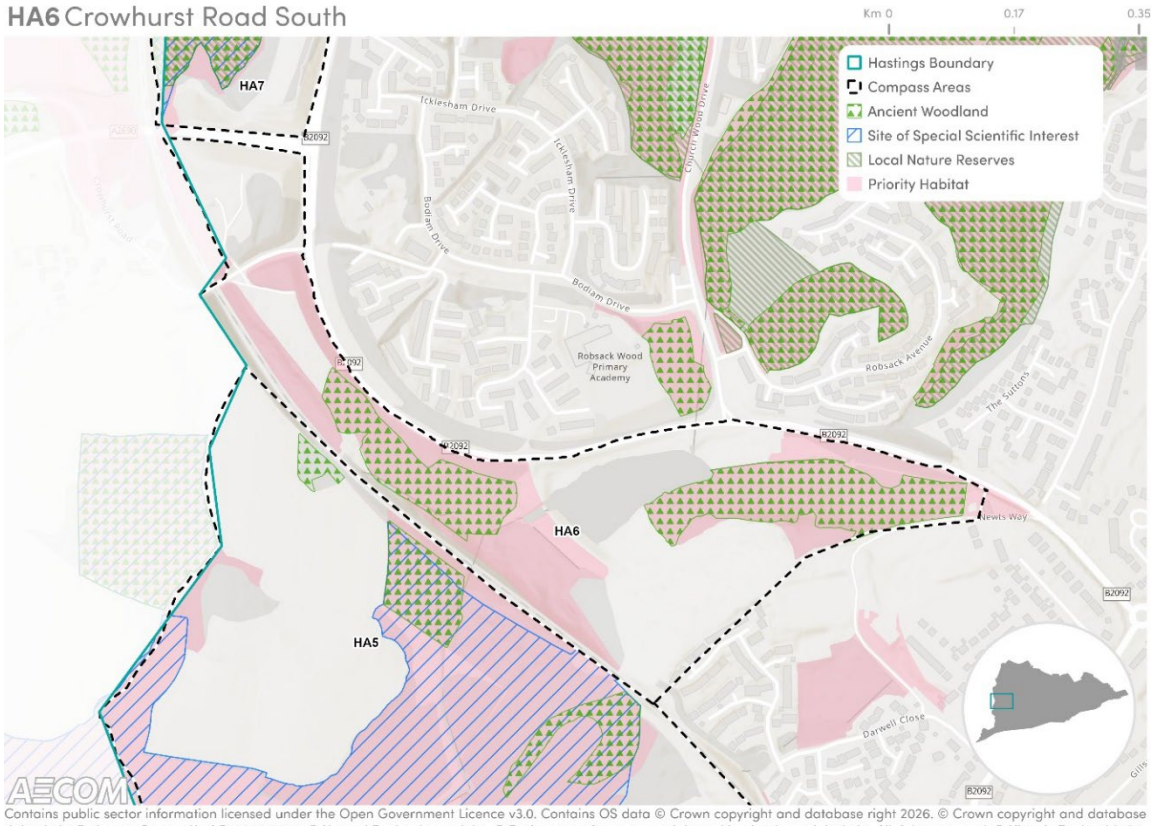

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Figure A-23: Heritage Constraints

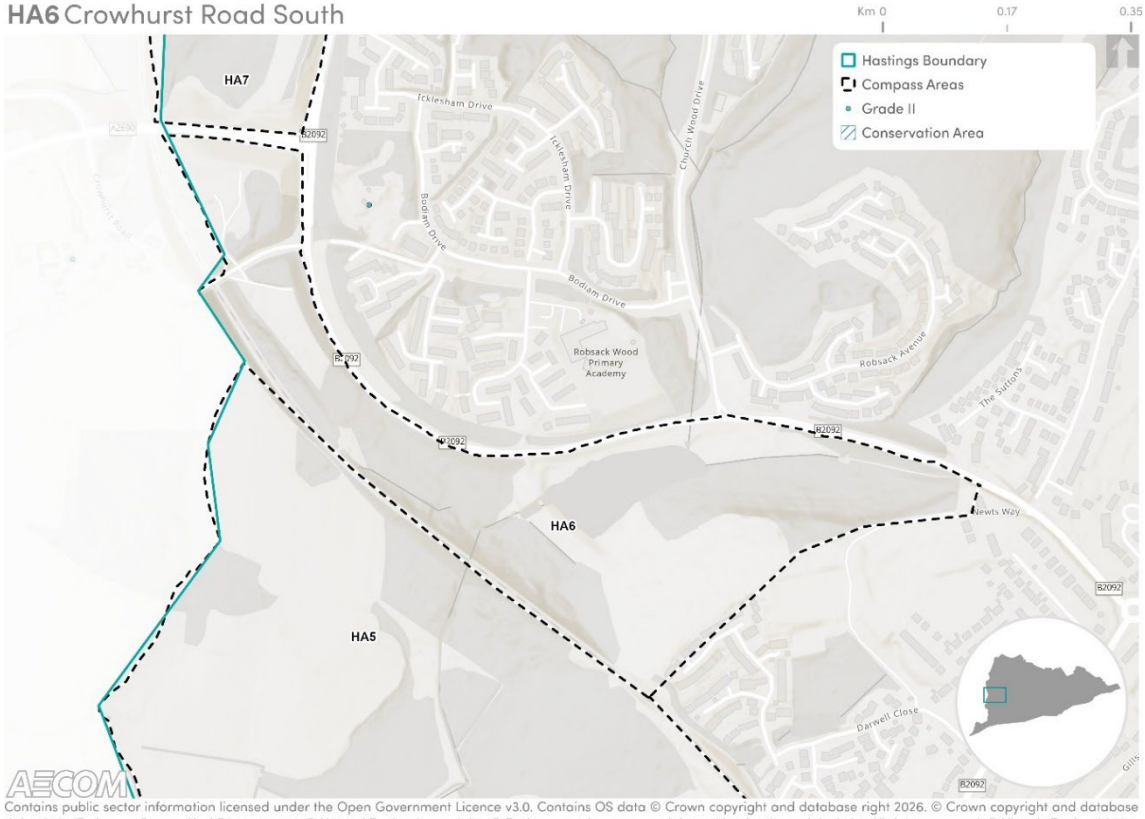

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Figure A-24: Flooding and Soil Constraints

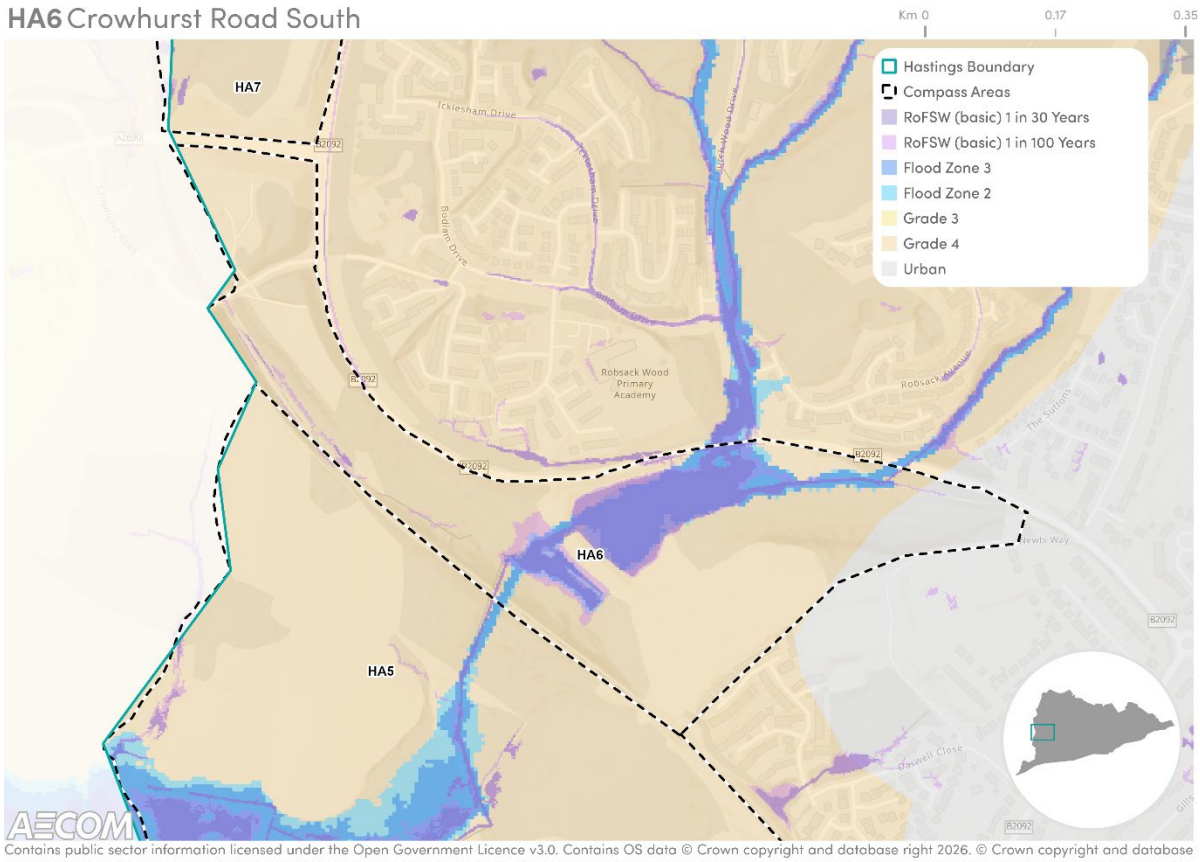

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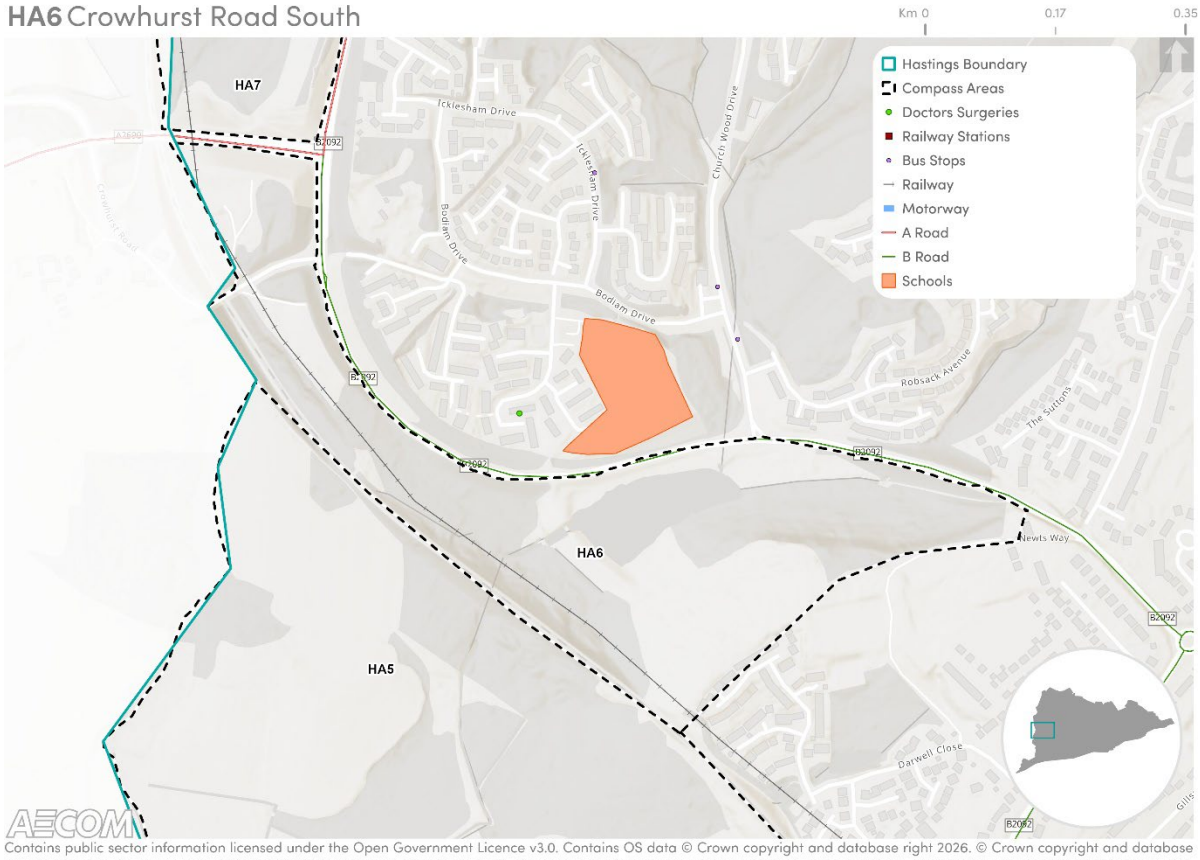
Figure A-25 : Local Facilities and Amenities



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Analysis: HA6 Crowhurst Road South

Category	Key constraints and opportunities
Biodiversity	HA6 has significant biodiversity constraints. Priority habitat comprises over half of the area, and there are significant areas of ancient woodland present in the western and eastern parts of the area. The area is also adjacent to the Combe Haven SSSI, and the habitats within the area connect to the areas of biodiversity interest associated with the SSSI.
Historic Environment	There are no designated historic environment constraints in this area.
Landscape	The HA6 area sits within East Sussex LCA 10: Combe Haven Valley. This LCA features small, winding High Weald valleys, ancient woodlands, and a central wetland within the Combe Haven Basin. Bordered by the Battle Ridge to the north, it also includes the Filsham reed beds and historic farmsteads. Despite some urban fringe areas, the landscape maintains a peaceful and remote atmosphere. The area comprises an important component of landscape and townscape character in the area.
Soils	The HA6 area is entirely underlain by Grade 4 agricultural land, which is considered to be poor quality.
Water	The Wishing Tree Reservoir is present in the central north of the area. Fluvial flood risk areas are associated with the streams feeding the reservoir from the north and east. There are very limited area of ‘low’ surface water flood risk adjacent to the railway line.
Accessibility to Services and Facilities	The area has good access to services and facilities and public transport networks. The Robsack Wood Primary Academy is within walking distance of HA6. The closest secondary school is the St. Leonards Academy, which is approximately 1.6 km. Bexhill High is located further afield, but within driving distance or via direct bus services to Bexhill. Additionally, education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services. Doctors surgeries in proximity include South Saxon House Surgery, which is within walking distance from the area. West St Leonards railway station is located approximately 1.8 km from HA6. The closest bus stops are on Church Wood Drive to the north, approximately 300m away, with services

Category	Key constraints and opportunities
	linking Hastings town centre and railway station, Conquest Hospital, Silverhill, Harley Shute and Bexhill.

1.11. HA7: Queensway area assessment

Figure A-26: Ecological Constraints

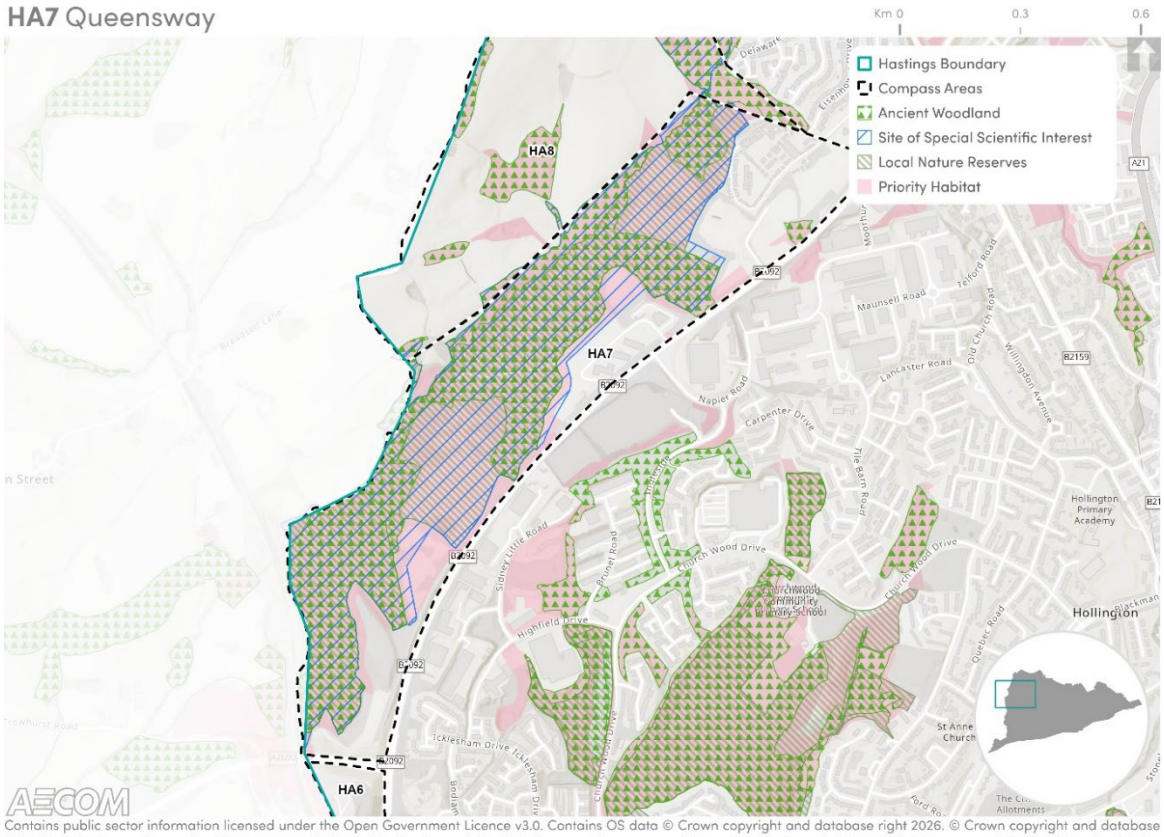

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Figure A-27: Heritage Constraints

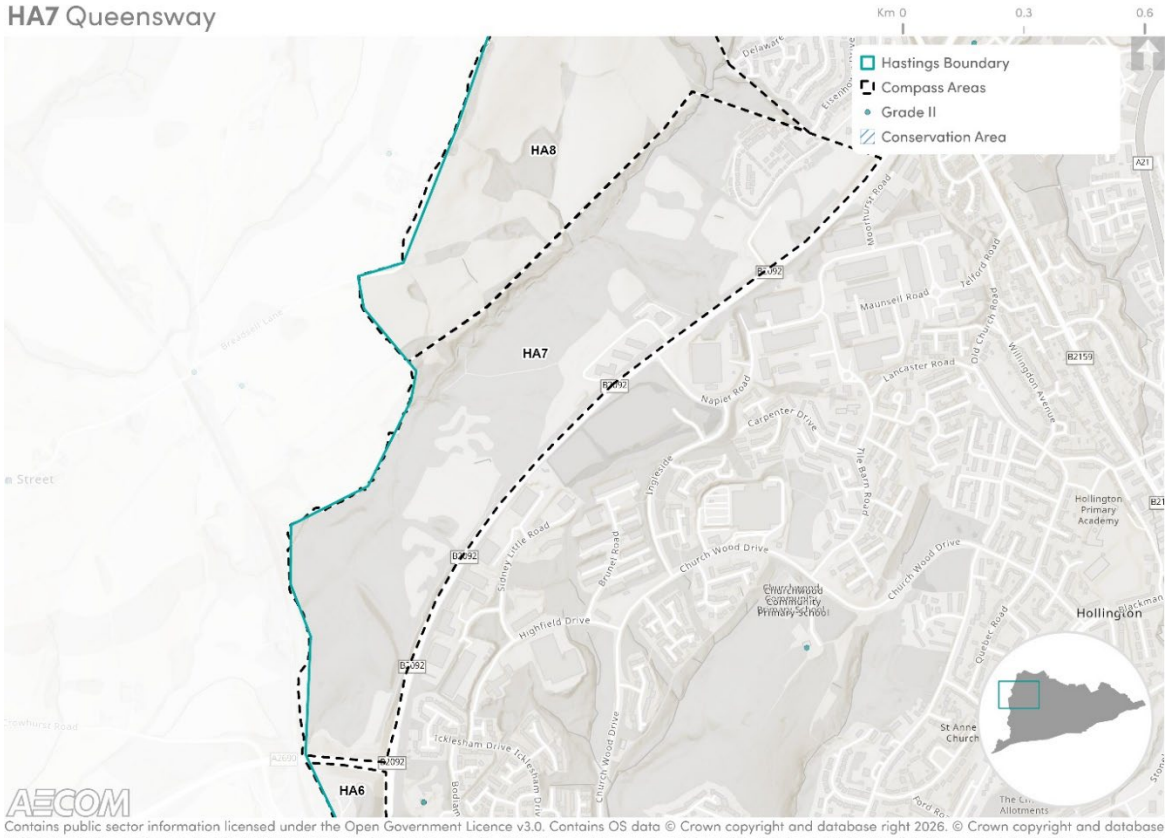

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Figure A-28: Flooding and Soil Constraints

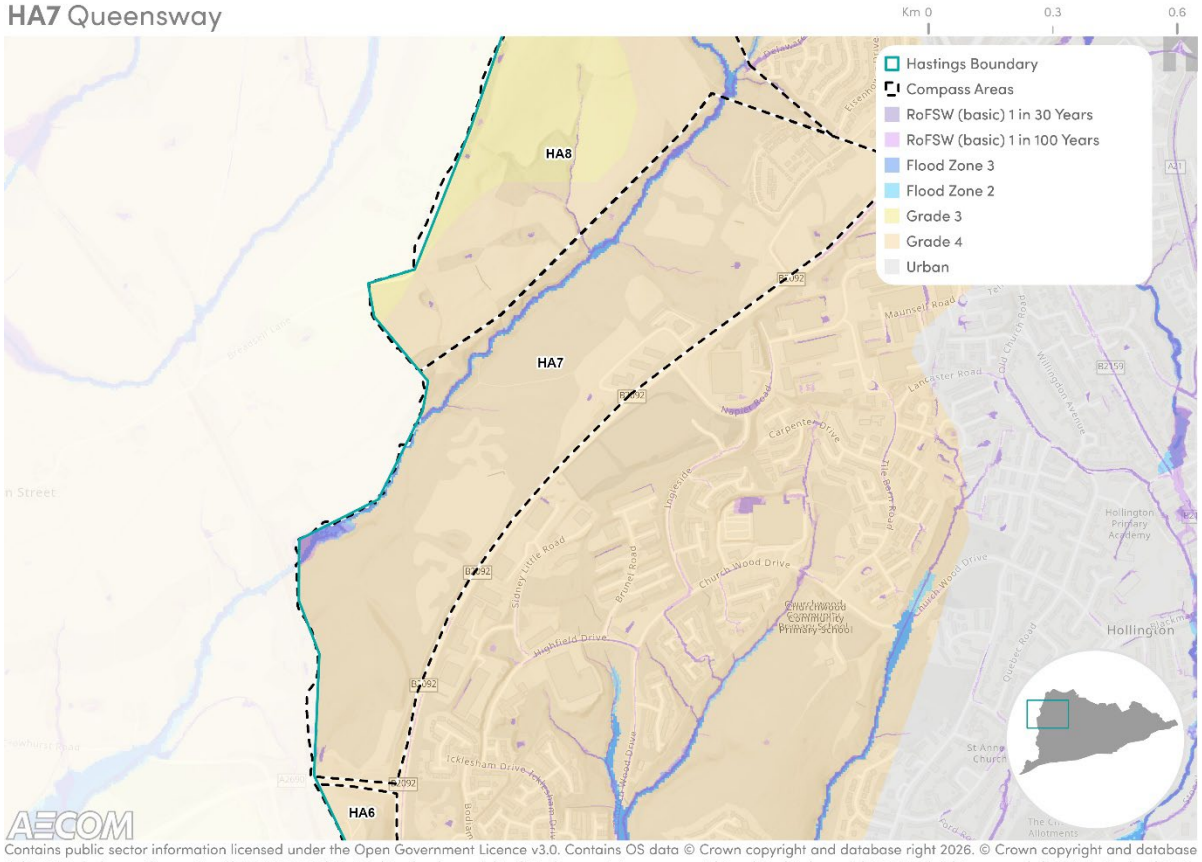

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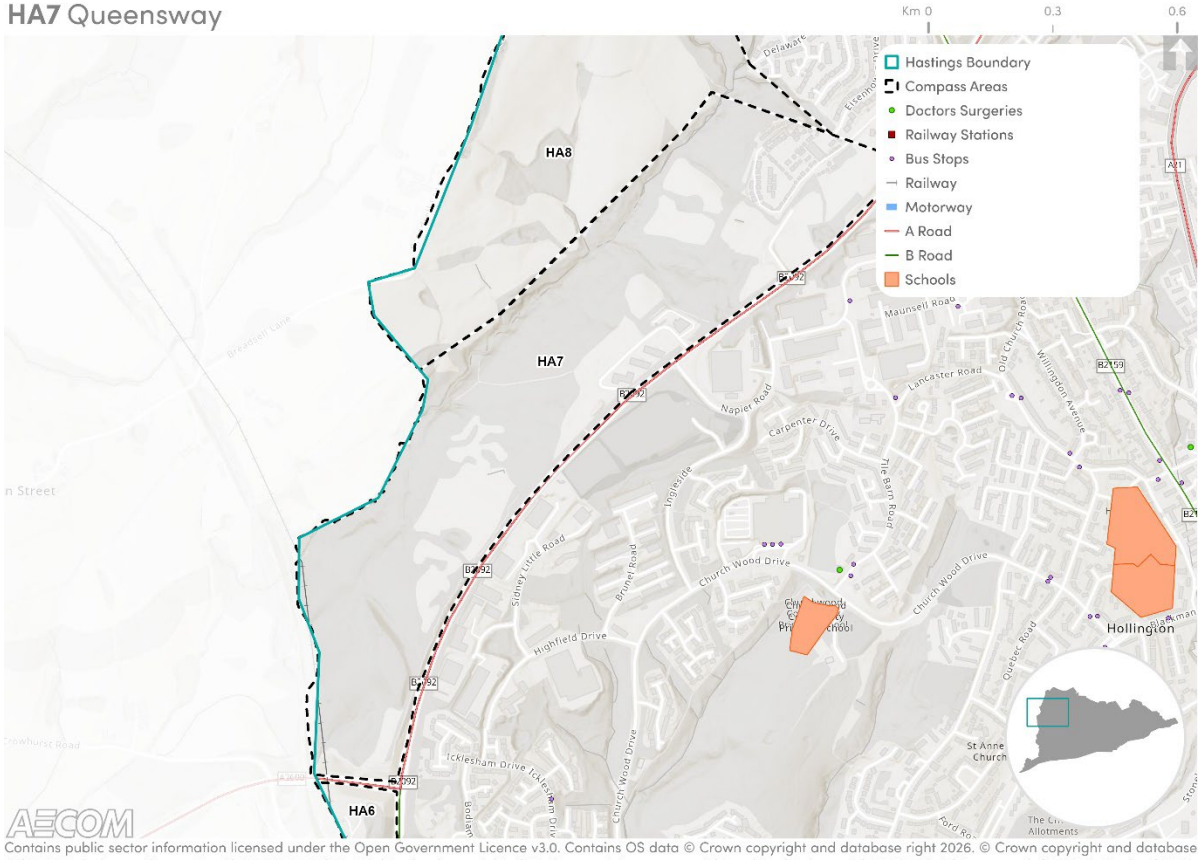
Figure A-29: Local Facilities and Amenities



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Analysis: HA7, Queensway area

Category	Key constraints and opportunities
Biodiversity	The HA7 area is very constrained with regard to biodiversity. The majority of the area covers the designated SSSI of Marline Valley Woods SSSI, in particular in the north and west of the area. Much of this area also makes up the Marline Wood LNR, which covers most of HA7. Most of the area is designated as BAP Priority Habitat, primarily deciduous woodland, as well as ancient woodland. There are also three areas of lowland meadows in the HA7 area. These are located within the SSSI/LNR, directly adjacent to the ancient woodland, central to HA7.
Historic Environment	There are no key historic environment constraints in this area.
Landscape	HA7 is located within East Sussex LCA 10: Combe Haven Valley. This LCA features small, winding High Weald valleys, ancient woodlands, and a central wetland in the Combe Haven Basin. Bordered by the Battle Ridge to the north, the area includes the Filsham reed beds and historic farmsteads, maintaining a tranquil and remote atmosphere despite some urban fringe areas.
Soils	The HA7 area is entirely underlain by Grade 4 Agricultural Land, which is considered to be poor quality.
Water	The north of HA7 has high levels of fluvial and surface water flood risk associated with a watercourse that runs directly alongside the northern boundary, inside the area. This runs from the northeast edge of HA7 to the southwest border.
Accessibility to Services and Facilities	HA7 is adjacent to the A2690 (Queensway). The northern section of HA7 is in close proximity of the B2159, which allows for access by road to schools such as Hollington Primary School and New Horizons School. These are located approximately 1.8 km from the northern section of the broad area. Churchwood Primary School is also accessible from HA7, approximately 1.0 km from the area. Claverham Community College is also within driving distance of HA7. From the south of HA7, there is Robsack Wood Primary School within walking distance of the area. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services. The High Glades Medical Centre is located 1.7 km from HA7, and Churchwood Medical Practice is approximately 1.6 km from the area, so both are in proximity.

Category	Key constraints and opportunities
	Whilst HA7 is located directly adjacent to an A-Road, this location is not served by any bus stops. Hastings railway station is an approximately 5.5 km drive from the site and can be reached by bus, providing rail access. Crowhurst railway station, located 6.8 km to the northwest, is not accessible via bus. Bus stops on the B2159, approximately 800 meters from the site, offer good connectivity.

1.12. HA8: Breadsell area assessment

Figure A-30: Ecological Constraints

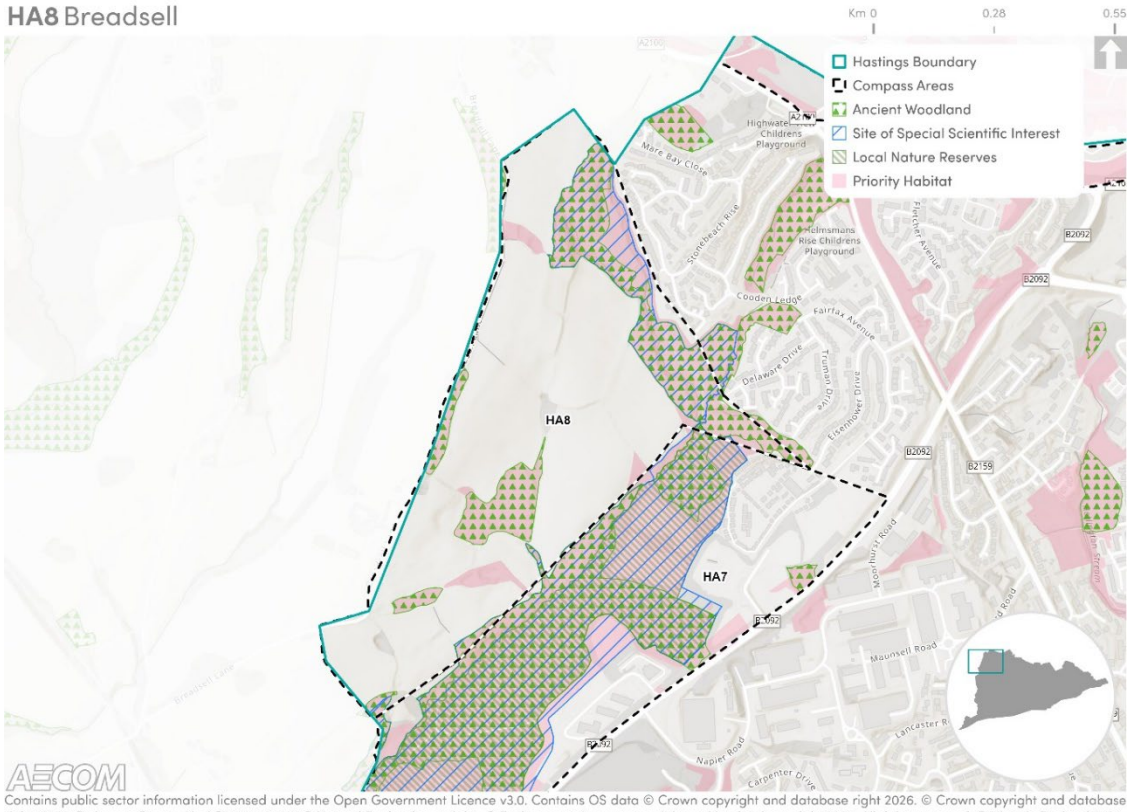

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Figure A-31: Heritage Constraints

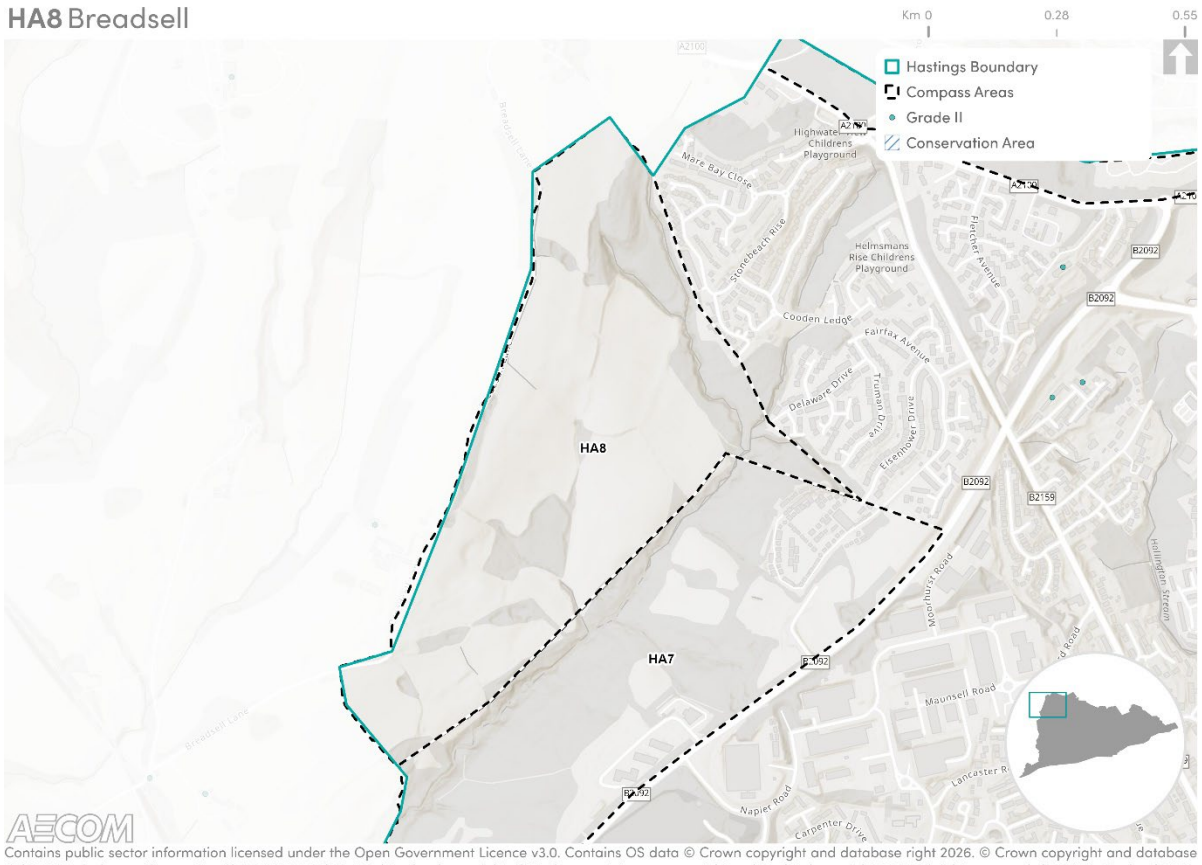

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Figure A-32: Flooding and Soil Constraints

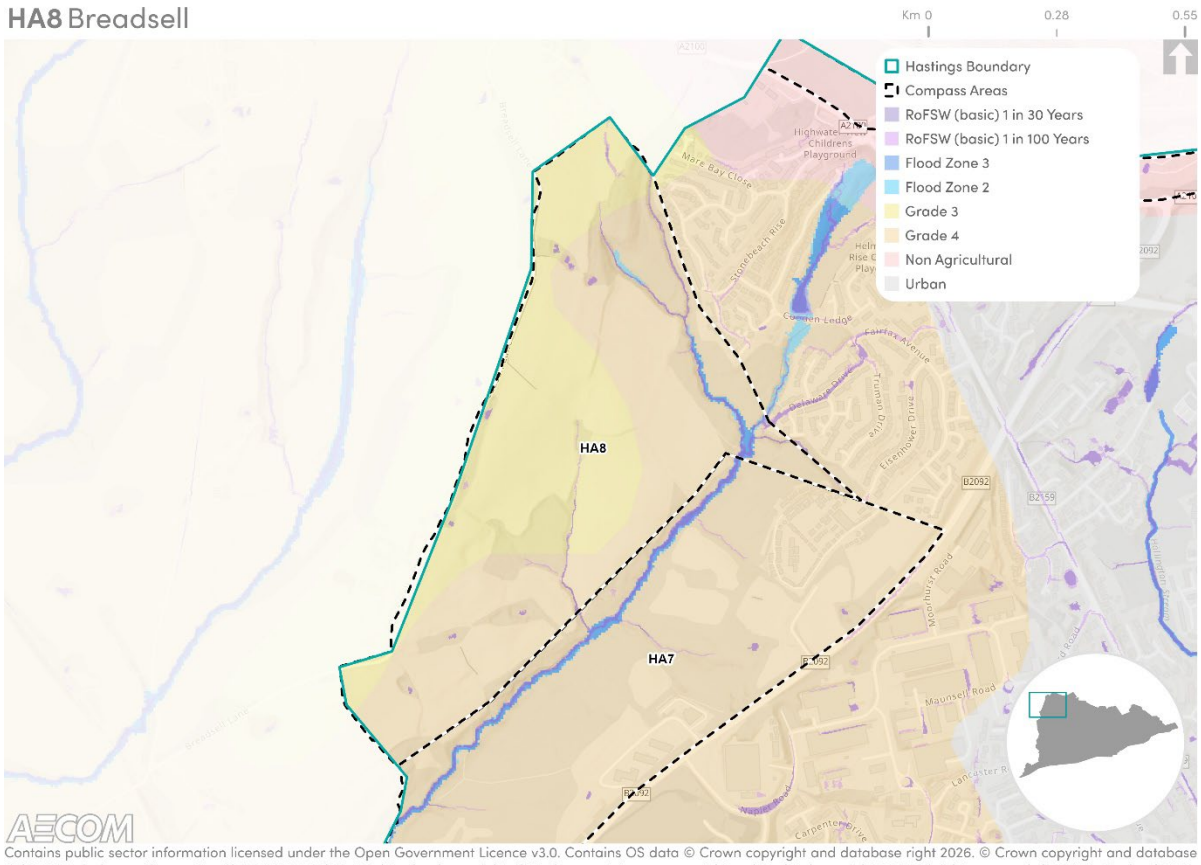

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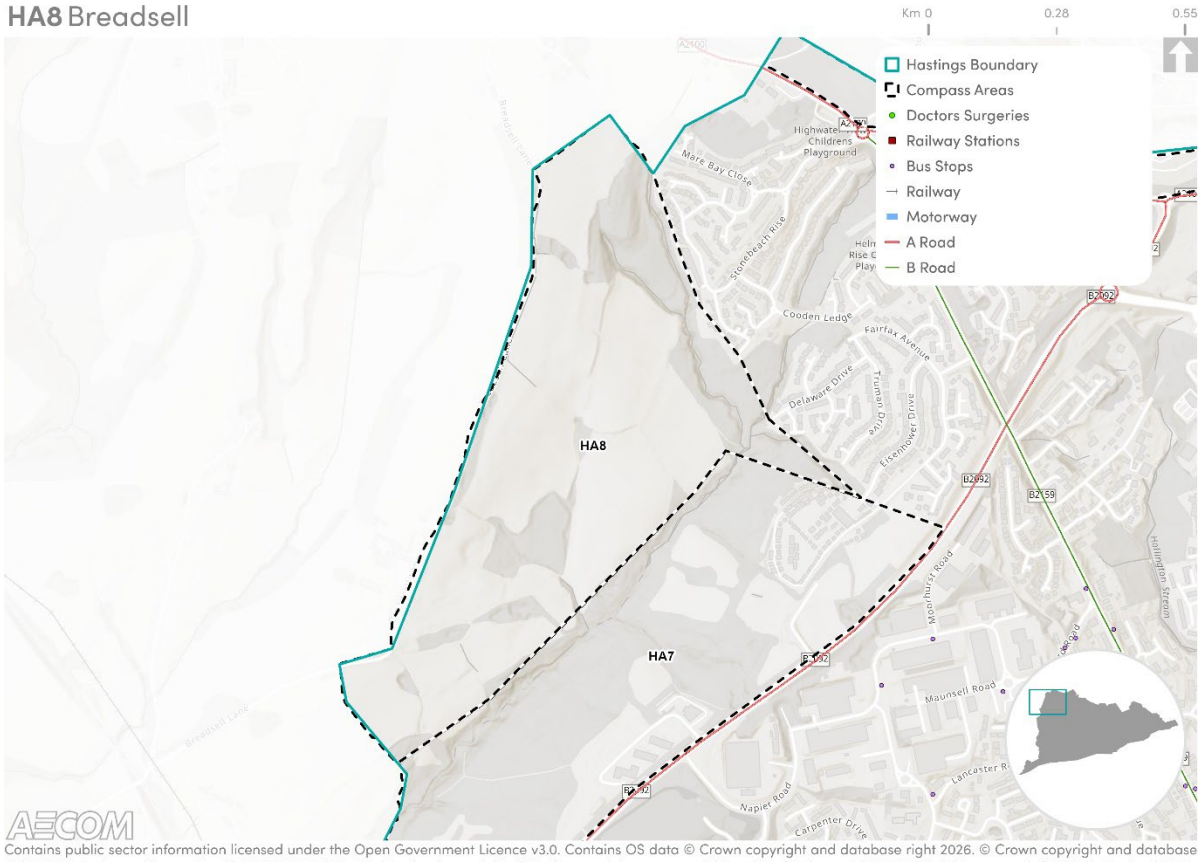
Figure A-33: Local Facilities and Amenities



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Analysis: HA8, Breadsell area

Category	Key constraints and opportunities
Biodiversity	The Marline Valley Woods SSSI is partially within the HA8 area. A large part of the SSSI can be found along the northeast boundary, as well as directly adjacent to the southeast boundary, with some small areas being found within the HA8 area along the border. These same areas are also covered by the Marline Wood LNR, which covers the majority of the part of the SSSI that is adjacent to HA8. There are areas of BAP Priority Habitat (Deciduous woodland) together with Ancient Woodland within the area. There is a small area of Priority Habitat/ancient woodland along the northeast border, as well as in the southeast part of HA8.
Historic Environment	There are no key constraints in this area for this category.
Landscape	The area is directly adjacent to the High Weald NL to the western boundary. According to the Hastings Landscape Sensitivity to Residential, Commercial and Solar Development study from 2024, the majority of the Breadsell area has a moderate-high or high sensitivity to residential development. The area sits within East Sussex LCA 10: Combe Haven Valley. The Combe Haven Valley LCA is characterized by small, winding High Weald valleys, ancient woodlands, and a central wetland in the Combe Haven Basin. Enclosed by the Battle Ridge to the north, it includes the Filsham reed beds and scattered historic farmsteads. The area retains a tranquil, remote feel, though there are some urban fringe areas.
Soils	In terms of ALC, land within HA8 is mainly classified as Grade 3 agricultural land, which covers the east of the area, to both the south and the north. However, it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken. Land to the west, where the deciduous woodland and SSSI can be found, is classified as Grade 4 Agricultural Land, which is considered to be poor quality.
Water	A watercourse runs adjacent to the southern boundary of HA8. Whilst this is mainly outside of the area, this runs through the western point of HA8. This means that the area drains into this watercourse and therefore has some small areas of flood risk. This includes areas of Flood Zone 2 and 3, as well as areas at medium

Category	Key constraints and opportunities
	surface water flood risk. This also extends up the northeastern part of HA8, adjacent to the boundary but on the inside of the area.
Accessibility to Services and Facilities	The broad area is located approximately 2 km by road from the nearest primary school, Hollington Primary School, which is also directly adjacent to New Horizons School, a special school for children up to 16. The area is located approximately 3.3 km from the closest secondary school, Ark Alexandra Academy. The St Leonards Academy is accessible via car or bus, however, is further away at approximately 5 km. Claverham Community College is also within driving distance of the area. Medical services are relatively accessible, with the Churchwood Medical Site and the High Glades Medical Centre within 3km distance by road. For public transport, Hastings railway station is situated a 5.6 km drive from the site, providing rail access – and is accessible via bus. Crowhurst Station is located 6.7 km northwest of the area and is not accessible via bus. Additionally, there are bus stops on the B2159 that provide good services approximately an 800m walking distance from the area.