Hastings Local Plan
Pre-Submission Version 2023-2041
(Regulation 19) September 2026

Preamble

What is this Document?

0.1 This document is the **Pre-Submission** version of the **Hastings Local Plan** (the Plan) and is being published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

0.2 The council has published this Plan in order to seek formal representations on its soundness and legal compliance. The Plan, evidence base and formal representations will be submitted to the Secretary of State, who will appoint an independent Planning Inspector to Examine the Plan.

0.3 The purpose of Examining the Plan is to establish if the Plan forms a sound basis for development in the Borough over the period to 2041. Once adopted, the Plan will form part of the overall Development Plan for Hastings[1].

Previous consultation and Council's Responses to Comments made

0.4 In February 2026 the council published the Draft Local Plan for consultation and received 2,292 comments, the majority of which related to sites allocated for future housing development.

0.5 The council has carefully considered all comments received and made changes to the Plan as appropriate. Details of the main issues raised, along with the council's response (including where changes to the Plan have been made) can be found in the Regulation 22 Statement available to view at hastings.gov.uk.

Commenting on the Proposed Submission Hastings Local Plan

0.6 Unlike earlier rounds of consultation, where views were sought on all aspects of the Draft Plan, this time comments must specifically address whether the Plan is **legally compliant** (has it been prepared in accordance with legal and procedural requirements?) and whether it is **sound**. Representations must relate to one or more of the tests of soundness as outlined in Paragraph 36 of the National Planning Policy Framework (December 2024), repeated below as follows:

> *Local plans […] are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*
>
> *a)* ***Positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by*

[1] **The Development Plan comprises the East Sussex Waste and Minerals Local Plans as well as the adopted Hastings Local Plan (plus any subsequent Neighbourhood Plans or Neighbourhood Development Orders)**

agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

0.7 Formal representations, therefore, if objecting to any element of the Plan, **must clearly state why the Plan is not legally compliant and/or sound**, identify the specific soundness test which is being objected to, and if possible, explain what should be done in order to make the Plan sound.

0.8 Formal representations can be submitted either through the council's website or by sending completed response forms, available online, either by email, post or by hand. Our preference is for comments to be submitted online as this is the most efficient way to capture representations. A full list of options for responding to this consultation is set out below:

Online:	hastings.gov.uk/localplan
Email:	fplanning@hastings.gov.uk
Post/ By Hand:	Planning Policy Hastings Borough Council Muriel Matters House Breeds Place Hastings East Sussex TN34 3UY
Phone no. for queries:	01424 451102

0.9 The Plan is being published for a 6-week period for formal representations starting on **1 October 2026** and closing at **23:59 on 12 November 2026**. Only representations received during these times will be accepted. Any representations received outside of these times **will be rejected**. The information you provide in your formal representation will be forwarded to the Independent Planning Inspector and will be made publicly available. All personal data, including telephone numbers, email addresses, postal addresses and signatures will be removed.

0.10 In addition to responding on the soundness of the Plan, representations can also be made on the evidence base underpinning it, including for example the Sustainability Appraisal and Habitats Regulations Assessment (but only insofar as it relates to the legal compliance and/or soundness of the Plan). All evidence base, along with the Plan, can be found in the Core Document Library at hastings.gov.uk/localplan.

0.11 For full details on how to make formal representations on the Proposed Submission Local Plan, please read the **Statement of Representations Procedure** available at the above web address.

Preparation of the Plan

0.12 As shown in Table 1 below, the Proposed Submission Local Plan (Regulation 19) is just one stage in the process of preparing and consulting on the Plan, before it undergoes independent examination and is finally adopted.

Stage of Plan Production	Timeline
Consulting statutory bodies on the scope of the Sustainability Appraisal	Quarter 1 2020/2021
Public participation in the preparation of the Local Plan (Local Plan Regulations, Regulation 18 Stage)	Quarter 4 2020/2021
Public participation in the preparation of the Local Plan (Local Plan Regulations, Regulation 18 Stage – Preferred Options)	Quarter 4 2025/2026 into Quarter 1 2026/2027
Publication of the Proposed Submission of the Local Plan (Local Plan Regulations, Regulation 19 – Proposed Submission Version)	late September 2026 for 6 weeks
Submission to the Secretary of State for Independent Examination	December 2026
Adoption of the Local Plan	June 2028

Table 1: Timetable for the Production of the Local Plan (LDS July 2026)

The Plan's Legal Status

0.13 The National Planning Policy Framework (NPPF) provides guidance on the determination of applications for planning permission. With respect of Development Plan policies, the NPPF states that:

> Local planning authorities may give weight to relevant policies in emerging plans according to:
>
> a. the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
>
> b. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
>
> c. the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)[2].

0.14 This version of the Plan has been published in accordance with Regulation 19, as such this Plan carries **limited weight** in decision making.

Next Steps

0.15 Following the Proposed Submission period for formal representations, the council will Submit the Plan, along with all representations and supporting evidence documents, to the Secretary of State, who will appoint an independent Inspector to Examine the Plan, in order to determine its soundness and whether it has met the statutory legal requirements.

0.16 The Inspector may suggest modifications be made to the Plan at the request of the council, in which case a further period of consultation on those modifications will take place. The Inspector will then issue their final report. Provided the Plan is found sound, the council may then Adopt the Plan, which will replace the current adopted Hastings Local Plan (February 2014).

0.17 Upon adoption of the Local Plan, this entire Preamble section will be deleted.

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[2] NPPF (December 2024) paragraph 49

Foreword

Cllr Glenn Haffenden, Leader of the Council

This Local Plan sets out how Hastings will grow and change over the coming years. It addresses some of the most significant challenges facing our borough: the need for more homes, the urgency of tackling climate change, the importance of protecting our green spaces and historic character, and the need to strengthen our local economy.

Housing remains one of the most pressing issues for our community. Too many residents struggle to access secure and affordable homes. Through this Plan, and alongside our Housing Strategy, we are committed to increasing the supply of genuinely affordable, high-quality housing, including new council houses. Growth must deliver real benefits for local people — supporting families, improving wellbeing, and creating sustainable neighbourhoods.

As well as providing homes and jobs, the Plan makes sure that the right infrastructure is in place. As well as an ambitious and realistic approach to maximising the delivery of affordable housing, the Plan incorporates other infrastructure requirements, including community facilities, sports facilities and health centres. The Plan ensures that developers contribute towards the delivery of these and other types of infrastructure, such as parking improvements, open space, play spaces, public rights of way and public transport enhancements.

Hastings is a town with a unique identity and exceptional environmental assets. We are therefore determined, wherever possible, to protect and enhance our open spaces, sports facilities, heritage and landscape setting. Growth must be carefully managed so that it strengthens, rather than undermines, the character of our borough.

This Plan reflects these difficult choices. We must respond to national requirements while ensuring that development happens in the right places, and to the right standard. Our high level of housing need means we have taken a ‘no stone unturned’ approach to meeting that requirement. This includes providing a strategy within the Plan for higher density new housing developments wherever this can be sustainably achieved.

Foreword

Cllr Mark Etherington, Lead Councillor for Strategic Planning and Climate Adaptation

National planning policy requires councils to plan positively for growth, and to meet identified housing need. The Local Plan demonstrates how this housing need can be met, alongside provision for employment land, infrastructure and community facilities.

Hastings faces significant constraints. The borough is tightly bounded with the sea to the south and areas of high environmental value to the north, east and west, including the High Weald National Landscape and Hastings Country Park Nature Reserve. As a result, land availability is strikingly limited and new development must therefore make efficient use of

suitable sites, starting with previously developed land. The Plan sets out minimum levels of density for new housing development, seeking the highest densities in the most sustainable locations.

This Plan sets out site allocations and development management policies to guide the scale, location and quality of development. It includes policies to promote energy efficiency, reduce carbon emissions, support sustainable transport, protect areas of environmental sensitivity, and strengthen the local economy. It also identifies land for employment growth to support investment and job creation within the wider Hastings and Rother Functional Economic Market Area. Pitches for our Gypsy and Traveller community have been identified. The Plan also responds to the challenge of our changing climate, with policies that address the need, not only to manage future flood risk, but to reduce existing risk where we can and ensure that homes and businesses are built with our changing climate in mind.

Careful, evidence-based planning is key to ensuring that Hastings grows sustainably. It is equally important to balance these development needs with climate resilience and environmental protection.

Table of Contents

Preamble 2
Foreword 6
1. Introduction 14
2. Hastings in context 15
3. Vision and objectives 17
4. Strategic Policies 18
Introduction 18
Strategic Policy 1 (SP1): Directing Growth – a Spatial Strategy 20
Strategic Policy 2 (SP2): New and Affordable Housing 24
Strategic Policy 3 (SP3): Business Development – Office and Industrial 32
Strategic Policy 4 (SP4): Business Development – Town Centres 37
Strategic Policy 5 (SP5): Meeting the Challenge of Climate Change 44
Strategic Policy 6 (SP6): Renewable and Low Carbon Technologies 47
Strategic Policy 7 (SP7): Protecting and Enhancing the Historic Environment 49
Strategic Policy 8 (SP8): Conserving and Enhancing the Natural Environment 52
Strategic Policy 9 (SP9): Managing Coastal Erosion and Flood Risk 55
Strategic Policy 10 (SP10): Transport Infrastructure 58
Strategic Policy 11 (SP11): Healthy and Safe Communities 63
Strategic Policy 12 (SP12): Infrastructure Delivery Strategy 67
Strategic Policy 13 (SP13): Development Viability 70
5. Development Potential Areas and Regeneration Areas 74
Development Potential Area Policy 1 (D1): Land at Breadsell 75
Regeneration Area Policy 1 (R1): Hastings Central 81
Regeneration Area Policy 3 (R3): St Johns Road 98
6. Site Allocation Policies 104
Part one – Housing and Mixed-Use Allocations 104
Policy HA1: Applications for Housing and Mixed-Use proposals 107
Policy HS1: Land adjacent to Sandrock Park, The Ridge 112
Policy HS2: Seaside Road, West St Leonards 119
Policy HS3: Former Westerleigh School 125
Policy HS5: Former West St Leonards Primary School, Bexhill Road 127
Policy HS6: Ore Valley (Former Power Station) 132
Policy HS7: Former Post Office and University of Brighton building 136
Policy HS8: Mayfield E, Bodiam Drive 138

Policy HS10: Land at Rock Lane 141
Policy HS11: Cinque Ports Way 144
Policy HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road 148
Policy HS13: Land North-West of Winchelsea Lane 152
Policy HS18: Land at Tilekiln Farm 154
Policy HS20: Former West Hill Road Reservoir 161
Policy HS21: Land East of Rock Lane 165
Policy HS23: Land East of Beaneys Lane, The Ridge 169
Policy HS25: Former Convent of Holy Child Jesus, Magdalen Road 173
Policy HS26: Site of Four Courts, Stonehouse Drive 179
Policy HS27: My Way Lodge, The Ridge West 184
Policy HSS5: Land at Chiltern Drive 188
Policy TP1: Land South of Crowhurst Road 191
Policy TP2: Land at Tilekiln Lane 194
Part two – Employment Allocations 199
Policy EA1: Applications for Employment Uses 202
Policy ES1: Queensway North, Queensway 207
Policy ES2: Site PX, Churchfields Estate 212
Policy ES3: NX2, Sidney Little Road, Churchfields Estate 216
Policy ES4: NX3, Sidney Little Road, Churchfields Estate 220
Policy ES5: Adjacent Unit C, 1-8 Brook Way 224
Policy ES6: UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane 228
Policy ES7: Ivyhouse Lane, Northern Extension 232
Policy ES8: Land at the junction of The Ridge West and Queensway 237
Policy ES10: Marline Fields, Enviro21 Business Park, Land West of Queensway 242
7. Development Management Policies 246
Part one – Housing 246
Policy H1: Specialist Housing for Older People 247
Policy H2: Shared Housing 251
Policy H3: Conversion of Existing Dwellings 254
Policy H4: Self build and Custom housebuilding 256
Policy H5: Accommodation for Traveller Communities 258
Policy H6: Housing Renewal 260
Policy H7: Temporary Residential Uses 262
Part two - Economic Development 267

Policy E1: Protecting and Enhancing Employment sites, areas and allocations. 268
Policy E2: Skills, Employment and Supply Chain 272
Policy E3: Primary Shopping Areas 275
Policy E4: Food, Drink, Entertainment and the Night-time Economy 277
Policy E5: The Visitor Economy 281
Policy E6: Outdoor Visitor Accommodation 287
Part three - Sustainable Communities 289
Policy SC1: Key Design Principles 291
Policy SC2: Housing mix, Accessibility and Adaptability 295
Policy SC3: Sustainable Design and Construction 300
Policy SC4: Alteration and Extension of Dwellings 307
Policy SC5: Proposals Affecting the Significance and Setting of Heritage Assets 312
Policy SC6: Sustainable Development and Heritage Protection 316
Policy SC7: Changes to building elevations and roofs in Conservation Areas 319
Policy SC8: Shopfronts, Advertisements and Commercial Frontages 324
Policy SC9: The High Weald National Landscape and Other Areas of Landscape Value 328
Policy SC10: Habitat Protection, Biodiversity and Net Gain 330
Policy SC11: Trees, Woodland and Hedgerows 334
Policy SC12: Green and Blue Infrastructure 337
Policy SC13: Urban Greening Factor 340
Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities 344
Policy SC15: Ground Behaviour, Geodiversity and Land Stability 349
Policy SC16: Flood Risk and Drainage 355
Policy SC17: Coastal Change Management 363
Policy SC18: Pollution and Hazards 370
Policy SC19: Environmental Nuisance 377
Policy SC20: Community Facilities 381
Part four - Infrastructure and Delivery 385
Policy ID1: Planning Obligations 386
Policy ID2: Access and Parking 393
Policy ID3: Open space, Sports and Recreation 398
Policy ID4: Utilities Infrastructure and new connections 402
8. Part five - Monitoring 405
List of Abbreviations 408

Definition of key terms (Glossary) 409
Appendix 1: Key Evidence Base Items 415
Appendix 2: Housing Trajectory 417
Appendix 3: Retail Impact Assessments 418
Appendix 4: Developer Contributions Schedule 419
Annex 1: Masterplan and Development Brief for the Former Convent of the Holy Child Jesus, Magdalen Road 427
References 428

Figure 1: Key Diagram 19
Figure 2: Land at Breadsell. 77
Figure 3: Station Area, showing opportunity sites. 84
Figure 4: Hastings Central Plaza, showing opportunity sites 89
Figure 5: Hastings Central Regeneration Area 95
Figure 6: St Johns Road Regeneration Area 101
Figure 7: Density Zones within Hastings Borough 108
Figure 8: Land Adjacent to Sandrock Park, The Ridge. 115
Figure 9: Seaside Road, West St Leonards 121
Figure 10: Former Westerleigh School 125
Figure 11: Former West St Leonards Primary School. 129
Figure 12: Ore Valley (Former Power Station). 133
Figure 13: Former Post Office and University of Brighton building 136
Figure 14: Mayfield E, Bodiam Drive 138
Figure 15: Land at Rock Lane 141
Figure 16: Cinque Ports Way 145
Figure 17: Gambier House, 111 West Hill Road and West House, 115 West Hill Road..... 149
Figure 18: Land North-West of Winchelsea Lane 152
Figure 19: Land at Tilekiln Farm. 157
Figure 20: Former West Hill Road Reservoir 163
Figure 21: Land East of Rock Lane. 166
Figure 22: Land East of Beaneys Lane. 170
Figure 23: Former Convent of Holy Child Jesus, Magdalen Rd 175
Figure 24: Site of Four Courts, Stonehouse Drive 181
Figure 25: My Way Lodge, Ridge West 185
Figure 26: Land at Chiltern Drive 189
Figure 27: Land South of Crowhurst Road 192
Figure 28: Land at Tilekiln Lane 195
Figure 29: LIEA Locations 204
Figure 30: Queensway North, Queensway 209
Figure 31: Site PX, Churchfields Estate 213
Figure 32: NX2, Sidney Little Road, Churchfields Estate 217
Figure 33: NX3, Sidney Little Road, Churchfields Estate 221
Figure 34: Adjacent Unit C, 1-8 Brook Way 225
Figure 35: UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane 229
Figure 36: Ivyhouse Lane, Northern Extension 234
Figure 37: Land at the junction of The Ridge West and Queensway 239
Figure 38: Marline Fields, Enviro21 Business Park, Land West of Queensway 243
Figure 39: Diagram of the 45 degrees test. 307
Figure 40: Hastings Green and Blue Infrastructure Indicative Core Network and Buffers .. 338
Figure 41: Development typologies for Flood Risk Assessments. 355
Figure 42: Coastal Change Management Area 367
Figure 43: Low Car Parking Area 397

Table 1: Timetable for the Production of the Local Plan (LDS July 2026) 4
Table 2: sources of new homes to 2041 25
Table 3: percentage tenure mix required for affordable housing. 30

Table 4: dwelling mix required for affordable/social rented housing. 30
Table 5: Station Area sites and anticipated uses 85
Table 6: Hastings Central Plaza sites and anticipated uses 91
Table 7: Opportunity Sites in Regeneration Area 3 99
Table 8: Site capable of delivering 20 dwellings or more 109
Table 9: Site capable of delivering fewer than 20 dwellings 110
Table 10: Gypsy and Traveller Permanent Pitch Sites 111
Table 11: List of SIEA/ LIEA 204
Table 12: Proposed allocations within SIEA1 205
Table 13: Proposed allocations within SIEA2 205
Table 14: Indicative planning obligations by threshold 391
Table 15: Quantity standards 398
Table 16: Quality and Value Standards 399
Table 17: Housing Trajectory 417

1. Introduction

1.1. The Hastings Draft Local Plan sets out how our town will grow and change up to 2041. It provides the framework for delivering new homes, jobs, infrastructure, and community facilities, while protecting Hastings' economy, iconic historic character and natural environment. The Plan is rooted in the council's vision of achieving the renaissance of Hastings through sustainable development: stabilising finances, tackling housing and inequality, delivering climate resilience, and fostering civic pride through regeneration and community wealth-building.

1.2. The Local Plan is not just about meeting government housing targets. It is about shaping Hastings in a way that reflects the town's distinctive character, community spirit, and extraordinary setting. It seeks to balance growth with protection, ensuring that new development contributes positively to health, wellbeing, climate action, and social cohesion.

1.3. Aligned with the Housing Strategy (2025–2030), policy throughout the Local Plan responds to acute housing pressures, rising deprivation, and the need for affordable, sustainable homes. It also sets out how Hastings can build a thriving, inclusive economy, improve transport and connectivity, and safeguard green spaces and heritage assets. Following the requirements of the National Planning Policy Framework (NPPF), the Council's Corporate Plan, Housing Strategy and the policies in the Local Plan provide a roadmap for a safer, healthier, more sustainable, and more prosperous Hastings.

1.4. The Local Plan once submitted to the Planning Inspectorate for examination effectively lives on until the successor authority adopts a replacement Local Plan as confirmed by the Planning Policy Guidance[i]:

As set out in Local Government (Structural Changes) (General) (Amendment) Regulations 2018, existing plans will remain in place for the areas set out in the plan. Plans that are being prepared, but not yet adopted, can also carry over and continue through to adoption in the new authority. However, the regulations state that new plans covering the whole of the new area must be adopted within 5 years of the reorganisation.

1.5. Drafting and adopting a new Local Plan now is one of the best ways to secure a positive outcome for residents, businesses and community organisations for years to come, in the context of Local Government Reorganisation.

2. Hastings in context

2.1. The Hastings Draft Local Plan is built around key policies that reflect the current challenges and the town's priorities for the future. Building a greener future focusing on sustainability and protecting the environment, ensuring that new homes are built and that they are affordable, energy efficient, and contribute to tackling climate change. Strengthening transport links to provide choice, local services, and community connections so that neighbourhoods are healthy, inclusive, and well supported. Highlighting the importance of jobs, shops, and a strong, diverse economy, creating opportunities for local people and supporting Hastings' long-term prosperity.

A Greener Future

2.2. Hastings faces severe housing pressures, but growth must be balanced with environmental responsibility. The town is tightly constrained by the sea and protected landscapes, meaning new development must make efficient use of land and buildings.

- **Climate Action:** All new homes will be net zero ready or built to Passivhaus standards, requiring no retrofit, and neighbourhoods will be designed to encourage walking and cycling.
- **Green Infrastructure:** Enhanced green spaces, sustainable transport, and energy efficient buildings will help reduce emissions and improve health.
- **Protecting Assets:** Parks, coastline, countryside, and historic places are central to Hastings' identity and will be safeguarded as the town grows.
- **Housing Delivery:** Meeting government housing targets will require creative solutions, higher density development, and bringing empty homes back into use.

Living Well Together

2.3. Many residents struggle with affordability, poor housing conditions, or insecure tenures.

- **Affordable Homes:** The Plan requires developers to build affordable, good quality homes.
- **Neighbourhoods and Services:** New development must contribute to schools, health and leisure facilities, and community spaces, creating strong, connected neighbourhoods.

Opportunities For All

- **Jobs and Skills:** The plan sets out requirements for new employment floorspace to be delivered, supporting creative, high tech, green, and manufacturing industries.
- **Circular Economy:** The Plan encourages sustainable business models and investment that reduce waste and create long term opportunities.
- **Connected Communities:** Affordable, improving options and choices through sustainable transport to link homes, workplaces, and leisure spaces, supporting social cohesion and economic growth.
- **Partnerships:** Developers, the council, and other organisations will contribute to infrastructure, ensuring Hastings benefits from investment in open space, sports, and cultural facilities.

2.4. The Hastings Draft Local Plan is both necessary and ambitious. It recognises the scale of local housing need, the importance of tackling inequality, and the necessity of planning within environmental limits. By delivering homes, supporting inclusive economic growth, improving transport and infrastructure, and safeguarding Hastings' unique environment, the Plan sets out a vision for a town where everyone can live well, work productively, and feel proud of their community.

3. Vision and objectives

Vision

3.1. 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.

Objectives

3.2. To improve the health and wellbeing of Hastings' communities and reduce deprivation by:

- Addressing climate change and supporting our carbon neutral ambition through reduced transport emissions, energy efficient buildings and expanded green infrastructure.
- Providing a local plan that keeps our communities connected to all our places of work, leisure and services through affordable, sustainable transport modes.
- Achieving and sustaining a thriving, inclusive and diverse economy, with a strong manufacturing sector including new creative, high tech and green industries with a focus on developing a circular economy creating jobs and skills opportunities for local people, delivering new employment floorspace.
- Increasing the supply and mix of new homes that people can afford and want in well-designed existing, or new neighbourhoods that make it easier to lead a more active lifestyle.
- Ensuring developers provide or contribute to the infrastructure needs arising from new development, such as open space, sports and play facilities.

4. Strategic Policies

Introduction

4.1. One of the principal functions of the Local Plan is to set out the amount of future development being planned for, where it is to be located, and what form it will take. This section presents both the overall development strategy, set out in Policy SP1, which identifies the spatial approach and broad distribution of development across the borough, and complementary 'strategic policies', which set out the overall approach in relation to key themes including the scale of housing and employment growth.

4.2. These borough-wide strategic policies form the basis of this Local Plan's policy framework and are the starting point for the more detailed policies and proposals in subsequent sections. It is these key strategic policies to which neighbourhood plans should generally conform. The strategic policies should be read alongside specific development potential and regeneration area policies, site allocation policies and detailed development management policies, as well as any locally specific policies set out within future neighbourhood plans.

4.3. The National Planning Policy Framework advises that plans should '[avoid] unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)'.

4.4. The Hastings Local Plan therefore seeks to avoid unnecessary duplication of national policy, and any duplication of national, regional or local policy or guidance within the policies of this plan will only be introduced where it is in the interests of good policy logic or the essential to the delivery of a coherent written statement.

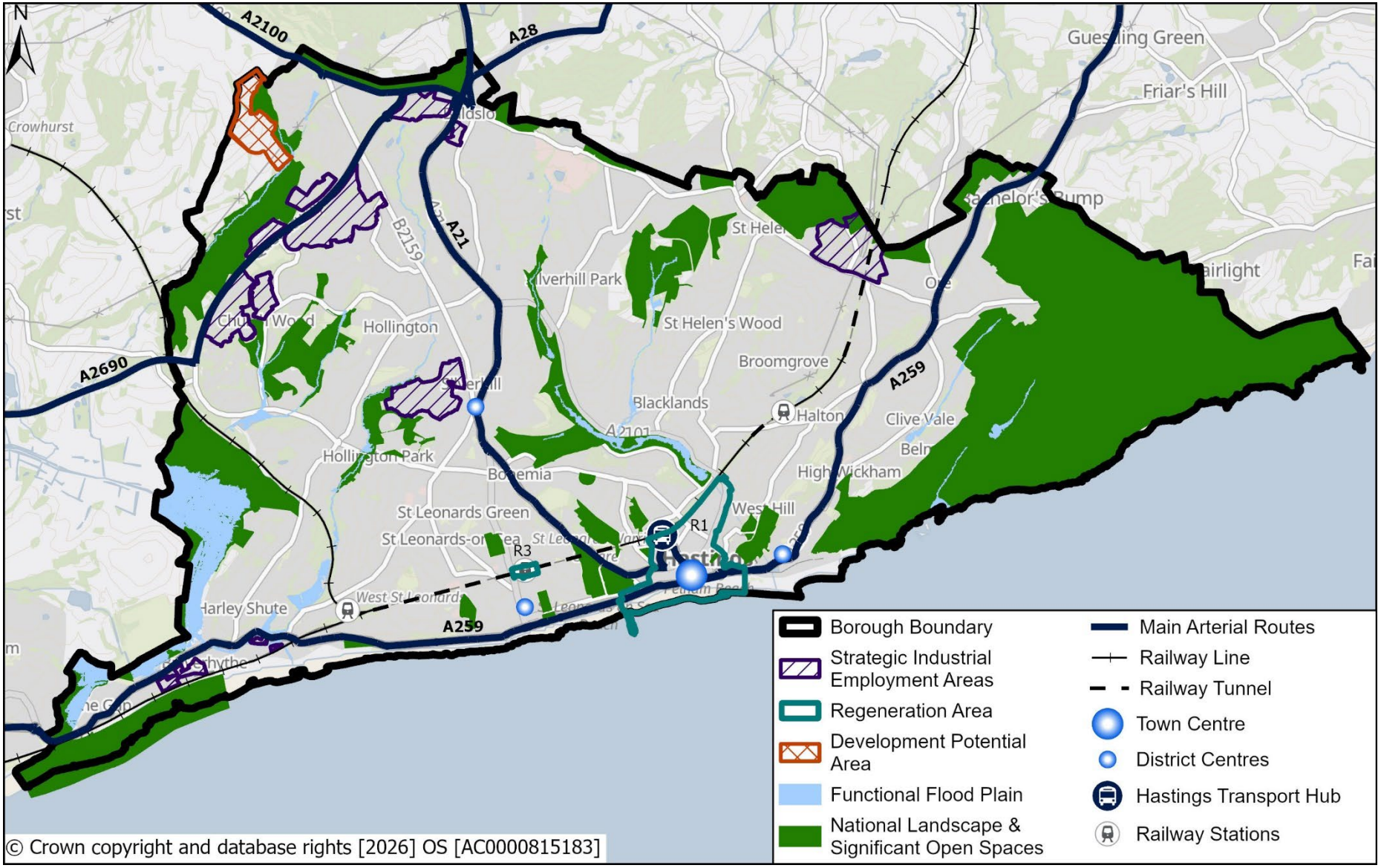

Figure 1: Key Diagram

Strategic Policy 1 (SP1): Directing Growth – a Spatial Strategy

4.5. 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.

4.6. 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.

4.7. 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, supports sustainable growth, will lessen encroachment on the natural environment - including protecting soil, water, and vegetation that have an important role in carbon mitigation.

4.8. Our growth strategy focuses 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.

4.9. To maximise housing delivery over the life of the plan, the Hastings Densification and Capacity Study puts forward suggested minimum densities at which new housing development sites should be built, with no identified maximum density. Whilst these minimum densities are a guide, they are put forward with the intention of ensuring that the very best use of land is made in redevelopment. The Study divides the Borough into Density Zones according to their appropriateness for increased density. A map showing these Density Zones within Hastings Borough is shown in Figure 7.

4.10. The Density Zones are a starting point based on analysis of suitability only with no account taken of potential individual site sensitivity arising from the natural and built environment. Seven criteria have been combined and analysed to provide an overview of the relative suitability of densification for different parts of the Borough. Conclusions on the potential for increasing

densities can be drawn from where and how these criteria overlap, building a case for how some areas are more suitable than others for significant densification.

4.11. As well as using the Density Strategy to inform indicative capacity numbers at individual site level, in some circumstances we have relied on other information. This includes, for example, where a site has an existing planning approval, or the capacity has been informed by design work from another study, or the site is located in a highly sensitive location such as the High Weald National Landscape. In addition, across all Density Zones, small sites which might only involve one single building on a plot, might deliver densities well in excess of the Density Zone within which they are located. This is particularly so for small sites in the most sustainable and central locations.

4.12. The Spatial Strategy seeks to achieve the right balance between planning positively to meet the town's development needs for homes, jobs, shops and services whilst continuing to protect and enhance the town's environment, recreational spaces and heritage assets. The core principles that will help to direct this are set out in strategic Policy SP1.

Strategic Policy 1 (SP1): Directing Growth

The Council will prioritise sites for development which are brownfield and offer regeneration opportunities. The Council will allocate greenfield sites where these are sustainably located and well-related to the existing urban area. The Council will require new residential developments to robustly justify that they have maximised delivery of housing within site constraints. The Council will resist development proposals on protected green, open and recreational spaces and where this conflicts with other development plan policies.

To achieve this:

1. **The delivery of at least 2,970 net new homes over the plan period will be focused upon a sustainable pattern of distribution across the Borough, with priority given to the regeneration of brownfield sites.**

    a. **Residential development proposals should deliver the maximum amount of development possible having regard to the minimum density within the ranges as identified within the Council's Density Zones, (as shown in Figure 7) whilst ensuring high quality design well-related to the character of the area and surrounding uses, which enhances natural and historic assets, where relevant.**

    b. **The Council will resist developments that underutilise land notwithstanding the Density Zones set out in Figure 7.**

2. **The Council will allocate land to provide for additional employment floorspace. 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 our Strategic and Local Industrial Employment Areas. In these locations intensification and renewal of existing industrial premises will be promoted Borough-wide, the loss of any existing viable industrial floorspace will be resisted.**

3. **The primary location for a range of uses including larger scale office functions, leisure offers, visitor accommodation, cultural and retail development, and appropriate education facilities should be Hastings Town Centre. Whilst smaller scale development, appropriate to its context and the character of area, are directed to District and Local Centres.**

4. **Visitor attractions should primarily be located in the resort area as identified on the Policies Map.**

Strategic Policy 2 (SP2): New and Affordable Housing

4.13. Local Plans are expected to promote sustainable patterns of development. This includes meeting, as a minimum, the identified level of housing needs for their areas in full. National policy requires us to use a government-set methodology to calculate the housing needed in our area, and to meet or exceed this number. For Hastings, this requirement is currently (August 2026) 686 homes a year. This equates to a requirement for 12,348 net new homes over the lifetime of the Plan.

4.14. The Framework provides two exceptions to meeting development needs in full. First, where protecting areas or assets of particular importance provides a strong reason for restricting the scale, type or distribution of housing development within an area. Second, where the adverse impacts of meeting needs in full would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

4.15. The Strategic Housing and Employment Land Availability Assessment [ii] (SHELAA) is an up-to-date and on-going data source in relation to housing land supply potential. In accordance with sustainable development objectives of the Framework, all suitable, available and deliverable housing sites, as currently identified in the SHELAA, have been allocated in the Plan.

4.16. This capacity-led approach is also informed by other studies that have fed into the Plan, which include densification, landscape sensitivity, flood risk assessments together with a Sustainability Appraisal. The scale and distribution of housing growth in the Borough aims to promote a sustainable pattern of housing development. A key aim has been to focus housing development in the most suitable and sustainable and least sensitive areas of the Borough.

4.17. The housing target for the Plan period is 2,970 net new homes. Annualised, this equates to 165 net new homes per annum. This is an “at least” target and represents the baseline position in relation to housing delivery. Table 2 shows all sources of housing supply and demonstrates the potential to exceed this target.

Table 2: sources of new homes to 2041

Sources of new homes to 2041	**Net number of units**
Units completed during Plan period to date: 2023/24 and 2025/26	1,050
Commitments – sites under construction, or with planning permission including communal living schemes	431
Sites allocated for development in the Plan	1,131
Small site Windfall allowance 2026/27 – 2040/41 (15 years x 45 dwellings)	675
Total	3,287

4.18. In addition, the SHELAA also identifies sites that do not yet meet all three tests (suitable, available, achievable) that would allow them to be included within the supply of deliverable sites in the Plan period. In recognition of this the Plan includes a number of locations where more housing could be delivered within the Plan period. We have set out a policy framework to guide future proposals in the event that the deliverability of these sites changes during the Plan period. These are:

- Regeneration Area Opportunity Sites. Areas that include these sites are identified by the prefix R in section 5
- Development Potential Area. This site is identified by the prefix D in section 5

4.19. Every effort has been made to make as much use of previously developed land (brownfield land) as possible in an effort to meet housing needs. However, due to issues with viability, deliverability and limited supply, it has also been necessary to identify greenfield sites to help promote housing delivery within the Borough.

4.20. Windfall development has made a significant contribution to housing delivery in the past. Evidence shows that small site Windfalls (less than 5 dwellings) will continue to come forward in all years of the Plan up to 2041. An average of 45 Windfall dwellings per year has been assumed between 2023/24 and 2040/41.

4.21. The new homes will be delivered primarily through private development, but there will be considerable partnership working with Registered Providers (RPs) in the delivery of affordable housing.

Size type and tenure

4.22. In addition to developing a housing target for the Plan, the NPPF states that ‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

4.23. The council’s Housing and Economic Development Needs Assessment[iii] (HEDNA) Update and addendum is a key evidence source in relation to housing needs over the Plan period. The HEDNA provides in-depth information in respect of overall housing need together with the size, type and tenure of housing required to meet the needs of different groups of current and future residents. Whilst Policy SP2 covers the tenure and size of affordable housing, we do expect all new homes to be well-designed, have

reasonable space standards and be adaptable or accessible. Therefore, Policies SC1 and SC2 respectively will also be relevant when considering the provision of affordable homes. This also applies to specialist housing, such as homes targeted at specific age groups which include care or support, covered under Policy H1.

4.24. The level of need for Gypsy and Traveller accommodation in the Borough is set out within the latest Gypsy and Traveller Accommodation Assessment (GTAA).[iv]. The council acknowledges that there is insufficient land identified through site allocations to meet this need, and therefore a proactive approach to ensuring sites are able to come forward during the plan period is required.

4.25. In order to maximise land supply to meet traveller needs throughout the plan period, the council will require developers to investigate the potential for residential sites of sufficient size to accommodate permanent traveller pitches. Where a proposal is for self-build or custom housebuilding, is within an incompatible flood zone, or involves a change of use of an existing building, this policy requirement will not apply. The strategy for meeting the housing needs of Gypsies and Travellers is based on Windfall delivery. Policy H5 enables the council to determine planning applications for Gypsy and Traveller windfall sites on a site-by-site basis, subject to individual circumstances and need.

Affordable Housing

4.26. Affordable housing is a national term defined in the Framework meaning housing available to those who are unable to access accommodation suitable for their families' needs, at a price that they can reasonably afford on the open market, whether for rent or home ownership. It should be available at a cost low enough to be afforded by eligible households and is determined with regard to local incomes and house prices. In Hastings, affordable housing is essential because:

- Local house prices and rents are much higher than local incomes.
- Many households rely on benefits or low-paid work.
- The private rented sector is large but often expensive and insecure.
- There is strong demand for genuinely affordable homes.

4.27. Affordable housing is delivered by the planning system through open market schemes working in tandem with affordable housing providers (registered providers (RPs)). In these circumstances affordable homes are secured either by a planning condition or a planning obligation. However increasingly, specialist affordable housing providers are delivering development sites entirely as affordable homes.

4.28. There are a number of different types of affordable housing, including social and affordable rented housing, and affordable home ownership. In Hastings, social and affordable rented homes are typically provided by housing associations. Social Rents are set using a national formula and are typically around 50–60% of local market rents. These are the lowest cost rented homes. Affordable rented homes can be up to 80% of local market rents. However, in Hastings we have worked with key partners to cap rents at the Local Housing Allowance (LHA) rates— the maximum rent level that can be covered by Housing Benefit or Universal Credit. This ensures that people on

lower incomes can realistically afford them. Affordable home ownership includes shared ownership, rent-to-buy and discounted market homes for example. These tenure options provide different routes into affordable housing, helping meet a range of needs from those requiring long-term rented homes to households looking to move towards ownership.

4.29. The council's Housing Strategy recognises that affordable rent homes are not always affordable to everyone locally, which is why the council works with providers to cap rents at LHA rates. We will seek to prioritise social rented homes where we can, however if agreeing to affordable rent homes (capped at LHA) results in more affordable homes being developed on a site we will support this.

4.30. The HEDNA Assessment follows the approach outlined in the Planning Practice Guidance (PPG) to model net affordable housing needs, based on relative costs and incomes. It takes account of current unmet needs, newly arising needs and the current annual supply of affordable housing. As of August 2026, this translates into a net requirement for 566 affordable homes per annum over the Plan period.

4.31. For Hastings, meeting this need in full is not a realistic prospect in view of the constraints and difficulties in meeting housing requirements in general. This is recognised in National Guidance, which does not require planning authorities to meet the full extent of affordable housing need. The circumstances do, however, demonstrate the pressing need to secure as much affordable housing through the planning system as development viability will allow. The policy approach set out here supports and complements the council's Housing Strategy[v] which also includes council-led projects relating to the acquisition and return of empty homes back into residential use, or the conversion of other premises for residential use. All these initiatives are part of the drive to increase the supply of affordable homes.

4.32. The council must have regard to national planning policy which makes clear that the viability considerations of the policy requirement for affordable housing should be considered as a whole, with other policy requirements, such as infrastructure contributions. This is the job of the council's Whole Plan Viability Assessment[vi] which has informed the percentage requirement for affordable housing contained within our Policy.

4.33. Homes England provides funding to help build new affordable homes. Current funding processes mean that it is often more viable for housing associations to deliver developments for 100% affordable housing rather than secure homes on a private development through the use of planning conditions or a planning obligation. Increasingly specialist affordable housing providers are delivering housing schemes which are entirely made up of a mix of affordable tenures. The council's affordable housing policy supports this potential.

4.34. Where applicants seek to reduce affordable housing provision for viability reasons, they will be expected to submit a viability report as a basis for negotiation. The council will require independent verification of viability reports, and the costs associated with this will be recouped from the applicant. Where agreement has been reached during the planning application stage on providing less than the full on-site affordable requirement, any reduced

affordable housing contributions will be subject to a review mechanism. Property markets do experience change at both the local and national level. The viability of a scheme may therefore be notably different by the time of implementation due to changes in market conditions; and uncertainties in relation to aspects of a viability assessment at the application stage. In considering viability matters, regard will be had to best practice, particularly as set out in PPG.

4.35. To ensure that the maximum reasonable level of affordable housing is provided in line with Policy SP2, and that other plan requirements are met, the council will require a viability review through planning condition/obligations on all residential/mixed use schemes which do not meet the affordable housing requirement and/or policy requirements in full at the time permission is granted. A viability review will determine whether a development is capable of providing additional affordable housing or meeting other unmet policy requirements.

4.36. Where land in the council's ownership is suitable for housing development, the council's priority is to secure the building of 100% affordable housing. The council has an ambition to see 100% affordable housing delivered on greenfield housing sites. Our evidence to-date supports a minimum viable delivery of 25% on brownfield sites and 40% on greenfield sites. The Plan provides explicit encouragement to the provision of greater levels of affordable housing on sites. We will continue to monitor development viability and seek to increase this percentage requirement over the lifetime of the Plan. Any such changes will be made through a Local Plan review process.

4.37. A key pillar of increasing housing affordability, supporting development viability, and supporting sustainable development is to ensure developers maximise opportunities to procure labour, skills and materials locally, either within Hastings or within the Functional Economic Market Area through Local labour and procurement agreements. Seeking local procurement opportunities for goods and services contributes to Sustainable Development Goal 12 'Ensure sustainable consumption and production patterns'.

4.38. Development also provides an opportunity to resolve critical barriers to upskilling, experienced by local working age people that serve to widen the affordability gap by limiting employment potential, including cost and access to opportunities. Through provision of a local skills development plan, developers or employers where the occupier is the developer can engage with existing initiatives or highlight the benefits of their own skills development programming. A completion statement outlining the key outcomes should be provided upon completion of the local skills development plan commitments.

Strategic Policy 2 (SP2): New and Affordable Housing

2. **Additional new homes may be delivered through Regeneration Areas and the Development Potential Area.**

3. **Eight permanent pitches for Gypsy and Travellers are required over the Plan period. To ensure that enough permanent accommodation for Gypsies and Travellers is delivered to meet identified needs, the council requires that on-site provision is investigated as part of Windfall residential development proposals to contribute to meeting overall need. Exceptions to this Policy are as follows:**

    a. **Sites of less than 0.25ha;**
    b. **Site exclusively proposed for provision of self-build and custom housebuilding;**
    c. **Sites entirely in flood zone 3, or with equivalent surface water flooding risk;**
    d. **Change of use applications (existing buildings).**

4. **Windfall housing development will be supported where it is consistent with other policies of this Local Plan.**

5. **Proposals will be expected to maximise site potential having regard to the Density Zones set out in Figure 7 as a minimum with no maximum density, unless it can be shown that there are strong reasons why this would be inappropriate. Under-development of sites will be resisted.**

6. **For Brownfield residential development proposals, the council will require 25% affordable housing. For Greenfield residential development proposals, the council will require 40% affordable housing.**

7. **All proposals will be expected to meet their full affordable housing requirement on-site except where:**

    a. **the council determines off site provision can provide a better housing solution, in which case a financial contribution in lieu of on-site provision, will be required, or**

    b. **a viability report has been submitted, and subject to independent verification, (the costs of which will need to be met by the applicant) agreed by the council. In these circumstances, the council will consider flexibility in the provision of affordable housing taking into account the following options individually or in combination:**

- **Changes in the affordable tenure mix**
- **Reductions in the overall proportion of affordable housing**
- **Provision of an off-site financial contribution (commuted sum)**

8. **Where agreement is reached on providing less than the full policy compliant requirement or a commuted sum, the council will require the applicant to enter into a review mechanism, secured via a planning condition and/or a planning obligation.**

9. **Where a contribution is agreed in lieu of on-site provision, the cost of this will be calculated in accordance with approach set out in the council's schedule of developer contributions.**

10. **Where affordable housing is a policy requirement, the council will expect a tenure mix in line with the requirements set out in Table 3.**

Table 3: percentage tenure mix required for affordable housing.

Affordable rent/social rent	**70% of the total affordable housing**
Affordable home ownership	**30% of the total affordable housing**

11. **For rented affordable homes, the council will expect a dwelling mix in line with the requirements set out in Table 4.**

Table 4: dwelling mix required for affordable/social rented housing.

1-bedroom homes	2-bedroom homes	3-bedroom homes	4+ bedroom homes
30%	35%	30%	5%

12. **Subject to meeting other policy requirements set out in this Plan, the council will encourage schemes which exceed the minimum affordable housing requirements subject to an appropriate housing and tenure mix being agreed in line with paragraph 10 above or as otherwise agreed.**

13. **Where specialist housing for older people is provided as private provision, including within a residential care home setting, the council will take in to account the characteristics of the scheme in determining a proposal, and where the proposal is considered to be, or to contain Class C3 accommodation, then affordable housing or a financial contribution will be expected to be provided in accordance with the requirements set out above.**

14. **The council will seek to work with developers on schemes of 40 or more units to identify and secure construction phase jobs, training and procurement opportunities associated with new residential development in Hastings.**

Strategic Policy 3 (SP3): Business Development – Office and Industrial

4.39. Hastings is the largest urban economic area within the Hastings and Rother Functional Economic Market Area and is home to a number of organisations that are of national and international renown including Kurt J Lesker, AAK BD Foods, Focus SB and Medica Group. It is part of a wider regional cluster of advanced manufacturing that is well positioned for accelerated growth during the plan period. By successfully supporting our growth industries, we will create a more vibrant economy, benefitting other sectors including the construction industry and service industries in turn.

4.40. Access to well-paid and skilled employment opportunities is key to improving housing affordability and ensuring that local people can access the jobs and training they need, reduces the need for out-commuting and improves the sufficiency and sustainability of the town as a whole. A skilled workforce, employment land allocations and clear economic policies all contribute to making Hastings a desirable location for investment. Vacancy rates in our industrial estates are low.

4.41. The Hastings economy differs from the wider South East in that there is lower representation in professional services and office-based activities and more manufacturing, construction, tourism and healthcare. There is also a healthy logistics and freight sector that has grown in strength within a relatively short period. Across the Hastings and Rother Functional Economic Market Area (FEMA) the manufacturing sector is locally resilient and contains some long-standing and high performing companies in electronics and the creative industries sector (including design, web, gaming, arts, visual arts, performing arts). The forecast growth of 4,750 FTE new jobs will take place across a range of sectors. Not all of this growth will arise from industrial, warehousing and logistics uses as covered by this policy (SP3). Strategic Policy SP4 provides for regeneration and sector growth across retail, office and leisure uses to support local economic development needs.

4.42. Over the last few years there has been very limited ‘churn’ in the industrial premises market – while that means a degree of retention of existing business in the area, it also means there are limited opportunities for new or growing companies in Hastings, without additional floorspace being created. Recent analysis has indicated that there has been no significant new supply of industrial space in Hastings and requirements for larger industrial units are reportedly almost impossible to fulfil. Analysis has also indicated a backlog of need for smaller premises. The consequence of this undersupply of industrial space is that no units are available to provide ‘grown-on’ space in Borough for local companies looking to grow, resulting in missed opportunities to attract inward investment. This together with an existing ageing stock and essentially no vacancies are constraining the economic potential of Hastings.

4.43. A local need for an additional 70,400sqm of employment floorspace has been identified through the HEDNA. New floorspace will support job creation and

retention and provide start-up, grow-on and investment space for both existing and incoming employers, as well as mitigating market paralysis. New, modern premises may also have a role in attracting cleaner, greener industry. We need to support this with new investment in workforce skills training and ensuring we have the digital infrastructure in place to support demand.

4.44. Opportunities for new employment development within the Borough are highly constrained, which means there will be a greater reliance on the intensification and regeneration of existing employment land and premises. This is our primary strategy for meeting employment land needs during the plan period. Our Strategic Industrial Employment Areas (SIEA), as illustrated in the key diagram (Figure 1) and shown on the Policies Map, include the Queensway Corridor, comprising sites across Queensway, Castleham, Churchfields and Ridge West, and the established Ponswood and Ivyhouse Estates, which offer the most potential for new development and densification. This will benefit both Hastings and the wider FEMA. Local Development Orders, which can give permission for certain types of use without the need for planning permission, may be used to facilitate intensification in these areas.

4.45. Sites at Bulverhythe also have an important economic role delivering waste management infrastructure, distribution, creative manufacturing and warehousing. Roebuck industrial estate and a number of other dispersed business premises across the Borough also have an important role in terms of the space they provide for existing and potential new businesses. In view of significant land constraints, these areas are protected as Local Industrial Employment Areas (LIEA) in recognition of the potential for more limited intensification over the lifetime of the Plan. Employment land and premises located outside of SEIAs and LEIAs will likewise be protected to maintain supply.

4.46. The plan contains site allocations capable of contributing around 20,000sqm gross new employment floorspace.

4.47. With changing work and lifestyle patterns, home-based working will continue. Employees are seeking shorter commutes to the workplace and greater diversity and vibrancy of services in their immediate locality to capitalise on quality-of-life improvements and health and wellbeing benefits that reducing commute time can deliver- such as more access to leisure time or the ability to utilise active travel solutions. Ensuring that there is adequate workspace in the local area can help to facilitate this.

4.48. The demand for office floorspace across East Sussex, in contrast to industrial space, is lower. However, the type of office most suitable for the needs of businesses moving forward has changed considerably. There is a growing demand in the local market for managed workspace/small office units for micro-businesses (fewer than 10 people). Space that can be used flexibly to accommodate small business or provide larger spaces for existing business to consolidate their offices would support business stability. Hastings Town

Centre, with its existing role as an important sub-regional economic centre, continues to be the primary location for future office development. Smaller and more local scale office uses could perform a similar role in our smaller centres, such as St Leonards and other District Centres.

4.49. In 2020 significant changes were made to planning law. This included extensions to ‘permitted development rights’ which allow conversions and change of use of certain employment premises without the need for full planning permission. A new ‘Commercial Business and Service’ planning use class has also been introduced. This allows changes of use, without any need for planning permission, within a wide range of uses including shops, restaurants and cafes, offices, gyms and childcare provision. Whilst the objectives here to enable a more flexible approach to support town centre recovery and to help promote the delivery of more housing are supported, we will continue to monitor the supply and demand for employment floorspace. We may revise our approach to managing change to office premises in central Hastings and the established industrial areas. This might extend to adopting tools that will require full planning permission for changes of use of office floorspace to residential development currently allowed under permitted development rights (through ‘Article 4 Directions’).

Strategic Policy 3 (SP3): Business Development – Office and Industrial

1. **Development that supports, protects and enhances the role and function of employment land and premises in Strategic and Local Industrial Employment Areas (as identified on the Policies Map) and maximises contributions towards the delivery of 4,750 new jobs by 2041 will be supported.**

2. **The Plan identifies four Strategic Industrial Employment Areas (SIEAs) and seeks to support proposals that protect and enhance their integrity, existing function and suitability of these locations to provide for the majority of future needs:**

SIEA1	**Queensway Corridor**
SIEA2	**Ivyhouse Lane**
SIEA3	**Ponswood**
SIEA4	**Bulverhythe Estate**

3. **The Plan identifies a need for 70,400sqm business floorspace by 2041, 19,830sqm of which will be delivered through employment allocations located within Strategic Industrial Employment Areas. These allocations are set out in the Employment Allocations Policies.**

4. **In Strategic and Local Industrial Employment Areas 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 uses;**

    c. **Waste management uses where these are demonstrably compatible with the locality;**

    d. **Vocational training facilities where they would not prejudice the industrial nature of the area;**

    e. **Office uses where ancillary to uses in a-d above.**

5. **Development should:**

    a. **Make maximum use of plot space through efficient design and layout arrangements ensuring parking provision does not dominate the site and where possible consider high densities/multiple storey development;**

b. **Create high quality business space capable of flexible use, subdivision and extension; and,**

c. **Create safe environments with ancillary office functions orientated to the street frontage, and;**

d. **Create environments that are resilient to the effects of climate change, including flood risk.**

6. **The council will only support redevelopment for other uses and activities outside of those specified in part (4) of this Policy where a site last in employment use is demonstrated to be redundant and the incoming use is compatible with 4a-d above, without compromising the function of existing employment uses and/ or resulting in a poor standard of amenity for occupiers.**

7. **Hastings Town Centre is the primary location for new office development and renewal, including affordable, flexible and shared workspace.**

8. **The council may secure specific uses permitted in line with this Policy by a planning condition. This will have the effect of limiting changes to other uses within the same planning use class without a planning consent and will allow the council to better manage floorspace needed to meet demand from businesses.**

9. **The council will encourage developers to identify and secure jobs, training and supplier (procured) opportunities associated with new development of commercial floorspace in Hastings.**

10. **To protect key employment assets and manage change in a sustainable way, the council may consider the use of targeted Article 4 Directions.**

Strategic Policy 4 (SP4): Business Development – Town Centres

4.50. The NPPF[vii] and PPG[viii] both place weight on the development of positive plan-led visions and strategies for town centres, and the promotion of new investment and development in town centres first, ahead of edge and out-of-centre locations. Policies need to define a network and hierarchy of town centres and promote their long-term vitality and viability[ix]. Policies also need to define the extent of a centre's Primary Shopping Areas (PSA) and the range of use that will be permitted within them[x].

4.51. The Borough's network of town, district and local centres are a core part of the local economy. Some of the larger shopping areas provide a range of facilities, including shops and services which appeal to residents and visitors alike; educational, medical and lifestyle support; as well as cafes, bars and restaurants which contribute positively to the evening economy. Different uses during the day and in the evening can reinforce each other, increasing the attraction of our larger centres to local residents, shoppers, workers and visitors[xi].

4.52. Our network of centres also acts as focal points for communities, and they have an important role in meeting the needs of less mobile members of the community, assisting social inclusion. The 'town centre first' approach is important in helping to reduce the need for people to travel by car and helps promote a low carbon economy. This is recognised by the council's ongoing commitment to regeneration and investment projects in Hastings Town Centre through Town's Fund Programming[xii]. Our shopping areas also have a key role in the provision of employment opportunities across a variety of sectors[xiii].

4.53. The council's strategy is therefore to continue to protect and enhance the retail and commercial role of the Borough's Town, District and Local Centres and to support proposals which will add to their vibrancy, providing a range of compatible uses consistent with their role within the town centre hierarchy.

The Hierarchy – Hastings Town Centre

4.54. Hastings Town Centre is clearly at the top of the town centre hierarchy by virtue of its scale. It has an important role within the local economy and wider wellbeing of the town. It is also the most accessible being served by all rail services and virtually all bus routes. Hastings Town Centre is a sub-regional centre, which means its catchment extends beyond the Borough boundary. The retail offer in the Town Centre is characterised by a mix of larger national and franchise retailers and smaller independent and specialist retailers.

4.55. The Town Centre boundary and Primary Shopping Area (PSA) are both identified on the Policies Map. The PSA is focused on Priory Meadow Shopping Centre and the adjoining pedestrianised streets of Queens Road,

Robertson Street, Wellington Place and further to the north along Queens Road as far as the Morrisons supermarket. This area contains national retailers, other shops and services, food and beverage, leisure and civic activities.

4.56. Businesses in Queens Road have worked together to create a distinct brand for the area. The Queens Road Quarter reflects the numerous creative businesses that operate in the area, independent bars, cafes and shops work together to draw people up from the town's main shopping area by promoting their unique offer.

4.57. There are also important areas of specialist and independent businesses on Trinity Street, Claremont and the non-pedestrianised section of Robertson Street extending into White Rock. This is the Hastings Commons 'Town to Sea' quarter. The area including the Observer Building, has seen significant improvement and a Heritage Action Zone has seen increased investment in the area's heritage assets. The area is also part of the America Ground, giving the area a unique identity that businesses and residents celebrate.

4.58. There are a number of important pedestrian linkages to the seafront, and whilst the character of the town centre uses changes here, the seafront area from Hastings Pier to Pelham Crescent falls within the town centre boundary. The seafront itself and the promenade is a vital part of the Town's visitor economy, as well as providing services to local residents. It will be important to ensure town centre development supports integration of the seafront and Town Centre and linked destinations, where new development is used to promote the 'Healthy Streets' approach to street and place design with the overarching aim of making streets healthy places for everyone.

4.59. Within suitable locations in Hastings Town Centre, the continued encouragement of appropriate residential development at first floor level and above helps to maintain and enhance the vibrancy and vitality of the Centre.

4.60. In recognition of the changing nature of retailing and new ways of working, Regeneration Area Policy (R1) Hastings Central, sets out a vision and strategy for targeted regeneration and development of Hastings Town Centre.

District Centres – St Leonards, The Old Town and Silverhill

4.61. District centres will usually comprise groups of shops often containing at least one supermarket or superstore, a range of non-retail services and food and beverage establishments, as well as local public facilities.

4.62. St Leonards is the second largest centre in the hierarchy and is of a scale to warrant the need for both a town centre boundary and a primary shopping area (PSA). Both are defined on the Policies Map. It has its own distinctive character and includes a broad range of retailers both national and

independent, other services, restaurants and cafes. Across the year there are street markets and festivals, utilising the nearby Warrior Square gardens. The PSA includes the whole of Kings Road, the lower part of London Road, and the eastern part of Norman Road. It is important that a vibrant and varied mix of town centre retail uses remain predominant in this area.

4.63. The Old Town is a mix of retail and residential properties, with an eclectic mix of independent shops, cafes, bars, restaurants and leisure amenities that give the area its unique identity. The area is a focal point for some of the town's cultural festivals such as 'Jack in the Green' and has a thriving nighttime economy all year round. Again, defined on the Policies Map, the town centre boundary for The Old Town covers George Street and High Street, East Parade and Rock-a-Nore Road. George Street and High Street form the PSA.

4.64. Though smaller in scale to St Leonards and The Old Town, Silverhill has a large-scale supermarket justifying its inclusion as district centre. In the case of Silverhill, the primary shopping area and the town centre boundary match.

4.65. All three district centres are underpinned by an important retail function, and whilst some degree of flexibility can be applied to the range of uses which can be supported within these centres, it is vital to ensure that they continue to meet local residents' essential day to day shopping needs and assist in promoting sustainable patterns of shopping in the borough.

Local Centres - Bohemia and Tower, Ore, Battle Road, Marine Court and Bexhill Road

4.66. Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent and a pharmacy. Other facilities could include a hot-food takeaway and launderette.

4.67. These smaller centres are defined on the Policies Map. Owing to their size, these centres have a single boundary where the town centre boundary and the primary shopping centre boundary are the same. Local centres can help to meet the needs of the local residents, particularly the less mobile and elderly as well as encouraging active or low carbon travel options for immediate local residents. Therefore, the Policy's focus in these centres is to encourage convenient and accessible local shopping facilities to meet the day-to-day needs of residents and contribute to social inclusion.

Street trading and Markets

4.68. Other activities that take place in and around the identified shopping areas can help to add to the vitality and vibrancy of them. Markets can be a good way for businesses to develop or for customers to discover new things. They can also help foster community spirit and create an identity for an area. A licence for street trading is required for anyone wishing to run a market stall and this can be obtained, provided that information about the times of sale, the types of things for sale and proof of insurance are submitted to the council.

4.69. The council will continue to encourage and support well managed covered and street markets such as those that have proved successful in Hastings Town Centre including St Andrews Mews and Queens Arcade, and also The Stade open space and hall, and Kings Road in St Leonards.

Sequential and Impact Tests

4.70. Maintaining and enhancing the vitality and viability of our Town Centres is dependent on ensuring that new investment is focussed within these centres in line with the 'town centre first' principle. This both aids their economic prosperity and ensures that new development takes place in the most sustainable locations, easily accessible by modes of travel other than the private car and convenient for visitors and residents alike.

4.71. When considering proposals for main town centre developments, the council will apply the sequential and impact tests in accordance with national policy. This means that applicants will be expected to have demonstrably followed a sequential approach when selecting development sites for main town centre uses, including fully exploring how the scheme could be adapted so that it could be accommodated on a more central site. The NPPF defines main town centre uses as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities) as retail, leisure and entertainment, intensive sport and recreation uses, offices, arts, culture, and tourism[xiv]. The NPPF further identifies town centres as the first choice of location for these uses[xv].

4.72. The NPPF states that local planning authorities should request an impact assessment for main town centre uses outside of the town centre hierarchy if the scale of development is over a proportionate, locally set threshold. The PPG provides guidance on the indicators which should be taken into account by local planning authorities seeking to identify local impact assessments. In relation to Hastings, we consider the following factors to be relevant:

- The scale of the existing centres in the retail hierarchy;

- The uses which are important to different centres in the hierarchy; and
- The health of the centres over time.

4.73. In relation to the scale of proposals relative to 'town centres', the size of the centres in the Borough's retail hierarchy varies quite considerably. Therefore, in 'scale' terms this would suggest that a very low threshold should be set reflecting the potential for stores proposed on the edge or outside of centres, (e.g. as part of petrol filling stations or the conversion of public house), to have a significant adverse impact on the trading performance, vitality and viability of district and local centres nearby. This will particularly be the case where these existing centres are dependent on smaller supermarkets and/or convenience stores to anchor their retail offer, and to generate footfall and linked trips and expenditure to the benefit of other shops, services and facilities.

4.74. Other factors have also been considered, including cumulative impact issues. As a consequence, in the interests of seeking to protect the health of the smaller centres in the Borough, we consider that a low threshold for convenience retail proposals should be set at a gross figure of 300sq.m and for comparison retail, 200sq.m. These thresholds should apply to new stand-alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace.

4.75. Where a retail impact assessment is required, Appendix 3: Retail Impact Assessments sets out the information which should be submitted in support of planning proposals.

Strategic Policy 4 (SP4): Business Development – Town Centres.

The hierarchy of town centres is:

Town Centre: Hastings Town Centre
District Centres: St Leonards; The Old Town and Silverhill
Local Centres: Bohemia and Tower; Ore Village; Battle Road; Marine Court and Bexhill Road

1. **The network of town, district and local centres will be retained and enhanced. Proposals for main town centre uses should be focused within town centres. The scale and type of development should reflect the centre's existing function and its capacity for new development.**

2. **Hastings Town Centre, as the primary town centre, should be the focus for larger scale development.**

3. **Proposals which diversify the provision of facilities in district and local centres and will be supported where they are of an appropriate scale in relation to the role of the centre.**

4. **All development will be expected to support and contribute to the council's strategy for retail town centres. New development will therefore be supported which:**

    a. **Makes a positive contribution to improving a town centre's viability and vitality;**

    b. **Supports the creation of a safe, attractive, accessible and high-quality environment, and enhances the overall mix of land uses in the centre;**

    c. **Demonstrates a quality of design that contributes to the character of the town centre, including any proposed buildings and public realm;**

    d. **Ensures the most effective use of land through the promotion of high-density development where appropriate, making use of space above shops for new uses, and re-uses or re-develops existing buildings.**

5. **Neighbourhood shops located outside of centres will be protected where they are important to the day-to-day needs of local communities.**

<u>Sequential and Impact Tests</u>

6. **Proposals for main town centre uses should be located in an identified centre unless:**

    a. **A sequential assessment has been carried out that demonstrates that no suitable sites are available, firstly in the primary shopping areas for retail, or the town centre boundary for other town centre uses, then edge of centre locations. Only if no sites are available in these locations should out of centre locations be considered. Preference will be given to sites that are well connected to an identified centre; and,**

    b. **The proposal, either by itself or in combination with other committed development proposals, will not have a significant adverse impact on existing, committed and planned investment in a centre or centres. Proposals for retail development which are greater than 300sqm (Convenience retail) and 200sqm (Comparison retail), will be required to carry out an impact assessment. Other main town centre uses will be required to carry out impact assessments in line with the requirements of the NPPF.**

    c. **The development is designed to only serve the needs of the neighbourhood.**

7. **The council will seek to work with developers and, where appropriate, occupants to identify and secure jobs, training and procurement opportunities associated with new development of retail and leisure floorspace in Hastings.**

Strategic Policy 5 (SP5): Meeting the Challenge of Climate Change

4.76. Addressing climate change is a statutory duty for local planning authorities under the Climate Change Act 2008[xvi] and Section 19(1A) of the Planning and Compulsory Purchase Act 2004[xvii]. It is also a central consideration within sustainable development.

4.77. At the local level, the council has declared its recognition of global climate and biodiversity emergencies and its ambition to aim to make Hastings a carbon neutral borough ahead of the UK target of 2050. Likewise, the East Sussex Prosperity Strategy[xviii] includes ensuring that the economy of East Sussex will achieve net zero carbon by 2050 as one of its two defining principles. To this end, the council has adopted a Climate Change Strategy and Action Plan[xix]. The planning system has a key role to play in meeting the challenge of reducing CO2 emissions to net zero, which requires continual and significant reductions in emissions over time.

4.78. The Strategy and Action Plan acknowledges both the need to reduce carbon emissions, and also the need to mitigate and adapt to the effects of climate change we are already experiencing and will continue to experience in future, including hotter, drier summers, wetter winters, stronger winds, and the risks associated with flooding, drought, excessive heating and risk of loss of species and habitats. During the course of 2026, Hastings experienced wildfires, flooding, harm to intertidal areas, incidences of landslides and red heat health alerts all of which impact our residents, businesses and protected species. These effects can be physical, emotional and/or financial.

4.79. At national level, the largest source of carbon emissions is domestic transport[xx]. In Hastings, buildings are the largest source of carbon emissions, with housing being the greatest contributor. Many of Hastings' older homes, across all tenures, have poor energy efficiency resulting in higher heating costs and increased vulnerability for residents to fuel poverty. In 2026, 10-11% of households are living in fuel poverty - equivalent to around 4,500 households.

4.80. It is acknowledged in Part 3 of the East Sussex Joint Strategic Needs Assessment (JSNA) that climate change has the potential to lead to increased physical health risks, negative mental health and wellbeing impacts, a risk to food security and nutrition (including that provided through traditional local industry, such as fishing), the local economy and the local environment. These impacts are likely to disproportionately effect vulnerable groups, such as older people, lower-income households, families with children and people with existing health conditions. As a coastal community, Hastings faces a number of additional impacts not found in more inland locations such as those associated with flood risk, erosion and accelerated coastal change[xxi].

4.81. Businesses in the borough need resilience to the economic shocks created by the cost-of-living crisis, changes to taxation and duties, climate driven

increases to operating costs and unstable energy costs that have dominated the early part of the 2020s. The security of a high standard of energy efficiency for commercial spaces provides some level of financial stability and security for both employers and their workforce and creates better more productive working conditions.

4.82. In order to meet local carbon budgets and ensure that homes and commercial premises are affordable to live in and operate, the council asks that proposals prioritise retrofit over rebuild to make best use of existing stock and ensure that new buildings are built to local net zero carbon standards. This includes making sure that buildings use as little water and energy as possible to both protect our local resources and reduce the risk of fuel or even absolute poverty for local people.

4.83. To support this goal, the council must set clear standards for how development proposals for new housing and workspaces should be designed to deliver net zero carbon, well-designed places that are affordable to live, work and spend leisure time in. Policy SP5, together with the other policies of this plan, provides an overall framework for net zero carbon development that fully mitigates and adapts to the effects of climate change both now and in the future.

Strategic Policy 5 (SP5): Meeting the Challenge of Climate Change

1. **Proposals must contribute to the council's aim to make Hastings carbon neutral ahead of the UK target of 2050. Development will be supported where it can be demonstrated that it would not contribute towards climate change and that it incorporates adequate adaptation and mitigation measures to ensure future resilience and limit climate-led health inequalities. Proposals involving existing buildings must prioritise retrofit over rebuild, thoroughly exploring the potential for refurbishment and improvements in performance. Proposals are required to comply with the following requirements:**

    a. **Be fossil fuel free;**

    b. **Demonstrate that the potential for retrofit has been fully explored before demolition is considered.**

2. **Proposals for new buildings must be designed and built to be Net Zero Carbon. They must be ultra-low energy buildings, be fossil fuel free, generate renewable energy onsite, and report embodied carbon. All proposals for new buildings must, where feasible and viable, comply with the following requirements:**

    a. **Be fossil fuel free;**

    b. **Meet space heating demand limits;**

    c. **Meet Energy Use Intensity (EUI) limits;**

    d. **Deliver 100% of the annual energy consumption required by the building through onsite renewables;**

    e. **Meet residential water consumption limits;**

    f. **Promote lean building design by creating buildings that are efficient in material use, form and design; and**

    g. **Calculate and report their whole life carbon.**

Strategic Policy 6 (SP6): Renewable and Low Carbon Technologies

4.84. The council is committed through its Climate Change Strategy and Action Plan to work towards achieving a carbon neutral borough ahead of the UK target of 2050 and has formally declared a climate emergency. Working towards providing a significant share of the town's energy needs through decentralised, renewable energy has the potential to reduce the local use of energy derived from fossil fuels alongside national initiatives.

4.85. Sites in Hastings have the potential to benefit from renewable energy generation due to the climate and topography. By maximising the potential for generating renewable energy onsite and storing it onsite, together with energy efficient design including the benefits offered by biosolar. As set out in Strategic Policy SP5, the council considers that average annualised energy demands should be capable of being met within development sites.

4.86. Renewable, bioenergy and biofuel technologies are rapidly advancing fields, benefitting from considerable Government investment both domestically and internationally. It is accepted that the availability, viability and space requirements of such technologies will change during the lifetime of this plan.

4.87. Accordingly, Policy SP6 provides a framework for the development of both current renewable energy generation measures and also provides for the possibility of suitable future innovations in energy generation when they become deliverable at the local level over the lifetime of the plan.

4.88. The council is supportive of proposals that will deliver cleaner energy solutions at any scale, although any such proposals should be considered alongside of any harmful impacts on the natural or built environment.

4.89. In appropriate locations, the council will explore the use of Local Development Orders to simplify the planning process for Low and Zero Carbon technologies and set clear standards around size, scale and amenity.

4.90. Low carbon heating solutions on a wider scale, such as neighbourhood or locality based, can provide an affordable, secure and green solution for occupants of buildings they service. As this model removes market choice from occupants, such interventions must demonstrate that they represent energy affordability for occupiers and do not reduce the energy affordability benefits delivered through SP5.

Strategic Policy 6 (SP6): Renewable and Low Carbon Technologies

The council will take a positive approach to proposals for new development which are either for or include renewable energy generation, zero carbon technologies and their supporting infrastructure.

The council will:

1. **Support proposals for decentralised energy generation and distribution and community led initiatives, subject to minimising environmental impacts.**

2. **Explore the use of Local Development Orders in appropriate locations to simplify and expedite the planning process for Low and Zero Carbon technologies.**

3. **Support proposals for the development of area-wide low carbon heating solutions in locations where mixed heat load and other factors make this feasible, where negative impacts can be mitigated or avoided and where energy affordability for occupiers can be demonstrated.**

4. **Take a positive approach to the enhancement of existing utilities infrastructure to increase network capacity and to facilitate the adoption of emerging Low and Zero Carbon technologies.**

Strategic Policy 7 (SP7): Protecting and Enhancing the Historic Environment

4.91. Hastings has a rich and varied historic environment. Architectural and historic interest exists in our buildings, townscapes, designed landscapes, and below ground. In all, there are 6 scheduled monuments, over 900 listed buildings, 18 Conservation Areas, 2 registered historic parks, numerous archaeological notification areas and other sites of archaeological and historic interest within the town. The many historic buildings and spaces combined with the town's stunning topography, deliver a uniquely attractive and high-quality historic townscape. The character of these historic areas contributes to a strong sense of place and contributes significantly to our distinctive and rich cultural heritage, which is highly valued.

4.92. The town's historic areas provide attractive living and working areas for the town's residents and have the potential to draw in investors and new residents. The town's rich history and built heritage contribute strongly to our tourism industry, which is an important sector of the local economy.

4.93. The historic environment is vulnerable to loss and inappropriate change. It is critical that these special historic buildings and areas are protected, now and in the future. Active management of our historic environment will be required, as identified in the council's Heritage Strategy and Action Plan,[xxii] to ensure that its significance is protected, whilst not preventing sensitive change, to ensure that the historic environment remains an active and vibrant contributor to our town, enabling future generations the opportunity to experience and enjoy these special places. Over the lifetime of the plan, the council will work with partners to secure the long-term viability of historic buildings through their re-use, preservation, or sensitive restoration. This will include working with owners and forming partnerships with external funders to tackle historic buildings that have been identified as vulnerable on the national Heritage at Risk Register. Where resources allow, the council will also focus regeneration efforts on vulnerable high status heritage assets and those historic buildings that occupy prominent locations in the town.

4.94. There is a presumption in favour of the conservation of heritage assets and their settings. The more important the asset, the greater the weight that will be given to the need to conserve it. As heritage assets are irreplaceable, any harm or loss will require clear and convincing justification. Keeping heritage assets in use is inherently sustainable as it reduces the consumption of building materials, energy and the generation of demolition and construction waste.

4.95. Development which sustains and/or enhances the significance of heritage assets and/or their setting will be encouraged. Investment in the appropriate refurbishment or restoration of heritage assets, where works will preserve or enhance significance, will be encouraged and supported by the council.

4.96. Not all locally important features of historic or architectural interest are listed buildings or part of a designated Conservation Area. However, they can still provide a valuable contribution to the local historic environment and can make an important contribution to creating a sense of place and local identity. This can include buildings, structures, and features, archaeological remains, and historic open spaces and the wider historic landscape or townscape, which are called non-designated heritage assets.

4.97. In relation to archaeology, there are many areas of the Borough where there is high potential for archaeological and paleoenvironmental evidence. Where the extent of the likely finds is unknown, great care needs to be taken to protect this archaeological resource through the planning process.

4.98. The effect of a development on the significance of a non-designated heritage asset is a material consideration in the planning process. The weighting that can be given to the conservation of the heritage asset, within the assessment of the development proposals, will depend on the balance between the scale of harm or loss that will result from the development, and the significance of the asset.

Strategic Policy 7 (SP7): Protecting and Enhancing the Historic Environment

Importance will be placed on development proposals making a positive contribution to the architectural quality, historic character, local distinctiveness, and sense of place of historic buildings and areas. Heritage assets should be conserved in a manner appropriate to their significance. This means that the higher the value of the heritage asset the more consideration will be given to maintaining its heritage significance. The council will therefore:

1. **Protect the significance and setting of the following heritage assets:**
    a. **Listed buildings;**
    b. **Conservation areas;**
    c. **Historic parks and gardens;**
    d. **Scheduled Monument sites;**
    e. **Areas of archaeological potential and known archaeological find sites; and,**
    f. **Non-designated heritage assets.**
2. **Support proposals that sensitively restore and reuse historic buildings to secure their long-term viability and continued active use.**
3. **Give great weight to avoiding harm or loss to the significance of designated heritage assets, and where justified by their significance, non-designated heritage assets. The council will also require clear and convincing justification for any proposals that would result in harm to, or loss of, a designated heritage asset. Proposals affecting non-designated heritage assets will be subject to a balanced judgement having regard to the asset's significance, the scale of harm, and any public benefits of the proposal.**

Strategic Policy 8 (SP8): Conserving and Enhancing the Natural Environment

4.99. The effect of a development on the significance of a non-designated heritage asset is a material consideration in the planning process. The weighting that can be given to the conservation of the heritage asset, within the assessment of the development proposals, will depend on the balance between the scale of harm or loss that will result from the development, and the significance of the asset.

4.100. The borough of Hastings is rich in natural areas, diverse landscapes, and a magnificent coastline. The High Weald National Landscape (NL) follows the Borough's administrative boundary to the north and includes Hastings Country Park Nature Reserve at the east of the borough. At the western end of the borough is the Combe Valley Countryside Park[xxiii].

4.101. Our designated wildlife sites include the internationally designated Hastings Cliffs Special Area of Conservation (SAC), 3 nationally designated Sites of Special Scientific Interest (SSSI) at Marline Valley, Combe Valley and Hastings Cliffs, 8 Local Nature Reserves (LNR), and 25 Local Wildlife Sites (LWS)[xxiv].

4.102. The world is witnessing a colossal decline in global biodiversity with one million animal and plant species threatened with extinction. Most terrestrial habitats are damaged, and the council's Climate Strategy and Nature Emergency Action Plan (CSNEAP) demonstrates the council's commitment to delivering a greener, more biodiverse future where nature recovery is seen as a priority.

4.103. As well as statutory duties towards biodiversity, local authorities have a key role in developing a sense of place, enabling people to improve their health and wellbeing by using well managed natural green spaces to increase their physical activity and provide benefits to mental health. This includes through improving access to the green and blue infrastructure network. However, improving public access to the network of green and blue infrastructure may not always be appropriate and access may need to be limited to protect and enhance biodiversity and/or to provide meaningful and significant Biodiversity Net Gain (BNG).

4.104. The Policy provides the strategic and high-level context for protecting the distinctive landscape and ecosystems of the borough. The Policy ensures the ecosystems and biodiversity of the borough are protected from harm, and where possible strengthened. The Policy aims to improve public access for all to nature and green and blue spaces to maximise health and wellbeing benefits.

4.105. In line with national policy[xxv] and legislation[xxvi], the council will improve our natural environment, reverse the decline in biodiversity, and leave our environment in a better state than we found it.

4.106. In decision making, the council will have regard to the priorities of the East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS) or its successor. The LNRS has identified a suite of priority habitats and species, with associated measures for their recovery, and has mapped 'Areas of Particular Importance for Biodiversity' (APIB) and 'Areas that Could Become of Importance for Biodiversity' (ACIB).

4.107. The LNRS identifies 8 principles and 24 priorities for nature recovery, supported by over 100 potential actions and a local habitat map showing where those actions could be delivered. The LNRS provides a positive framework through which development can actively contribute to biodiversity improvement, including through Biodiversity Net Gain requirements.

4.108. The LNRS does not change land designations or create new protections; it identifies opportunities and guides where nature recovery efforts could be targeted.

Strategic Policy 8 (SP8): Conserving and Enhancing the Natural Environment

The council will protect and enhance the town's distinctive landscape character and natural environment and increase opportunities for people to engage with nature. This will be achieved by:

1. **Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including to health, wellbeing, and climate change adaptation.**

2. **Commensurate to their status, protecting and enhancing the town's distinctive landscapes including woodlands, Ancient Woodlands, open and amenity green spaces, the undeveloped coastline, the High Weald National Landscape, Hastings Country Park Local Nature Reserve and the Combe Valley Countryside Park.**

3. **Protecting and enhancing the water, soils, sites or habitats designated or identified of local, national and international importance for biodiversity or geodiversity, including Irreplaceable Habitats such as Ancient Woodland.**

4. **Providing net gains for biodiversity including establishing coherent ecological networks that are more resilient to current and future pressures.**

5. **Supporting projects that protect and enhance the network of green and blue infrastructure and contribute to the delivery of the Local Nature Recovery Strategy and Green and Blue Infrastructure and Biodiversity Net Gain Strategy across the Borough, including publicly accessible open spaces and 'urban fringe' areas which capitalise on the benefits to health and wellbeing and mitigating climate change.**

6. **Where appropriate, improving public access for all to the network of green and blue infrastructure across the Borough, including publicly accessible open spaces and 'urban fringe' areas.**

7. **Supporting proposals that align with the objectives of the East Sussex and Brighton and Hove Local Nature Recovery Strategy or its successor.**

Strategic Policy 9 (SP9): Managing Coastal Erosion and Flood Risk

4.109. Hastings is vulnerable to several sources of flooding, with the interaction of these various mechanisms increasing the complexity of flood risk. The steep topography causes significant overland flow and risk of surface water flooding. This can occur in combination with high river flows, high tides and associated groundwater levels, restricting drainage. As the sewer system is largely combined, such issues can additionally contribute to sewer flood risk. Climate change is expected to further exacerbate flood risk in the Borough.

4.110. In order to ensure that existing assets and dwellings are protected from increasing flood risk, appropriate flood defences and mitigations (both engineered and Natural Flood Management measures) will be supported. This includes measures to address surface water flooding, with areas particularly at-risk including Hastings Town Centre, Old Town, Hollington Stream and Warrior Square. For areas at risk from fluvial flooding, Natural Flood Management measures should be the preferred mitigation method unless this is impractical.

4.111. It is understood that due to this elevated overall vulnerability, a large portion of the borough will experience some flood risk from at least one source of flooding either now or within the lifetime of development proposals, including areas at risk of flooding as a result of coastal change. It is therefore understood that it may not be possible to avoid locations with some risk of flooding when identifying sites for development proposals. Policy SP9 seeks to direct development away from the highest risk areas (taking into account all sources of flooding and future projections of risk) and towards areas with the lowest possible flood risk for the development type.

4.112. Where site allocations identified within this plan are at risk of flooding, the council will ensure that sites are sequentially tested in line with National Planning Policy and Practice Guidance, and that the exception test is applied where necessary.

4.113. Where an elevated flood risk from one or more sources is present, now or in the future, a sequential and exception test should be undertaken to ensure that all alternative locations with lower flood risk have been considered and demonstrate that the benefits of development in the proposed location will outweigh the risk. Appropriate mitigation and adaptation measures should also be proposed in order to manage risk and safeguard human health, both at the development location and downstream.

4.114. As flood risk is dynamic, the risk levels may change during the lifetime of the plan and additional flood storage capacity may be required, the council together with the Lead Local Flood Authority (East Sussex County Council or its successor) will continue to review levels of risk on a regular basis and update guidance and technical advice accordingly. The flood storage

capacity should be increased through extensions to existing and/or additional flood water storage ponds or other appropriate storage solutions, and these should be designed to provide enhancements to existing biodiversity and avoid impact on significant archaeological sites. The Plan identifies Flood Storage Capacity Improvement Areas where opportunities to improve flood risk within key catchments should be directed and explored, for example through improving flow rates, river restoration practices, attenuation, or otherwise increasing or improving the ability of the borough to store and direct water away from water-sensitive habitats and incompatible residential and commercial areas. Including through Natural Flood Management Measures.

4.115. As a coastal borough, Hastings has approximately 12km of coastline, 5km of which is a developed frontage protected by sea walls and groynes which help to retain the shingle beaches. The Hastings coastline is experiencing the effects of coastal change, which have been accelerated in recent years due to the wider impacts of climate change including sea level rise and extreme weather effects. The coastline includes a range of assets and designations sensitive to the effects of coastal change including economic, heritage, environmental, transport and social. Many of these assets and designations are likewise potentially sensitive to change brought about by enhanced coastal or flood defence schemes or structures and the impact of any proposals to introduce new flood or coastal defences must be assessed and considered, and consultation with relevant parties such as Natural England in respect of Impact Risk Zones for Marine Conservation Zones, is essential.

4.116. A Coastal Change Management Area (CCMA) allows the council to better protect our existing and future economic and heritage assets from coastal change, protect human health and the marine environment.

Strategic Policy 9 (SP9): Managing Coastal Erosion and Flood Risk

1. **The development and improvement of flood defence infrastructure and drainage assets in Hastings will be supported, including Natural Flood Management measures for the management of fluvial flooding subject to appropriate environmental impact assessment;**

2. **Flood Storage Capacity Improvement Areas will be safeguarded in order to ensure that both current and future flood management needs may be met and ensure public safety;**

3. **Major growth and change will be directed 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, taking into account all sources of flooding;**

4. **The council will work with partners, including the Lead Local Flood Authority, to review levels of flood risk over the life of the Local Plan including the need for increased flood storage capacity, taking into account the impacts of climate change;**

5. **Within the Fairlight Cliffs to Glyne Gap Coastal Change Management Area (Figure 42: Coastal Change Management Area), development proposals must be able to demonstrate avoidance, mitigation and adaptation strategies to manage risk associated with coastal change;**

6. **Development within the CCMA will be subject to additional planning controls, including prohibition of new residential development, time-limited permissions and a requirement for reinstatement, to prevent hazardous environmental and social impacts as a result of coastal change including those associated with the Marine Conservation Zones (MCZ) and their Impact Risk Zones (IRZ);**

7. **Where possible, the council will support proposals that will allow important economic and heritage assets, and natural capital, within the CCMA to make adaptations to become more resilient to coastal change.**

Strategic Policy 10 (SP10): Transport Infrastructure

4.117. Located on the periphery of the South East, Hastings has limited strategic transport infrastructure linking the Town to larger centres of population. This is combined with local accessibility issues which can hamper access to jobs, services and negatively impact on health and wellbeing. The transport strategy is to support capacity and safety improvements on strategic rail and road routes but with an increasing emphasis over the lifetime of the Plan to move Hastings towards a more active and sustainable transport future locally.

4.118. To tackle these issues, the council will work proactively with transport providers including Network Rail (and emerging Great British Railways), train operators, National Highways, East Sussex County Council, bus providers, Transport for the South East, and the Sussex and Brighton Strategic Authority (who will become the transport authority for the Sussex area) to bring forward a greater level of high-quality transport infrastructure.

4.119. In addition, we know places that provide opportunities for people to lead physically active lives can positively impact physical and mental wellbeing. One of the simplest ways of exercising daily is getting around by active travel - walking, wheeling or cycling - which could be to or from work, school, a nearby bus stop or train station, or shopping area. Such journeys can go a huge way towards meeting daily physical activity needs as well as contributing to better air quality. The East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) provides a long-term framework for developing walking, wheeling and cycling networks across the county, and supports sustainable growth, healthier lifestyles, improved accessibility, reduced carbon emissions and stronger connections between homes, employment areas, schools, town centres and public transport hubs. It also establishes a prioritised programme of schemes to guide future investment and funding bids.

4.120. For Local Plan purposes, development should support the delivery of the LCWIP by protecting and enhancing identified active travel routes and contributing to infrastructure that promotes walking, wheeling and cycling as safe, attractive and convenient travel choices. The LCWIP has recently been reviewed in conjunction with the development of the local plan to improve sustainable access to future housing and employment.

4.121. The council is supportive of measures which aim to shift the focus from delivering highway improvements to providing better and more accessible streets and places that supports more walking, wheeling, cycling, integrated alongside access to public transport provision and electric vehicle charging infrastructure. This vision led approach which underpins this Local Plan is referred to as ‘decide and provide’ and focusses on planning for ‘people and places’. Development will be subject to a ‘monitor and manage’ approach where potential impacts of development will be monitored so appropriate mitigation(s) can be brought forward as required. This is in alignment with the

County Council's transport strategy Local Transport Plan (LTP4) [xxvii], the East Sussex modal strategies, including the LCWIP[xxviii], and the Rail, Freight and Electric Vehicle Strategies.

4.122. The East Sussex Freight Strategy[xxix] was adopted in December 2025. It focuses on sustainable distribution, infrastructure safeguarding, and major rail integration. Details for freight movements and connectivity affecting Hastings include managing heavy vehicles on existing A/B routes, promoting rail modernisation, and adapting to regional changes.

4.123. Local plans can help to support the strategy by identifying and protecting sites for lorry parking, vehicle charging, depots, and consolidation hubs, as well as encouraging first-mile and last-mile urban freight delivery solutions to lower carbon footprints and minimising conflicts with active travel.

4.124. The East Sussex Rail Strategy supports the Hastings Local Plan's objectives for sustainable growth, improved accessibility and reduced carbon emissions. Key rail priorities for Hastings include extending High Speed 1 services, electrifying and increasing capacity on the Marshlink Line, improving links to Brighton and Eastbourne, reopening the Uckfield to Lewes line to improve network resilience, and electrifying the Hurst Green to Uckfield route. In the shorter term, reducing journey times through network improvements and enhancing station accessibility will help make rail travel a more attractive and sustainable transport option, supporting economic development and reducing reliance on private cars.

4.125. In terms of the public rights of way network, in line with the NPPF, where possible, opportunities to provide better facilities for users, for example by providing links to existing rights of way networks, including national trails will be sought. In Hastings, this includes the King Charles III England Coast Path National Trail[xxx].

4.126. Car parks across the Town are used by visitors, shoppers, commuters and businesses. There is a mix of off-road car parks, on-street parking and restricted parking zones. All of these include the provision of disabled parking bays and specific coach parking and drop off points. Efforts will be made to reduce demand for parking by working with key partners to promote active use of public transport and electric vehicle charging infrastructure. Travel choice, with an emphasis on active travel and public transport will be supported.

4.127. East Sussex County Council is delivering a countywide programme to expand public electric vehicle (EV) charging infrastructure, supported by Government Local Electric Vehicle Infrastructure (LEVI) funding and private investment. This will increase access to EV charging for residents, businesses and visitors, particularly those without off-street parking. Charging locations will be identified based on local demand, existing provision, accessibility, parking availability and electricity network capacity. The County Council is also

developing a scheme to enable eligible residents without driveways to install cross-pavement charging channels, where safe and appropriate, to facilitate charging from domestic electricity supplies. Together, these initiatives will support the transition to electric vehicles and contribute to local climate change and sustainable transport objectives[xxxi].

4.128. Contributions for improvements to transport infrastructure which may arise from new development are set out Policy ID1: Planning Obligations and site allocation policies.

Strategic Policy 10 (SP10): Transport Infrastructure

1. **Over the lifetime of the Plan, in order to deliver sustainable development, the council will work proactively with transport providers and partners to enable the delivery of infrastructure and services which supports development growth, economic connectivity including through the prioritisation of active travel, public transport and the uptake of ultra-low and zero-emission vehicles to support carbon neutral objectives. This will include the council securing development contributions to help meet these objectives.**

2. **Enhancements that support increased rail capacity and high-speed services to London and increased rail capacity on all routes will be supported including:**

    a. **Electrification of or introduction of alternative fuelled (bi-mode) trains on the Marshlink service between Hastings and Ashford to support decarbonisation;**

    b. **Infrastructure improvements on the Marshlink line and at Ashford International to enable high speed rail services to run to Eastbourne via Rye, Hastings and Bexhill;**

    c. **A259 Marshlink Level Crossings including the Star and Guildeford crossings east of Rye;**

    d. **The upgrading of Ore Station to improve accessibility for passengers; and**

    e. **Hastings to Tonbridge capacity and power supply improvements.**

3. **Railway station improvements that support inclusive journeys and enable better integration with bus services, cycle and pedestrian networks will be supported.**

4. **Bus service improvements and infrastructure as identified in the East Sussex Bus Service Improvement Plan including enhanced routes to connect to new development will be supported.**

5. **Walking, wheeling and cycling infrastructure will be prioritised including through the development and delivery of a network of walking, wheeling and cycling improvements and area-based accessibility improvements identified in the East Sussex Local Cycling and Walking Infrastructure Plan.**

6. **The council will support, and where necessary safeguard and secure land for the following local and strategic road improvements:**

a. **Highway schemes that enable and unlock development;**

b. **Corridor based junction capacity improvements and network management schemes to maximise the efficiency of the existing road network; and**

c. **Improvements to capacity and safety on the A21 Sevenoaks to Hastings route corridor including:**

   i. **the A21 safety package and,**

   ii. **improvements between Kippings Cross and Lamberhurst, Hurst Green and Flimwell.**

7. **Measures that minimise car parking will be supported in areas of high public transport accessibility to include areas of low or no car parking.**

8. **Existing coach parking and coach drop-off points will be protected. Proposals relating to the loss of coach parking or drop-off points should either demonstrate that the provision is no longer required or plan for reprovision elsewhere taking into account the need to prioritise active travel movement.**

9. **To provide for the uptake of ultra-low and zero-emission vehicles for journeys, the delivery of supporting infrastructure, including electric vehicle charging infrastructure will be supported**.

10. **Measures will be supported that integrate sustainable access for goods distribution including freight consolidation and micro-consolidation hubs, or other measures that reduce vehicle trips including enabling and encouraging last-mile deliveries by sustainable modes, including e-cargo bikes and electric light freight vehicles.**

Strategic Policy 11 (SP11): Healthy and Safe Communities

4.129. Health and wellbeing is a wide-ranging topic which cuts across many policy areas within this Local Plan. The World Health Organisation's definition of health as 'complete wellbeing' may no longer be fit for purpose. Instead, health experts propose changing the emphasis towards 'the ability to adapt and self-manage in the face of social, physical, and emotional challenges'.

4.130. Health inequalities and deprived neighbourhoods are found across the country; however, coastal communities are often disproportionately affected, as is the case in Hastings. Hastings performs poorly against almost all indicators of health – both in terms of physical health and against the wider determinants.

4.131. The wider determinants of health are defined locally through the East Sussex Planning for Health, Wellbeing and Sustainability Framework[xxxii] which identifies five key thematic areas:

- Neighbourhood design – including access to local services and jobs, community safety and cohesion and access to arts and culture;
- Housing – including quality and accessibility;
- Food – including access to healthy food and opportunities to grow food;
- Natural environments – including exposure to pollution, hazard and nuisance, access to and provision of green and blue spaces; access to opportunities to play and spend time outdoors and adaptation to climate change;
- Transport – local connectivity, opportunities for active travel, mobility and accessibility and access to bus and train services.

4.132. Just as health considerations are referenced throughout the NPPF, the Local Plan takes health and wellbeing to the heart of all policies by addressing each of these thematic areas. Applications for development in accordance with the Local Plan will be required to address physical, mental, social, community and economic health needs in order to deliver a policy compliant scheme.

4.133. Policies in Parts 5 and 6 of the plan identify broad areas and individual sites that can contribute to the housing and employment needs of the borough, together with areas which should be protected and enhanced for sporting, recreational and cultural purposes, providing places to live, work, and learn and to facilitate the wellbeing and fulfilment of everyone in the borough. Policies in Part 7 of the plan set requirements for new development to provide:

- Decent, adaptable, energy efficient and affordable homes that are well connected to services and green spaces;

- High-quality, energy efficient and well-located modern workplaces that are likewise well connected;
- Improved play spaces, sports facilities, playing pitches and open spaces;
- Increased opportunities for active, green and multimodal travel;
- Safe communities free from crime, hazard and nuisance including the effects of flooding and landslide;
- Opportunities for community-led development, such as self-building and enhancements to community facilities;
- Enhancements to biodiversity, habitats and green and blue infrastructure;
- Maintenance of the network of walkable accessible shops and services in the community at town, district, local and neighbourhood levels.

4.134. To support this approach, the council will require a Health Impact Assessment (HIA) screening for developments of 40 or more dwellings and/ or 1,000sqm of new commercial floorspace and an in-depth HIA to be undertaken where the screening process identifies potential for significant impacts on health and wellbeing.

4.135. A Health Impact Assessment (HIA) assesses potential effects of a development proposal on the health of a population. The HIA recommends measures to maximise positive impacts, minimise negative impacts and reduce health inequalities. As a tool, it supports the planning system to address local health and wellbeing needs and tackle inequalities through influencing the wider determinants of health. HIA form part of a suite of tools that support developers in designing high-quality proposals with a good standard of amenity in line with the detailed policies in Part one – Housing, Part two - Economic Development and Part three - Sustainable Communities plan. Because of this, it is recommended that screening is performed at RIBA Stage 2, so that it can inform the proposal. Following the screening process, and prior to submission of an application, applicants are strongly encouraged to engage in pre-application discussions with East Sussex County Council (or its successor) in their capacity as Public Health Authority to agree the screening outcome and determine whether a HIA would be required.

4.136. Screenings and, where recommended, detailed HIA assessments appropriate to the proposal will be required for full, outline and reserved matters applications that meet the policy threshold for screening. Proposals should

strive to maximise the positive impacts and benefits for health and wellbeing across all of the wider determinants of health.

4.137. Screening is a preliminary assessment to identify what health impacts may arise from a development proposal and whether the proposal would benefit from further assessment. To support this approach, the council will require a Health Impact Assessment (HIA) screening for certain developments and a HIA to be undertaken where the screening process identifies potential for significant impacts on health and wellbeing. If a HIA is required the scope of the HIA will vary depending on the size and type of the development, and its location.

4.138. Further information on HIA Screening and HIA Processes, together with template documents, is set out within the East Sussex HIA Toolkit[xxxiii] developed by the East Sussex Planning for Health Working Group.

4.139. In order to maximise the benefits of HIA, developers should undertake HIA screening at the earliest possible stage of the planning application preparation, before a design proposal is fully worked up. This ensures that applicants can seek to avoid any negative impacts of a development scheme whilst maximising positive effects on health and wellbeing, and reduces the likelihood that additional work will be needed following submission of the application.

Strategic Policy 11 (SP11): Healthy and Safe Communities

1. **All development should be designed to promote health and wellbeing. To achieve this outcome, the council will require the delivery of healthy homes and communities for people to live, work and thrive to achieve improved education, health, employment and quality of life. The council believes in the health in all policies approach which is embedded within the local plan. Therefore:**

2. **Development should maximise the positive impacts and benefits for health and wellbeing and help to create healthy, inclusive, and safe places which reduce health inequalities, help to address the social and physical determinants of health including reducing the risk of crime and create prosperity in Hastings as identified in relevant documentation such as the East Sussex Joint Strategic Needs Assessment.**

3. **Proposals for 40 or more dwellings and/ or 1,000sqm of new commercial floorspace will be required to undertake a Health Impact Assessment (HIA) screening at an early stage of the design process, to determine if a HIA is required.**

   Where an HIA is required, the screening process will indicate the level and type of assessment required proportionate to the proposal. Any recommendations arising from the HIA should be incorporated into the proposal prior to submission of a planning application.

   HIA should be undertaken in accordance with East Sussex HIA Toolkit and submitted as part of the planning application.

   Where a potentially harmful health impact is identified, mitigation measures should be identified and incorporated into the proposal.

Strategic Policy 12 (SP12): Infrastructure Delivery Strategy

4.140. National Planning Policy requires that the strategic policies of local plans make sufficient provision for infrastructure. As set out in the Infrastructure Delivery Plan (IDP), infrastructure may be considered to include:

- **Utilities**: Energy, Digital, Water, Sewerage.
- **Social:** Education, Healthcare, Libraries, Cultural Infrastructure (including Museums), Community Facilities, Burials and Cremations.
- **Transport:** Road, Rail, Bus, Active Travel (walking, wheeling and cycling) and Multimodal Travel.
- **Flood and Water Management**: Sea defences, flood management measures and SuDS.
- **Emergency Services:** 'Blue light' services like police, ambulance and fire and rescue services.
- **Open Space and Leisure:** Sports facilities, playing pitches, allotments, open space, equipped play.
- **Green and Blue Infrastructure:** Internationally, Nationally and Locally designated sites, Priority Habitats, green and blue corridors, ecologically valuable open spaces.
- **Land Stability:** Stabilisation measures at strategic scale to prevent or mitigate the risk associated with collapse or landslide.
- **Waste:** Waste processing, waste management vehicles.

4.141. Broadly speaking, infrastructure needs can be split into two categories:

- The need for new or upgraded **Assets**, which are things you could reach out and touch, like bin lorries, gas mains and reservoirs.
- The need for any additional **Capacity**, which is how many homes, people and/or businesses that any given asset can cope with.

4.142. Reports of individual infrastructure failures, such as burst pipes, gas leaks or power cuts, do not provide evidence of development-related infrastructure deficiencies and are therefore not material to the preparation of the Local Plan or the Infrastructure Delivery Plan. The purpose of the IDP is to assess the need for new infrastructure and capacity enhancements arising from planned growth. It does not consider the operational performance of existing assets or

the procedures employed by infrastructure providers in responding to isolated service interruptions or asset failures.

4.143. Policy SP12 sets out our strategy for infrastructure delivery to support the level of growth anticipated during the plan period through:

- Setting a clear framework for the assessment of infrastructure requirements;
- Establishing how and under what circumstances infrastructure will be delivered;
- How the council will continue to work with stakeholders to understand ongoing infrastructure needs over the plan period;
- The timescale in which infrastructure obligations must be delivered;
- Establishing that proposals for new or upgraded utilities infrastructure will normally be permitted.

Strategic Policy 12 (SP12): Infrastructure Delivery Strategy

1. **Development proposals will be required to take into account existing infrastructure and to provide and/ or contribute to the provision, and where appropriate maintenance, of facilities, infrastructure and services where development gives rise to a need for additional or improved infrastructure;**

2. **Development proposals should be supported by evidence of early engagement with infrastructure providers, demonstrating the capacity of existing infrastructure, and details of any new or improved infrastructure required to support the proposed development;**

3. **The Council will work with partners, including infrastructure and service providers and stakeholders to ensure that the necessary physical, economic, structural, social, cultural and environmental infrastructure is provided to support communities;**

4. **Infrastructure should be provided at the appropriate time, usually this will be prior to the development becoming operational or being occupied, although in some cases, pre-commencement provision may be required. Larger developments may need to be phased to ensure that this requirement can be met;**

5. **The delivery of relevant infrastructure will be secured either through direct provision by the developer or financial contributions, such as legal agreement and/ or planning obligations. In most cases, infrastructure requiring maintenance and management will require a clear and deliverable plan to be in place for the lifetime of the asset. Contributions towards infrastructure maintenance will also be secured where relevant;**

6. **Proposals by utilities providers, operators and undertakers for the delivery of new or upgraded utilities infrastructure for the purposes of meeting the needs generated by new development and by existing communities will normally be permitted;**

7. **Proposals must have regard to the current Infrastructure Delivery Plan (IDP), including any site-specific infrastructure needs identified through the IDP for allocated sites.**

Strategic Policy 13 (SP13): Development Viability

4.144. National Planning Policy requires that a whole plan viability assessment should be performed in line with the approach set out in Planning Practice Guidance. The purpose of this assessment is to understand the likely viability of planned types of development anticipated to come forward during the plan period and to inform the setting of developer contributions at a level that maximises certainty that proposals will be deliverable, reducing (but not eliminating) the need for viability assessments at the decision-making stage.

4.145. Multiple evidence base documents that have informed the development of plan policies identify the borough as part of a wider area that is under severe water stress. Additionally, the Strategic Flood Risk Assessment (SFRA) identifies that much of the borough is vulnerable to the effects of flooding from all sources, including surface water.

4.146. The Infrastructure Delivery Plan together with Southern Water's Planning Policy Statement indicates that in order to manage surface water flooding and its contribution to other sources of flooding and mitigate environmental impacts as assessed through the Habitats Regulation Assessment (e.g., sewer flooding from combined sewers, managed discharges and the discharge of treated effluent into the marine environment), and to safeguard and maintain available supplies of potable water within the Bewl and Darwell reservoirs, the use of a higher water efficiency standard that reduces both consumption of potable water and discharges into sewer systems is essential in order to ensure that the development strategy is deliverable.

4.147. Due to the dispersal of water-sensitive designated habitats throughout the borough, and the need to carefully manage runoff rates in relation to their potential to increase flood risk to existing homes and businesses and to manage the impacts of drainage on the stability of the borough's predominately soft, wet and weak soils, there is a high likelihood that the majority of proposals will by necessity need to be SuDS-led and informed by a clear drainage strategy based on appropriate monitoring in order that development can be delivered in a form that is safe for occupiers, existing communities and prevents harm to water-sensitive designated habitats.

4.148. The SFRA, NCERM2 and Shoreline Management Plan demonstrate that the borough is at risk from all sources of flooding, vulnerable to the effects of coastal change and also to the combined effects of one or more sources of flooding increasing the severity of flood related incidents (e.g. through tidal lock). National Planning Policy asks that proposals both not increase flood risk elsewhere and, where possible, reduce flood risk overall. Due to the demonstrable harm that could occur should flood risk fail to be addressed through the development management process, flood risk management measures are considered to be essential infrastructure in all cases.

4.149. Policy SP10 sets out the need for both safety and capacity improvements of both the Strategic and Local highways networks in order to accommodate the additional impacts of new development over the lifetime of the plan.

4.150. The priority order of obligations has been derived from the Infrastructure Delivery Plan. The council will continue to engage with infrastructure providers throughout the lifetime of the plan as set out in Policy SP12 in order to ensure all obligations remain justified.

4.151. The Plan period runs to 2041 and at the time of publication economic conditions are recognised as 'volatile' by the Secretary of State[3]. The Secretary of State further elaborated within their Letter to the Chief Executive of the Planning Inspectorate dated 15 July 2026 that 'While deliverability and viability must remain important considerations in plan making, substantial economic volatility can generate uncertainty which may not reflect the longer-term prospects for delivery over the life of plan. With the benefits of up-to-date local plans firmly in mind, it is important that local plan deliverability and viability challenges be considered in a broad context, especially when economic conditions are volatile and are causing fluctuations to market conditions and heightening development risk and associated costs. As such, allocations should generally be assessed against their prospects of delivery over the plan period as a whole, rather than solely against current market conditions. For these reasons, where a robust evidence base exists and there is a reasonable basis for concluding that allocations are capable of delivery over the plan period as a whole, I expect concerns regarding deliverability and viability to be approached pragmatically'[xxxiv].

4.152. Guidance developed by the S106 Cross-Sector Working Group supports the use of a site-specific, viability-led approach to the delivery of Affordable Housing through S106 where early engagement from the pre-planning phase onwards between social housing providers, the local planning authority, the housing authority and developers will help to shape the mix, tenure and type of affordable housing provided while considering the viability of proposals and overall supporting a pragmatic engagement-drive approach to affordable housing delivery that is capable of reflecting dynamic circumstances.

4.153. The guidance advises that 'Discussing these matters early is critical to understanding whether a scheme is fundamentally workable, including its long-term affordability for residents and management costs. It helps align expectations on design, standards, costs, and ongoing maintenance, while reducing the risk of redesign, delays, renegotiation, or changes to legal agreements once delivery is underway. Early agreement provides greater certainty for all parties'[xxxv].

[3] Local Plan examinations: letter to the Interim Chief Executive of the Planning Inspectorate (July 2026)

4.154. Taking the above into account, the results of viability assessments by definition represent a single point in time. Having regard to NPPF 2026, the council wishes to future proof this plan in respect of viability and the delivery of policy obligations. Policy SP13 provides for changing economic circumstances throughout the lifetime of the Plan.

Strategic Policy 13 (SP13): Development Viability

In order for development to come forward with sufficient essential infrastructure, it may be necessary to make commensurate, proposal-specific adjustment to affordable housing policy requirements. The following priorities must be worked through where proposal specific viability assessments are necessary:

1. **All development proposals will be required to deliver the following obligations:**

    a. **Meeting or exceeding the minimum water efficiency standard as set out in Policy SC3;**

    b. **A drainage strategy, and resulting SuDS;**

    c. **Any necessary flood risk prevention, adaptation and/or mitigation measures, as set out in Policy SC16;**

    d. **Improvements to the Strategic or Local highways network that are critical by reason of capacity and/or safety.**

2. **Where a proposal cannot meet all of the requirements set out in 1 above, permission will be refused.**

3. **Where a site allocation policy or site investigation indicates the need for essential site-specific infrastructure, this will be required in addition to the requirements set out in 1 above.**

4. **Where the requirements of 1 or 3 or a combination of the two would result in delivery of less than the full affordable housing obligations as set out in SP2, a commensurate cascade[4] adjustment to affordable housing will be acceptable subject to the applicant consenting to the use of the viability review mechanism as set out in SP2.**

5. **Other financial obligations will be sought in the following priority order, subject to quantum thresholds set out in Policy ID1:**

    a. **Sustainable transport;**

    b. **Healthcare;**

    c. **Education (SEND);**

    d. **Education (EYFS);**

[4] So that, through changes to the mix, tenure or number of affordable dwellings or by the payment of commuted sums, the site becomes viable.

e. **Offsite Open Space and Equipped Play;**

f. **Education (Primary/ Secondary);**

g. **All other obligations specified in ID1.**

5. Development Potential Areas and Regeneration Areas

5.1. As part of the council's overall spatial strategy, a number of areas have been identified that have the potential to deliver larger scale or locally important growth.

5.2. Unlike site allocations, these areas are at an earlier stage of consideration and require some additional steps to be taken to fully understand their development potential, including site investigation and detailed master planning.

5.3. This section introduces one Development Potential Area and two regeneration areas.

5.4. The Development Potential Area, Land at Breadsell, is a location that straddles the boundary with neighbouring Rother to be investigated to understand its potential.

5.5. The two Regeneration Areas are Hastings Central Regeneration Area, which is a location identified for large-scale regeneration and Land at St John's Road Regeneration Area, which is identified for rationalisation and enhancement of the existing railway access and play space while potentially incorporating other uses.

5.6. Both Regeneration Areas require additional strategic interventions to maximise their regeneration potential.

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

5.7. This greenfield location adjacent to the High Weald National Landscape (Figure 2) extends to approximately 16 hectares in the northwest of Hastings. The northern part of the area, approximately 4.17 hectares falls within Rother District. The larger area, around 12 hectares, lies within Hastings Borough. To the west, the land abuts Breadsell Lane, and to the north, the land adjoins Hastings Road (A2100).

5.8. As the suitability of development is subject to further technical assessment, the land is identified as a Development Potential Area.

5.9. Breadsell Lane along the eastern boundary of this location abuts the High Weald National Landscape. The northern fields are separated from those to the south by a wooded shaw, which extends west of Coneyburrow Wood. The southern fields are enclosed, with Coneyburrow Wood and Birchen Wood to the north-eastern boundary, leading to Four Acre Wood within the lower valley side to the east, all of which are designated Ancient Woodland and form part of the Marline Valley Wood Site of Special Scientific Interest (SSSI) associated with a watercourse, the Marline Stream. The whole location site is within the Impact Risk Zone (IRZ) for the SSSI.

5.10. Physical features include mature native hedgerows, agricultural drainage ditches, overhead electricity lines and the Borough's high pressure gas main.

5.11. Development here means that impact on the Marline Valley Woods SSSI is a key issue that goes to the heart of the suitability of this location for development. Investigations to date have established that a significant amount of ecohydrological and geohydrological monitoring is required in order to establish the acceptability of the principle of development at this location.

5.12. The 2009 Rigare Study 'scoping level hydrological and hydrogeological assessment of a proposed housing development site, Breadsell Lane, Hastings', indicates that development would likely lead to impacts upon the Marline Valley Woods SSSI. The report sets out that significant work is required to understand how development would impact the SSSI which will require a period of ecohydrological and geohydrological monitoring.

5.13. Proposals to develop the site for any use will be required to demonstrate that appropriate ecohydrological and geohydrological monitoring of the SSSI has been undertaken in accordance with a monitoring programme which is agreed between Hastings Borough Council and Natural England and identifies the conditions required to support the existing ecosystem as well as a scheme of mitigation which replicates the current conditions in perpetuity.

5.14. The groundwater aquifer is identified as being highly vulnerable to the introduction of pollutants and any risk of this will need to be designed out both construction and occupation phases, with cumulative impacts of development

within the IRZ considered insofar as this is possible. Development proposals should avoid breaching the underlying sandstone layer.

5.15. Due to its location within the setting of the High Weald National Landscape (HWNL), the site will require a comprehensive Landscape Visual Impact Assessment (LVIA) to adequately assess the impact of any proposal on the National Landscape. The LVIA's findings must inform the design of a landscape-led masterplan for the site that responds positively to the site's topography and the surrounding land, and incorporates any necessary mitigation measures, including those related to site hydrology and groundwater.

5.16. The entire area lies within a defined ACIB of the East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS). Proposals for this site should therefore contribute towards measures to create new habitat adjacent to protected sites, to create new wildlife corridors, and to create new and protect and enhance existing woodland. As well as ecohydrological and groundwater (geohydrological) considerations, significant buffers will be required to minimise any additional impacts associated with development, including but not limited to, increased recreational pressure, light pollution, garden escapes and invasive non-native species, and increased predation by domestic pets.

5.17. The identified potential access is located within neighbouring Rother District. Work will be required to ensure the site is fully accessible and any access is capable of meeting acceptable highways standards.

5.18. The council considers that a masterplan should be submitted and approved by the Local Planning Authorities prior to a planning application for development coming forward.

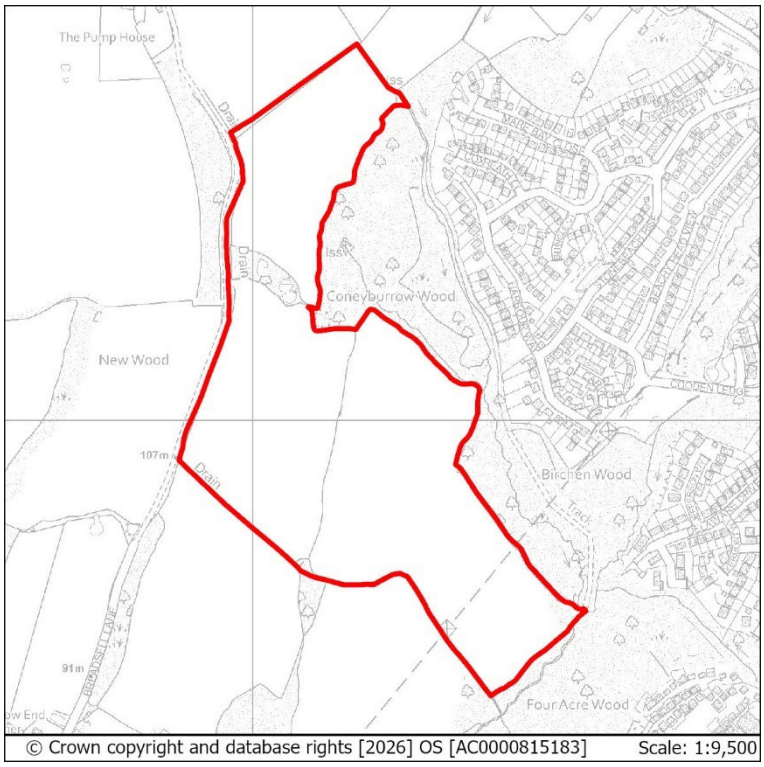

Figure 2: Land at Breadsell.

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

Use: Residential
Indicative Capacity (net additional dwellings): 200-300
Site Area (net developable): 12.03ha

In order to establish the acceptability of the principle of development on this site, it will be necessary to undertake an assessment of the ecological impact of any proposed development on the adjacent Marline Valley Woods SSSI. This must include the results of an agreed monitoring programme of the adjacent SSSI which sets out the requirements of the species and habitats contained within. The results of the programme must identify mitigations to replicate the current conditions within SSSI to avoid any undue harm to the protected site.

Should the principle of development be established, prior to the submission of a proposal for the development of the site, a Masterplan should be agreed with the Local Planning Authorities. The Masterplan should be informed by informed by relevant technical evidence and take into account the advice within the High Weald AONB Housing Design Guide, with regard to the policy requirements set out below.

Proposals for development on this site should:

1. **Take a SuDS-led and landscape-led approach to design and layout, which should maximise greenspace and take into account the results of any hydrological and groundwater monitoring to ensure negative impacts on the Marline Valley Woods SSSI will be avoided and/ or mitigated. This must be guided by:**

    a. **The results of hydrological and groundwater monitoring which must be informed by trial pits and/or boreholes;**

    b. **The need to avoid breaching the underlying sandstone layer during the preparation, construction and occupation phases (save for the purposes of (a) above);**

    c. **The results of a comprehensive Landscape Visual Impact assessment (LVIA) which must assess the impact of the proposal on the nearby National Landscape and incorporate mitigation measures where required.**

2. **Provide affordable housing in line with Policy SP2;**

3. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as**

recommended by the ECOP. The ECOP must make specific reference to the presence of onsite and nearby Sites of Special Scientific Interest (SSSI), Ancient Woodland, Impact Risk Zones for all potentially affected SSSI, the results of site surveys of D1 itself, and to other nearby areas of wildlife sensitivity. The EcIA should recommend appropriate buffers for areas of ecological sensitivity. Opportunities for enhancement should have regard to the LNRS;

4. **Ensure scheme and construction access is via A2100 subject to agreement with relevant bodies;**

5. **Maintain and enhance the existing hedgerows within site excluding where access is required which should be reprovided elsewhere on the development site;**

6. **Provide a lighting plan for both the construction and occupation phases of the proposed development, with regard to the High Weald National Landscape Dark Skies TAN to minimise adverse impacts on the National Landscape and nearby areas of wildlife sensitivity, including the SSSI. The plan should include measures to prevent overspill from internal lighting. The lighting plan must be agreed before permission is granted.**

7. **Provide publicly accessible open space and natural, unfenced multifunctional play space. Open space and play will be secured in perpetuity by legal agreement;**

8. **Include a maintenance and management plan for areas of publicly accessible open space and play;**

9. **Create a layout which incorporates a landscape buffer zone along the boundary of the site, the tree and hedgerow belt in the southern fields, adjacent to the Marline Valley Woods SSSI and areas of Ancient Woodland.**

10. **Consult relevant historic environment records and assess heritage assets using appropriate expertise including, where necessary, a field evaluation.**

11. **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.**

12. **Ensure that any necessary reinforcement of the water and/or wastewater network is in place to accommodate the quantum and type of proposed development prior to connection, and that such reinforcement is agreed with Southern Water. This will be secured by**

condition. Early engagement with Southern Water is also recommended.

13. Ensure vehicle access meets acceptable highways standards;

a. Be supported by a Transport Assessment and Travel Plan. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the proposal;

14. Include walking and cycling links to ensure local connectivity, including to local community infrastructure, green spaces and public transport provision, taking into account site topography.

Regeneration Area Policy 1 (R1): Hastings Central

5.19. Hastings Town Centre is positioned at the top of the Borough's retail hierarchy and is materially larger in terms of floorspace than the other town centres in the Borough. It includes around 550 non-residential public and private premises including shops, offices, educational space, leisure uses, visitor accommodation and municipal buildings, all set within a square mile. It is the physical, economic and social 'heart' of Hastings, sustaining more than 20% of the town's jobs (c.6,000 jobs), it performs an important retail role in the sub-region, and includes the Town's main transport hub.

5.20. Located between the town centres of The Old Town to the east and St Leonards to the west, these two centres provide a complementary role to Hastings Town Centre. Collectively these centres, with their distinctive characters, offer a diverse range of shopping and leisure experiences.

5.21. Significant regeneration has taken place in the town centre since 2000s with the delivery of office, education and health facilities and a new railway station. More recently has been the success of the Trinity Triangle Heritage Action Zone (HAZ) located in the eastern part of the Town Centre boundary.

5.22. A catalyst for the continued regeneration of the Town Centre is the Town's Fund programme, running to 2026. The investment provided by the Towns Fund will see the revival of Hastings Town Centre with investment in key heritage assets, buildings in the town centre and improvements in the public realm. To continue driving the regeneration of the Town Centre throughout the Plan period, the council will develop a dedicated regeneration plan as part of Pride in Place. With £20 million in endowment-style funding already confirmed from the government, the plan will set out local priorities identified through extensive engagement with communities across the borough, supporting long-term, locally led regeneration through to 2034.

5.23. The regeneration activity already delivered through the Town's Fund (to 2026) has created opportunities to further invest in the Centre that reflect the council's wider, long-term ambitions. A critical part of taking the regeneration of the Town Centre forward, in addition to the policies set out here, is the continued collaboration between the council and Homes England on specific sites within the town centre. This partnership is expected to remain central to the delivery of regeneration initiatives, including as the new Sussex Mayor comes into power in May 2028. Working in partnership, the council aims to coordinate and manage key interventions and unlock wider investment opportunities from both the public and private sectors.

5.24. Shopping habits are changing, and Hastings Town Centre needs to continue to change and evolve. Our retail needs assessment shows very low growth forecast for retail needs in Hastings over the coming years, and the same study indicates that the strategy for both convenience and comparison goods floorspace in Hastings should instead be focused upon making qualitative

improvements to the town centre offer. Similarly, whilst there is a modest amount of growth expected for net additional food and beverage floorspace, this can be accommodated via the general turnover of units in the town centre and encouraging provision in redevelopment schemes in the centre.

5.25. As well as changes to high street retailing, the Plan needs to take in to account other issues such as new ways of working, and a pressing need for more homes. Taken together, these factors can be harnessed to support Hastings town centre over the Plan period. The council wants to encourage a mix of uses in appropriate locations which will ensure the Town Centre remains vibrant and attractive to residents, visitors and investors. The vision is to build on the strengths of the town centre; to make it an even more attractive place to live, work and visit; to offer a town centre experience that cannot be found online, and to encourage a thriving daytime, evening and night-time economy.

5.26. The council has identified a number of regeneration sites which offer potential for redevelopment or conversion. This includes a range of sites in terms of cleared sites ready for development, vacant and currently occupied buildings:

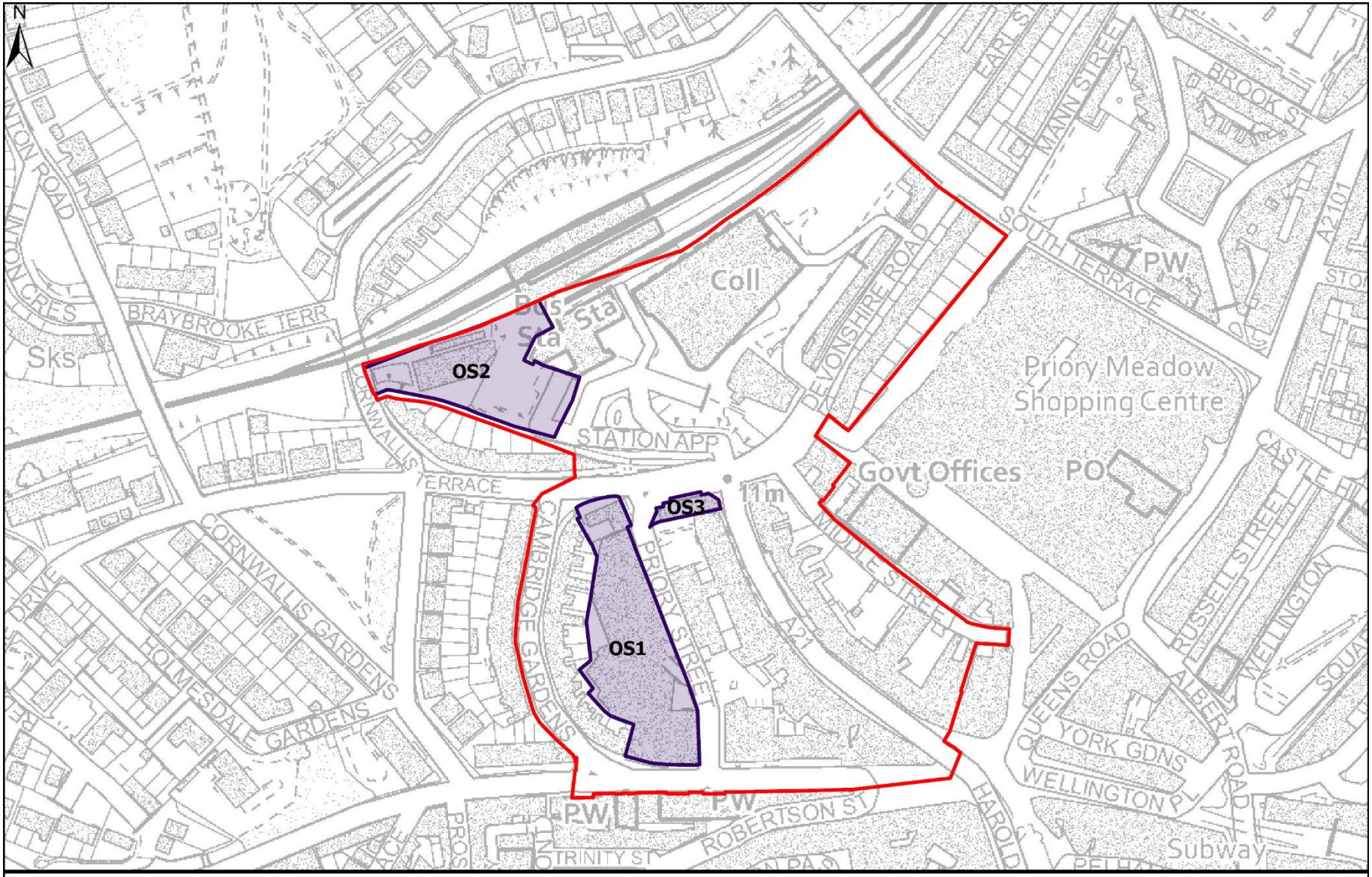

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Figure 3: Station Area, showing opportunity sites.

Station Area

5.27. This area includes Hastings Railway Station and Priory Quarter which has been the focus for education and office development adjacent to the station and extending along Havelock Road. Significant regeneration has taken place in this area since 2000. The council wants to see the regeneration of this area continue, including the redevelopment of Queensbury House and Priory Street, to create new economic and residential spaces.

5.28. The whole area has the potential to act as an attractive gateway to Hastings. Opportunities exist for public realm improvements, and the reconfiguration of public spaces, enhancing this area's offer as a pedestrian hub and as an important access point to the town centre. There is potential to create linkages to the wider Town Centre area.

5.29. The council will work with developers and partners to bring forward mixed use development and public realm improvements.

5.30. Development will need to address the following key objectives:

- Improving town centre connectivity;
- Delivering new and enhanced employment generating uses;
- Support the regeneration of Hastings Town Centre through provision of land uses that complement the main town centre uses;
- Create high quality homes in the heart of Hastings.

5.31. The Gateway area contains three opportunity sites as shown in Figure 3:

- OS1: Priory Street Car Park, ESK and Gizmo
- OS2: Station Approach car park and Royal Mail Delivery Office
- OS3: Queensbury House, Havelock Road

5.32. Table 6 sets out Council's anticipated uses for these sites. Policy R1 sets out the strategy and guiding principles for their redevelopment. In line with the flexibility established within Policy R1, the council is expecting significant intensification to be achieved in Hastings town centre.

Table 5: Station Area sites and anticipated uses

Site Ref	Site Name	Potential uses and indicative capacity
OS1	Priory Street Car Park, ESK and Gizmo	This site offers strong potential for mixed-use development and intensification. Its proximity to the primary shopping area, transport hub and further education facilities, means it could provide a range of

Site Ref	Site Name	Potential uses and indicative capacity
		employment spaces, and other town centre uses such a leisure. Residential use, as part of a mixed-use development, would also be suitable. A high-quality design and public realm improvements will be important along with active frontages to Priory Street and Cambridge Road. Proposals should take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting. Summary: Mixed use including residential, business, leisure c.10,000sqm of commercial space c.160 residential units
OS2	Station Approach car park and Royal Mail Delivery Office	This site is located next to the station plaza, and provides the opportunity to create an appealing, attractive gateway to Hastings. The site is capable of supporting a mixed-use scheme with retail, leisure and residential uses. Redevelopment of the Royal Mail site will have to take account of the relocation of its existing operation. Summary: Mixed use including retail, business and residential c.10,000sqm of commercial space c. 92 – 115 residential units
OS3	Queensbury House, Havelock Road	The redevelopment and/or reuse of this key gateway site has the potential to deliver a high-quality, tall landmark building that provides a range of business and commercial floorspace, including food and drink and residential. Proposals should take account of Southern Water's underground infrastructure in the design of the

Site Ref	Site Name	Potential uses and indicative capacity
		layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting. Summary: Mixed use including business/leisure, and residential and retail c.4,000sqm of commercial space c. 20 – 40 residential units

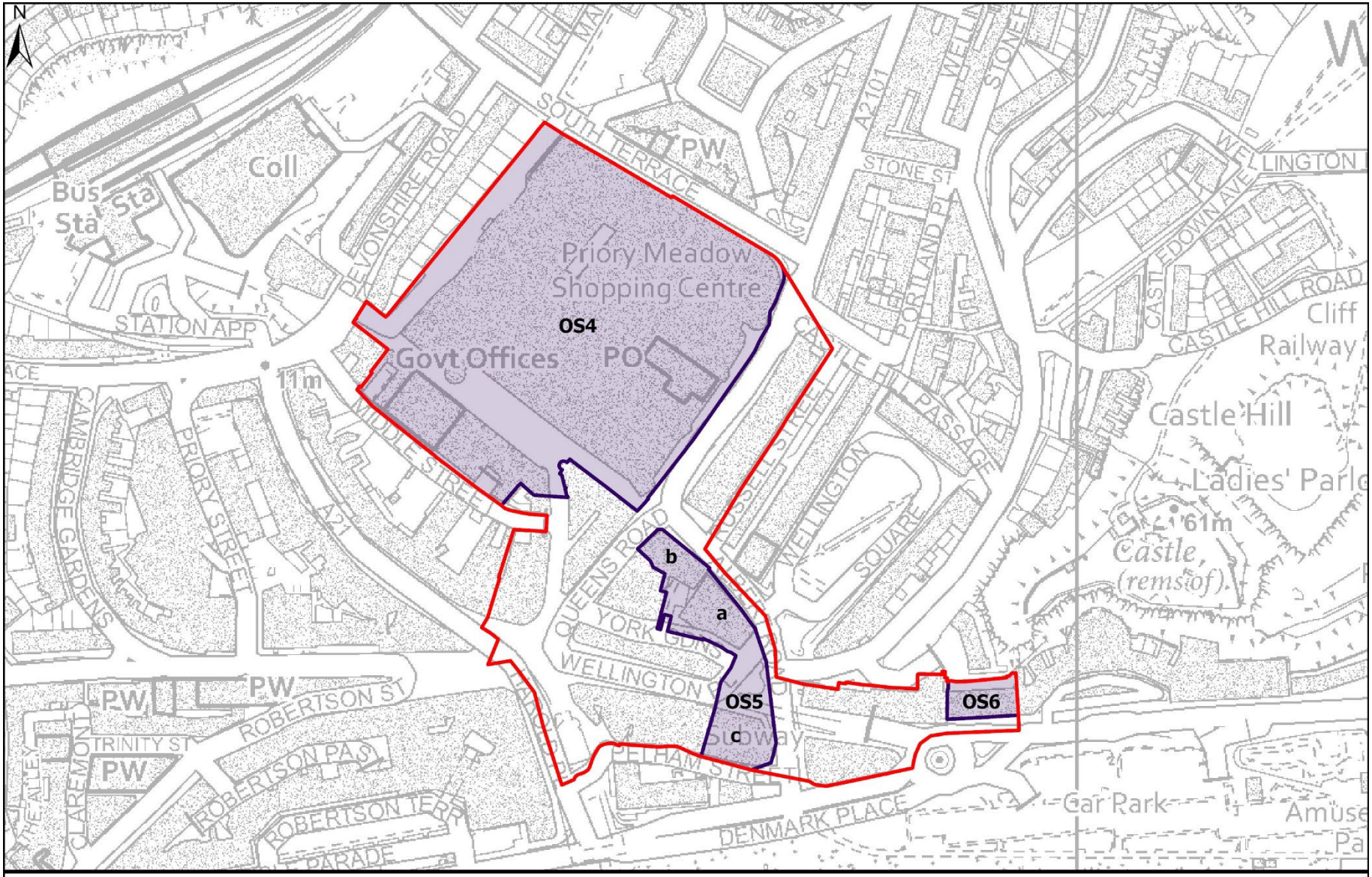

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Figure 4: Hastings Central Plaza, showing opportunity sites

Hastings Central Plaza

5.33. There continues to be an opportunity to revitalise the Town Centre's primary shopping area, with additional investment in retail and leisure development particularly in key gateway locations closer to the seafront. This will encourage more shopping and leisure footfall to benefit the centre's vitality.

5.34. Hastings Central Plaza is an area of Hastings Town Centre (as shown in Figure 4), taking in the lower part of Queens Road, Wellington Place, Albert Road, Station Approach, Priory Meadow, Castle Street and Breeds Place. It is a busy shopping area. The streets are lively with shoppers and visitors attracted by the mix of multiple retailers and independent traders. There is a vibrant retail and leisure presence, including cafés and restaurants also have a strong presence. Castle Street is a key pedestrian gateway linking the seafront to the Town Centre Shopping Area.

5.35. A key objective is to attract high quality commercial investment, increase pedestrian flows between the seafront and the primary shopping area and creating an attractive and vibrant shopping and leisure destination, increasing dwell time and drawing residents and visitors from a wide catchment. Residential uses on upper floors and community related uses may also be appropriate as part of mixed-use development schemes.

5.36. This regeneration area has the potential to provide an enhanced leisure, cultural and entertainment offer. The look and feel of the area needs to be reinvigorated to create a high-quality destination attracting new investment as well as visitors. The public realm needs to be enhanced and where possible, trees and other nature-based solutions incorporated to soften the hard landscaping, providing shade and capturing surface water close to the source.

5.37. New development in this area should:

- improve the quality and variety of town centre uses;
- deliver high quality design and associated public realm;
- redevelop key sites to increase capacity within the town centre;
- raise the overall standard of design, including shopfront design, creating attractive and vibrant streets.

5.38. The following sites have the potential to be redeveloped and are shown in Figure 4.

- OS5:

  a. Corner of Wellington Place and Albert Road

  b. Cinema, Queens Road

  c. 1-7 Wellington Place

- OS4: Priory Meadow
- OS6: Muriel Matters House, Breeds Place

5.39. Table 6 sets out Council's anticipated uses for these sites. Policy R1 sets out the strategy and guiding principles for their redevelopment.

Table 6: Hastings Central Plaza sites and anticipated uses

Site Ref	Site Name	Potential uses and indicative capacity
OS5a	Corner of Wellington Place and Albert Road	This site is located in a prominent position within the Primary Shopping Area. The current building is divided between comparison retail floorspace and leisure uses. The building was originally developed as a large convenience store and is of poor design making a negative contribution to the streetscape and conservation area. To ensure the vitality of the town centre is maintained and strengthened, the council will support the redevelopment or remodelling of this site to deliver an exciting building of high quality at the eastern end of Wellington Place, for retail or leisure use. Office or residential uses may be acceptable on upper floors as part of a mixed-use development. In addition, the redevelopment of site OS5(a) offers the potential to enhance the public space located at the junction of Albert Road and Wellington Place. This area currently lacks a clear function and detracts from the setting of Wellington Square and Hastings Castle.
OS5b	Cinema, Queens Road	This site is located in a prominent gateway position within the Town Centre, connecting Priory Meadow's central plaza with the wider centre and seafront, and is located within the primary shopping area. The building was constructed as the Gaiety Theatre and is a striking building in Italianate red brick and stone. It is currently operating as a cinema

Site Ref	Site Name	Potential uses and indicative capacity
		with a 4-screen multiplex facility. Leisure uses are an important element of the town centre, and the council will continue to support cinema provision at this site. The council will support the enhancement of cinema facilities on this site or as part of a mixed-use development scheme incorporating site OS5(a). In the event of the reprovision of the cinema on a suitable alternative site within the town centre, the council will support the redevelopment of the site to incorporate retail and leisure uses. Development proposals for this site: - should be predominantly for cultural, leisure or retail; - should seek to retain the existing building
OS5c	1-7 Wellington Place	The redevelopment of this site will form an important part of the vision to transform this part of the primary shopping area into a high-quality destination enhancing this gateway location between the town centre and the seafront. The current building negatively impacts the town centre streetscape and conservation area. The council will support the redevelopment or remodelling of this site to deliver an exciting building of high quality that will act as an 'anchor' at the eastern end of Wellington Place. The redevelopment of this site together with Policy OS5(a) should raise design standards in this part of the town centre. Residential uses may be acceptable on upper floors as part of a mixed-use development scheme. The council will support the

Site Ref	Site Name	Potential uses and indicative capacity
		redevelopment of this site for a mix of uses including comparison retail, leisure provision, restaurant, café uses, and residential uses will be acceptable as part of a comprehensive scheme. The site provides the opportunity to deliver a new high quality landmark building marking the entrance to the town centre from the seafront.
	Summary:	Mixed use including retail, residential, sport and leisure, cinema, food and drink. Proposals should take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting. c.3,500 sqm c. 84 – 105 residential units
OS4	Priory Meadow	Priory Meadow is located in the central part of the primary shopping area. It caters for comparison shopping and accommodates a high proportion of the Town's national retailers. Maintaining the quality and variety of the retail offer will be important. So too is the need to encourage new leisure uses to attract people to the centre at different times of the day and evening. The council will explore with the centre owners and developers the opportunities to increase the quantity, quality and range of offer in the centre. This includes increasing storeys and potentially introducing residential and other town centre uses on upper storeys. Proposals should take account of Southern Water's underground

Site Ref	Site Name	Potential uses and indicative capacity
		infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting. Summary: Mixed Use c. 130 residential units
OS6	Muriel Matters House	Muriel Matters House is a seafront multi-storey office building which offers potential for conversion or redevelopment. Retention of some office space is compatible with a variety of town centre uses including residential. Whilst an active ground floor frontage should be retained. Proposals should take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting. Summary: Mixed use c. 25 – 35 residential units

Regeneration Area Policy 1 (R1): Hastings Central

5.40. To support the council's objective to promote economic growth, Policy R1 provides maximum flexibility to enable the delivery of new and mixed-use development with a focus on job creation with the objective of expanding the draw of the town beyond just traditional retail.

5.41. Where these uses contribute to the vitality of the Town Centre, well designed, 'meanwhile uses', that is temporary changes to the use of a building, may have a role in supporting the area in the short to medium term. Residential development could also be part of the town centre mix.

5.42. The historic townscape of the centre, with multiple listed buildings and Conservation Area status will require sensitive design and adaptive reuse. A fabric-first approach is essential to safeguard heritage assets while enabling contemporary uses. The compact nature of the Town Centre offers excellent accessibility by public transport and active travel. This creates high potential for intensification, with a significant uplift in average densities, adaptive reuse, and mixed-use development within existing built form. Sites within this area would benefit from a holistic and well-integrated masterplan approach.

5.43. Given that tall development is likely to take place on some of these sites, it is also important to ensure that proposals include a views analysis to determine appropriate building height, massing, and the suitability of any taller elements.

5.44. Growing the permanent residential community in Hastings Town Centre will contribute to the vitality and viability of the town centre, bringing people into the town at different times of the day, increasing footfall and supporting a more vibrant evening and night time economy.

5.45. It will be important however, to provide a balance between protecting the town centre from the loss of those characteristics which make it a vibrant town centre and encouraging more residential development. Residential uses at ground floor level within the primary shopping area would be harmful to the overall vitality of the centre, both in terms of fragmenting retail and commercial uses, and also by creating incompatible living conditions for potential occupiers by compromising residential amenity.

5.46. Hastings Town Centre is inhibited by transport and public realm issues. Parts of the primary shopping area have been pedestrianised, but there is a lack of consistency in design, use of materials, and street furniture. Improving the attractiveness and useability of the public realm in conjunction with changing our approach to parking in an area with high transport accessibility is key part of our strategy.

5.47. Policy R1 sets out the council's strategy for revitalising Hastings Town Centre.

5.48. The Policy sets out the council's strategy for Hastings Town Centre and is intended to act as a guide to inform the design and delivery of new development. Not all of the criteria will be relevant to every development proposal. In line with the flexibility established within Policy R1, the council strongly encourages pre-application engagement to establish suitable uses for each of the identified sites.

Figure 5: Hastings Central Regeneration Area

Regeneration Area Policy 1 (R1): Hastings Central

Development proposals within the Hastings Central Regeneration Area should be underpinned by an understanding of the significance of surrounding heritage assets. The council will support a variety of land uses in Hastings Central to encourage a mixed-use vibrant town centre and will support the development of:

1. **Employment generating uses, including: retail, office, light industry, studios, leisure, cafés, restaurants, visitor facilities (including hotels), education facilities and where appropriate drinking establishments.**

2. **Residential uses, including student accommodation for institutions located in Hastings and Rother, providing they do not prejudice the commercial function of the area. In the Primary Shopping Area, residential uses will only be acceptable at first floor level and above.**

3. **Non-residential Uses that support active frontages at ground level to enliven the street environment**

4. **Opportunity sites have been identified in the Station Area and the Hastings Central Plaza. These sites provide the opportunity for intensification and expansion to enhance the retail and leisure offer, support the local economy, promote tourism and provide residential accommodation. There is the potential for this to be supported through the development of a Hastings Central Regeneration Area Design Guide during the Plan period.**

General Principles

New development should make a positive contribution to improving the town centre. This includes improving the viability and vitality, supporting the creation of a safe, attractive, accessible and high-quality environment through a variety of places and spaces for social interaction, improving the overall mix of land uses and enhancing connectivity, both within the centre and to adjoining areas. This will be achieved by:

5. **Requiring all schemes to demonstrate a quality of design that makes a positive contribution to the character of the Town Centre, including proposed buildings and the public realm.**

6. **Ensuring the most effective use of land through the promotion of high-density development where appropriate, and the redevelopment of cleared, vacant or underused sites to increase commercial capacity within the Town Centre.**

7. **Improving the connectivity and legibility between the different areas of the Town Centre, including the seafront.**

8. **Recognising the rich historic environment in the Regeneration Area, ensuring that proposals conserve and where appropriate enhance the significance of nearby designated heritage assets.**

9. **Consult relevant historic environment records and assess heritage assets using appropriate expertise including, where necessary, a field evaluation.**
10.

11. **Raising the quality of streets and public realm including enhance the quality of the natural environment by investing in and establishing new green and blue infrastructure, having regard to the opportunities identified through the LNRS.**

12. **The introduction of residential uses as part of commercial-led mixed-use development to support and sustain the vibrancy of the town centre and the evening economy.**

13. **Improving pedestrian and cycle access, traffic circulation and management.**

5.49. The Policy sets out the council's strategy for Hastings Town Centre and is intended to act as a guide to inform the design and delivery of new development. Not all of the criteria will be relevant to every development proposal. In line with the flexibility established within Policy R1, the council strongly encourages pre-application engagement to establish suitable uses for each of the identified sites.

Regeneration Area Policy 3 (R3): St Johns Road

5.50. The St John's Road Regeneration Area totals 1.61ha and comprises land in and around Warrior Square Station, including a former Taxi office and café, the north and south station concourse, and equipped play area. The site fronts St John's Road, London Road, Chapel Park Road and Ellenslea Road and provides an opportunity for comprehensive regeneration in a highly sustainable location.

5.51. Part of the location slopes steeply east to west and includes areas of terracing supported by retaining structures. There is a sharp difference in levels at the Chapel Park Road frontage where the site crosses the Hastings – St Leonards railway tunnel, and several other incidences of level changes within the boundary. It is within the Kings Road Conservation Area and partially within the St Leonards District Centre.

5.52. As a key gateway into and out of St Leonards, a landmark development enhancing the views from Kings Road and the wider Conservation Area would be appropriate for this location. Similarly, there is potential to reprovide or improve the equipped play area to provide stronger links to the station and the District Centre.

5.53. The station itself requires improvement to ensure high quality step free access to both platforms. In addition, any redevelopment proposal should seek to strengthen sustainable transport and multimodal links to and from the location.

5.54. There is an opportunity to rationalise and improve the relationship of the station itself to the London Road including improvements or layout changes to vehicle and footpath access which has accessibility challenges and lacks natural surveillance. There is the potential for residential-led, mixed use development along St John's Road and south of Ellenslea Road subject to reaching agreement with landowners and other stakeholders within or adjacent to the area. Proposals will need to take into account loading capacities, easements and the need to avoid impacting the integrity and operation of the railway and its associated tunnels.

5.55. Due to the prevalence of impervious surfaces, the location is vulnerable to surface water flooding. Redevelopment will provide an opportunity to improve flood risk attenuation measures, such as urban greening factor interventions and the introduction of new green and blue infrastructure. It should be noted that part of the site lies within an ACIB of the East Sussex and Brighton & Hove Local Nature Recovery Strategy (LNRS), with mapped measures for nature networks.

Table 7: Opportunity Sites in Regeneration Area 3

Site Ref	Site Name	Potential uses and indicative capacity
OS7	Land south of Ellenslea Road	This site currently serves as carparking for the station. Proposals should seek to retain parking within the Regeneration Area as a whole and consider innovative solutions to incorporate additional mixed and residential uses at higher elevations.
OS8	Land north of St Johns Road	This site is a sloping, terraced location comprised of most hardstanding and has the potential to incorporate mixed and residential uses. This area incorporates a play space of good quality but with poor relationship to the station and District Centre. Proposals for the Regeneration Area as a whole should consider how this relationship can be improved, either through relocation within the Regeneration Area or access improvements.
OS9	Land south west of St Leonards Warrior Square Station	This site is located in a prominent gateway position, connecting the area with Kings Road and London Road. The site has the potential to incorporate some element of mixed or residential use, and has potential as a sustainable location for a Day Nursery.

5.56. Any redevelopment proposals should:

a. be prepared in association with relevant stakeholders and be informed by comprehensive and inclusive consultation and engagement with the wider community;
b. be informed by a design and conservation statement enabling a detailed understanding of the wider Conservation Area and townscape context;
c. be based on thorough ground investigation taking into account the railway network infrastructure in consultation with the railway authority;

d. improve the overall connectivity, legibility and platform access for the station platforms and consider the future of the station buildings as part of the overall context of the location;
e. adapt to and mitigate the effects of surface water flooding.

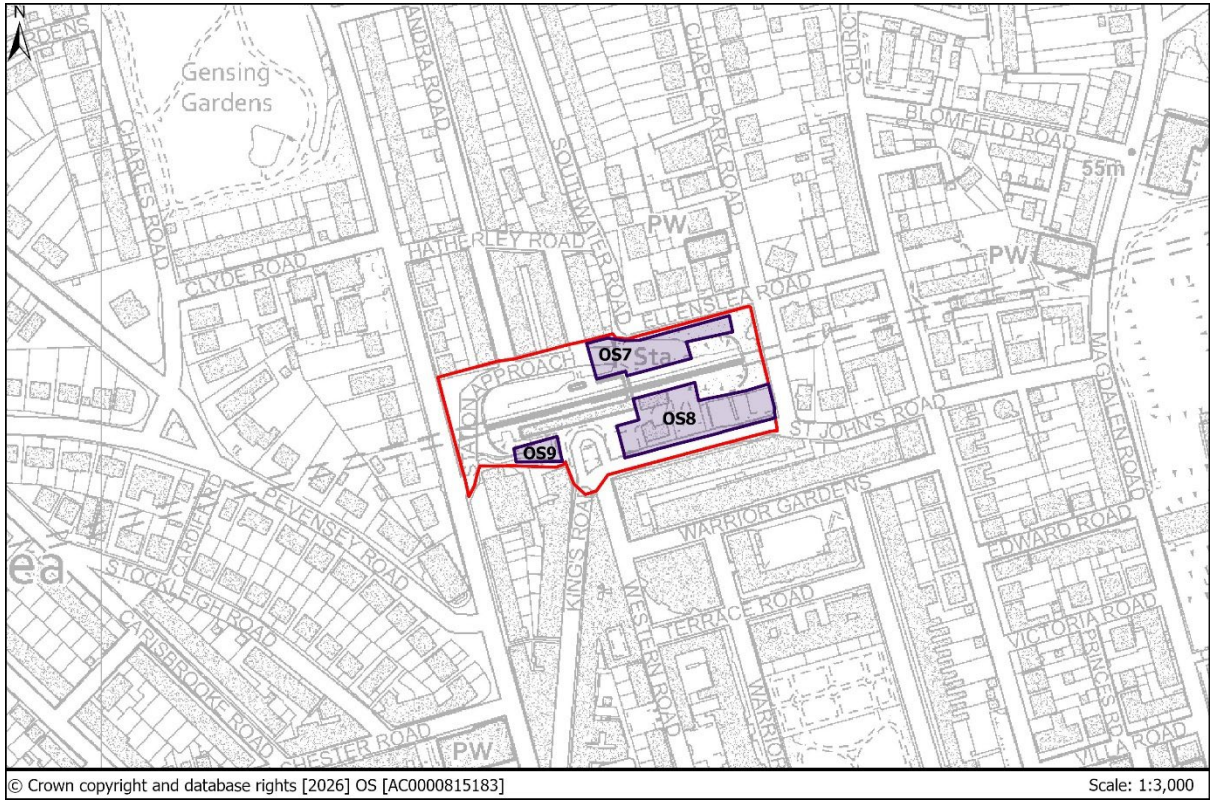

Figure 6: St Johns Road Regeneration Area

Regeneration Area Policy 3 (R3): St Johns Road

1. **A comprehensive approach is required for the redevelopment of the station and the area immediately surrounding it, that incorporates improvements to the accessibility, capacity and design of Warrior Square Station.**

2. **As the area has the potential to support the Borough's requirements for new housing, appropriate residential development is acceptable as part of the overall mix including the provision of affordable housing, in line with policy SP2. A variety of commercial and community uses may be acceptable for street level elevations and trackside.**

3. **Ensure that all new homes meet the Council's Net-Zero Carbon Homes standards in Policy SC3 and that the scheme includes other measures to mitigate the effects of climate change in particular measures for shading and cooling.**

4. **Proposals should be in accordance with a Masterplan and development brief that has been prepared in conjunction with the Railway Authority and adopted by the Council.**

5. **Proposals for development should consider the setting of the Kings Road conservation area and the prominent position of the station as a key gateway site and landmark building location.**

6. **Proposals should be informed by agreed land stability and geotechnical reports prepared in conjunction with the Railway Authority covering the temporary, intermediate and permanent condition of the site, taking into account all dead and imposed loads and railway infrastructure.**

7. **Include a maintenance and management plan for any new, retained or improved land stability mitigation measures to ensure they will be safe for their intended lifetime.**

8. **Car free or low-car development will be acceptable subject to Policy ID2.**

9. **Proposals should take into account the topography of the area.**

10. **Proposals should retain or reprovide the play space and improve the access and connectivity to the station and District centre.**

11. **Opportunities to mitigate, manage and adapt to surface water flooding through to protect the railway line and surrounding pedestrian access should be explored.**

12. **Proposals should ensure that green and blue infrastructure and high scoring urban greening features are incorporated**.

6. Site Allocation Policies

6.1. To understand both housing need and potential land supply in Hastings, the Council is guided by a number of evidence and base studies including:

- Housing and Economic Development Needs Assessment Update 2026
- Strategic Housing and Employment Land Availability Assessment 2026
- Densification and Capacity Study Interim and Final Reports 2026
- Landscape Sensitivity to Residential, Commercial and Solar Development within Hastings 2024
- Strategic Flood Risk Assessment 2024 (Amended 2026)
- Sustainability Appraisal 2026

Part one – Housing and Mixed-Use Allocations

6.2. Allocating a site in the Local Plan establishes the principle that the development of the site for housing is acceptable. However, the numbers set out in site allocation policies are indicative of what might be achieved. It is for the planning application process to determine the precise details of the development.

6.3. The Local Plan must take need into account and provide for an adequate amount, quality, and type of housing in the appropriate places. Policy SP2 states that the Local Plan will make provision for the delivery of a minimum of 2,970 dwellings over the period 2023-2041 (165 net new dwellings per annum), of which 1,131 are allocated in the Plan.

6.4. The housing allocations have been informed by the suitability, availability and deliverability assessment which forms part of the Strategic Housing and Employment Land Availability Assessment (SHELAA) process. The site allocations have also been informed by Sustainability Appraisal (SA) process to ensure that sustainable development is achieved in accordance with the NPPF.

6.5. The plan allocations reflect a brownfield first approach to development, however given the significant land constraints within Hastings greenfield sites have been identified to help meet housing needs in the borough.

6.6. The approach guiding residential housing site selection is therefore as follows:

6.7. Sites that are suitable, available and achievable within the plan period are identified as site allocations. These sites are identified by the prefixes HS, HSS and GT and are formal site allocations.

6.8. Sites that are suitable and have the potential to be available and achievable within the plan period are identified as Regeneration Area Opportunity Sites.

Areas that include these sites are identified by the prefix R and can be found in Section 5 of the Plan.

6.9. The sites allocated under Policy HA1 are critical to achieving the objectives and strategy set out in Chapter 1. For larger sites, or where there are unique considerations, site specific policies are provided.

6.10. For smaller sites and Windfall sites, any subsequent planning application will be determined in accordance with the policies set out in this Local Plan.

6.11. Appendix 2: Housing Trajectory shows when these housing allocations are expected to be delivered during the plan period, including in the first five years.

6.12. Where site allocations identified within this plan are at risk of flooding, the council will ensure that sites are sequentially tested in line with National Planning Policy and Practice Guidance, and that the exception test is applied where necessary.

6.13. The council is aware of the importance of monitoring the delivery of allocated sites in order to ensure housing needs are being met and in order to maintain a continuous five-year supply of deliverable sites. In accordance with the NPPF, the council shall annually identify and update a supply of specific deliverable sites, sufficient to meet its housing requirement for 5 years plus an additional buffer as applicable.

Marline Valley Woods SSSI and the Queensway Corridor

6.14. All development in the Queensway Corridor has the potential to affect the SSSI. The Marline Valley Woods SSSI contains interest features which include a number of rare bryophytes within the SSSI's steep-sided ghyll stream. The interest features of the SSSI rely on the continuation of the existing hydrological regime (the quality and quantity of water flowing from adjacent land to the SSSI). The SSSI is hydrologically linked to these locations.

6.15. All applications in this location, whether in relation to sites allocated within this plan or as applications for sites yet to be identified, have the potential to affect the hydrogeology of the SSSI via impacts to the existing ground and surface water.

6.16. Boreholes and trial pits in this area have shown it to be highly variable in nature with regard to the depth of the permeable layers and highly complex to develop. Applications must demonstrate that development will not impact the SSSI and that underlying sandstone layers will not be breached either by the finished development or during the construction phase.

<u>Interpretation of Site Allocation Policies</u>

6.17. Site allocation policies should not be read in isolation. The Plan needs to be read as a whole in order to ascertain which policies will be relevant to individual sites or proposals. Local plans should not repeat National planning guidance or regulations or matters already addressed elsewhere within development plans. Therefore, where site allocation policies do not explicitly reference subject areas covered elsewhere within the development plan, it does not mean that these subject areas are not considered relevant. Where subject areas are specifically covered within site allocations it is because there are unique circumstances surrounding that site that should be taken into account when preparing planning applications in addition to the other policies of the plan.

Policy HA1: Applications for Housing and Mixed-Use proposals

The Plan needs to be read as a whole in order to ascertain which policies will be relevant to individual sites or proposals. Proposals should, where appropriate, address the following non-site-specific material considerations within proposals for development:

- **Design and character**
- **Heritage impacts**
- **Affordable housing**
- **Housing mix**
- **Residential amenity**
- **Transport, including sustainable and active travel**
- **Flood risk and sustainable drainage solutions (SuDS) for surface water management**
- **Contamination, nuisance and hazards including where the 'agent of change' principle applies**
- **Land stability**
- **Ecology and Green and Blue infrastructure**
- **Biodiversity Net Gain**
- **Arboriculture and landscape**
- **Open Space and Play Space**
- **Waste and recycling**
- **Contributions and legal agreements**

Residential development proposals must meet the requirements set out in strategic policy, including those that set out density and housing mix, unless specific site circumstances provide a clear justification for an alternative approach.

The following sites are identified on the Policies Map and are allocated for residential/or residential-led development, to deliver the housing land requirement set out in Policy SP2. The requirements set out in each allocation policy are specific to that site and should be considered in unison with the above non-site-specific material considerations. For specific requirements applicants should refer to the council's validation checklist.

<u>Specific Locational Requirements: Marline Valley Woods SSSI</u>

Proposals for residential or mixed-use development adjacent to the Marline Valley Woods SSSI must be SuDS-led and maximise greenspace, avoid breaching the underlying sandstone layer and use borehole and/ or trial pit data to inform relevant groundwater assessments.

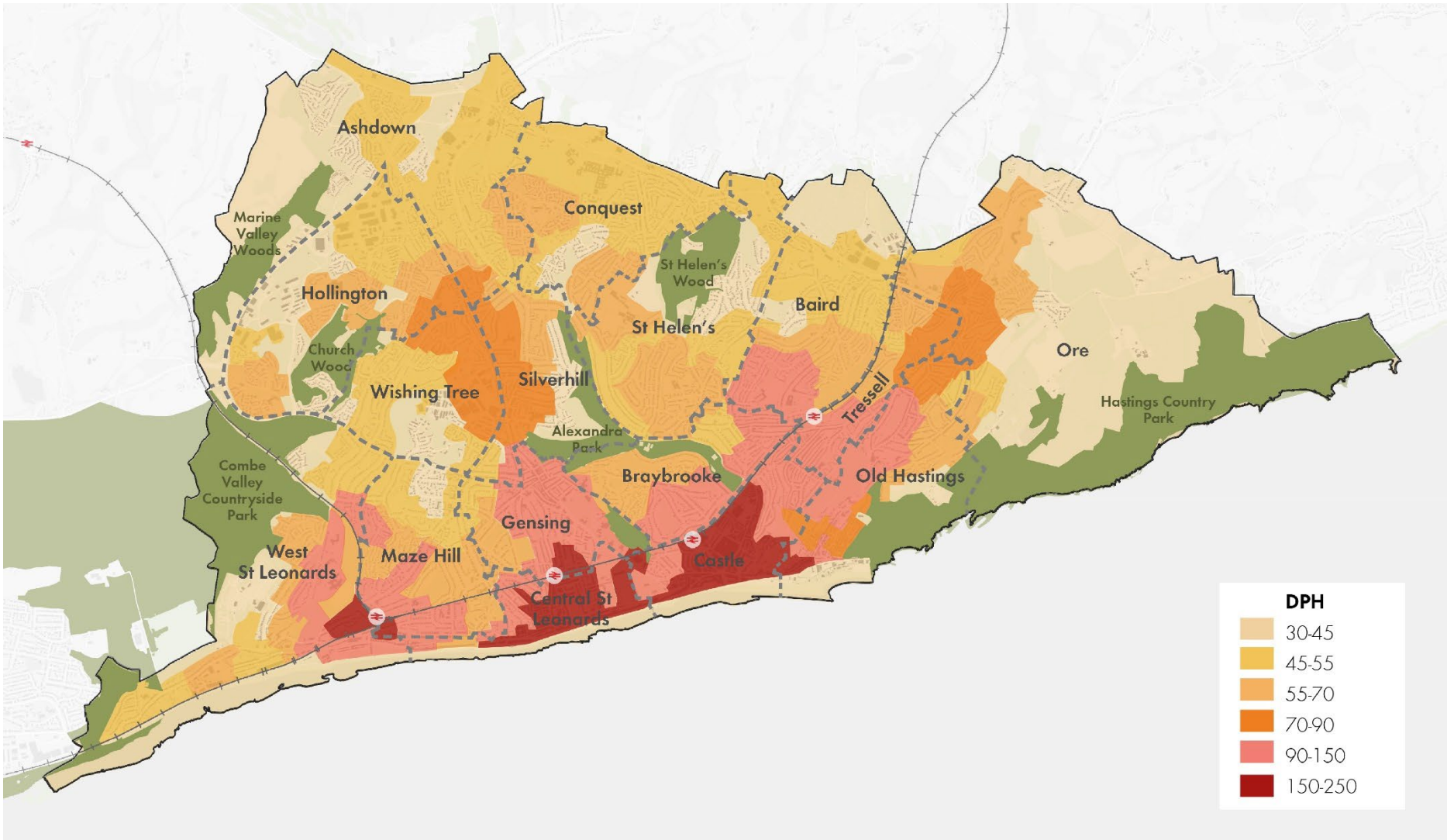

Figure 7: Density Zones within Hastings Borough

Table 8: Site capable of delivering 20 dwellings or more

Site Reference	Site Address	Site Area (ha)	Use	Indicative Capacity
HS1	Land adjacent to Sandrock Park, The Ridge	2.60 (net developable)	Residential	95
HS2	Seaside Road, West St Leonards	2.22	Mixed use: residential, commercial and leisure	120
HS3	Former Westerleigh School	2.15	Residential	100
HS5	Former West St Leonards Primary School, Bexhill Road	0.8 (net developable)	Residential	50
HS6	Ore Valley (Former Power Station)	2.36	Residential	78
HS7	Former Post Office and University of Brighton building	0.10	Mixed Use: Commercial and residential	41
HS8	Mayfield E, Bodiam Drive	1.06	Residential	38
HS10	Land at Rock Lane	1.2	Residential	26
HS11	Cinque Ports Way	0.37	Residential	58
HS12	Gambier House, 111 West Hill Road and West House, 115 West Hill Road	0.55	Residential	20

Site Reference	Site Address	Site Area (ha)	Use	Indicative Capacity
HS13	Land North-West of Winchelsea Lane	1.17	Residential	20
HS18	Land at Tilekiln Farm	4.33 (1/3 of site retained for open space)	Residential	75
HS20	Former West Hill Road Reservoir	0.21	Residential	30
HS21	Land East of Rock Lane	0.72	Residential	20
HS23	Land East of Beaneys Lane, The Ridge	0.40	Residential	18
HS25	Former Convent of Holy Child Jesus, Magdalen Road	4.76	Residential	200
HS26	Four Courts, Stonehouse Drive	4.44	Residential	Gross capacity 450 net 64
HS27	My Way Lodge, The Ridge West	1.29 (1/2 of site retained as open space)	Residential	20

Table 9: Site capable of delivering fewer than 20 dwellings

Site Reference	Site Address	Site Area (ha)	Use	Indicative Capacity (Dwellings)
HSS5	Land at Chiltern Drive	0.20	Residential	13
HSS8	Former Hollingsworth Garage, Braybrooke Road	0.34	Residential	9
HSS13	5 The Green	0.11	Residential	10
HSS14	Former Hillesden Mansions, 7-11 Chapel Park Road	0.11	Residential	15
HSS16	Mayfield Farm	0.48	Residential	11

Total allocated sites	1,131

Table 10: Gypsy and Traveller Permanent Pitch Sites

Site Reference	Site Address	Site Area (ha)	Use	Indicative Capacity (Pitches)
TP1	Land at Crowhurst Road	0.17ha	Permanent traveller pitches	2
TP2	Land at Tilekiln Lane	0.17ha	Permanent traveller pitches	2

Policy HS1: Land adjacent to Sandrock Park, The Ridge

6.18. Land adjacent to Sandrock Park, The Ridge is a site in the north of the Borough close to the boundary with neighbouring Rother District. The site is relatively level and sits at one of the highest elevations in the Boroughs overall topography. The site is bound by woodland to the northern and eastern extents and shares a boundary with the remains of St Helens Church and the Ore Place Conservation Area and is in close proximity to the late Tudor and early Jacobean manor house at Ore Place and to the High Weald National Landscape.

6.19. The St Helen's Wood Local Nature Reserve has a range of habitats that are sensitive to increases in surface water runoff, such as acid grassland, and others that are sensitive to changes in groundwater conditions, which recharge the ghyll within the Local Nature Reserve. It is essential that any scheme is SuDS-led in the first instance and informed by an agreed programme of hydrological and groundwater monitoring in line with the policies of this Plan.

6.20. The site has access to local shops, services, sports, employment and recreation facilities including nearby St Helen's Wood to the south and Sandhurst Playing Field to the north. It is within walking distance of local schools and well-connected to the existing bus network along The Ridge.

6.21. There is a low to negligible risk of surface water flooding at the periphery of the site, and a surface water flow pathway along the highway (The Ridge) to the north. The site will require a Flood Risk Assessment due to its size, and recommendations as arising from this report should ensure that flood risk will not be increased elsewhere as a result of either the construction or occupation phase of development. Existing areas of localised sewer flooding are present in close proximity to the site boundary. Flood risk, drainage, surface water and sewerage assessments should explicitly address this constraint and ensure that no new pathways or hydraulic connections are introduced that could increase the likelihood of sewer flooding impacting the site, adjacent residential areas, or other sensitive receptors.

6.22. Local sewerage infrastructure in closest proximity has limited capacity to accommodate the proposed development. Proposals for development at this location may therefore generate a need for reinforcement of the wastewater network should more detailed modelling show that additional capacity is needed. Proposals should demonstrate engagement with Southern Water at the earliest possible point to understand reinforcement needs, and any reinforcement must be completed prior to connection. This means that development cannot be occupied until it is demonstrated that reinforcement is fully completed.

6.23. The site sits within an Archaeological Notification Area.

6.24. The south east of the site includes ‘The Lodge’ (Lodge Cottage), a building, historically associated with a former entrance to the manor Ore Place, original in its form and detail, now vacant and in a state of disrepair. It is a building of notable architectural appearance and character and forms part of a group of buildings which include St Helens Church and a former school building, all of which contribute to the setting of the Ore Place Conservation Area. The Lodge should be retained in any overall development, and any development must relate well to the significance and setting of this building, and in the wider context of the Conservation Area.

6.25. Proposals for the development of the site should seek to retain and enhance the Public Right of Way (PROW) within the site that bypasses The Ridge. Schemes should ensure that the PROW benefits from good natural surveillance that follows Secured by Design principles and improves overall connectivity to the surrounding area and important services.

6.26. The site is bound by woodland, including trees subject to Tree Preservation Orders which acts as a natural buffer to adjacent housing estates and The Ridge. Woodland to the south-west, west and north forms a continuous and unbroken woodland corridor to the St. Helen's Wood Local Nature Reserve and Local Wildlife Site to the south and highway access should seek to limit removal of trees and look at innovative solutions to mitigate any impacts of loss. Natural buffers to the east adjacent to the Ore Place Conservation Area and St Helen’s Church should be preserved and enhanced to protect the setting.

6.27. In addition to the tree belt corridor, the site is in close proximity to the High Weald National Landscape to the north and adjacent to parts of the East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS) APIB which includes St Helen’s Wood Local Nature Reserve to the south. The entirety of the site sits within the ACIB with measures mapped for woodland, urban nature and nature networks. It is important that any scheme that is proposed clearly shows how links in the green infrastructure network will be retained and how ACIB measures will be delivered and maintained. The site has a total area of 3.9ha, of which approximately 1/3 will need to be given over to publicly accessible open space, habitat creation, ecological buffers and delivery of green and blue infrastructure. The net developable area of the site should therefore be considered to be 2.6ha.

6.28. The Local Nature Reserve, Local Wildlife Site, woodland, the APIB, the results of hydrological and groundwater monitoring and the High Weald National Landscape must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), any proposal must also be informed by an Ecological Impact Assessment (EcIA), and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development.

6.29. New development on the site will also be required to make a contribution to improvements to Sandhurst Playing Fields opposite, including toward the

upgrading of the current pavilion. A contribution towards existing play facilities in the surrounding area will also be required as set out in Part four - Infrastructure and Delivery

6.30. Vehicle access must meet acceptable highways standards, and a transport report will be required for the site, which should take account of transport impacts, including those along The Ridge.

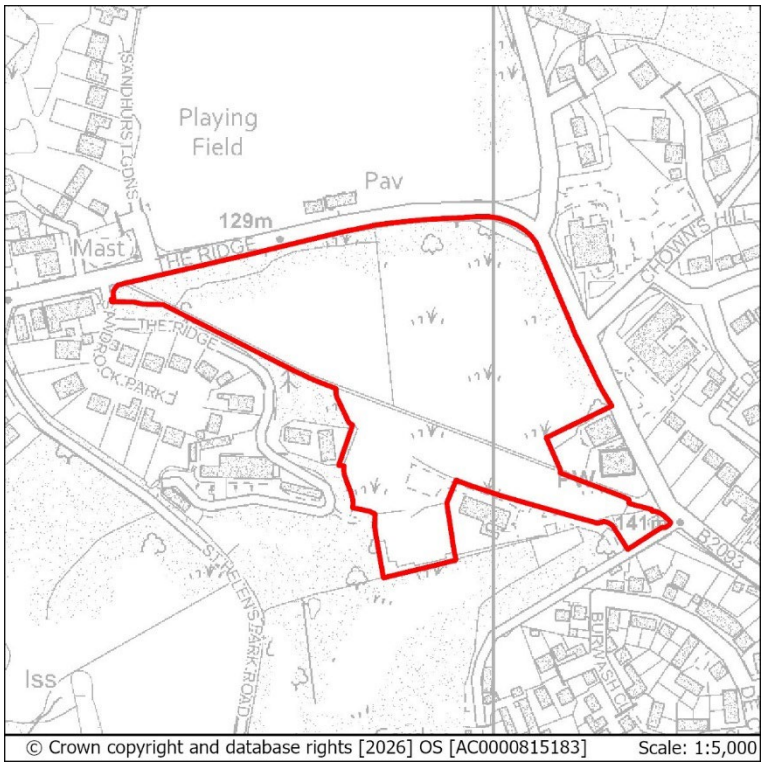

Figure 8: Land Adjacent to Sandrock Park, The Ridge.

HS1: Land adjacent to Sandrock Park, The Ridge

Use: Residential
SHELAA Reference: HL140
Minimum Indicative Capacity (net additional dwellings): 95
Site Area (gross area): 3.9ha
Site Area (net developable area): 2.6ha

Proposals for Development on this site should:

a. **Be SuDS-led, and informed by an agreed programme of hydrological and groundwater monitoring;**

b. **Provide affordable housing requirement in line with Policy SP2;**

c. **Include a Flood Risk Assessment (FRA) and drainage strategy taking into account all sources of flooding and ground conditions. The drainage strategy should be informed by an agreed programme of monitoring as set out in (a) above. The FRA and its recommendations should fully take into account sensitive receptors downstream, the results of groundwater monitoring and ground condition surveys, the need to avoid creating new hydrological pathways to and from areas of contamination risk, and ensure that flood risk is not increased elsewhere;**

d. **Incorporate measures that will protect sensitive receptors downstream from the introduction of new sources of pollution, including during the site preparation and construction phases of development;**

e. **Take into account Southern Water's infrastructure the crosses the site, and ensure easements are provided;**

f. **Ensure that any necessary reinforcement of the sewerage system is in place to accommodate the quantum and type of proposed development prior to connection, and that such reinforcement is agreed with Southern Water. This will be secured by condition;**

g. **The site's drainage strategy must be supported by a maintenance and management plan to ensure it will be managed for the lifetime of the development. This plan must be presented as a standalone document. Where any new, retained or improved flood mitigation or adaptation measures are included within the development an additional standalone maintenance and management plan must be produced;**

h. **Include a Historic Environment Record (HER) informed desk-based assessment of potential interests within an Archaeological Notification Area and agree to an appropriate programme of archaeological investigation secured by condition/s prior to any development works (as advised by ESCC).**

i. **Include a View Analysis to assist in demonstrating that the proposal would not cause unacceptable harm or loss of significance to the Ore Place Conservation Area, Manor House and remains of St Helen's Church**

j. **Be of a high quality with a strong visual architectural character and appearance and should retain and restore The Lodge (Lodge Cottage).**

k. **Retain and enhance the Public Rights of Way within the site following the principles of crime prevention through environmental design and support connections to the wider walking and cycling network and improve provision of pedestrian facilities to key local services.**

l. **Provide an area equivalent to at least 1/3 of the site for onsite open space, habitat creation, and delivery of green and blue infrastructure. Publicly accessible open space will be secured by legal agreement in perpetuity and must be of a size and quality that supports recreational use.**

m. **Retain, enhance or provide boundary landscaping and noise screening, not all of which should be publicly accessible, to act as a buffer:**

    i. **From The Ridge and existing residential development, excluding the access point to the site, and;**
    ii. **To the Local Nature Reserve and Local Wildlife Site**

n. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to woodland within and adjacent to the site, the High Weald National Landscape, St. Helens Wood Local Wildlife Site and Local Nature Reserve, the results of hydrological and groundwater monitoring, and surveys of the site itself. The assessment must take into account any additional recreational impacts that may result from the proposal during all phases of development.**

o. **Be supported by a Transport Report indicating how the conclusions and recommendations of the Report have been incorporated within the development and setting out a 'monitor and manage' regime.**

p. **Ensure vehicular access to the site meets appropriate highways standards.**

Policy HS2: Seaside Road, West St Leonards

6.31. Seaside Road, West St Leonards is a vacant brownfield site with potential to be used as a mixed-use development incorporating 120 residential dwellings alongside commercial, leisure or recreational uses. This site should deliver a high-quality destination leisure environment for both visitors and residents alike, and provide clear links to the existing walking, wheeling and cycling network to create a vibrant and active connection to the wider seafront including the beachside area of the Combe Valley Countryside Park.

6.32. Seaside Road is one of the few remaining significant re-development sites within the seafront resort area. It presents an opportunity to create a high-quality development which, together with the adjacent Cinque Ports Way site, will both regenerate the area and act as a tourist attraction in its own right. The development should seek cohesion with the nearby Bexhill Road Local Centre by improving existing pedestrian and cycle access along Grosvenor Gardens and creating an attractive and safe route for residents and visitors that is well-integrated with the existing A259 crossing point that links the site to West St Leonards Station.

6.33. Commercial, recreational and leisure uses should be sensitive to and compatible with the seafront location of the development and should take advantage of opportunities to create a broad promenade for pedestrians and cyclists behind the seawall running east to west across the site and improve access to the beach itself. This should also act as a way of protecting views along the seafront.

6.34. As part of the recreation offer, public open space must be delivered in the northern part of the site opposite Seaside Way due to the presence of an underground water tank. There is an existing playground on the site that must be retained or sympathetically relocated to the same standard or better prior to the occupation of the development.

6.35. The site is in close proximity to the APIB and within the ACIB of the East Sussex and Brighton and Hove Local Nature Recovery Strategy, with the Local Wildlife Site to the west and the Marine Conservation Zone (MCZ) and Special Protection Area (SPA) to the south. There are mapped measures for nature networks within and adjacent to the site. Existing areas of vegetative shingle habitat should be protected with opportunities explored for enhancement using appropriate native species of local provenance.

6.36. There is tidal and fluvial flood risk (Zone 3) with a high groundwater table on the site and so a Flood Risk Assessment taking into account all potential sources of flooding will be required, and mitigation as advised by the report, should be incorporated into any potential scheme and maintained for its lifetime. Improvements to the seawall will be required. Safe access and exit for all residents must be provided.

6.37. Sustainable Drainage Systems (SuDS) for the site may need to be highly bespoke and should ensure that any potential for contamination of sensitive receptors both within and surrounding the site arising from recreational, residential and highway use arising from development is mitigated appropriately.

6.38. The eastern part of the site contains filled land and there have been previous commercial uses elsewhere on the site. Proposals will be expected to provide an assessment of ground conditions and potential contamination.

6.39. Southern Water have a number of underground assets within the site, including tanks and pumping facilities. Easements to allow the maintenance of assets will need to be provided and maintained. Consultation with Southern Water is recommended at an early stage to inform any proposed scheme.

6.40. Local sewerage infrastructure in closest proximity has limited capacity to accommodate the proposed development. Proposals for development at this location may therefore generate a need for reinforcement of the wastewater network should more detailed modelling show that additional capacity is needed. Proposals should demonstrate engagement with Southern Water at the earliest possible point to understand reinforcement needs, and any reinforcement must be completed prior to connection. This means that development cannot be occupied until it is demonstrated that reinforcement is fully completed.

6.41. The site, given its size and location, will be expected to support a varied housing mix including affordable housing.

6.42. The Council will expect to see a high-quality innovative design with particular regard to sustainability. The Grosvenor Gardens Conservation Area sits immediately to the east of this site. Any new development must sustain and enhance the setting of the conservation area.

6.43. The location, scale and massing of housing units should have regard to the outlook of adjacent properties in Seaside Road and Grosvenor Gardens. Opportunities should be taken where possible to exploit the sea views that the site offers.

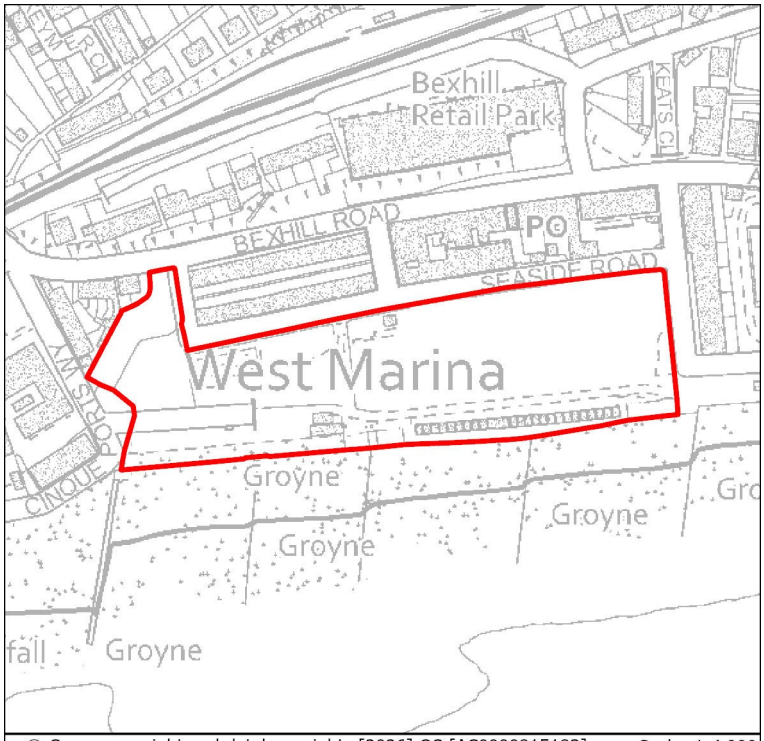

Figure 9: Seaside Road, West St Leonards

HS2: Seaside Road, West St Leonards

Use: Mixed Use: Residential, Commercial and Leisure.
SHELAA Reference: HL9
Minimum Indicative Capacity (net additional dwellings): 120
Site area (gross): 2.22ha

Proposals for development on this site should:

a. **Provide affordable housing requirement in line with Policy SP2.**

b. **Include leisure, recreation and/or commercial uses that are sensitive to and compatible with the seafront location.**

c. **Explore opportunities for co-ordinating development with the Cinque Ports Way site (HS11), or allowances made, including any road and junction improvements.**

d. **Include walking and cycling links to ensure local connectivity, including to local community infrastructure, green spaces and public transport provision, taking into account site topography. This could include:**

   i. **Strengthening the link to West St Leonards Station and the cycle route and public right of way at the south of the site;**

   ii. **Accessible pedestrian routes to the A259 bus corridor, incorporating high quality bus passenger waiting facilities;**

   iii. **Ensuring vehicular assess to the site does not conflict with the cycleway/promenade to the south of the site;**

   iv. **A transport assessment and a travel plan, with particular consideration of the potential impact on the A259 corridor.**

e. **Ensure that the overall design responds to underground constraints, including Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting.**

f. **Ensure that any necessary reinforcement of the sewerage system is in place to accommodate the quantum and type of proposed development prior to connection, and that such reinforcement is agreed with Southern Water. This will be secured by condition.**

g. **Avoid unacceptable harm to the significance and setting of the Grosvenor Gardens Conservation Area.**

h. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the close proximity to the APIB, including the nearby Local Wildlife Site and Marine Conservation Zone/Special Protection Area to the south, and to other nearby areas of wildlife sensitivity.**

i. **Minimise harm to vegetative shingle habitat and enhance where possible using appropriate native species.**

j. **Provide a public realm and promenade that is attractive and inviting to residents and tourists that should also act as a way of protecting views along the seafront. Pedestrian access to the beach should be enhanced, particularly to the west of the site near the existing access at Cinque Ports Way.**

k. **Provide new public open space land above the underground tank in the north of the site with informal opportunities for 'play' integrated into the design of the site and retaining or relocating the existing play space.**

l. **Include a Flood Risk Assessment (FRA) and drainage strategy taking into account all sources of flooding, potential for contamination and ground conditions and be informed by appropriate hydrological monitoring. 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 legal agreement. Proposed improvements to sea defences should also take account of their impact upon Impact Risk Zones for Dungeness, Romney Marsh and Rye Bay SPA marine area and the Beachy Head East MCZ and mitigate any harms caused.**

m. **The FRA must demonstrate that the proposal will be safe from flooding for its intended lifetime taking into account climate change and residual risk, taking into account sensitive receptors downstream and how the layout and mitigation measures will support this while also ensuring that flood risk is not increased elsewhere.**
The site's drainage strategy must be supported by a maintenance and management plan to ensure it will be managed for the lifetime of the development. This plan must be presented as a standalone document. Where any new, retained or improved flood mitigation or adaptation measures are included within the development an additional standalone maintenance and management plan must be produced.

n. **Incorporate a creative design response to integrating the electricity substation.**

o. **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future**

access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.

Policy HS3: Former Westerleigh School

6.44. Former Westerleigh School provides an opportunity for redevelopment of the former school site.

6.45. The topography of the land, the existing mature trees within the site and important nature conservation issues will need to be explored in any scheme that is put forward for this site.

6.46. The site, given its size and location, will be expected to support a varied housing mix and affordable housing will also be required. Of particular importance for this site will be measures to reduce surface water flood risk, and Sustainable Drainage Systems are likely to be required. Connections between the green space protected on site and those existing green spaces off site will also need to be shown on any application to ensure the conservation and enhancement of the green infrastructure network.

6.47. The site will require vehicular access to the site that is developed to an adoptable standard. The potential vehicular access does not need to follow the line of the existing road and can consider land to the south of the existing access.

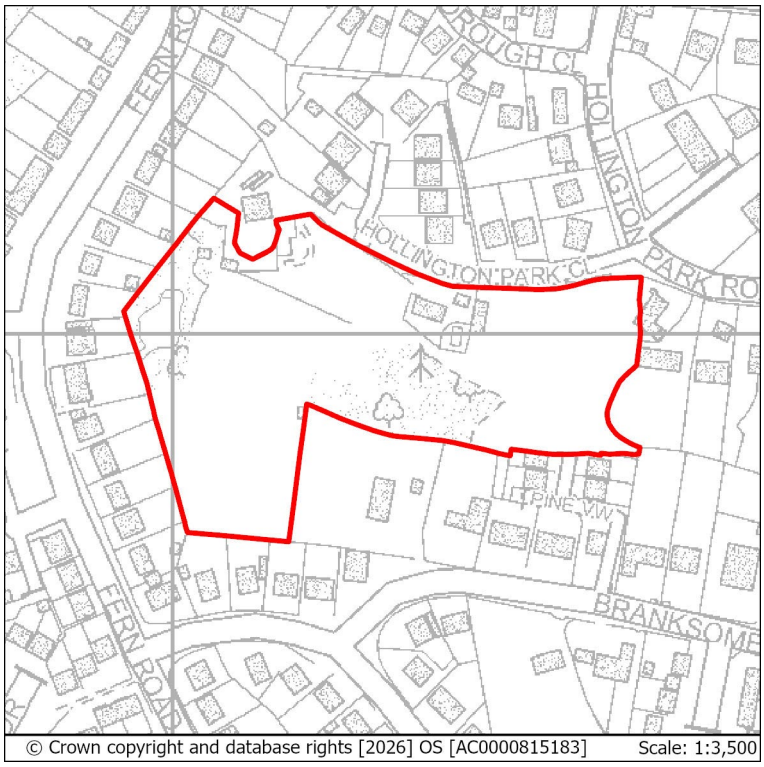

Figure 10: Former Westerleigh School

HS3: Former Westerleigh School

Use: Residential
SHELAA Reference: HL10
Minimum Density Range: 45-55 dwellings per hectare
Minimum Indicative Capacity (net additional dwellings): 100
Sites Area (gross): 2.15ha

Proposals for Development on this site should:

a. **Provide affordable housing requirement in line with Policy SP2;**

b. **Be informed by slope stability reports and a geotechnical report due to the site topography;**

c. **Maintain existing green corridors or replace them with comparative new green corridors;**

d. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to surveys of the site itself and to other nearby areas of wildlife sensitivity.**

e. **Construct vehicular access to the site to an adoptable standard;**

f. **Include walking and cycling links to improve local connectivity, including to local community infrastructure, green spaces and public transport provision, taking into account site topography;**

g. **Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting;**

h. **Provide an Arboriculture Plan that demonstrates how existing trees and proposed new trees on the site will be integrated into the development.**

Policy HS5: Former West St Leonards Primary School, Bexhill Road

6.48. Former West St Leonards Primary School is a brownfield site in the west of the borough. The site slopes north to south and is vulnerable to flooding from surface water and river flooding. The site is part of the South Saxons Local Wildlife Site (LWS). In view of this ecological sensitivity, and the need to address flood risk sequentially within the site, the built portion of any development proposal should be confined to the north of the Public Right of Way (PROW) which crosses the site. This site is suited to a low-rise apartment style scheme.

6.49. The Hollington Stream runs alongside the eastern boundary. Parts of the site to the south and west are in Flood Zone 3b, and a Flood Risk Assessment taking into account all potential sources of flooding will be required. Mitigation as advised by the report should be incorporated into any potential scheme and maintained for its lifetime. The Hollington Stream to the east and south of the site is an important ecological asset and is also engineered to avoid unacceptable flood risk so close working with the council and the Environment Agency is encouraged. Safe access and exit for all residents must be provided.

6.50. Adequate buffer zones should be incorporated into any proposal that takes into account riparian zones, the impacts of climate change on flood risk, BAP Priority Habitat (deciduous woodland) to the west of the site and Southern Water's infrastructure to the south-east. Natural Flood Management Measures, such as floodplain restoration, may be appropriate within this site.

6.51. Sustainable Drainage Systems (SuDS) for the site may need to be highly bespoke and should ensure that any potential for contamination of sensitive receptors both within and surrounding the site arising from recreational, residential and highway use arising from development is mitigated appropriately. Easements should be provided to allow the monitoring of water quality.

6.52. Mitigations should not interfere with the existing hydrological regime of the site due to the potential for impact on wetland habitats. The site will require hydrological monitoring to determine the potential for impact, and this should in turn inform ecological assessment of the site. Any discharge rates must be agreed with the Pevensey and Cuckmere Water Level Management Board before any planning permission is granted.

6.53. The site sits within the South Saxons Local Wildlife Site (LWS) and is in the main neutral grassland with a small reedbed in the south-west corner. The LWS and the Hollington Stream must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. The BNG assessment must include a River Condition Assessment. Any development proposal must

seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development.

6.54. Proposals for the development of the site should seek to retain and enhance the Public Right of Way (PROW) within the site that connects Edinburgh Road to Filsham Road.

6.55. The site was formerly landfill and may still produce landfill gas. There is also a small area of contaminated land in the north-western corner of the site. An assessment of potential contamination will therefore be required.

6.56. Vehicle access must meet acceptable highways standards, and a transport report will be required for the site.

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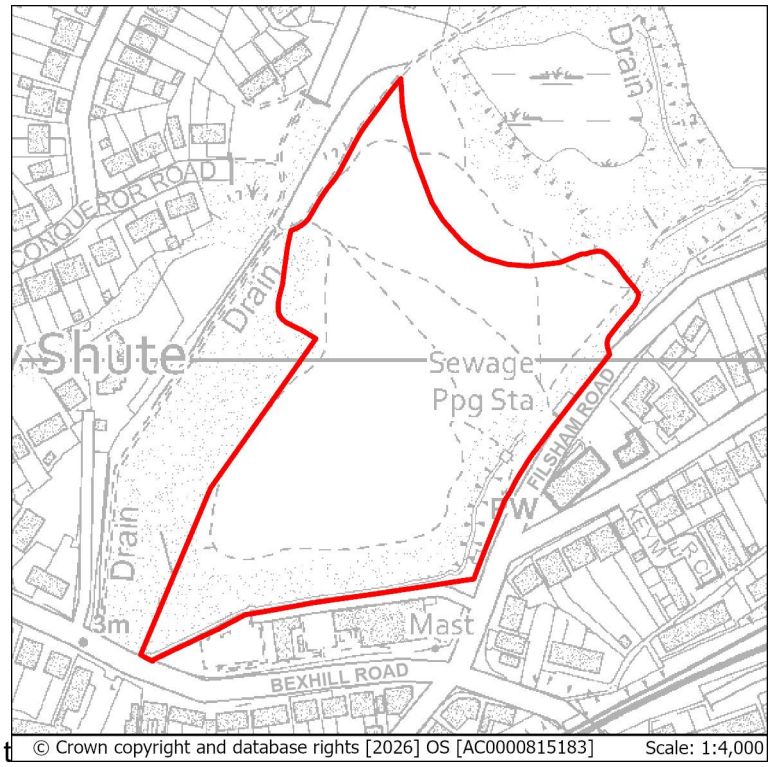

Figure 11: Former West St Leonards Primary School.

HS5: Former West St Leonards Primary School, Bexhill Road

Use: Residential
SHELAA Reference: HL115
Minimum Indicative Capacity (net additional dwellings): 50
Site Area (gross area): 3.5ha
Sites Area (net developable area): 0.8ha

Proposals for Development on this site should:

a. **Provide affordable housing requirement in line with Policy SP2;**

b. **Locate and confine the built portion of the proposal to the north of the PROW within the site;**

c. **Include a Flood Risk Assessment (FRA) and drainage strategy that informs scheme design and layout, taking into account all sources of flooding, potential for contamination and ground conditions and be informed by appropriate hydrological monitoring. The FRA and its recommendations should fully take into account the engineering of the Hollington Stream;**

d. **Proposals must ensure that a sequential approach informed by the FRA is taken within the site to direct more vulnerable uses to the lowest areas of flood risk taking into account (b) above;**

e. **The site's drainage strategy must be supported by a maintenance and management plan to ensure it will be managed for the lifetime of the development. This plan must be presented as a standalone document. Where any new, retained or improved flood mitigation or adaptation measures are included within the development an additional standalone maintenance and management plan must be produced.**

f. **Consider the use of Natural Flood Management Measures to help manage flood risk within the site and provide easements to allow continued monitoring of the Hollington Stream;**

g. **Have discharge rates agreed with the Pevensey and Cuckmere Water Level Management Board (PCWLMB) prior to granting of permission;**

h. **Incorporate buffer zones around watercourses (10m), BAP Priority Habitat to the west (15m) and any necessary allowances for climate change;**

i. **Be supported by an Ecological Impact Assessment (EcIA), a River Condition Assessment and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the Hollington Stream, South Saxons Local Wildlife Site and multiple priority habitats present within the site. The assessment must take into account any additional recreational impacts that may result from the proposal during all phases of development;**

j. **Biodiversity Net Gain assessments (BNG) will require a River Condition Assessment (RCA) and buffers in excess of those required for flood risk management;**

k. **Retain and enhance the PROW within the site, and support connections to the wider walking and cycling network and key transport hubs including the station at West St Leonards;**

l. **Be supported by a Transport Assessment, following a vision-led and validate approach and including a provision for monitor and manage transport interventions. Proposals must also indicate how the conclusions and recommendations of the Report have been incorporated within the development;**

m. **Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting;**

n. **Ensure vehicular access to the site meets appropriate highways standards, and be capable of providing safe access and exit from the site during flood events.**

Policy HS6: Ore Valley (Former Power Station)

6.57. The Ore Valley (Former Power Station) is a brownfield former industrial site with potential for residential redevelopment.

6.58. The developable parts of this site are confined to the southern half and a smaller area to the north. The remainder of the site is woodland, which should be retained and arrangements made for its management. Access is available from an existing access point to Fellows Road at the eastern end of the site.

6.59. The site is located in an area of deep surface water flood risk, and Southern Water has indicated that there is currently insufficient sewerage capacity to serve the site. It is also located adjacent to a designated Local Wildlife Site and will require its own ecological assessment in terms of future development.

6.60. Local sewerage infrastructure in closest proximity has limited capacity to accommodate the proposed development. Proposals for development at this location may therefore generate a need for reinforcement of the wastewater network should more detailed modelling show that additional capacity is needed. Proposals should demonstrate engagement with Southern Water at the earliest possible point to understand reinforcement needs, and any reinforcement must be completed prior to connection. This means that development cannot be occupied until it is demonstrated that reinforcement is fully completed.

6.61. The site will be expected to support a varied housing mix, including affordable housing. Given the previous uses of this site there is potential for contamination, which would need to be investigated.

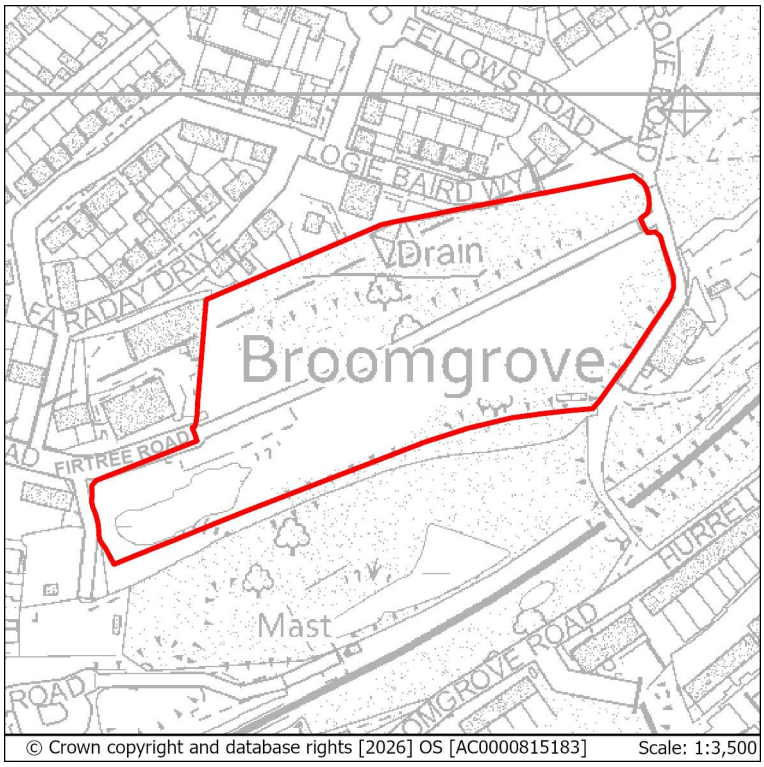

Figure 12: Ore Valley (Former Power Station).

HS6: Ore Valley (Former Power Station)

Use: Residential
SHELAA Reference: HL39
Minimum Indicative Capacity (net additional dwellings): 78
Site Area (gross): 2.36ha

Proposals for Development on this site should:

a. **Provide affordable housing requirement in line with Policy SP2;**

b. **In all cases retain the woodland area to the north of the site corresponding to approximately 0.85 ha (capacity has been calculated net of this site area);**

c. **Be informed by a Transport Assessment and Travel Plan, following a vision-led approach, and including a provision for 'monitor and manage' for transport interventions. The active travel element should include walking and cycling links to ensure local connectivity to Ore Station, including to local community infrastructure, green spaces and public transport provision, taking into account site topography;**

d. **Ensure vehicular access to the site meets appropriate highways standards;**

e. **Be supported by a Flood Risk Assessment and detailed Drainage Strategy which considers the following:**

   i. **The high groundwater table and implementation of a suitable drainage strategy informed by onsite monitoring and soil percolation testing;**

   ii. **The provision of a storage pond in the western part of the site. The drainage strategy should seek to attenuate surface water within the pond before discharging into the culverted Ordinary Watercourse in the southern part of the site.**

f. **Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting;**

g. **Ensure that any necessary reinforcement of the sewerage system is in place to accommodate the quantum and type of proposed development prior to connection, and that such reinforcement is agreed with Southern Water. This will be secured by condition;**

h. **Assess the ecological and recreational impact of the proposed development on the adjacent Broomgrove Local Wildlife Site. Proposals should seek to avoid or mitigate any identified impact.**

Policy HS7: Former Post Office and University of Brighton building

6.62. The Former Post Office and University of Brighton building is a town centre brownfield site. The site is suitable for mixed use development, with retail uses at the ground floor to provide an active frontage to the development. The site will be expected to support a varied housing mix and to include affordable housing.

6.63. New development will have to take account of the amenity of adjoining residents and businesses due to the town centre location. The development should preserve and enhance the Hastings Town Centre conservation area and take consideration of views to and from Hastings Castle.

6.64. Proposals should support ensuring that the public realm in Priory Square is enhanced and provide appropriate improvements to open space and street furniture.

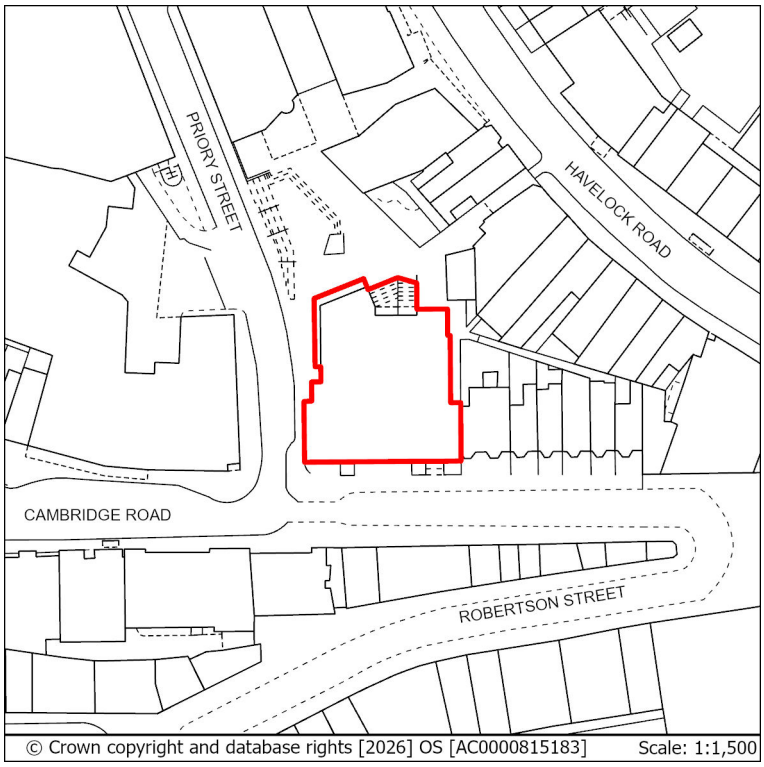

Figure 13: Former Post Office and University of Brighton building

HS7: Former Post Office and University of Brighton building

Use: Mixed Use
SHELAA Reference: HL138
Minimum Indicative Capacity (net additional dwellings): 41
Site Area (gross): 0.1ha

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2.**

b. **Enhance public realm within Priory Square, including policy compliant 'greening' to the site in a form appropriate to the urban setting, seating and improvements to open space to encourage active and positive daytime use and support the promotion of Priory Street as a secondary route to the Town Centre and Bohemia.**

c. **Provide for active uses at ground floor level which should include retail, leisure or other town centre complementary uses which also preserve the frontage of the former post office building.**

d. **Avoid unacceptable harm to the significance of the Hastings Town Centre conservation area and long-range views of and from Hastings Castle.**

e. **Take appropriate measures to mitigate the impact of noise on residential dwellings due to location within the active nighttime economy setting.**

f. **Enhance Priory Square itself following the principles of** Secured by Design **to create a safe and welcoming space for all users.**

g. **Include easements for works and infrastructure access to surrounding premises.**

h. **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.**

Policy HS8: Mayfield E, Bodiam Drive

6.65. Mayfield E, Bodiam Drive is a gently sloping site at the edge of an existing residential area, and there is the potential for this site to accommodate at least 38 dwellings. This site is in council ownership, and consideration has been given to the sale value of the land which the Council hopes to achieve and the potential for the site to provide affordable housing. The council is working to ensure that the site delivers 100% affordable housing.

6.66. There are opportunities to connect this site to the Mayfield Farm development by road or footpath which would aid permeability, making it easier for people to travel to and from their homes. There is also a good opportunity to include an access footpath to the existing bus stop on Bodiam Drive at the north-east corner of the site.

6.67. Landscaping and potentially noise screening (hedging for example), is likely to be required along the western border of the site to shield the development from the Queensway Road. Any development on this site could potentially affect the setting of Mayfield Farmhouse; a Grade II listed building that is sited immediately to the south-west. Due to the size of the site, a Flood Risk Assessment is required.

Figure 14: Mayfield E, Bodiam Drive

HS8: Mayfield E, Bodiam Drive

Use: Residential
SHELAA Reference: HL4
Minimum Indicative Capacity (net additional dwellings): 38
Site Area (gross): 1.06ha

Proposals for Development on this site should:

a. **Provide affordable housing.**

b. **Be informed by a Transport Assessment and Travel Plan, following a vision-led approach, and including a provision for 'monitor and manage' for transport interventions including consideration of connections to and through Mayfield Farm (HSS16). Active travel should be prioritised and include walking and cycling links to improve local connectivity, including to local community infrastructure, green spaces and public transport provision taking into account site topography.**

c. **Avoid unacceptable harm to the significance and setting of the Grade II listed Mayfield Farmhouse that is sited immediately to the south-west of the site.**

d. **Provide boundary landscaping and noise screening along the western border of the site to act as a buffer to Queensway to the west.**

e. **Ensure the existing depression to the south of the site is retained and incorporated into the surface water drainage system as part of the proposed development.**

f. **Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting.**

g. **Provide an Arboriculture Plan that demonstrates how existing trees on the site will be integrated into the development particularly those contained within the south-eastern corner of the plot and those that border the curtilage of the listed building.**

h. **Ensure the existing green corridor is maintained or replaced by comparative new green corridors.**

i. **Ensure the layout of the site is arranged so that the rear private gardens of the residential units are positioned immediately adjacent to the boundary of the farmhouse to protect the setting of**

	the listed building. Hedging should be considered to reinforce the natural screening rather than walls or fences.

Policy HS10: Land at Rock Lane

6.68. Land at Rock Lane is a greenfield site located at the boundary with Rother District Council. The site adjoins a development to the northern boundary in Rother. The site is located in the High Weald National Landscape Area of Outstanding Natural Beauty (AONB). The site is suitable for residential development and would be expected to achieve 40% affordable housing and provide a variety of types and tenures of housing.

6.69. Design proposals would need to be sensitive to the location of the site within the National Landscape and have consideration to providing an active frontage to Rock Lane. The development would need to ensure that easements and buffers are secured to infrastructure on site including drains and overhead power lines.

6.70. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must take into account any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development. The site is within an ACIB with mapped measures for nature networks. The development would need to ensure that an ecological management plan is developed for the site.

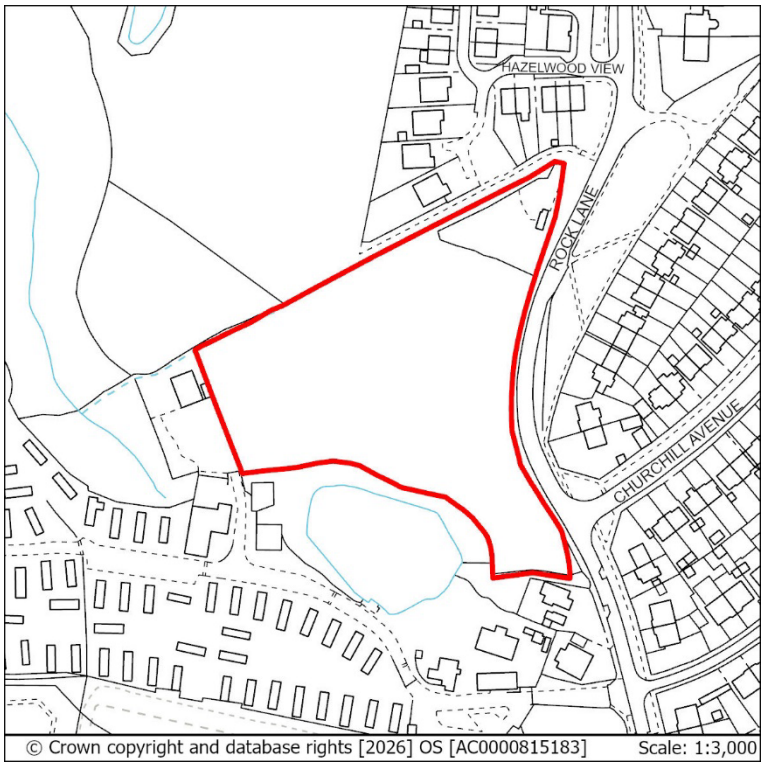

Figure 15: Land at Rock Lane

HS10: Land at Rock Lane

Use: Residential
SHELAA Reference: HL63
Minimum Indicative Capacity (net additional dwellings): 26
Site Area (gross): 1.2ha

Proposals for Development on this site should:

a. **Provide affordable housing requirement in line with Policy SP2.**

b. **Include an appropriate and safe buffer at the eastern boundary of the site (adjacent Rock Lane) due to presence of overhead power lines.**

c. **Create a frontage along Rock Lane and demonstrate the conservation and enhancement of the National Landscape (AONB) showing how adverse impacts will be avoided. Proposals must demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide.**

d. **Safeguard the Dark Skies of the High Weald National Landscape in line with the Dark Skies Technical Advice Note.**

e. **Maintain a 5m buffer to the existing drain along the northern boundary of the site.**

f. **Provide multi-functional open and play space, including a maintenance and management plan for their lifetime.**

g. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the High Weald National Landscape, site surveys, and to other nearby areas of wildlife sensitivity. Opportunities for enhancement should have regard to the LNRS;**

h. **Include a Management Plan for the identified Ecology Zone, including measures for the management and ongoing maintenance of that area.**

i. **Be informed by a Transport Assessment and Travel Plan, following a vision-led approach, and including a provision for 'monitor and manage' for transport interventions. Active travel should be prioritised, and the proposals should include and enhance walking and cycling links to ensure local connectivity, access to the wider National Landscape (AONB) and Ivyhouse Lane Employment Area,**

including to local community infrastructure, green spaces and public transport provision, taking into account site topography.

j. Provide vehicular access from Rock Lane to be provided in accordance with highway standards, footway provision along the frontage and suitable crossing facilities to access bus stops on Churchill Avenue.

k. Have regard to any relevant policies from Rother District Council development plan documents.

Policy HS11: Cinque Ports Way

6.71. Cinque Ports Way has redevelopment potential for a low-rise apartment-led scheme. Any proposals are encouraged to explore opportunities for co-ordinating development with the Seaside Road site (HS2), or allowances made to better enable this, including road and junction improvements.

6.72. In relation to archaeological potential, the site lies at least partially over Quaternary deposits which hold potential to preserve significant archaeological and/or paleoenvironmental evidence, including waterlogged organic remains. This below ground historic environment potential should be assessed and recorded.

6.73. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must take into account the adjacent Local Wildlife Site and any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development. The site is within an ACIB with mapped measures for nature networks. The development would need to ensure that an ecological management plan is developed for the site.

6.74. There is a Public Right of Way (and a National Cycle Route) running along the southern boundary, which it will be important to link to. There is a Local Wildlife Site adjacent to the west; and avoidance of harm to it is of high importance and as such an impact assessment will be required.

6.75. This is a site that is in a flood risk area (from all types of flooding), protection and mitigation measures must be included in any scheme. Sustainable Drainage Systems (SuDS) are likely to be required along with potential contributions to the maintenance of the existing sea defences.

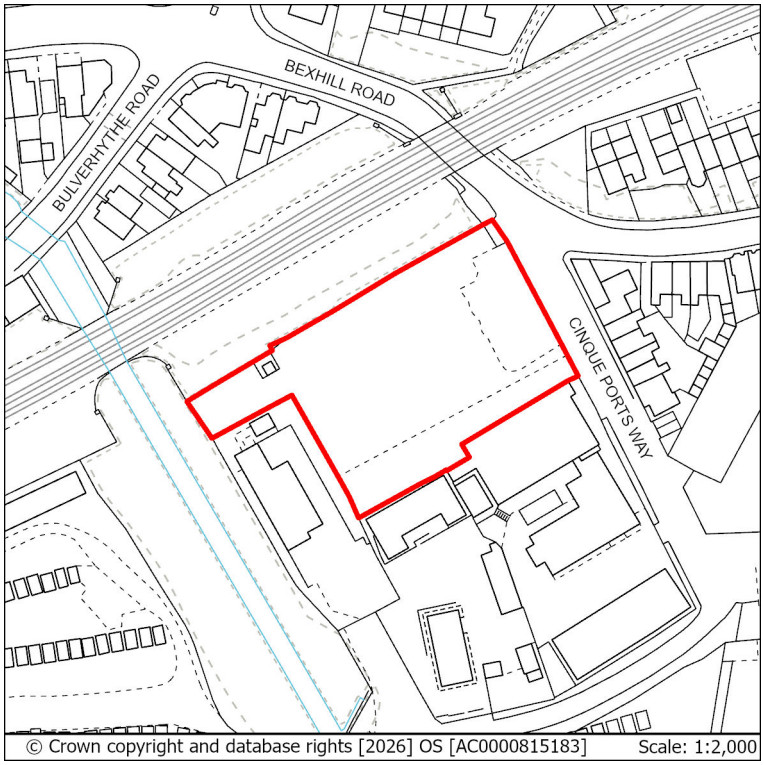

Figure 16: Cinque Ports Way

HS11: Cinque Ports Way

Use: Residential
Minimum Density Range: 90 - 150 dwellings per hectare
Minimum Indicative Capacity (net additional dwellings): 58
Site Area (gross): 0.37ha

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2**

b. **Include walking and cycling links to the A259 bus corridor, improve local connectivity, including to local community infrastructure, green spaces and public transport provision, including high-quality bus passenger waiting facilities.**

c. **Be informed by a Transport Assessment and Travel Plan, following a vision led approach, and including provision for 'monitor and manage' for transport interventions. The proposals should enhance access to the public right of way and national cycle route that runs along the southern boundary and to the pedestrian walking and cycling routes to West St Leonards Station to improve connectivity.**

d. **Avoid unacceptable harm to the setting of the Grosvenor Gardens Conservation Area, including opportunities for innovative design that responds well to the scale and character of the area.**

e. **Consult relevant historic environment records and assess heritage assets using appropriate expertise including, where necessary, a field evaluation.**

f. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the adjacent Bulverhythe Shingle Beach and Cliffs Local Wildlife Site, the results of site surveys, and to other nearby areas of wildlife sensitivity. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;**

g. **Provide a public realm and promenade that is attractive and inviting to residents and tourists and encourages foot or cycle journeys to the Bexhill Road Local Centre and St Leonards District Centre to the east.**

h. **Assess the ecological and recreational impact of the proposed development on the Bulverhythe Shingle Beach and Cliffs Local Wildlife Site. Proposals should seek to avoid or mitigate any identified impact.**

i. **Be supported by a Flood Risk Assessment and detailed drainage strategy that incorporates measures to address flood risk. This should include improvements to the sea wall and contributions to ongoing maintenance in light of tidal and fluvial flood risk which should be secured by legal agreement. This site has a high groundwater table and drainage design should be informed by onsite monitoring. Any improvements to sea defences should also take account of their impact upon Impact Risk Zones for Dungeness, Romney Marsh and Rye Bay SPA marine area and the Beachy Head East MCZ and mitigate any harms caused.**

j. **Demonstrate that the proposal will be safe from flooding for its intended lifetime taking into account climate change and residual risk and sensitive receptors downstream and show how the layout and mitigation measures will support this while also ensuring that flood risk is not increased elsewhere.**

k. **Have discharge rates agreed with the Pevensey & Cuckmere Water Level Management Board (PCWLMB) prior to granting of permission.**

l. **Ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes is maintained. It should also take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting.**

Policy HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road

6.76. The site is a brownfield site, and the existing buildings were vacated by the NHS in July 2011. The site is in a prominent cliff top location that offers a good residential development opportunity.

6.77. The site is located within the Grosvenor Gardens Conservation Area, and the retention of the Gambier House building is preferred. Any scheme involving its demolition will need clear and convincing justification to demonstrate the reasoning behind such a proposal. The site has an existing access point that should be taken advantage of.

6.78. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must take into account any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development. The site is within an ACIB with mapped measures for nature networks. The development would need to ensure that an ecological management plan is developed for the site. It is also important that any adverse impacts on the adjacent Local Wildlife Site are avoided.

6.79. The site is within the Western Landslide Activity Risk Area (LARA) as shown on the Policies Map, and has potential for land instability. Development should provide an enhanced land stability report and provide an appropriate buffer zone to the south, the extent of which should be determined by site specific land stability assessments and engineer reports. This buffer zone should include safe and accessible easements for the monitoring and management of any existing or planned cliff stabilisation measures, and the condition of the cliff in general. It is recommended that land stability assessments for this site take into account data derived from any ongoing land stability monitoring and modelling within this area. The primary interest of the adjacent LWS is the soft cliffs and the inverts that are dependent on them. Any stabilisation works will need to take this into account and either allow continued slippage or provide a suitable alternative.

6.80. SuDS must be informed by both detailed drainage strategies and land stability assessments. SuDS must demonstrably be appropriate for the complex geotechnical character of the area.

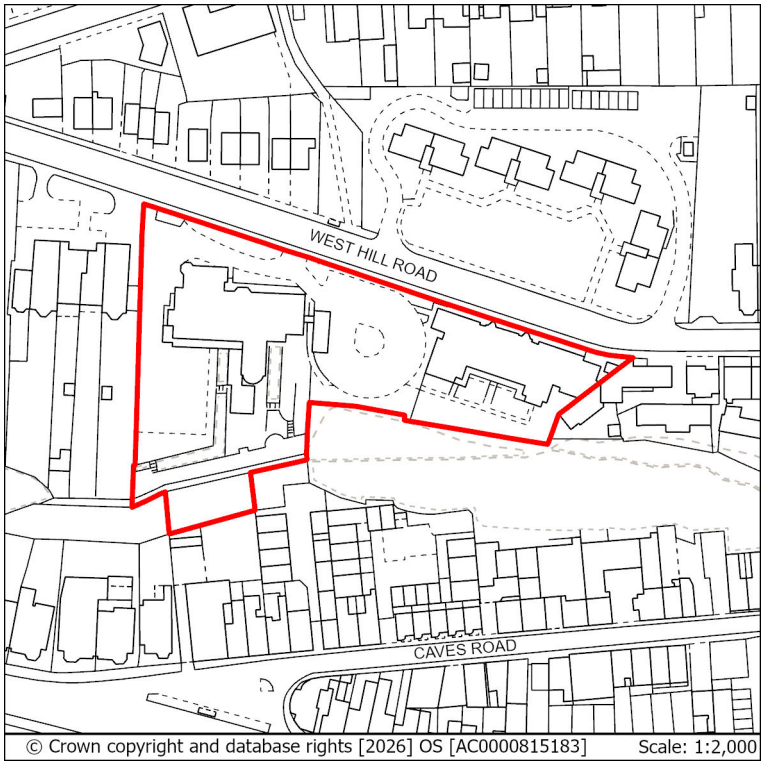

Figure 17: Gambier House, 111 West Hill Road and West House, 115 West Hill Road

HS12: Gambier House, 111 West Hill Road and West House, 115 West Hill Road

Use: Residential
SHELAA Reference: HL111
Minimum Indicative Capacity (net additional dwellings): 20
Site Area (gross): 0.55ha

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2.**

b. **Retain and restore Gambier House and incorporate infill development that should be designed to reflect the scale and strong visual architectural character and appearance of retained significant buildings within the site and the wider Conservation Area; Consider the removal of 20th century extensions, particularly the extension to the east of the historic core of West House and the 1½ storey roof extension capped with pyramidal roof.**

c. **Ensure strategic spatial gaps between the built form that are characteristic of the conservation area to ensure a sense of openness.**

d. **Ensure the existing access point is utilised.**

e. **Be informed by land stability reports and a geotechnical report due to the proximity to cliff edge and possible presence of caves or voids within the cliff itself. Reports should take into account both the temporary (construction phase) and operational (occupation phase) condition of the site, proposing mitigations for each state.**

f. **Ensure the layout of the site is arranged so that an undeveloped buffer zone informed by assessments of land stability is created at the southern extents of the site which shall be landscaped with appropriate planting to protect the cliff faces. Easements to safeguard access to maintain any existing or future land stability measures must be provided.**

g. **Ensure SuDS designs are informed by the findings of land stability and detailed drainage reports, and that any new dead or imposed loads to be created by SuDS schemes are incorporated within the land stability and geotechnical assessments. This site also has a high groundwater table and drainage design should be informed by onsite monitoring and not use infiltration SuDS systems and include a new sewer connection for the site.**

h. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as**

recommended by the EcIA. The ECOP must make specific reference to the adjacent Caves Road Cliffs Local Wildlife Site, the results of site surveys, and to other nearby areas of wildlife sensitivity. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;

i. Provide innovative solutions for any necessary on-site parking that do not dominate the site.

j. Have discharge rates agreed with the Pevensey & Cuckmere Water Level Management Board (PCWLMB) prior to granting of permission.

k. Include walking and cycling links to ensure local connectivity, including to local community infrastructure, green spaces and public transport provision, taking into account site topography.

Policy HS13: Land North-West of Winchelsea Lane

6.81. Land North-West of Winchelsea Lane is a greenfield site located in the High Weald National Landscape (AONB) adjacent to residential development in Rother District. The site is steeply sloping and will require a land stability assessment and a sensitive design response to the topography. The site has potential drainage issues and will need to incorporate Sustainable Drainage Systems (SuDS). The site is within the High Weald National Landscape and therefore a sensitive form of development is required in line with Local Plan policies.

6.82. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must take into account any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development.

6.83. The council will expect any scheme to support a varied housing mix and affordable housing will also be required.

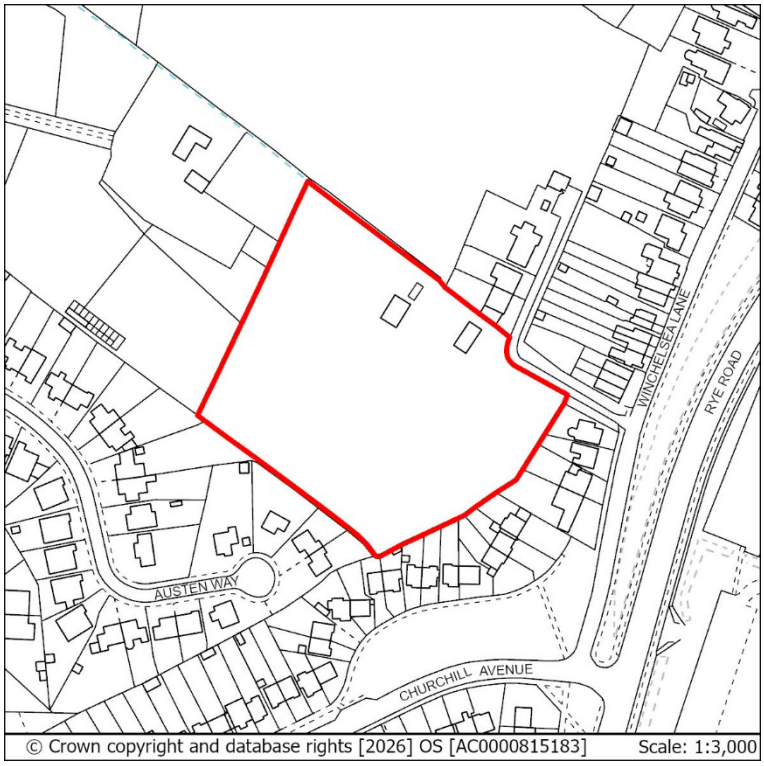

Figure 18: Land North-West of Winchelsea Lane

HS13: Land North-West of Winchelsea Lane

Use: Residential
SHELAA Reference: HL87
Minimum Indicative Capacity (net additional dwellings): 20
Site Area (gross): 1.17ha

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2.**

b. **Demonstrate the conservation and enhancement of the National Landscape showing how adverse impacts will be avoided, mitigated or compensated for. Proposals must demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide.**

c. **Safeguard the Dark Skies of the High Weald National Landscape in line with the Dark Skies Technical Advice Note.**

d. **Provide multi-functional open and play space in accordance with policy.**

e. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the High Weald National Landscape, the results of site surveys, and to other nearby areas of wildlife sensitivity;**

f. **Include and enhance walking and cycling links to ensure local connectivity.**

g. **Be supported by a Flood Risk Assessment and detailed Drainage Strategy.**

h. **Retain and enhance any existing green infrastructure.**

i. **Be informed by slope stability reports and a geotechnical report.**

Policy HS18: Land at Tilekiln Farm

6.84. Land at Tilekiln Farm is a site in the east of the Borough close to Ore Village Local Centre. The site slopes steeply to the south-east towards the Bourne Stream which runs along the south-east boundary.

6.85. The site is currently occupied in part by a former agricultural building towards the north-eastern corner with the remainder being open grassland which has previously been farmed but now lies fallow. The site is enclosed on three sides by residences which front onto Fairlight Road, Fairlight Avenue, Tilekiln Lane, Edith Road and Harold Road and the Bourne Stream itself. The site is currently accessed from Fairlight Avenue.

6.86. The site is the northern valley slope within a larger landform and sits within the High Weald National Landscape. Therefore, the design of any scheme must be landscape-led to fit sensitively into the High Weald National Landscape taking into account any recommendations arising from site specific Landscape Studies and take into account the High Weald AONB Housing Design Guide. It is recommended that due to the scale of development proposed within this landscape sensitivity context, a period of public consultation takes place prior to the submission of a detailed planning application.

6.87. Landscape Studies should show how natural boundary screening will be incorporated in a manner that is sensitive to its setting within the High Weald National Landscape, including retained trees and hedgerow and new strong buffers to define boundaries and soften visibility of existing rooflines.

6.88. A lighting plan must be provided, and lighting schemes should be designed with regard to the High Weald National Landscape Dark Skies Technical Advice Note (TAN). Proposals also should seek to minimise light spill from internal sources in line with the Dark Skies TAN through design mitigations.

6.89. To address localised deficiencies in access to open space and play within the Ore area and eastern Borough fringes, residential development and essential site infrastructure should cover no more than 2/3 of the site. The remainder of the site should be secured as public open space by legal agreement and include natural, unfenced and multifunctional play space that takes into account the recommendations of the High Weald AONB Housing Design Guide. A maintenance and management plan will be required for open space and play facilities provided onsite.

6.90. The site experiences localised flooding along the course of the Bourne Stream and has a small area of Flood Zone 3b directly adjacent to the stream and an area of ponding in the centre of the site. There is also the potential for groundwater flooding or drainage constraints due to an elevated groundwater table, and an agreed programme of hydrological and hydrogeological

monitoring should be undertaken to inform relevant assessments and the site drainage strategy.

6.91. A Flood Risk Assessment taking into account all potential sources of flooding will be required and mitigation as advised by the report should be incorporated into any potential scheme and maintained for its lifetime. The measures recommended by the report should ensure that a sequential approach to the location of development is taken in line with its level of vulnerability and that development will not contribute further to flooding associated with the Bourne Stream at lower elevations, and should include recommendations that have the potential to reduce flood risk to residential properties in nearby Clive Vale by reducing the flow rate of water entering the watercourse during heavy rainfall events.

6.92. Adequate riparian buffer zones should be incorporated into any proposal that takes into account riparian zones and the impacts of climate change on flood risk. The Bourne Stream is a sensitive receptor and Sustainable Drainage Systems (SuDS) for the site should ensure that any potential for contamination of sensitive receptors both within and surrounding the site arising from recreational, residential and highway use arising from development is mitigated appropriately and existing surface water drains that discharge into the stream within the site are incorporated within any scheme, or an alternative solution is sought where this will reduce flow rates and reduce the introduction of potential pollutants to the stream. Easements should be provided to allow the monitoring of water quality.

6.93. The site is within the ACIB with mapped measures for rivers and nature networks and this, the National Landscape and the Bourne Stream and the SSSI impact risk zone must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP). The site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of all stages of development. Assessments of BNG will require a River Condition Assessment. Any development proposal must seek to avoid, minimise or where this is not possible, mitigate impact on these areas during both the construction and occupation phases of the development.

6.94. The site is also within an Archaeological Notification Area and will require both an assessment of potential interests and agreement of an appropriate programme of archaeological investigation.

6.95. A transport study or assessment will be required to identify and ensure suitable access can be gained to the site. Opportunities to promote active travel should be included.

6.96. Proposals for the development of the site should seek to retain and enhance the Public Right of Way (PROW) within the site that connects Fairlight Avenue to Barley Lane, identifying opportunities to connect the footpath to any new areas of public open space delivered through the scheme. Boundary screening around the footpath should be retained and enhanced where no new connections are required.

6.97. Due to the sloping nature of the site, its position within a river valley and the overall ground conditions detailed land stability reports will be required that take into account both the temporary and permanent condition of the site and propose mitigations to safeguard the stability of the site. Assessments of land stability and ground behaviour and their recommendations must be in line with the guidance provided within policy SC15.

6.98. Due to the site sitting within the Impact Risk Zone (IRZ) for the Hastings Cliffs to Pett Beach SSSI, Natural England should be consulted at the earliest possible stage where development proposals are of a quantum and type (currently 100 dwellings) that would require consultation with Natural England. Proposals for fewer than 100 dwellings are advised to seek the advice of Natural England as a matter of best practice.

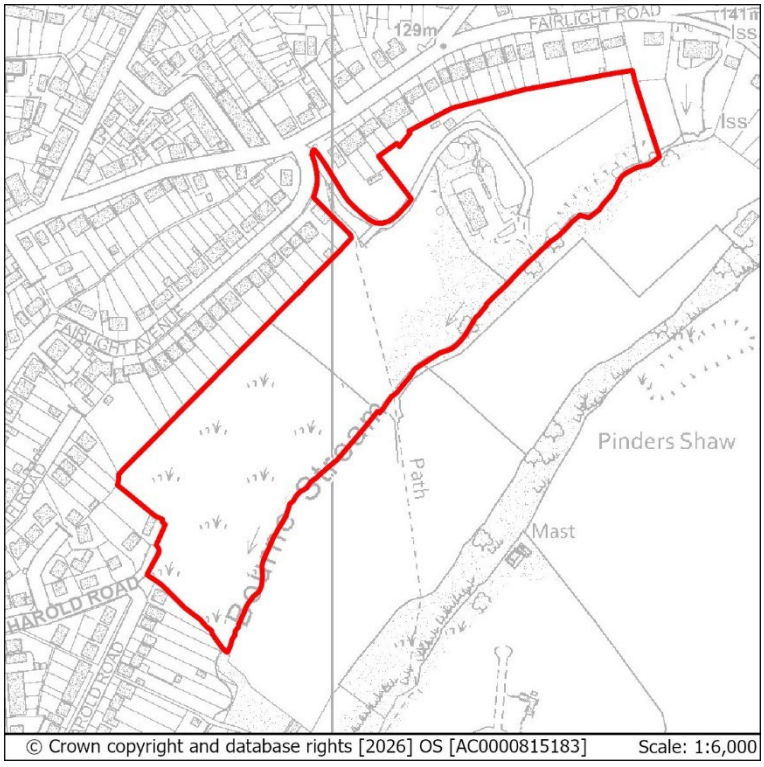

Figure 19: Land at Tilekiln Farm.

HS18: Land at Tilekiln Farm

Use: Residential
SHELAA Reference: HL148
Minimum Indicative Capacity (net additional dwellings): 75
Site Area (gross): 6.29ha
Site Area (net developable area): 4.19ha

Proposals for Development on this site should:

a. **Demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide.**

b. **Retain, enhance and provide appropriate boundary treatments and landscaping with proposed built development enclosed within new strong buffers to define boundaries and soften visibility of existing rooflines from the valleyside. A suitable buffer to the woodland belt along the Bourne Stream and other vegetated belts within the site should be incorporated.**

c. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or their loss will be compensated for including the existing tree belts alongside the Bourne Stream.**

d. **Provide a lighting plan for both the construction and occupation phases of the proposed development, with regard to the High Weald National Landscape Dark Skies TAN. The plan should include measures to prevent overspill from internal lighting. The lighting plan must be agreed before permission is granted.**

e. **Provide affordable housing in line with Policy SP2.**

f. **Secure a minimum of 1/3 of the site as public open space in perpetuity in a form which is characteristic of the National Landscape setting. This will be secured by legal agreement.**

g. **Incorporate natural, unfenced multifunctional play space within the site.**

h. **Include a maintenance and management plan for areas of publicly accessible open space and play.**

i. **Include a Flood Risk Assessment (FRA) and drainage strategy taking into account all sources of flooding, local ground conditions, the presence of surface water drains and be informed by appropriate hydrological monitoring. The FRA and its recommendations must demonstrate that the proposal will be safe from flooding for its**

intended lifetime taking into account climate change, residual risk and the functional role of the floodplain. It should take into account the results of an agreed programme of hydrological and groundwater monitoring, seek to improve the flow rate of the Bourne Stream during heavy rainfall and reduce the overall risk of flooding in residential areas downstream, including through Natural Flood Management Measures.

j. Apply a sequential approach to proposed development within the site following the recommendations of the FRA, directing more vulnerable development away from areas with highest risk.

k. Provide a drainage strategy that is supported by a maintenance and management plan to ensure SuDS will be managed for the lifetime of the development. This plan must be presented as a standalone document. Where any new, retained or improved flood mitigation or adaptation measures are included within the development an additional standalone maintenance and management plan for these elements must be produced.

l. Incorporate measures to preserve and enhance water quality by preventing pollutants from entering the Bourne Stream, such as the use of interceptors.

m. Incorporate riparian buffer zones around the Bourne Stream (10m), including any necessary allowances for climate change. Provide easements to allow monitoring of the Bourne Stream.

n. Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the Bourne Stream, Hastings Cliffs to Pett Beach SSSI and High Weald National Landscape, the results of site surveys of HS18 itself, and to other nearby areas of wildlife sensitivity. The assessment must take into account any additional recreational impacts that may result from the proposal during all phases of development.

o. Assessments of BNG must be informed by a River Condition Assessment of the Bourne Stream.

p. Include a Historic Environment Record (HER) informed desk-based assessment of potential interests within an Archaeological Notification Area and agree to an appropriate programme of archaeological investigation secured by condition/s prior to any development works (as advised by ESCC).

q. Be informed by a Transport Assessment and Travel Plan, following a vision led approach, and including a provision for 'monitor and manage' for transport interventions, particularly in relation to any

requirements for mitigation in relation to Fairlight Road and the A259. The active travel element should include walking and cycling links to ensure local connectivity including to local community infrastructure, green spaces and public transport provision.

r. Retain and enhance the PROW within the site, and support active travel connections to the wider walking and cycling network and key transport hubs including Ore Village Local Centre.

s. Ensure vehicular access to the site meets appropriate highways standards.

t. Be informed by agreed land stability and geotechnical reports covering the temporary and permanent condition of the site taking into account all dead and imposed loads.

u. Include a maintenance and management plan for any new, retained or improved land stability mitigation measures to ensure they will be safe for their intended lifetime.

Policy HS20: Former West Hill Road Reservoir

6.99. The former West Hill Road Reservoir is a former Water Board site unused since 1927 on the North side of West Hill Road. There are structures remaining on the site including a front reservoir, a single aspect derelict brick pump house with a flat roof, the original Victorian waterworks cottage, and the rear reservoir chambers. Due to its former use, there is a potential for some element of pollution to be present.

6.100. The earth-mounded front reservoir forms part of the concrete retaining wall running parallel to West Hill Road and site investigation will be required to determine how to safely remove or remediate the front structures without causing ground movement or landslide within the surrounding areas.

6.101. The rear chambers consist of two vast brick-lined, earth-mounded and vaulted tanks with an internal height of about 5 metres. The roof has a row of ventilators visible from the outside within a largely grassed area.

6.102. The pumping house is a mono-aspect flat roofed structure in the centre of the site, and together with the Victorian-style waterworks cottage will require demolition or incorporation into any scheme. The site is ineligible for vacant building credit due to the poor condition of the structures.

6.103. The topography of the site is obscured by the structures in place within it, which at present result in a stepped site rising South-North. There is potential for the site to be remediated to a predominately flat or gently sloping topography, provided suitable engineered solutions are agreed.

6.104. The site will require a full and detailed land stability assessment covering the temporary (during demolition and construction), intermediate (following removal of structures) and permanent (post development) condition of the site. The development of the site may need to be phased accordingly. It is recommended that these reports also take into account drainage design and any potential for pollution.

6.105. The site is within the Grosvenor Gardens Conservation Area and there is a bus stop to the South of the site which should be retained and potentially improved by any proposed scheme.

6.106. The site contains non-designated heritage assets, and no demolition should take place until the existing structures and buildings have been recorded.

6.107. The site is in an overgrown condition with scrubby coverage throughout and will require an Ecological Constraints and Opportunities Plan (ECOP) and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must take into account any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any

development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development.

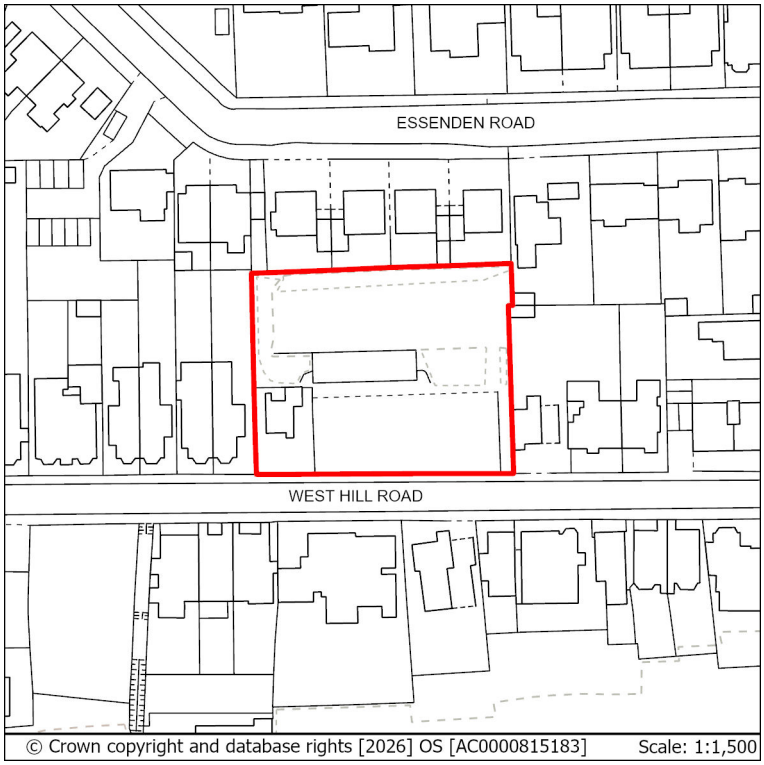

Figure 20: Former West Hill Road Reservoir

HS20: Former West Hill Road Reservoir

Use: Residential
SHELAA Reference: HL151
Minimum Indicative Capacity (net additional dwellings): 30
Site Area (gross): 0.21

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2.**

b. **Be informed by agreed land stability and geotechnical reports covering the temporary, intermediate and permanent condition of the site, taking into account all dead and imposed loads.**

c. **Include a maintenance and management plan for any new, retained or improved land stability mitigation measures to ensure they will be safe for their intended lifetime.**

d. **Retain and enhance or reprovide the bus stop to the South of the site.**

e. **Avoid unacceptable harm or loss to the significance and setting of the Grosvenor Gardens Conservation Area.**

f. **Acknowledge that no demolition shall take place on the site until the existing structures and buildings have been recorded in line with relevant Historic England Guidance. This will be secured by condition.**

g. **Provide appropriate evidence of a vision led and validate approach to transport impacts of the development, to include walking and cycling links to ensure local connectivity to key transport hubs including West St Leonards Station and National Cycle Route 2.**

h. **Ensure vehicular access to the site is attained from West Hill Road and meets appropriate highways standards.**

i. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the nearby Caves Road Cliffs Local Wildlife Site, the results of site surveys, and to other nearby areas of wildlife sensitivity.**

Policy HS21: Land East of Rock Lane

6.108. Land East of Rock Lane is a 1.72ha site that straddles the Hastings – Rother administrative boundary. Approximately 0.72ha is within Hastings. The site is a part brownfield site with an existing access road and areas of dense vegetation.

6.109. The site shares a south-eastern boundary with site HS13, however a sharp difference in levels and an established drainage ditch and tree belt prevent the two sites from sharing significant transport infrastructure. However, there is potential for a pedestrian and cycle link connecting both sites to provide access to local schools, sports facilities and services in the vicinity of Rye Road.

6.110. The site is within the High Weald National Landscape (AONB) and therefore a sensitive form of development is required in line with Local Plan policies.

6.111. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must make specific reference to the High Weald National Landscape and take into account any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development.

6.112. The site slopes north south and an appropriate assessment of land stability should be provided. Proposals should seek to incorporate existing surface water management measures such as the drainage channels to the north and east of the site into any proposed Sustainable Drainage Systems (SuDS).

6.113. Due to the overall area of the site, a Flood Risk Assessment will be required.

6.114. Vehicle access to the site must be from Rock Lane in neighbouring Rother District, and any proposal should be accompanied by a Transport Report, prioritising sustainable and multimodal transport options, within a vision led and validate approach.

Figure 21: Land East of Rock Lane.

HS21: Land East of Rock Lane

Use: Residential
SHELAA Reference: HL153
Minimum Indicative Capacity (net additional dwellings): 20
Site Area (gross): 0.72ha (1.72ha total)

Proposals for Development on this site should:

a. **Demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide;**

b. **Provide affordable housing in line with Policy SP2;**

c. **Be informed by agreed land stability and geotechnical reports;**

d. **Allow for a comprehensive scheme that incorporates the adjoining land within the Rother District Council administrative area;**

e. **Safeguard the Dark Skies of the High Weald National Landscape in line with the Dark Skies Technical Advice Note**

f. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the High Weald National Landscape, the results of site surveys, and to other nearby areas of wildlife sensitivity.**

g. **Incorporate foot and cycle path connectivity to Winchelsea Lane and Rye Road;**

h. **Ensure vehicular access from Rock Lane to the site meets appropriate highways standards;**

i. **Provide appropriate transport evidence, setting out a clear vision led approach for sustainable and multimodal transport, and an appropriate regime for managing and monitoring the impacts of development to identify whether further transport interventions are necessary.**

j. **Take account of Southern Water's underground infrastructure in the design of the site layout. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting;**

k. **Be supported by a Flood Risk Assessment and detailed Drainage Strategy;**

l. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or how compensation will be made for their loss.**

Policy HS23: Land East of Beaneys Lane, The Ridge

6.115. Land East of Beaneys Lane is a 7.60ha site that straddles the Hastings – Rother administrative boundary. Approx. 0.40ha is within Hastings.

6.116. The site is within the High Weald National Landscape (AONB) and therefore a sensitive form of development is required in line with Local Plan policies.

6.117. Although the Hastings' portion is relatively flat, the portion of the site that sits within Rother District undulates and then slopes steeply to the north within the northernmost area. Proposals should be supported by an appropriate land stability report for both the temporary (during construction) and permanent (occupation) condition of the site that includes mitigations where appropriate.

6.118. Due to the overall area of the site, a Flood Risk Assessment will be required taking into account both the site itself and the potential for impacts downstream. The site includes two areas of watercourse and proposals should seek to incorporate suitable SuDS measures.

6.119. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). Assessments must make specific reference to the High Weald National Landscape, SSSI Impact Risk Zones and nearby Ancient Woodland and take into account any nearby areas of wildlife sensitivity and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. Any development proposal must seek to avoid or minimise impact on ecologically sensitive areas during both the construction and occupation phases of the development.

6.120. There are TPOs at the southern boundary of the site, which should be retained as part of any proposed scheme. Trees and woodland within the site should be retained to provide connectivity to an area of Ancient Woodland to the North of the site.

6.121. Vehicle access to the site must be from The Ridge, and any proposal should be accompanied by a Transport Report, including sustainable and multimodal transport options.

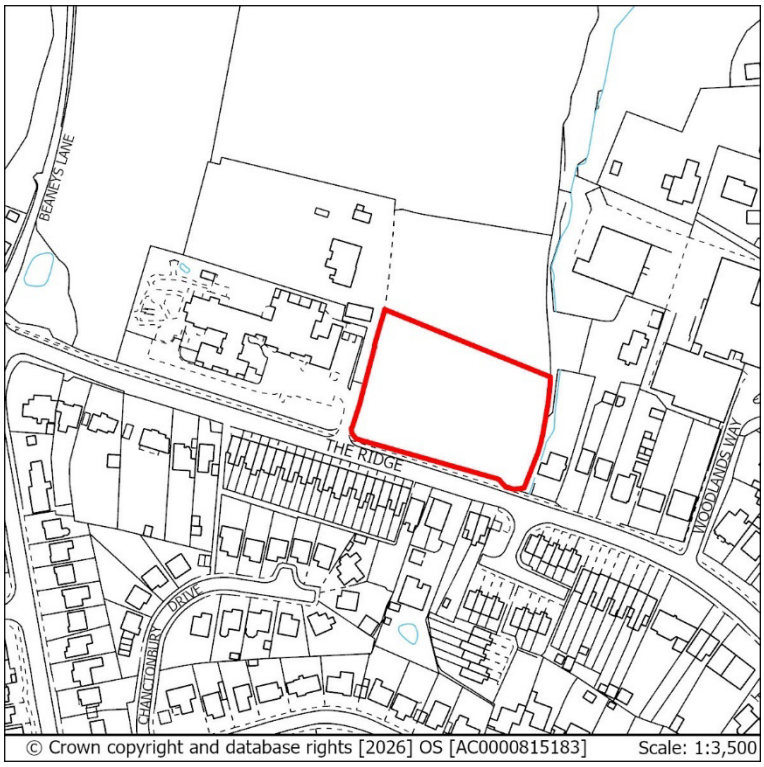

Figure 22: Land East of Beaneys Lane.

HS23: Land East of Beaneys Lane, The Ridge

Use: Residential
SHELAA Reference: HL144b
Minimum Density Range: 45 - 55 dwellings per hectare
Minimum Indicative Capacity (net additional dwellings): 18
Site Area (gross): 0.40ha (7.60ha total)

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2;**

b. **Be informed by agreed land stability and geotechnical reports for both the temporary and permanent condition of the site;**

c. **Allow for a comprehensive scheme that incorporates the adjoining land within the Rother District Council administrative area;**

d. **Incorporate opportunities for active and multimodal travel;**

e. **Ensure vehicular access to the site from The Ridge meets appropriate highways standards.**

f. **Provide appropriate transport evidence, setting out a clear vision for sustainable and multimodal transport, and an appropriate regime for monitoring the impacts of development to determine whether further transport interventions are necessary.**

g. **Be supported by a Flood Risk Assessment and detailed Drainage Strategy.**

h. **Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design to ensure the conservation and enhancement of the landscape and character of the High Weald National Landscape.**

i. **Be informed by ecological and hydrological survey work which demonstrates development will have no adverse impact on the integrity of the Maplehurst Wood SSSI;**

j. **Be supported by an Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the nearby Ancient Woodland, High Weald National Landscape and SSSI Impact Risk Zones as well as the results of site surveys, and to other nearby areas of wildlife sensitivity.**

k. **Assess the ecological impact of the proposed development, including through an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or how compensation will be made for their loss demonstrating that the proposal has been designed to maximise retention of connectivity to the Ancient Woodland to the North.**

Policy HS25: Former Convent of Holy Child Jesus, Magdalen Road

6.122. This 4.76ha former Convent is a nationally important heritage site. It contains a unique collection of Grade II listed buildings and a Grade II* listed chapel, in an enclosed landscaped setting. The Convent complex is situated in a clifftop location and as a result there is a high degree of visibility from within the site to other parts of the Borough, out to sea, and corresponding townscape views from other parts of the Borough towards the site. The site sits within the Magdalen Road conservation area.

6.123. This is a complex site, and a Masterplan and Development Brief is needed to understand and identify the quantum and form of any new development required to secure the future of the listed buildings and to deliver a viable and sustainable scheme for the site as a whole in terms of its heritage value. The council has worked with Historic England and the current site owners to develop a Masterplan and Development Brief for the site, located at Annex 1.

6.124. The site has been vacant for a number of years and is in a deteriorating condition. A condition survey prepared in support of the Masterplan and Development Brief for the site identifies the need for significant repair and restoration of the buildings, as well as the need for their long-term management.

6.125. Development proposals for this site must secure the repair, restoration and long-term sustainable future of the Convent buildings. In addition, given the historic sensitivity of the site and its high visibility in the wider townscape, development proposals must be heritage led and based on a thorough understanding of the significance of the buildings and the surrounding landscape and any heritage features within it.

6.126. The site is allocated for a residential-led scheme with an indicative capacity of 200 dwellings, which includes conversion of some of the listed buildings together with new build development and would be subject to the approval of detailed designs at the application stage.

6.127. Owing to the complexities of the site, any planning application submitted must be a Full planning application and must align with the principles set out in the Masterplan and Development Brief. Any planning application submitted in outline, or which does not present a comprehensive proposal for the whole site, will not be supported.

6.128. Whilst the allocation is residential-led, consideration will be given to an alternative masterplan or development brief, provided it robustly demonstrates how it will secure the restoration and long-term reuse of the heritage assets, secure public benefits, and provide a comprehensive scheme for the regeneration of the whole site.

6.129. The Local Planning Authority will liaise closely with Historic England on any scheme submitted including the sharing with them of viability or financial assessments submitted to support development proposals.

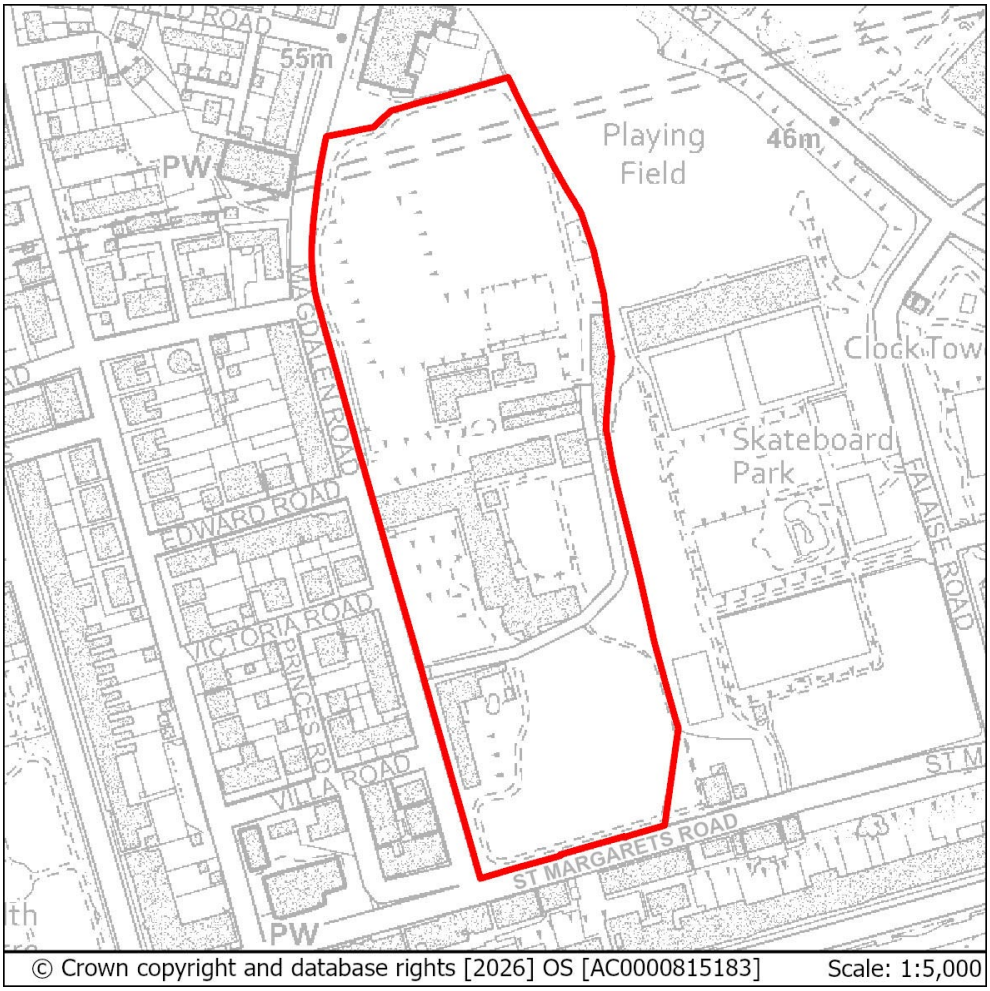

Figure 23: Former Convent of Holy Child Jesus, Magdalen Rd

HS25: Former Convent of Holy Child Jesus, Magdalen Road

Use: Residential-led Heritage regeneration
Indicative Capacity: 200 dwellings
Site Area (gross): 4.76ha

The Former Convent of the Holy Child Jesus site is allocated as a comprehensive heritage, landscape and residential-led regeneration scheme. Development must secure the repair, restoration, active re-use and long-term management of the Grade II* listed chapel, Grade II listed buildings, curtilage listed structures and protection of the Nuns' Cemetery, a non-designated heritage asset.

Proposals for Development on this site will be supported in principle subject to the criteria set out below:

a. **Any Development must be brought forward comprehensively across the entire site by way of a Full planning application and must align with the principles set out in the Masterplan and Development Brief at Annex 1. Outline or hybrid planning applications will not be supported;**

b. **Proposals must define the full extent of development from the outset, including heritage works, demolition, phasing, layout, scale, access, landscaping, viability, public benefits, long-term management and delivery mechanisms. These will be secured through a legal agreement or other enforceable mechanism;**

c. **Development must be supported by the following:**

   i. **Heritage Impact Assessment**
   ii. **Building Condition Survey**
   iii. **Conservation Management Plan**
   iv. **Schedule of repair and restoration works**
   v. **Phasing and delivery plan**
   vi. **Viability assessment demonstrating how development secures the heritage objectives**
   vii. **Landscape and visual impact assessment**
   viii. **Arboricultural assessment**
   ix. **Sustainable drainage strategy**
   x. **Access, movement and parking strategy**
   xi. **Long-term stewardship and management plan**

d. **The Grade II* listed chapel shall be sensitively restored and brought back into use, the nature of which should be compatible with its significance, spatial qualities and setting. Any proposal should maximise opportunities for managed public access and heritage**

interpretation, where this aligns with its proposed operation and long-term use;

e. Any proposal for conversion and reuse of the Grade II listed buildings, which may include residential, cultural, community, educational, workspace, later living or other appropriate uses, must ensure that their significance is conserved and enhanced and that their long-term use and public benefit is secured;

f. The repair, restoration and reuse of the listed buildings must be secured as early as possible in the development process. The occupation and/or completion of new-build residential development must be linked to the completion of agreed heritage works, via the use of planning condition, legal agreement or other enforceable mechanism;

g. The Nuns' Cemetery, which has been identified as a non-designated heritage asset, must be protected as a respectful landscape feature. The cemetery and any land with potential for burials, including unmarked lay burials, must be protected from development and disturbance wherever practicable. The Historic Environment Record should be consulted and archaeological field investigations carried out where appropriate, in accordance with an approved Written Scheme of Investigation;

h. Clear justification must be provided for the layout, form, scale and massing of development and how this relates to the heritage significance of the site, including its setting, topography, viability and the requirement to secure the restoration and long-term conservation of the heritage assets;

i. Any proposals must preserve and where possible enhance the character and appearance of the Magdalen Road Conservation Area, including protecting the setting of any designated, or non-designated, heritage assets affected by the proposals;

j. Development must be of a high-quality design and layout, be locally distinctive, and use contextual materials and forms which respond positively to the site's historic, townscape and landscape context;

k. The overall scheme must provide a connected landscape, comprising restored historic gardens, ecological enhancements, gardens, sustainable drainage, play provision, open space and safe and legible pedestrian and cycle links to adjoining areas;

l. Landscape features, mature trees and existing boundary planting must be retained where practicable. Where any of these features are negatively impacted, clear justification must be provided, setting out how such impacts are to be minimised, mitigated and compensated for, as part of the overall landscape strategy;

m. The proposal is accompanied by appropriate environmental assessments that take into account its location within the ACIB with mapped measures for improvement;

n. Development proposals must respond to the three character areas identified in the Masterplan and Development Brief as follows:

Northern Area

i. Landscape-led residential development arranged around gardens, prioritising pedestrian routes and communal spaces. Layout, massing, scale and grain must align with that of the adjacent Magdalen Rd and must respond to site topography, retain existing mature trees and preserve the Nuns' Cemetery

Central Area

ii. Prioritisation must be given to the repair, conservation and adaptive re-use of the Grade II* listed chapel, the Grade II listed Former Convent buildings and gardens. Any new development must preserve and enhance the character and coherence as a former convent complex, maintaining important views, garden settings and relationships with the chapel.

Southern Lawn

iii. Development must be peripheral and must retain and enhance the role of the lawn, a significant open landscape space that is essential to the setting, significance and legibility of the convent complex. Key views to the Training College and Grade II* listed chapel must be protected and any new buildings must be subordinate to the heritage assets and landscape setting.

o. Any proposal which would prejudice the comprehensive delivery of the site as a whole, including the restoration and reuse of the listed buildings, the long-term management of the site, or the delivery of public benefits, will not be supported.

Policy HS26: Site of Four Courts, Stonehouse Drive

6.130. This is a 4.4ha site comprising 381 dwellings across four tower blocks (each one 18 storeys): Bevin Court, Kennedy Court, Roosevelt Court and Churchill Court. Within the site there is also a community centre, a nursery, three 2 storey terraces and two semi-detached bungalows, and a limited amount of parking.

6.131. Developed in the 1960s, the existing high-rise blocks have numerous deficiencies which the landowner wishes to address through a comprehensive renewal scheme.

6.132. The site is allocated for a minimum of 450 dwellings gross, with higher densities being encouraged. Development on the site should be apartment-led, seeking to maximise the established high-density nature of the site.

6.133. Comprehensive renewal of the site provides an opportunity to increase housing provision, improve the quality and accessibility of the accommodation and to create a more attractive and better-connected public realm.

6.134. Redevelopment of the site should concentrate not only on the replacement and increase of the number of housing units on the site, but also on providing substantial community infrastructure, including central open space, play space, landscaping, biodiversity gains and connectivity, both within the site and through to the wider environs beyond.

6.135. Development should be apartment-led, with dwellings of varying size and layout, in order to maximise the area of central open space. Alternative schemes will be considered provided that they are design-led and include substantial central open space.

6.136. The community centre and nursery are important community facilities and should be retained, or, if demolished as part of a comprehensive redevelopment scheme, be replaced with facilities of at least equivalent function. Replacement should seek to improve the level of provision in terms of quality, accessibility and useability and any period of time where community facilities will not be available to occupiers should be as minimal as possible.

6.137. The site consists of a varied and sloping topography. The design of any scheme should seek to utilise the landform to help positively shape the layout and built form. Proposals will need to demonstrate how access routes, pedestrian and vehicular movements, drainage and parking effectively utilise the changes in levels on the site. Consideration should be given to reducing the need for cut and fill, significant retaining structures and major engineering works.

6.138. The Hollington Stream runs alongside the boundary of this site. A limited portion of the site is in Flood Zone 3b, and a Flood Risk Assessment taking into account all potential sources of flooding will be required and mitigation as

advised by the report should be incorporated into any potential scheme and maintained for its lifetime, with a sequential approach taken to ensure compatibility of scheme elements with the level of flood risk. The Hollington Stream is an important ecological asset and is also engineered to avoid unacceptable flood risk so close working with the council and the Environment Agency is encouraged. Safe access and exit for all residents must be provided.

6.139. Adequate buffer zones should be incorporated into any proposal that takes into account riparian zones, the impacts of climate change on flood risk, BAP Priority Habitat (deciduous woodland) to the west of the site and Southern Water's infrastructure to the south-east. Natural Flood Management Measures, such as floodplain restoration, may be appropriate within this site. Easements should be provided to allow the monitoring of water quality.

6.140. The site is adjacent to the Ponds Wood Local Nature Reserve and Local Wildlife Site. The LWS and the Hollington Stream must be specifically referenced in Ecological Impact Assessments (EcIA) and Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints, taking into account the ecological and recreational impact of development. The entire area lies within a defined ACIB of the East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS). Proposals for this site should therefore contribute towards measures to for buffer strips along rivers and streams and the BNG assessment must include a River Condition Assessment.

Figure 24: Site of Four Courts, Stonehouse Drive

HS26: Site of Four Courts, Stonehouse Drive

Use: Residential-led Renewal
Minimum Capacity: 450 dwellings (gross) 64 dwellings (net)
Site Area (gross): 4.44ha

Proposals for development on this site should:

a. **Deliver a comprehensive apartment-led renewal scheme, making best use of the established high-density residential location by providing a minimum of 450 dwellings;**

b. **Demonstrate a high quality of design, make efficient use of the site, provide an appropriate mix of dwelling sizes;**

c. **Ensure the existing community centre and nursery are retained or, as part of the comprehensive redevelopment of the site, replaced with enhanced provision, including outdoor play space for the nursery;**

d. **Create a distinctive neighbourhood oriented around a centrally located area of substantial open space, forming the focus of the development, providing opportunities for recreation, biodiversity enhancement and sustainable drainage;**

e. **Provide high-quality, accessible, well designed and overlooked play provision, integrated within the central open space as well around the wider site, including equipped play and opportunities for doorstep play;**

f. **Make best use of the site's topography to positively inform design, scale, layout and massing.**

g. **Be supported by appropriate technical assessments and mitigation measures, including where necessary:**

   i. **A flood risk assessment addressing all sources of flooding and a drainage strategy with specific reference to the Hollington Stream;**
   ii. **An Ecological Impact Assessment and Ecological Constraints and Opportunities Plan informed by surveys of the site itself and nearby areas of wildlife sensitivity including Ancient Woodland, Hollington Stream, Ponds Wood Local Nature Reserve and Local Wildlife Site. The site sits within the ACIB with mapped measures for buffer strips along rivers and streams which should likewise be incorporated into the reports. A River Condition Assessment will be required to inform assessments of BNG;**
   iii. **An arboricultural assessment;**
   iv. **Land stability, groundwater and geotechnical investigations to inform the demolition, construction and occupation phases;**
   v. **A Visual Impact Assessment, demonstrating how the scale, massing and roofscape of the development responds to the surrounding townscape and wider views;**

h. **Provide safe and legible pedestrian and cycle routes throughout the site, linking with existing external networks.**

i. **Parking provision, including secure cycle storage, should respond to the proposed dwelling mix and be incorporated into building design and layout, reducing impact on the public realm and open space provision.**

j. **Include arrangements through legal agreement, for the long-term management and maintenance of the public open space, landscaping, ecological features and community facilities and any land stability mitigation measures;**

k. **As part of any required Site Waste Management Plan, which deals with construction, demolition and excavation waste, include an Operational Waste Management Plan. This should set out the location and design of integrated waste and recycling storage, collection points, servicing and management arrangements.**

Policy HS27: My Way Lodge, The Ridge West

6.141. My Way Lodge is a 1.29ha site close to the borough boundary in north west Hastings. It is currently occupied by an extended 20th Century home, a number of outbuildings and its garden. The site shares a boundary to the west with the Beauport Park holiday village and to the south with The Ridge West.

6.142. The site sits within the High Weald National Landscape, and any scheme should be landscape-led and take into account the advice and guidance set out within the High Weald AONB housing design guide. In order to mitigate landscape impacts, reduce noise transfer to and from surrounding areas and manage pollution from The Ridge West appropriate boundary treatments and tree buffers should be incorporated. As the agent of change, the scheme should not prejudice the operation of the Beauport Park holiday village nor allow negative impacts arising from the presence of the village to result in a poor standard of amenity of the eventual occupiers of the My Way Lodge site.

6.143. The site is within the Beauport Park Local Wildlife site and the ACIB, and will require appropriate ecological assessments. Assessments should make reference to surveys of the site itself, the ACIB, the adjacent APIB and the Beauport Park Local Wildlife Site, as well as any other nearby areas of wildlife sensitivity. Due to the location in the HWNL and the presence of wildlife sensitive areas, a lighting plan following the advice of the High Weald National Landscape Dark Skies TAN should be provided for all phases of development demonstrating how light spill will be prevented or mitigated.

6.144. There is a deficiency of access to open space and play in this location. In order to ensure future occupiers have appropriate access to open space and play, development should be confined to an approximately 0.5ha area to the west of the site that is currently occupied by the main dwelling, areas of hardstanding and other ancillary structures. The remainder of the site, net of any areas required for SuDS and other ecological obligations should form public open space for the development, and incorporate equipped or structured play space, either fenced or unfenced. A row of WWII anti-tank blocks run along the northern boundary, and schemes that leave these blocks in situ and incorporate them into a unique public realm response will be encouraged. Advice should be sought at an early stage regarding any appropriate asset recording.

6.145. The site currently benefits from multiple vehicle accesses to The Ridge West, and a transport assessment and plan should demonstrate whether these may be brought up to an acceptable standard or whether a new access would be required.

6.146. In accordance with other policies of this plan and National Planning Policy, schemes must not restrict or otherwise inhibit the upsizing, access or operational functionality of the nearby utilities sites to the south of The Ridge West.

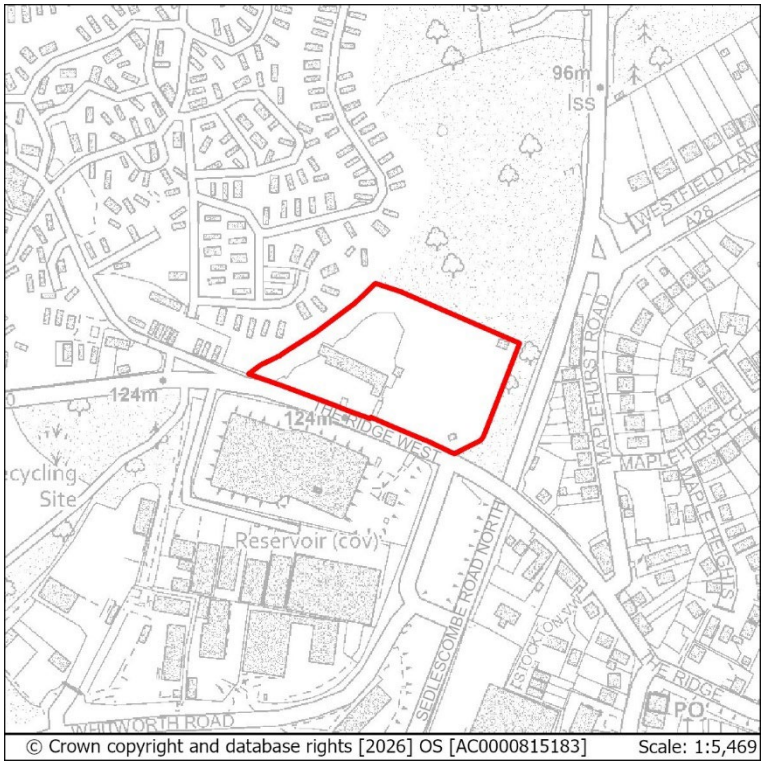

Figure 25: My Way Lodge, Ridge West

HS27: My Way Lodge, The Ridge West

Use: Residential
Minimum Indicative Capacity: 20 dwellings
Site Area: 1.29 (0.5ha net developable area)

Proposals for Development on this site should:

a. **Clearly demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide;**

b. **Retain, enhance and provide appropriate boundary treatments and landscaping, incorporating 15m buffers to existing tree belts;**

c. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or their loss will be compensated for;**

d. **Provide a lighting plan for both the construction and occupation phases of the proposed development, with regard to the High Weald National Landscape Dark Skies TAN. The plan should include measures to prevent overspill from internal lighting. The lighting plan must be agreed before permission is granted;**

e. **Provide affordable housing in line with Policy SP2;**

f. **Secure the undeveloped, eastern half of the site as public open space incorporating natural, unfenced multifunctional play space in a form which is characteristic of the National Landscape setting. This open space and play provision must be secured in perpetuity, to be secured by legal agreement;**

g. **Include a maintenance and management plan for areas of publicly accessible open space and play;**

h. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP should make specific reference to the High Weald National Landscape, the Beauport Park Local Wildlife Site, surveys of the site itself and any other nearby areas of wildlife sensitivity. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;**

i. **Provide a sewer connection at the nearest point of sufficient capacity;**

j. **Be supported by a Transport Report. Proposals must also indicate how the conclusions and recommendations of the Report have been incorporated within the development;**

k. **Provide connections to the wider walking and cycling network and key transport hubs including Battle Station in neighbouring Rother;**

l. **Ensure vehicular access to the site from The Ridge West meets appropriate highways standards;**

m. **Must not prejudice the current or future use of the neighbouring holiday park during either the construction or occupation phases of development. Should there be any need to mitigate adverse impacts, the cost of this should be borne by the agent of change prior to completion of development. This will be secured by condition;**

n. **Seek to incorporate non-designated heritage assets along the northern boundary of the site into the wider public realm.**

Policy HSS5: Land at Chiltern Drive

6.147. Land at Chiltern Drive is a smaller site at the corner of Chiltern Drive and Southdown Avenue. It is both steeply sloping and has a mix of levels within the site. The site includes a terrace of pent roof bungalows to the south that should either be demolished or incorporated into any site proposal.

6.148. The site is crossed by overhead distribution lines linking the Ridge Primary Electricity Substation and the Hastings Main Electricity Substation on Ore Valley Road. Any scheme should either provide the necessary clearances for the powerlines or consider relocating them underground to remove height and working restrictions imposed by their presence. Appropriate easement to maintain the assets should be agreed with the electricity board.

6.149. The site is adjacent to the Broomgrove Local Wildlife Site, and it is essential that any development is informed by an EcIA as well as an ECOP.

6.150. Due to the site topography and the topographical character of the surrounding area, the site will require a full and detailed land stability assessment covering the temporary (during site preparation and construction) and permanent (post development) condition of the site.

6.151. Proposals will need to consider and be informed by the need to resist ground movement and deformations during all project phases in order to protect the integrity of nearby dwellings and those already present onsite if retained. It is recommended that ground investigations also take into account drainage design and any potential for contamination.

6.152. Relevant ecological assessments will be required, including recommendations for any necessary translocation, habitat creation or restoration within the site.

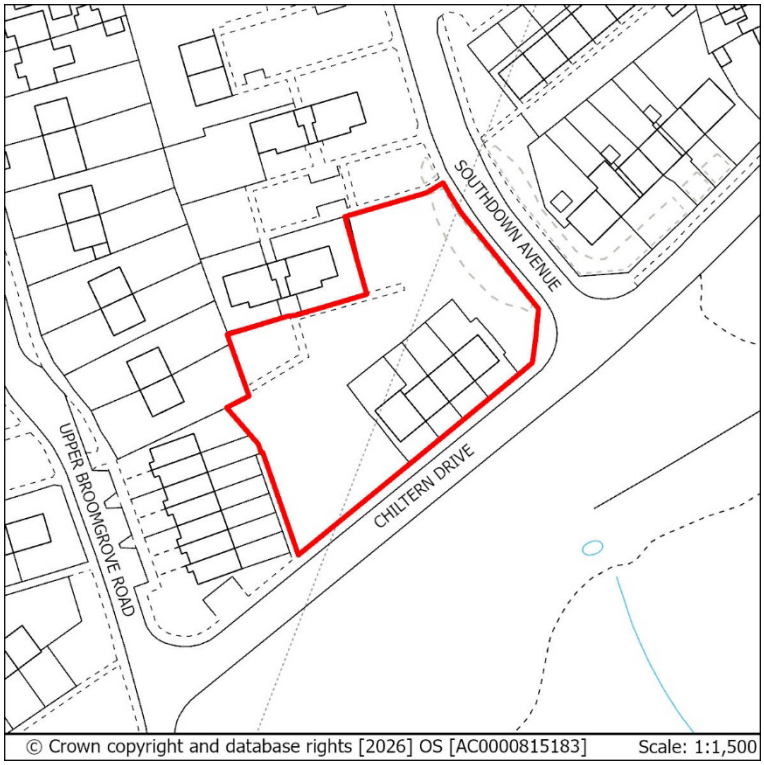

Figure 26: Land at Chiltern Drive

HSS5: Land at Chiltern Drive

Use: Residential
SHELAA Reference: HL100
Minimum Indicative Capacity (net additional dwellings): 13
Site Area (gross): 0.24

Proposals for Development on this site should:

a. **Provide affordable housing in line with Policy SP2;**

b. **Be informed by agreed land stability and geotechnical reports covering the temporary and permanent condition of the site, taking into account:**

   i. **all dead and imposed loads, and;**
   ii. **the need to protect the integrity of adjacent buildings;**

c. **Include a maintenance and management plan for any new, retained or improved land stability mitigation measures to ensure they will be safe for their intended lifetime;**

d. **Be informed by an EcIA and include an ECOP. The ECOP must make specific reference to the Broomgrove Local Wildlife Site;**

e. **Include walking and cycling links to ensure local connectivity to key transport hubs including Ore Railway Station;**

f. **Ensure vehicular access to the site meets appropriate highways standards;**

g. **Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting;**

h. **Assess the ecological impact of the proposed development, including through an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or how compensation will be made for their loss.**

Policy TP1: Land South of Crowhurst Road

6.153. The site is located at the junction of B2092 Crowhurst Road and A2690 Queensway. Queensway has connections to the wider road network, including the A2690 Combe Valley Way (leading to the A259 to Brighton) and the A21 (leading to London and the A259 to Ashford) Some access improvements are required. The site has sufficient space to comfortably accommodate at minimum no.2 pitches, associated berths and ancillary buildings.

6.154. The site has a Local Wildlife Site and Ancient Woodland nearby. These areas must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the lighting plan must seek to minimise light spill to these and other areas of wildlife sensitivity. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.155. The site has an established tree belt at the perimeter, and any scheme should seek to preserve and enhance this both for the ecological value and for the amenity benefits it can provide in terms of amenity by screening the site from the noise, emissions and lack of privacy that could result from a more open boundary with Queensway. Additionally, retention of boundary landscaping to the west of the site will also provide a buffer that can help mitigate any noise and disturbance from the nearby railway line.

6.156. The site does not currently benefit from a sewerage connection, or suitable access to the highway. A sewer connection will be required for any utility block and must also be able to support the safe and easy disposal of any cassette waste holding tank contents from vehicles. Access to the site must be improved in line with the advice of the highway authority to provide safe access to and from the site for both residents and servicing.

6.157. The site has minimal risk from surface water flooding. However, for the amenity of residents an appropriate SuDS system should be incorporated into any proposal. Such schemes should seek to preserve water quality by including any necessary mitigation measures.

Figure 27: Land South of Crowhurst Road

TP1: Land South of Crowhurst Road

Use: Permanent Site for Gypsies and Travellers
Minimum Indicative Capacity (pitches): 2
Sites Area: 0.17ha

Proposals for Development on this site should:

a. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the nearby Ancient Woodland and Local Wildlife Site, and priority habitat within the site and make clear recommendations regarding the provision of appropriate buffers. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;**

b. **include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity, including nearby Ancient Woodland and Local Wildlife Site;**

c. **provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or how compensation will be made for their loss;**

d. **retain and enhance existing landscaping to maintain an amenity and pollution buffer with Queensway and the nearby railway;**

e. **include improvements to the access at the junction of Crowhurst Road and the Queensway as advised by the Local Highways Authority (East Sussex County Council).**

f. **provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.**

g. **include an appropriate drainage plan to manage surface water and preserve water quality.**

Policy TP2: Land at Tilekiln Lane

6.158. The site is located at the southernmost point of Tilekiln Lane in East Hastings, and an unadopted road accessed from Fairlight Road. Some access improvements may be required to facilitate vehicle access for both development and occupation of the site. The site has sufficient space to comfortably accommodate at minimum no.2 pitches, firebreaks, associated berths and ancillary buildings.

6.159. The site is the location of the tile kiln for which the road is named and is in close proximity to the recorded entry points of the associated clay pits and sits within an Archaeological Notification Area (ANA). An appropriate programme of archaeological investigation will be essential.

6.160. A belt of TPOs runs alongside the north-northwestern perimeter, and the site is in close proximity, and in some places adjacent, to the Hastings Country Park Local Wildlife Site, Hastings Country Park and Fairlight Place Farm Local Nature Reserve, and the High Weald National Landscape. It additionally sits within an impact risk zone for the SSSI. These areas must be specifically referenced in any Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP) to ensure appropriate mitigation for any priority habitats and protected species is provided and ensure that appropriate buffers are identified and provided for ecologically sensitive areas and priority habitats.

6.161. The lighting plan must seek to minimise light spill to these and other areas of wildlife sensitivity. An arboriculture plan must also be provided to set out how existing trees and hedgerow will be either integrated into the proposal, or their loss will be compensated for. The EcIA, ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.162. The site has an established tree and hedgerow belt at the perimeter and areas of green screening within the site, and any scheme should seek to preserve and enhance this both for the ecological value and for the amenity benefits it can provide in terms of amenity by screening the site from the noise, emissions and lack of privacy and to mitigate any landscape impact on the adjacent High Weald National Landscape.

6.163. The site does not currently benefit from a sewerage connection, or suitable access to the highway. A sewer connection will be required for any utility block and must also be able to support the safe and easy disposal of any cassette waste holding tank contents from vehicles. Access to the site must be improved in line with the advice of the highway authority regarding both vehicle access and the unadopted condition of the highway to provide safe access to and from the site for both residents and servicing.

6.164. The site has minimal risk from surface water flooding. However, for the amenity of residents an appropriate SuDS system should be incorporated into any proposal. Such schemes should seek to preserve water quality by including any necessary mitigation measures.

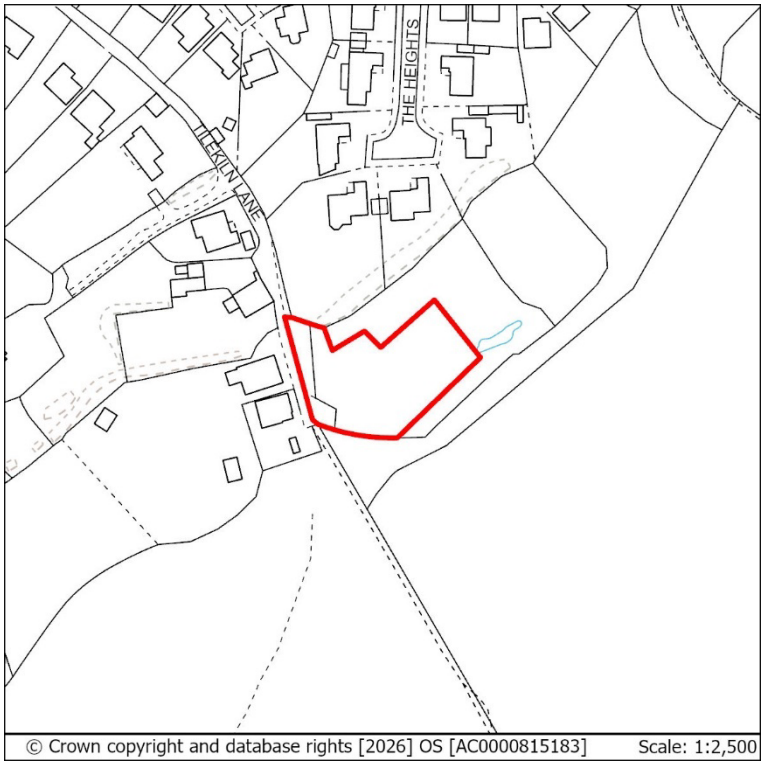

Figure 28: Land at Tilekiln Lane

TP2: Land at Tilekiln Lane

Use: Permanent Site for Gypsies and Travellers
Minimum Indicative Capacity (pitches): 2
Sites Area: 0.17ha

Proposals for Development on this site should:

a. **Be informed by an Ecological Constraints and Opportunities Plan (ECOP) and Ecological Impact Assessment (EciA) and incorporate appropriate conservation and mitigation measures as recommended by the reports. The ECOP must make specific reference to the presence of the nearby Local Wildlife Site, Local Nature Reserve, Country Park, SSSI and High Weald National Landscape;**

b. **Demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide where this would be relevant to this type of proposal;**

c. **Safeguard the Dark Skies of the adjacent High Weald National Landscape in line with the Dark Skies Technical Advice Note and minimise light spill to areas of wildlife sensitivity such as those mentioned in (a) above;**

d. **provide an Arboriculture Plan that demonstrates how existing trees and hedgerow on site will be integrated into the development, or how compensation will be made for their loss;**

e. **Include a Historic Environment Record (HER) informed desk-based assessment of potential interests within an Archaeological Notification Area and agree to an appropriate programme of archaeological investigation secured by condition/s prior to any development works (as advised by local authority archaeologists).**

f. **Other than where removal is essential for access, retain and enhance existing landscaping to maintain an amenity and pollution buffer with the surrounding area;**

g. **Access to the site must meet highways standards and early engagement with the Highway Authority is advised;**

h. **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.**

i. **Include an appropriate drainage plan to manage surface water and preserve water quality.**

Part two – Employment Allocations

6.165. To meet the future additional provision for employment space in Hastings, the council is guided by the employment evidence studies listed below:

6.166.

- Housing and Economic Development Needs Assessment (HEDNA) Update 2024 and HEDNA update 2026
- Strategic Housing and Employment Land Availability Assessment 2026
- East Sussex Economic Prosperity Strategy 2024
- Room to Grow 2
- East Sussex Employment Land Pipeline Study 2023
- Land and Premises Supply Study: Market Assessment for East Sussex 2020
- East Sussex Economic Recovery Plan 2020 (Updated February 2022)

6.167. A policy approach is recommended by the NPPF and Planning Practice Guidance whereby Councils positively plan to enhance the local economy and encourage jobs growth through the allocation of sufficient land to meet existing and future needs.

6.168. Where site allocations identified within this plan are at risk of flooding, the council will ensure that sites are sequentially tested in line with National Planning Policy and Practice Guidance, and that the exception test is applied where necessary.

6.169. The Local Plan evidence identifies a need for 70,400sqm business floorspace by 2041. Approximately 19,830sqm of floorspace will be delivered through employment allocations located within the Strategic Industrial Employment Areas (SIEAs). This be delivered on allocated sites within SIEA1 (Queensway Corridor) and SEIA2 (Ivyhouse Lane).

6.170. These allocations are consistent with SIEAs being assessed as suitable locations to meet the majority of Hastings' future employment needs. This is recognised in Policy SP3 which seeks to protect the integrity and function of SIEAs as key locations for future employment growth. Outside of SIEA1 and 2 there are no proposed site allocations within other SIEAs and it is anticipated that over the lifetime of the plan development in these locations will come forward as part of ongoing estate regeneration as older or lower quality stock is replaced by more modern employment floorspace that better reflects modern sectors and their processes and improves their layout and form to deliver a higher density within each SIEA as a whole.

6.171. The majority of the allocated employment sites were previously identified as allocations in the Hastings Development Management Plan 2015. These sites have been reassessed in detail by the council and remain suitable, achievable and deliverable for business (office or industrial) use. With specific regard to deliverability, it is noted that the recent provision of strategic road infrastructure, which was not present upon adoption of the previous Local Plan, has materially increased the opportunity and attractiveness to the market of these sites.

6.172. Local Industrial Employment Areas (LIEA) provide a unique local function that is often sector specific and will be supported and protected through policy to where proposals are submitted that will enhance their existing function. In addition to the allocated employment sites set out below, the Plan also provides support for the enhancement of existing Strategic and Local Industrial Employment Areas and other sites currently or last in employment, subject to the criteria set out in Policy SP3 and E1 being met. There is also potential for small pockets of employment land to be delivered on the mixed-use housing allocation sites provided this will not compromise residential amenity.

6.173. With the potential that further land may come forward, potentially aligned with the Regeneration Area sites, flexibility in supply has been established. Consequently, the council will undertake robust monitoring of employment land supply and losses on an annual basis to ensure sufficient land is available to meet identified needs.

Marline Valley Woods SSSI and the Queensway Corridor

6.174. All development in the SIEA1 Queensway Corridor has the potential to affect the SSSI. The Marline Valley Woods SSSI contains interest features which include a number of rare bryophytes within the SSSI's steep-sided ghyll stream. The interest features of the SSSI rely on the continuation of the existing hydrological regime (the quality and quantity of water flowing from adjacent land to the SSSI). The SSSI is hydrologically linked to these locations.

6.175. All applications in this location, whether in relation to sites allocated within this plan or as applications for sites yet to be identified, have the potential to affect the hydrogeology of the SSSI via impacts to the existing ground and surface water.

6.176. Boreholes and trial pits in this area have shown it to be highly variable in nature with regard to the depth of the permeable layers and highly complex to develop. Applications must demonstrate that development will not impact the SSSI and that underlying sandstone layers will not be breached either by the finished development or during the construction phase.

Interpretation of Site Allocation Policies

6.177. Site allocation policies should not be read in isolation. The Plan needs to be read as a whole in order to ascertain which policies will be relevant to individual sites or proposals. Local plans should not repeat National planning guidance or regulations or matters already addressed elsewhere within development plans. Therefore, where site allocation policies do not explicitly reference subject areas covered elsewhere within the development plan, it does not mean that these subject areas are not considered relevant. Where subject areas are specifically covered within site allocations it is because

there are unique circumstances surrounding that site that should be taken into account when preparing planning applications in addition to the other policies of the plan.

Policy EA1: Applications for Employment Uses

The Plan needs to be read as a whole in order to ascertain which policies will be relevant to individual sites or proposals. Proposals for new or enhanced employment uses should take account of the site selection criteria and design specifications set out in Policy SP3.

Proposals should, where appropriate, address the following material considerations within proposals for development. For specific requirements applicants should refer to the council's validation checklist:

- **Design and character**
- **Heritage impacts**
- **Residential amenity**
- **Transport, including sustainable and active travel**
- **Flood risk and sustainable drainage solutions (SuDS) for surface water management**
- **Contamination, nuisance and hazards including where the 'agent of change' principle applies**
- **Land stability**
- **Ecology and Green and Blue infrastructure**
- **Biodiversity Net Gain**
- **Arboriculture and landscape**
- **Waste and recycling**
- **Contributions and legal agreements**

Where relevant, proposals should take account of underground water infrastructure, high pressure gas mains and overhead power transmission and distribution lines in the design of the layout of the site. Easements may be required, which will affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting.

The following sites are allocated, as shown on the Policies Map, for employment use to meet the employment land requirement set out in Policy SP1.

The sites listed in the table below (and as shown on the Policies Map) are allocated for employment use to deliver the employment floorspace requirement set out in Policy SP3.

Detailed requirements can be found in the Validation List.

<u>Specific Locational Requirements: Marline Valley Woods SSSI</u>

Proposals for commercial development adjacent to the Marline Valley Woods SSSI must be SuDS-led and maximise greenspace, avoid breaching the

underlying sandstone layer and use borehole and/ or trial pit data to inform relevant groundwater assessments.

Approach to Industrial Employment Areas

Table 11: List of SIEA/ LIEA

Industrial Location	Designation	Policy approach
Queensway North and South	SIEA1	Safeguard, enhance and intensify.
Ridge West	SIEA1	Safeguard, enhance and intensify.
Castleham	SIEA1	Safeguard, enhance and intensify.
Conqueror	SIEA1	Safeguard, enhance and intensify.
Churchfields	SIEA1	Safeguard, enhance and intensify.
Ivyhouse and Rock Lane (incorporating Hayward Way)	SIEA2	Safeguard, enhance and intensify.
Ponswood	SIEA3	Safeguard, enhance and intensify.
Bulverhythe East	SIEA4	Safeguard, enhance and intensify.
Bulverhythe West	SIEA4	Safeguard, enhance and intensify.
Roebuck Estate	LIEA1	Safeguard and enhance.
Fishmarket	LIEA2	Safeguard and enhance.

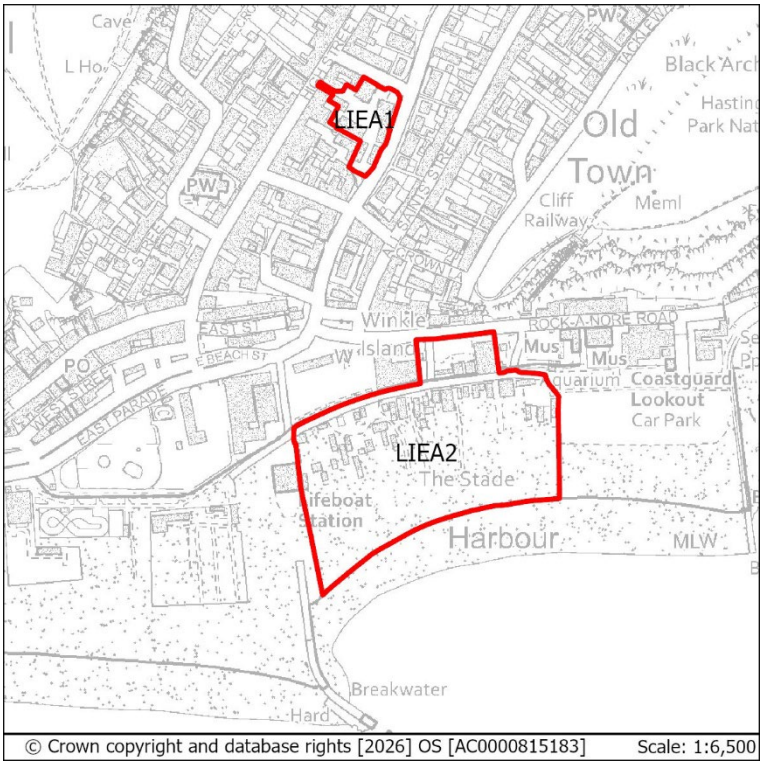

Figure 29: LIEA Locations

Approach to allocated sites

Extents of SIEA should be viewed using the Policies Map hastings.gov.uk/localplan

Table 12: Proposed allocations within SIEA1

Site Ref.	Site Address	Site Area (ha)	Use	Indicative Capacity (sqm floorspace)	Proposals should comply with these additional site-specific requirements:
SIEA1	**– Queensway**	**Corridor**			
ES1	**Queensway North, Queensway**	**4.68**	**Industrial**	**6,500**	**See site Policy ES1**
ES2	**Site PX, Churchfields Estate**	**0.58**	**Industrial**	**1,800**	**See site Policy ES2**
ES3	**NX2 Sidney Little Road, Churchfields Estate**	**0.32**	**Industrial**	**860**	**See site Policy ES3**
ES4	**NX3 Sidney Little Road, Churchfields Estate**	**0.17**	**Industrial**	**280**	**See site Policy ES4**
ES8	**Land at junction of The Ridge West and Queensway**	**2.95**	**Industrial**	**4,700**	**See site Policy ES8**
ES10	**Marline Fields, Enviro21 Business Park, Land West of Queensway**	**1.38**	**Industrial**	**550**	**See site Policy ES10**

Table 13: Proposed allocations within SIEA2

SIEA2	**– Ivyhouse**	**Lane**			
ES5	**Adjacent Unit C, 1-8 Brook Way**	**0.16**	**Industrial**	**500**	**See site Policy ES5**
ES6	**UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane**	**1.57**	**Industrial**	**1,900**	**See site Policy ES6**
ES7	**Ivyhouse Lane, Northern Extension**	**2.13**	**Industrial**	**2,800**	**See site Policy ES7**

Policy ES1: Queensway North, Queensway

6.178. The site occupies a prominent position in SIEA1 and is accessed from A2690 Queensway with strong links to both the A259 (Brighton-Ashford) and the A21 (London). The site is capable of delivering a range of layouts, including a single larger size unit or a broader mix of small-medium size units. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.179. The site is adjacent to a Site of Special Scientific Interest and Local Nature Reserve, with a Local Wildlife Site and Ancient Woodland within the site and nearby. Due to the site sitting within the Impact Risk Zone (IRZ) for the Marline Valley Woods SSSI, Natural England should be consulted at the earliest possible stage. The development of the site must be SuDS-led and maximise onsite greenspace, with proposals informed by an agreed programme of hydrological and groundwater monitoring for minimum 12 months to ensure that development will not negatively impact the local conditions necessary to support the species dependant on the Marline Valley Woods SSSI, either alone or cumulatively with existing or permissioned development.

6.180. Due to the topography of the site, investigations of ground behaviour and land stability should take into account the hydrology and hydrogeology of the site, and a detailed stability report will be required. Proposals for SuDS that include attenuation may be appropriate subject to hydrological, hydrogeological and ground behaviour assessments.

6.181. The site itself is undulating with areas of dense scrub and mature trees. These designated areas and Ancient Woodland must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). The site itself should be thoroughly surveyed to identify constraints. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development, including the hydrological effects of drainage into the Marline Valley Stream. The introduction of pollutants to the highly vulnerable groundwater aquifer within the site should likewise be avoided during both phases and cumulative impacts of development within the IRZ should be considered. Development proposals should seek to avoid breaching the underlying sandstone layer.

6.182. The site is within an ACIB with mapped measures for nature networks. The development would need to ensure that an ecological management plan is developed for the site.

6.183. It is anticipated that the site will feature an ecology buffer zone to the North West of the site closest to the SSSI, and an area of Ancient Woodland which

will require a suitable buffer. Opportunities to deliver green and blue infrastructure and net gain activities in this location should be explored.

6.184. A lighting plan will be required due to the close proximity to areas of wildlife sensitivity and must demonstrate how steps have been taken to reduce light spill that may impact on these areas. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary that should be retained and enhanced where possible, particularly to the north of the site where it borders a holiday park to safeguard the amenity of occupiers. The ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.185. The site falls within an Area of Opportunity (AoO) for waste management facilities. Generally, it is considered acceptable for employment land uses to co-exist with waste sites, depending on the type of employment use (e.g. B2 or B8) and the nature of the waste operation taking place. The agent of change principle would also apply, to ensure that any potential waste operation could successfully operate alongside other business or industrial uses within the site.

6.186. Development proposals should be supported by transport evidence, taking a vision led and validate approach with particular consideration of the transport impact along The Ridge.

6.187. It is anticipated that the site will be served by a single looped spine road accessed directly off Queensway - with a simple main ‘T’ junction and a secondary ‘emergency only’ junction. Limited improvements to Queensway itself may be required. Proposals should support access to and from the site by public and sustainable travel, including consideration of a pedestrian connection to the adjoining chalet site or the adjacent residential area. There may also be opportunities to improve connections to nearby Rights of Way.

6.188. Improvements to better support access to the site through public and sustainable transport may be required. Further advice on transport matters is available from East Sussex County Council.

6.189. Where possible, proposals should seek to make connections to the area of open space bordering High Beech Close to enhance the amenity value of the finished development and deliver policy compliant green infrastructure within the site.

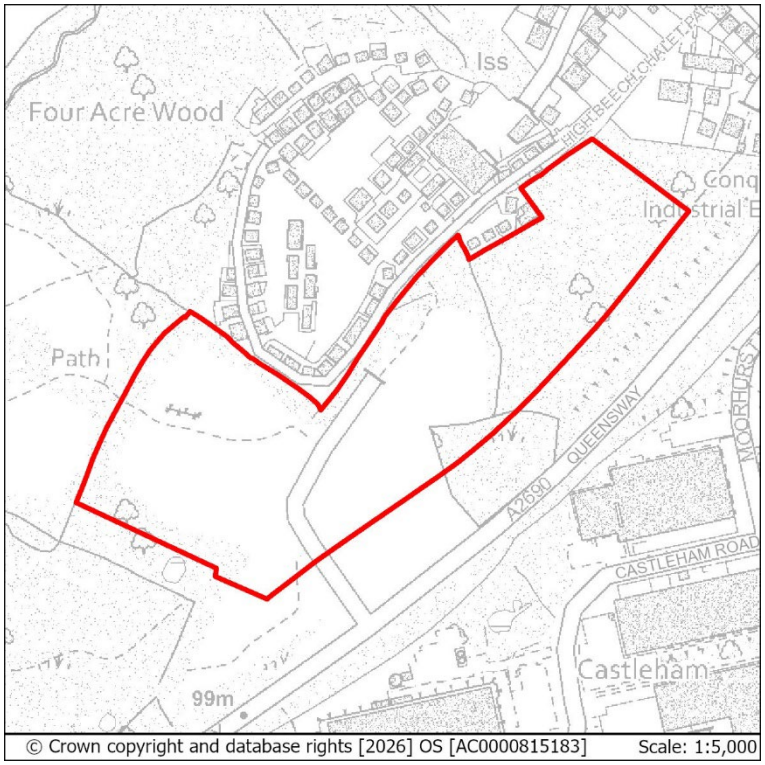

Figure 30: Queensway North, Queensway

Policy ES1: Queensway North, Queensway

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 6,500sqm
Site area: 4.70ha

Proposals for development on this site should:

a. **Demonstrate an approach that is SuDS-led to design and layout, taking into account the results of any hydrological and groundwater monitoring to ensure negative impacts on the Marline Valley Woods SSSI can be avoided;**

b. **Be designed in a way that contributes positively to the intensification of SIEA1 while maximising onsite greenspace;**

c. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the adjacent Site of Special Scientific Interest (SSSI), the results of site surveys of ES1 itself, and to other nearby areas of wildlife sensitivity. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;**

d. **Include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity, including nearby SSSI, Ancient Woodland and Local Wildlife Site;**

e. **Include boundary landscaping to act as a buffer to the existing holiday park to the north;**

f. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, including the existing tree belts running through the centre of the site, and at the western boundary;**

g. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account the impact on the Marline Valley Stream, the SSSI and groundwater pollution vulnerability. Hydrological and hydrogeological monitoring using trial pits and/ or boreholes should inform the drainage plans for this site;**

h. **Include traffic access improvements onto and off Queensway (and an additional emergency access);**

i. **Include appropriate active and sustainable travel infrastructure;**

j. **Be supported by a Transport Assessment and Travel Plan. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development and set out a monitor and manage regime to ensure the impact of development can be appropriately mitigated through further transport interventions.**

k. **Investigate the impact of ground behaviour and land stability and incorporate remediation or mitigation measures as appropriate;**

l. **Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;**

m. **Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to occupiers, the environment, and neighbours;**

n. **Investigate the potential to make navigable connections to the area of open space adjacent to the site;**

o. **Provide policy compliant green and blue infrastructure within the site.**

Policy ES2: Site PX, Churchfields Estate

6.190. The site sits within SIEA1, and is well connected A2690 Queensway with strong links to both the A259 (Brighton-Ashford) and the A21 (London). A modern, low-carbon business centre has been developed on site QX to the North of this location and the site offers potential for a similar style of development. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.191. The site is adjacent to an area of Ancient Woodland to the East, and a Local Wildlife Site sits nearby to the South East. The site itself is sloping with areas of dense scrub. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). The Ancient Woodland must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints. Due to the site sitting within the Impact Risk Zone (IRZ) for the Marline Valley Woods SSSI and Combe Haven SSSI, Natural England should be consulted at the earliest possible stage. The site is within an ACIB with mapped measures for woodland and nature networks. The development would need to ensure that an ecological management plan is developed for the site.

6.192. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development. The introduction of pollutants to the highly vulnerable groundwater aquifer within the site should likewise be avoided during both phases. Combining or complimenting ecological and SuDS measures with those already implemented through the development of site QX may be appropriate.

6.193. The site slopes away steeply to the South and occupies a relatively high position within the valley. A fault line runs close to the Southeast corner of the site, with a watercourse close by. Due to these characteristics and the base geology, investigations of ground behaviour and land stability should take into account the hydrology and hydrogeology of the site, the strata and the potential for subterranean water conduits. A detailed stability report will be required and should inform any potential SuDS design for the site.

6.194. A lighting plan will be required due to the close proximity to areas of wildlife sensitivity and must demonstrate how steps have been taken to reduce light spill that may impact on these areas. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary to the south and east that should be retained and enhanced where possible. The ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.195. A Transport Assessment and Travel Plan will be required setting out a vision led and validate approach, prioritising public and sustainable travel. There are a number of potential site access routes, including opportunity to connect to an existing access route at site QX. The choice of access point should be justified, and development proposals will need to show consideration of the transport impact along The Ridge.

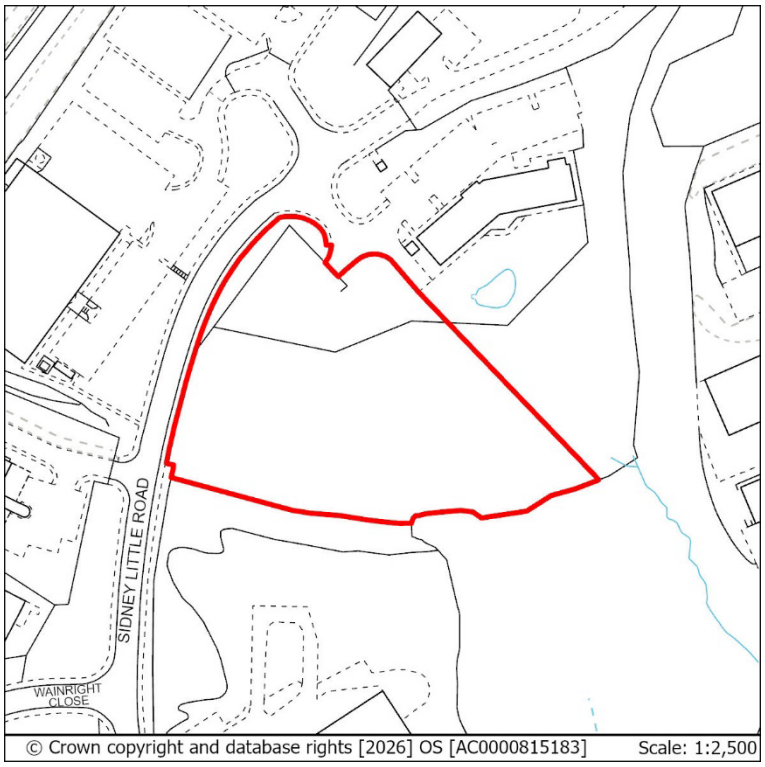

Figure 31: Site PX, Churchfields Estate

Policy ES2: Site PX, Churchfields Estate

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 1,800sqm
Site area: 0.58ha

Proposals for development on this site should:

a. **Be designed in a way that contributes positively to the intensification of SIEA1;**

b. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the adjacent Ancient Woodland, Priority Habitat and the results of site surveys of ES2 itself, and to other nearby areas of wildlife sensitivity including identifying appropriate buffers. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;**

c. **Include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity, including adjacent Ancient Woodland and nearby Local Wildlife Site;**

d. **Include boundary landscaping appropriate to the setting and taking into account existing trees and vegetation;**

e. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, including the existing tree belts running through the centre of the site, and at the southern and eastern boundary;**

f. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account Impact Risk Zones, the strata, potential for subterranean water conduits and groundwater pollution vulnerability. Hydrological and hydrogeological monitoring should inform the drainage plans for this site;**

g. **Include appropriate active and sustainable travel infrastructure, maximising walking, wheeling and cycling links, as well as appropriate access to public transport.**

h. **Be supported by a Transport Assessment and Travel Plan. The Transport Assessment must take account of the site's proximity to The Ridge and set out clear justification for any proposed access**

to the site, which must be agreed with the Highway Authority. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development and include arrangements to implement a monitor and manage approach to identify whether further transport interventions are required.

i. Investigate the impact of ground behaviour and land stability and incorporate remediation or mitigation measures as appropriate;

j. Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;

k. Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;

l. **Provide policy compliant green and blue infrastructure within the site;**

Policy ES3: NX2, Sidney Little Road, Churchfields Estate

6.196. The site occupies a prominent position in SIEA1, and is well linked to the A2690 Queensway with strong links to both the A259 (Brighton-Ashford) and the A21 (London). It is one of a group of three small development plots. The first, NX1 immediately to the south, was developed as a row of small business units. The site is capable of delivering additional small units. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.197. The site is adjacent to an area of Ancient Woodland to the East, and a Local Wildlife Site sits nearby to the South East. The site itself is sloping with areas of dense scrub. The site will require an Ecological Constraints and Opportunities Plan (ECOP), and any proposal must also be informed by an Ecological Impact Assessment (EcIA). The Ancient Woodland must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development. The introduction of pollutants to the highly vulnerable groundwater aquifer within the site should likewise be avoided during both phases. The site is within an ACIB with mapped measures for woodland and nature networks. The development would need to ensure that an ecological management plan is developed for the site.

6.198. There is potential to create integrated ecological and surface water management interventions, including SuDS, with sites PX and NX3, building upon those already delivered through the development of site QX. Due to the site sitting within the Impact Risk Zone (IRZ) for the Marline Valley Woods SSSI and Combe Haven SSSI, Natural England should be consulted at the earliest possible stage.

6.199. A lighting plan will be required due to the close proximity to areas of wildlife sensitivity and must demonstrate how steps have been taken to reduce light spill that may impact on these areas. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary to the south and east that should be retained and enhanced where possible. The ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.200. The site slopes to the South and includes some areas of undulation. A fault line runs through the Southwest portion of the site. The area of high groundwater vulnerability to pollution sits to the South of the fault. Due to these characteristics, investigations of ground behaviour and land stability should take into account the hydrology and hydrogeology of the site, the strata and the potential for subterranean water conduits. A detailed stability

report will be required and should inform any potential SuDS design for the site.

6.201. A Transport Assessment and Travel Plan will be required, setting out a vision led and validate approach to development. The existing access off Sidney Little Road is configured to serve both the existing units and those still to be built on this site and on site NX3, however improvements to better support access to the site through public and sustainable transport may be required. Development proposals will need to show consideration of the transport impact along The Ridge.

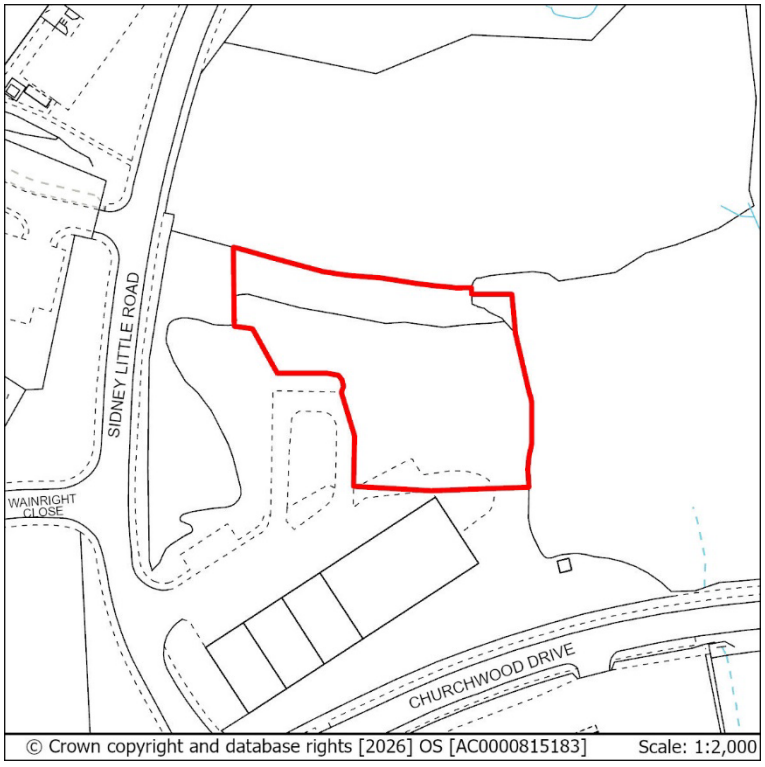

Figure 32: NX2, Sidney Little Road, Churchfields Estate

Policy ES3: NX2, Sidney Little Road, Churchfields Estate

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 800sqm
Site area: 0.32ha

Proposals for development on this site should:

a. **Be designed in a way that contributes positively to the intensification of SIEA1;**

b. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the adjacent Ancient Woodland, the results of site surveys of ES3 itself, and to other nearby areas of wildlife sensitivity. Opportunities for enhancement should have regard to the LNRS and should include an ecological management plan;**

c. **Include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity, including adjacent Ancient Woodland and nearby Local Wildlife Site;**

d. **Include boundary landscaping appropriate to the setting and taking into account existing trees and vegetation;**

e. **Provide an Arboriculture Plan that demonstrates how existing trees on site and at the southern and eastern boundary will be integrated into the development;**

f. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account Impact Risk Zones, the strata, potential for subterranean water conduits and groundwater pollution vulnerability. Hydrological and hydrogeological monitoring should inform the drainage plans for this site;**

g. **Include appropriate active and sustainable travel infrastructure, maximising walking, wheeling and cycling links, as well as appropriate access to public transport;**

h. **Be supported by a Transport Assessment and Travel Plan. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development, and include arrangements to implement a monitor**

and manage approach to determine whether additional transport interventions are required;

i. Investigate the impact of ground behaviour and land stability incorporating remediation or mitigation measures as appropriate;

j. Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;

k. Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;

l. Provide policy compliant green and blue infrastructure within the site.

Policy ES4: NX3, Sidney Little Road, Churchfields Estate

6.202. The site occupies a prominent position in SIEA1, and is well linked to the A2690 Queensway with strong links to both the A259 (Brighton-Ashford) and the A21 (London). It is one of a group of three small development plots. The first, NX1 immediately to the south, was developed as a row of small business units. This site is capable of delivering additional small units. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.203. The site is in close proximity to an area of Ancient Woodland to the East, and Local Wildlife Sites to the South East and South West. The site itself is sloping with areas of dense scrub. These areas of wildlife sensitivity and the site itself should be thoroughly surveyed as part of the Ecological Constraints and Opportunities Plan (ECOP), to identify constraints. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development. The introduction of pollutants to the highly vulnerable groundwater aquifer to the South of the site should likewise be avoided during both phases.

6.204. There is potential to create integrated ecological and surface water management interventions, including SuDS, with sites PX and NX2, building upon those already delivered through the development of site QX. Due to the site sitting within the Impact Risk Zone (IRZ) for the Marline Valley Woods SSSI and Combe Haven SSSI, Natural England should be consulted at the earliest possible stage.

6.205. A lighting plan will be required due to the close proximity to areas of wildlife sensitivity and must demonstrate how steps have been taken to reduce light spill that may impact on these areas. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary to the West that should be retained and enhanced where possible. The ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.206. The site slopes to the South and undulates throughout. A fault line runs through the Southwest portion of the site. Due to these characteristics, investigations of ground behaviour and land stability should take into account the hydrology of the site, the strata and the potential for subterranean water conduits. A detailed stability report will be required and should inform any potential SuDS design for the site.

6.207. A Transport Assessment and Travel Plan will be required, setting out a vision led and validate approach to development. The existing access off Sidney Little Road is configured to serve both the existing units and those still to be built on this site and on site NX2, however improvements to better support access to the site through public and sustainable transport may be required.

Development proposals will need to show consideration of the transport impact along The Ridge.

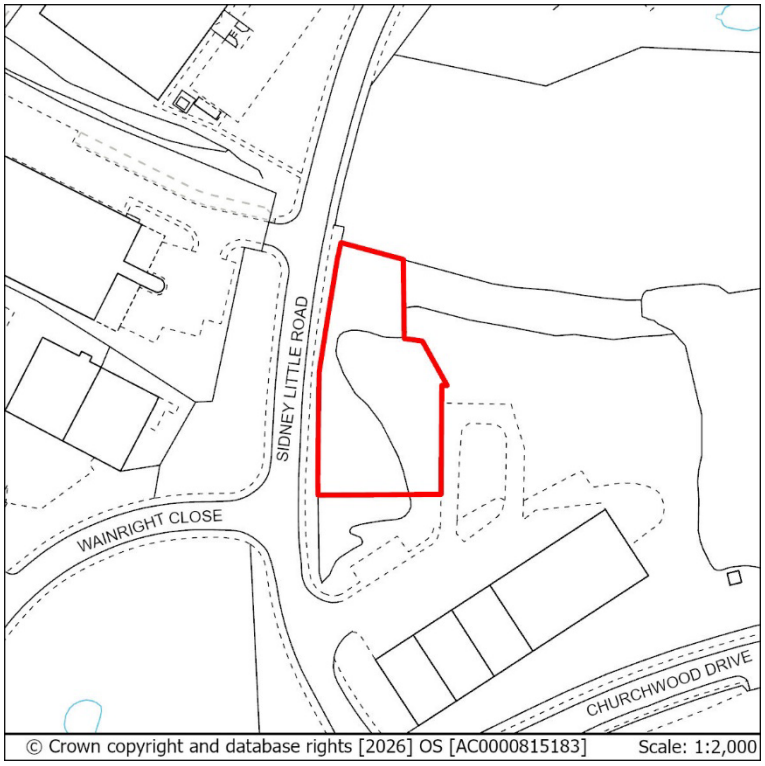

Figure 33: NX3, Sidney Little Road, Churchfields Estate

Policy ES4: NX3, Sidney Little Road, Churchfields Estate

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 280sqm
Site area: 0.17ha

Proposals for development on this site should:

a. **Be designed in a way that contributes positively to the intensification of SIEA1;**

b. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the adjacent Ancient Woodland, the results of site surveys of ES4 itself, and to other nearby areas of wildlife sensitivity.**

c. **Include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity, including nearby Ancient Woodland and Local Wildlife Site;**

d. **Include boundary landscaping appropriate to the setting and taking into account existing trees and vegetation;**

e. **Provide an Arboriculture Plan that demonstrates how existing trees on site and at the western boundary will be integrated into the development;**

f. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account Impact Risk Zones, the strata, potential for subterranean water conduits and groundwater pollution vulnerability. Hydrological and hydrogeological monitoring should inform the drainage plans for this site;**

g. **Include appropriate active and sustainable travel infrastructure, maximising walking, wheeling and cycling links, as well as appropriate access to public transport;**

h. **Be supported by a Transport Assessment and Travel Plan. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development, and include arrangements to implement a monitor and manage approach to determine whether further transport interventions are required;**

i. **Investigate the impact of ground behaviour and land stability incorporating remediation or mitigation measures as appropriate;**

j. **Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;**

k. **Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;**

l. **Provide policy compliant green and blue infrastructure within the site.**

Policy ES5: Adjacent Unit C, 1-8 Brook Way

6.208. The site occupies a prominent position in SIEA2, and is well linked to the B2093 The Ridge with strong links to both the A259 (Brighton-Ashford) and the A21 (London). It is a relatively small plot in a small depression within a larger sloping system. It is in close proximity to a number of taller units, with the topography of the land rising towards The Ridge to the South. The site is capable of delivering additional units that are sensitive to the setting of the Rock Lane – Ivyhouse Lane area and the adjacent National Landscape as a whole. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.209. The site is adjacent to the National Landscape, including the Cemetery and Crematorium which has wide reaching views across the NL. Regard should be had to the High Weald National Landscape Area of Outstanding Natural Beauty (AONB) Unit Management Plan and associated Technical Guidance. Although the site has been allocated to meet strategic employment needs, any development must take full account of the effect on its setting, and views of it from other parts of the National Landscape – in particular from the Rock Lane and Hastings Cemetery areas from where it is visible. A landscape impact assessment should inform the design of any scheme.

6.210. Due to the site sitting within the Impact Risk Zones (IRZ) for Maplehurst Wood SSSI and Hastings Cliffs to Pett Beach SSSI, Natural England should be consulted at the earliest possible stage. Any development proposal must seek to avoid or minimise negative impact on designated areas of landscape or environmental importance during both the construction and occupation phases of the development.

6.211. A lighting plan will be required due to the close proximity to the National Landscape and must demonstrate how steps have been taken to reduce light spill that may impact on this area. Additional guidance on lighting plans in this location is provided in the High Weald Unit's Dark Skies Technical Advice Note.

6.212. Southern Water infrastructure crosses this site, this should be taken into account in the design of any proposal. Care should be taken to prevent the introduction of pollutants to the surface water sewer either during or following construction, in line with Policy SC18 (Pollution and Hazards).

6.213. Due to the topographical position of the site, investigations of ground behaviour and land stability should take into account the hydrology of the site, and a detailed stability report will be required.

6.214. Development proposals should be supported by a Transport Assessment and Travel Plan, taking a vision led and validate approach with particular consideration of the transport impact along The Ridge;

6.215. Proposals should seek to enhance pedestrian and cycling infrastructure both to local residential areas and to existing links within the National Landscape that may support better connectivity to Rock Lane. This could potentially be delivered in combination with site ES7.

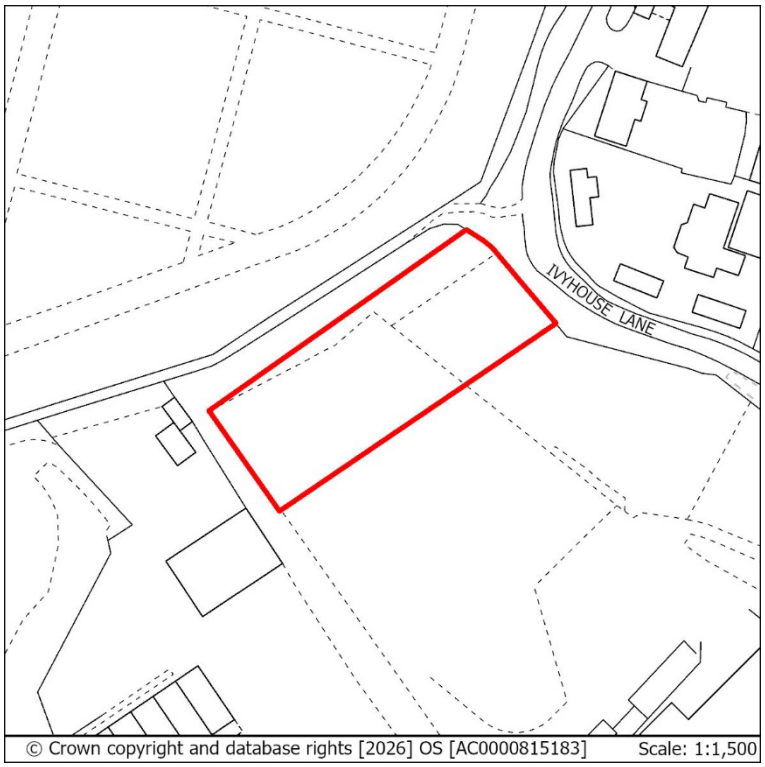

Figure 34: Adjacent Unit C, 1-8 Brook Way

Policy ES5: Adjacent Unit C, 1-8 Brook Way

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 500sqm
Site area: 0.16ha

Proposals for development on this site should:

a. **Be designed in a way that contributes positively to the intensification of SIEA2;**

b. **Include landscape impact assessment, taking into account both its setting and long-range views across the National Landscape;**

c. **Include a lighting plan to minimise light spill to the nearby National Landscape;**

d. **Include boundary landscaping appropriate to the setting and taking into account existing trees and vegetation;**

e. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account the existing surface water sewer, the Impact Risk Zones and ground behaviour. Hydrological monitoring should inform the drainage plans for this site;**

f. **Take into account the Southern Water infrastructure crossing the site;**

g. **Include appropriate active and sustainable travel infrastructure, including improvement to existing pedestrian and cycling routes, including links and enhancements to access PROW HAS/234/1;**

h. **Be supported by a Transport Assessment and Travel Plan, following a vision led and validate approach. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development proposal and include arrangements to implement a monitor and manage approach to mitigation;**

i. **Access must be achieved from Brook Way.**

j. **Investigate the impact of ground behaviour and land stability and incorporate remediation or mitigation measures as appropriate;**

k. **Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;**

l. **Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;**

m. **Provide policy compliant green and blue infrastructure within the site**

Policy ES6: UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane

6.216. The site occupies a prominent position in SIEA2, and is well linked to the B2093 The Ridge with strong links to both the A259 (Brighton-Ashford) and the A21 (London). The site is contained within the Hastings main grid site and is not publicly accessible, with access to the site restricted to field staff due to the danger misuse of the site presents. It is expected to deliver updated operational space for the District Network Operator (DNO), including ancillary office functions.

6.217. The site slopes to the North, with TPO trees along the Northern boundary. The site incorporates electricity infrastructure within the curtilage. Care should be taken to minimise risks associated with proximity to this infrastructure as much as possible, including ensuring appropriate overhead clearances for transmission and distribution lines are observed in line with GS6 and Policy SC18 (Pollution and Hazards). Due to the danger to local wildlife presented by the transmission lines, any ecological assessment will need to consider whether good quality onsite ecological enhancements can be delivered through an ecology report. In consideration of the constraints presented by this particular site, faunal enhancements such as bird and bat boxes will not be encouraged. However, ground based measures such as logpiles, hibernacula and hedgehog boxes will be welcomed.

6.218. The site also has potential to accommodate low carbon technologies as part of any development, including heat pump technology where appropriate.

6.219. The site is close to the National Landscape. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development. There is already well-established boundary landscaping to the North and South sides of the site, which should be retained where possible. To the South side of the site, boundary landscaping should create an amenity buffer between the site and residential premises to the south side of B2093 The Ridge. A landscape impact assessment should inform the design of any scheme.

6.220. The site sits within the Impact Risk Zone (IRZ) for Hastings Cliffs to Pett Beach SSSI, and Natural England should be consulted at the earliest possible stage. Any development proposal must seek to avoid or minimise negative impact on designated areas of landscape or environmental importance during both the construction and occupation phases of the development.

6.221. A lighting plan will be required and must demonstrate how steps have been taken to reduce light spill from the site, including impacts on nearby residential premises to the south side of B2093 The Ridge.

6.222. A small part of the Southwestern part of the site has high vulnerability to groundwater pollution. The introduction of pollutants to this aquifer or nearby

surface water systems should be avoided during both construction and occupation phases.

6.223. The site already benefits from direct access to the B2093 The Ridge, although there is also potential for a new or additional access to be created from Ivyhouse Lane. Due to the nature of the site, it is anticipated that the main mode of transport used to access it will be motorised fleet vehicles as opposed to more active forms of travel due to the primary purpose being the base facility for operational staff for delivering activity related to large scale electricity infrastructure maintenance and connection. Proposals should seek to provide EV charging infrastructure and work towards decarbonising the fleet where possible. Development proposals will need to show consideration of the transport impact along The Ridge, and a Transport Assessment and Travel Plan will be required.

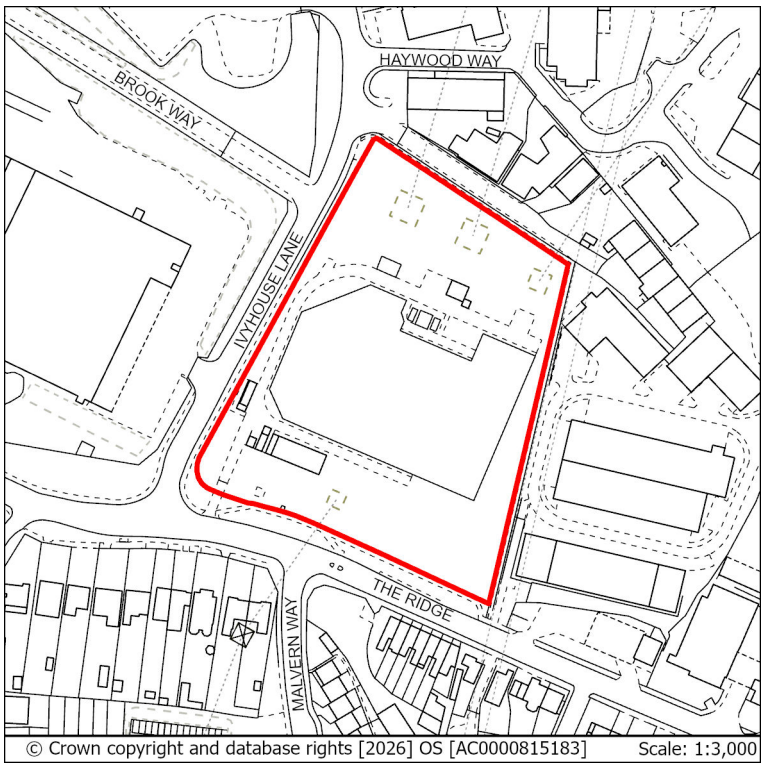

Figure 35: UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane

Policy ES6: UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 1,900sqm
Site area: 1.57ha

Proposals for development on this site should:

a. **Be designed in a way that contributes positively to the intensification of SIEA2;**

b. **Include landscape impact assessment, taking into account both its setting and long-range views across the National Landscape;**

c. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP should take into account site specific constraints;**

d. **Include a lighting plan to minimise light spill;**

e. **Retain and enhance boundary landscaping appropriate to the setting to the north and south of the site, taking into account existing trees and vegetation and continuing to safeguard the amenity of residential premises opposite the site to the south;**

f. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account the Impact Risk Zone and ground behaviour. Hydrological monitoring should inform the drainage plans for this site;**

g. **Be supported by a Transport Assessment and Travel Plan following a vision led and validate approach. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development proposal and include arrangements to implement a monitor and manage approach to mitigation;**

h. **Explore opportunities to relocate the main vehicle access for the site to Ivyhouse Lane;**

i. **Investigate the impact of ground behaviour and land stability and incorporate remediation or mitigation measures as appropriate;**

j. **Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;**

k. **Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;**

l. **Take into account the presence of overhead power transmission and distribution lines within the site and ensure that any scheme maintains easements and safe clearance distances during both the construction and occupation phases;**

m. **Provide policy compliant green and blue infrastructure within the site;**

Policy ES7: Ivyhouse Lane, Northern Extension

6.224. The site occupies a prominent position in SIEA2, and is well linked to the B2093 The Ridge with strong links to both the A259 (Brighton-Ashford) and the A21 (London). It is an undeveloped site in close proximity to ES5 and slopes towards the South, with some undulation. A second slope system lies to the East, with evidence of overland flows connecting to a series of watercourses leading to culverts and sinks close to the railway line where it emerges from the Ore Tunnel. A fault line crosses the Northeast corner of the site. The site forms a natural extension to the Ivyhouse Lane estate and is capable of delivering additional units that are sensitive to the setting of the Rock Lane – Ivyhouse Lane area and the adjacent National Landscape as a whole. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.225. The site is within the National Landscape. Regard should be had to the High Weald National Landscape Area of Outstanding Natural Beauty (AONB) Unit Management Plan and associated Technical Guidance. Although the site has been allocated to meet strategic employment needs, any development must take full account of the effect on its setting, and views of it from other parts of the National Landscape – in particular from the Rock Lane and Hastings Cemetery areas from which it is visible, and from the Caravan Park to the West. A landscape impact assessment should inform the design of any scheme.

6.226. The National Landscape must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints and opportunities for delivering biodiversity net gain. Due to the site sitting within the Impact Risk Zone (IRZ) for Hastings Cliffs to Pett Beach SSSI, Natural England should be consulted at the earliest possible stage. Any development proposal must seek to avoid or minimise negative impact on designated areas of landscape or environmental importance during both the construction and occupation phases of the development.

6.227. A lighting plan will be required due to the position of the site within the National Landscape and must demonstrate how steps have been taken to reduce light spill that may impact on this area. Additional guidance on lighting plans in this location is provided in the High Weald Unit's Dark Skies Technical Advice Note.

6.228. The site contains a well-defined tree boundary, as well as trees throughout the site. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary that should be retained and enhanced where possible, particularly to the Northwest of the site where it borders a holiday park to safeguard the amenity of occupiers.

The ECOP, lighting plan and arboriculture plan can form part of the same document if appropriate.

6.229. A historic lane runs north-south within the site a provides some separation. Any proposal should ensure that it is sensitive to the setting of the lane itself and seek to incorporate it into the scheme.

6.230. To the East of the track, there is an area with high vulnerability to groundwater pollution. The introduction of pollutants to this aquifer or nearby surface water systems or bodies should be avoided during both construction and occupation phases.

6.231. Due to the size of the site, a Flood Risk Assessment will be required, which should incorporate recommendations for appropriate SuDS and measures to control surface water. Due to the topography, base geology and water interactions within the site, investigations of ground behaviour and land stability should take into account the hydrology and hydrogeology of the site, and a detailed land stability and drainage report will be required. Given the interactions between existing site hydrological features and the railway line, the potential for impact on the railway infrastructure nearby should be considered as part of this report and National Rail Route Asset Managers for Earthworks and Drainage should be consulted at an early stage.

6.232. Transmission lines run to the East of the site, and care should be taken to ensure development of the site does not result in a loss of easements to maintain this infrastructure.

6.233. The site falls within an Area of Search (AoS) for waste management facilities Generally, it is considered acceptable for employment land uses to co-exist with waste sites. This is depending on the type of employment use (B2 or B8) and the nature of the waste operation taking place. The agent of change principle would also apply, to ensure that any potential waste operation could successfully operate alongside other business or industrial uses within the site.

6.234. Development proposals will need to show consideration of the transport impact along The Ridge, and a Transport Assessment and Travel Plan will be required which set out a vision led and validate approach to transport impacts from the site. Proposals should seek to enhance pedestrian and cycling infrastructure both to local residential areas and to existing links within the National Landscape that may support better connectivity to Rock Lane. This could potentially be delivered in combination with site ES5.

6.235. Due to the proximity to the Borough boundary with neighbouring Rother District, relevant policies within their development plan documents will also apply. Assessments of environmental risk including flood risk, pollution and ground behaviour should consider the impacts from or on nearby areas in Rother District where this is relevant.

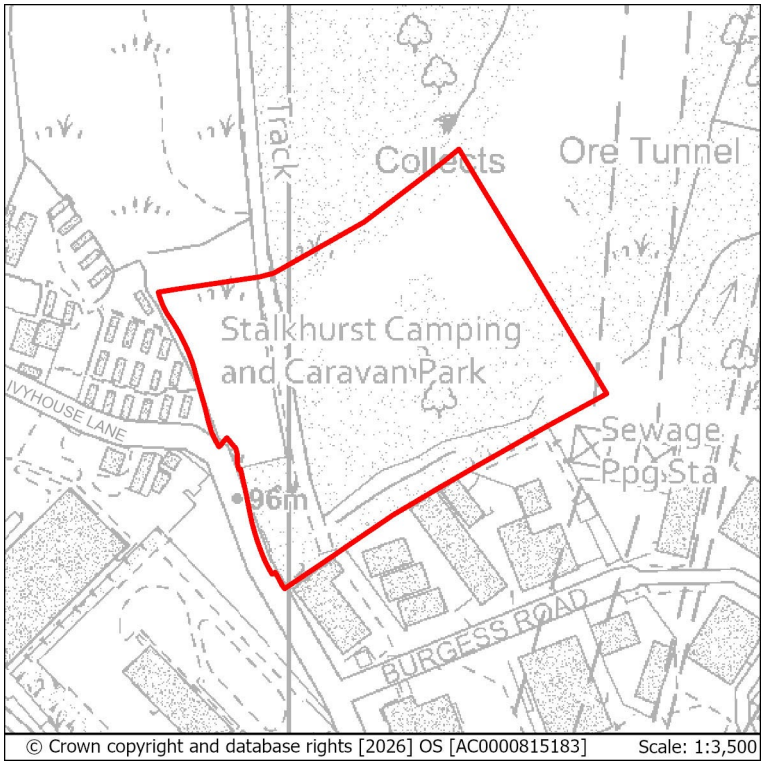

Figure 36: Ivyhouse Lane, Northern Extension

Policy ES7: Ivyhouse Lane, Northern Extension

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 2,800sqm
Site area: 2.31ha

Proposals for development on this site should:

a. **Demonstrate a landscape-led approach to design and layout, which should follow the advice in the High Weald AONB Housing Design Guide;**

b. **Be designed in a way that contributes positively to the intensification of SIEA2;**

c. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the High Weald National Landscape, Impact Risk Zone, and adjacent Ancient Woodland, and include the results of site surveys of ES7 itself;**

d. **Retain the historic sunken lane as a wildlife corridor;**

e. **Include a landscape impact assessment, taking into account both its setting and long-range views across the National Landscape;**

f. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development or their loss compensated for;**

g. **Include a lighting plan to minimise light spill within the National Landscape;**

h. **Include boundary landscaping appropriate to the setting and taking into account existing trees and vegetation, including to the north east to act as a buffer to the existing holiday park;**

i. **Ensure drainage schemes, including SuDS, are appropriate for the site and take into account the existing surface water sewer, the Impact Risk Zones, the potential for impact on railway assets, and ground behaviour. Hydrological and hydrogeological monitoring should inform the drainage plans for this site;**

j. **Preserve existing Rights of Way within the site;**

k. **Include appropriate active and sustainable travel infrastructure, including improvement to existing pedestrian and cycling routes and maximising walking, wheeling and cycling links, as well as appropriate access to public transport;**

l. **Be supported by a Transport Assessment and Travel Plan, following a vision led and validate approach. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development proposal and include arrangements to implement a monitor and manage approach to mitigation;**

m. **Investigate the impact of ground behaviour and land stability and incorporate remediation or mitigation measures as appropriate;**

n. **Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;**

o. **Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;**

p. **Ensure easements to transmission lines to the east of the site are maintained during all phases of development;**

q. **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes. Ensure that any necessary reinforcement of the water and/or wastewater network is in place to accommodate the quantum and type of proposed development prior to connection, and that such reinforcement is agreed with Southern Water. This will be secured by condition. Early engagement with Southern Water is also recommended.**

r. **Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting.**

s. **Provide policy compliant green and blue infrastructure within the site.**

Policy ES8: Land at the junction of The Ridge West and Queensway

6.236. The site occupies a prominent position in SIEA1, and is accessed from A2690 Queensway with strong links to both the A259 (Brighton-Ashford) and the A21 (London). The site is capable of delivering a range of layouts. The site has potential to deliver a small business park. It is anticipated that the development of the site will be phased, and proposals should clearly set out the sequence of any phasing in order that planning obligations can be attached to suitable milestones. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV.

6.237. The site is sloping, with a steep and heavily vegetated embankment to the West and Northwest of the site adjacent A2690 Queensway. Another area of embankment is located to the South where the site borders Whitworth Road. This results overall in a basin-like topography, with areas of undulation. There is the potential for artificial (or 'made') ground to be present within the site. A watercourse crosses the Southeast corner of the site and travels through a culvert below Whitworth Road, with a depression surrounding the culvert entrance. A fault line is also present in the far Southeast of the site. There is a Public Right of Way along the Eastern boundary of the site, entering the site close to the Southeast corner. The track continues across Whitworth Road through public open space and terminates at Beauport Home Farm Close.

6.238. It is mainly open grassland and is surrounded by woodland with some belts of trees, including TPO trees in the Southwest and Northeast corners of the site. It is positioned close to the High Weald National Landscape and is adjacent to a Local Wildlife Site. These designated areas must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints.

6.239. Due to the site sitting within the Impact Risk Zone (IRZ) for the Marline Valley Woods SSSI, Combe Haven SSSI and the Maplehurst Woods SSSI Natural England should be consulted at the earliest possible stage. The cumulative impact of development within the IRZs should be considered alongside the impact of this development alone. Any development proposal must seek to avoid or minimise impact on areas of environmental and landscape significance during both the construction and occupation phases.

6.240. A lighting plan will be required due to the close proximity to areas of wildlife sensitivity and must demonstrate how steps have been taken to reduce light spill that may impact on these areas. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary that should be retained and enhanced where possible. The ECOP,

lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.241. Due to the size of the site a Flood Risk Assessment will be required, and drainage schemes to manage surface water should form part of any proposal. Surface water flows towards the Southwest corner where the site meets the junction of Whitworth Road and Queensway, and development proposals should ensure that there is adequate drainage in this area. There is a pond to the South of Whitworth Road that should be considered when designing any drainage scheme.

6.242. The majority of the site has a high vulnerability to groundwater pollution, and the introduction of pollutants to the highly vulnerable groundwater aquifer within the site should be avoided during both phases. Development proposals should seek to avoid breaching the underlying sandstone layer.

6.243. Due to the topography and geology of the site and the potential presence of artificial ground, investigations of ground behaviour and land stability should take into account site hydrology, hydrogeology and the impact of loading on existing structures. A detailed stability report will be required.

6.244. A significant proportion of the site falls within a Waste Consultation Area (WCA) for a safeguarded waste site. This waste site is a waste transfer station and handles scrap metal and skip collected waste. The nature of these operations is such that they can give rise to potential impacts associated with noise, vibration, dust, HGV movements and visual amenity.

6.245. Development proposals will need to show consideration of the transport impact along The Ridge and the A21 (John Macadam Way). Any proposed access via the roundabout at Whitworth Road should take into account the watercourse and the depression surrounding the culvert entrance and take care to consider the impact of loading on any existing structures. Care should be taken to avoid the culvert becoming blocked during or following construction.

6.246. Improvements to better support access to the site through public and sustainable transport will be required, including creating a navigable connection to track Hastings 131a that connects to the housing estate at Beauport Home Farm. Opportunities to better connect this footpath to Hastings 130 should also be explored to allow better pedestrian connections to residential neighbourhoods at Harrow Lane.

Figure 37: Land at the junction of The Ridge West and Queensway

Policy ES8: Land at the junction of The Ridge West and Queensway

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 4,700sqm
Site area: 2.95ha

Proposals for development on this site should:

a. **Be designed in a way that contributes positively to the intensification of SIEA1;**

b. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of nearby Sites of Special Scientific Interest (SSSI), TPO trees, Impact Risk Zones for all potentially affected SSSI, the results of site surveys of ES8 itself, and to other nearby areas of wildlife sensitivity;**

c. **Include measures to conserve and enhance the setting of the High Weald National Landscape;**

d. **Include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity including the adjacent Local Wildlife Site;**

e. **Include boundary landscaping to act as a buffer to Queensway and The Ridge;**

f. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, or their loss will be compensated for including the existing tree belts running through the centre of the site;**

g. **Include a Flood Risk Assessment and demonstrate how the proposal will deliver flood resilient design based on the recommendations of this report. Site appropriate SuDS and surface water management measures should be identified as part of this process, taking into account the impact on watercourses, culverts, SSSI Impact Risk Zones and groundwater pollution vulnerability. Hydrological and hydrogeological monitoring should inform the drainage plans for this site.**

h. **Include appropriate active and sustainable travel infrastructure;**

i. **Be supported by a Transport Assessment and Travel Plan following a vision led and validate approach. The Transport Assessment must take account of the site's proximity to The Ridge and the A21.**

Proposals must also indicate how the conclusions and recommendations of the Assessment have been incorporated within the development proposal and include arrangements to implement a monitor and manage approach to mitigation Development may be required to contribute to transport improvements on The Ridge or the A21 in advance of occupation;

j. Investigate the impact of ground behaviour and land stability, including the impact on existing structures, and incorporate remediation or mitigation measures as appropriate;

k. Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;

l. Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;

m. Proposals must take into account the Waste Consultation Area that affects the site and propose suitable mitigations for any negative impacts arising or potentially arising from nearby waste processing, taking into account odour, noise or vibration, to be advised by the Waste Planning Authority.

n. Investigate the potential to make navigable connections to housing estates at Beauport Home Farm and Harrow Lane and the public open space to the south at Whitworth Road by improving footpath access;

o. Provide policy compliant green and blue infrastructure within the site;

p. Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes. Ensure that any necessary reinforcement of the water and/or wastewater network is in place to accommodate the quantum and type of proposed development prior to connection, and that such reinforcement is agreed with Southern Water. This will be secured by condition. Early engagement with Southern Water is also recommended;

q. Take account of Southern Water's underground infrastructure in the design of the layout of the site. Easements would be required, which may affect the site layout or require diversion, and these should be clear of all proposed buildings and tree planting.

Policy ES10: Marline Fields, Enviro21 Business Park, Land West of Queensway

6.247. The site occupies a prominent position in SIEA1, and is accessed from A2690 Queensway with strong links to both the A259 (Brighton-Ashford) and the A21 (London). This site is the second phase of the Enviro21 Business Park and has been cleared and prepared for development and has good access through the existing spine road. It is capable of accommodating an extension to the existing park. The site also has strong potential to accommodate low carbon technologies as part of any development, including solar PV and the potential for small scale wind generation as part of any scheme may also be explored.

6.248. The site is adjacent to a Site of Special Scientific Interest and Local Wildlife Site, with Ancient Woodland and a Local Nature Reserve nearby. These designated areas must be specifically referenced in any Ecological Constraints and Opportunities Plan (ECOP), and the site itself should be thoroughly surveyed to identify constraints. Due to the site sitting within the Impact Risk Zone (IRZ) for the Marline Valley Woods SSSI, Natural England should be consulted at the earliest possible stage.

6.249. Any development proposal must seek to avoid or minimise impact on these areas during both the construction and occupation phases of the development, particularly the hydrological effects of drainage into the Marline Valley Stream. The introduction of pollutants to the highly vulnerable groundwater aquifer within the site should likewise be avoided during both phases. The cumulative impacts of development within the IRZ should also be considered. Development proposals should seek to avoid breaching the underlying sandstone layer.

6.250. The site slopes away steeply towards the SSSI to the West and occupies a relatively high position within the valley. Due to these characteristics and the base geology, investigations of ground behaviour and land stability should take into account the hydrology and hydrogeology of the site, and a detailed stability report will be required. Proposals for SuDS that include attenuation may be appropriate subject to hydrological, hydrogeological and ground behaviour assessments.

6.251. A lighting plan will be required due to the close proximity to areas of wildlife sensitivity and must demonstrate how steps have been taken to reduce light spill that may impact on these areas. An arboriculture plan must also be provided to set out how existing trees will be either integrated into the proposal, or their loss will be compensated for. The site has a natural tree boundary that should be retained and enhanced where possible. The ECOP, lighting plan and arboriculture plan can all form part of the same document if appropriate.

6.252. Due to the size of the site, a Flood Risk Assessment will be required. This must take into account the risk of surface water flooding and incorporate mitigation measures as appropriate.

6.253. Development proposals will need to show consideration of the transport impact and provide a transport assessment and a travel plan, following a vision-led approach. Improvements to better support access to the site through public and sustainable transport will be required, including consideration of improvements to the pedestrian connection to Napier Road and footpath Hastings 34a.

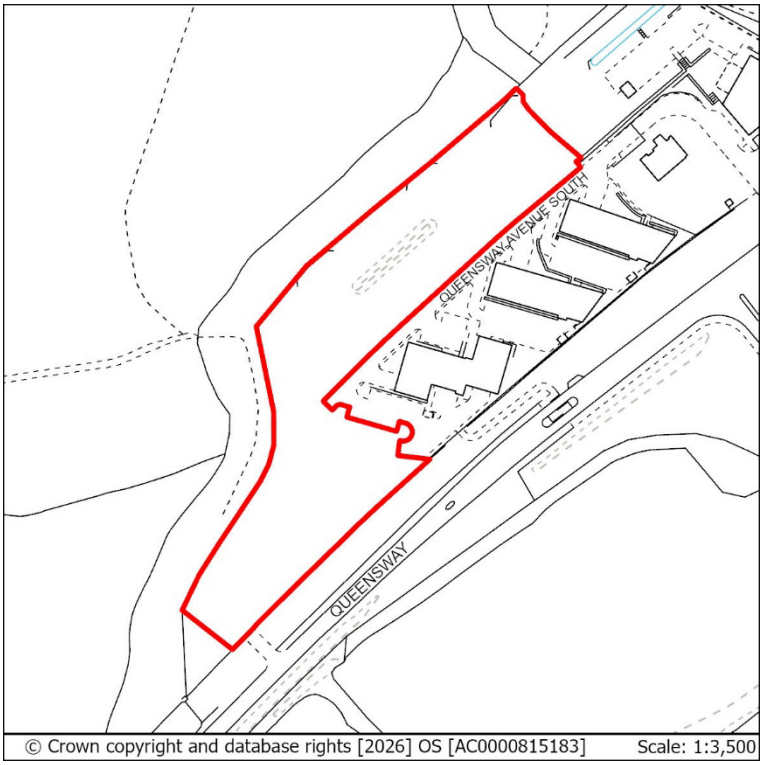

Figure 38: Marline Fields, Enviro21 Business Park, Land West of Queensway

Policy ES10: Marline Fields, Enviro21 Business Park, Land West of Queensway

Use: Employment
Minimum Indicative Capacity (minimum floorspace): 550sqm
Site area: 1.48ha

Proposals for development on this site should:

a. **Demonstrate an approach that is SuDS-led to design and layout, which should take into account the results of any hydrological and groundwater monitoring to ensure negative impacts on the Marline Valley Woods SSSI can be avoided.**

b. **Be designed in a way that contributes positively to the intensification of SIEA1 while maximising onsite greenspace;**

c. **Be supported by an Ecological Impact Assessment (EcIA) and include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the EcIA. The ECOP must make specific reference to the presence of the adjacent Site of Special Scientific Interest (SSSI), the results of site surveys of ES10 itself, and to other nearby areas of wildlife sensitivity.**

d. **Include a lighting plan to minimise light spill to nearby areas of wildlife sensitivity, including SSSI, Ancient Woodland and Local Wildlife Site;**

e. **Provide an Arboriculture Plan that demonstrates how existing trees on site will be integrated into the development, including the existing tree belts running through the centre of the site, and at the western boundary;**

f. **Include a Flood Risk Assessment, and demonstrate how the proposal will deliver flood resilient design based on the recommendations of this report, taking into account the impact on the Marline Valley Stream, the SSSI and groundwater pollution vulnerability. Hydrological and hydrogeological monitoring using trail pits and/ or boreholes should inform the drainage plans for this site. Site appropriate SuDS and surface water management measures should be identified as part of this process;**

g. **Include appropriate active and sustainable travel infrastructure, maximising walking, wheeling and cycling links, as well as appropriate access to public transport;**

h. **Be supported by a Transport Assessment and Travel Plan, following a vision led and validate approach. The Transport Assessment must take account of the site's proximity to The Ridge. Proposals must also**

indicate how the conclusions and recommendations of the Assessment have been incorporated within the development proposal and include arrangements to implement a monitor and manage approach to mitigation;

i. Investigate the impact of ground behaviour and land stability and incorporate remediation or mitigation measures as appropriate;

j. Investigate the potential for contamination within or effecting the site, and incorporate remediation or mitigation measures as appropriate;

k. Be designed to avoid or, where this is not possible, mitigate the impact of potential pollution and environmental hazards to the environment, occupiers and neighbours;

l. Investigate the potential to make navigable connections to Napier Road and the SSSI by improving footpath access and crossing points;

m. Provide policy compliant green and blue infrastructure within the site.

7. Development Management Policies

7.1. The Plan sets out Strategic Policies in Part 4 of this document, there are also place-based and allocation policies to guide future development in the borough. The development management policies contained in this section are also part of the policy framework, which aim to achieve the Vision for Hastings and the strategic objectives of this Local Plan. They provide more detail for decision making in relation to particular issues and for assessing the acceptability of certain types of development.

7.2. The policies set out in this section address the main issues that occur in relation to the consideration of planning applications in the borough. They do not repeat national policies. In the absence of a directly relevant development management policy, proposals will be considered in the context of national policies and/or relevant Local Plan strategic and place-based policies.

Part one – Housing

7.3. National Planning Practice explicitly tasks Local Planning Authorities to assess the needs of different groups in the community and reflect them in planning policies. These groups include affordable housing, families with children, looked after children, older people, students, people with disabilities, service families, travellers, and self-builders. The policies within this section of the Plan focus on housing delivery and provide detailed guidance in relation to housing for specific groups.

7.4. East Sussex County Council is responsible for the planning and commissioning of placements for looked after children (LAC) throughout the county, including foster care, residential children's homes, supported accommodation and semi-independent living arrangements.

7.5. In terms of placement type, the majority of LAC in East Sussex are accommodated in foster care. This distribution indicates that the majority of need is met within general needs housing stock through foster care, with a more limited need for children's homes.

7.6. Taken as a whole, the policies of the National Planning Policy Framework and this plan provide a framework to deliver safe, appropriately located, well-managed children's homes with a good standard of amenity for both occupiers and the surrounding community, where this would require planning permission.

Policy H1: Specialist Housing for Older People

7.7. National planning policy[xxxvi] and guidance[xxxvii] tells us that we need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people. Examples of the types of housing covered by Policy H1 include:

- Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.
- Retirement living and sheltered housing: This usually consists of purpose-built homes with limited communal facilities (e.g. lounge, laundry room and guest room). It provides some support to enable residents to live independently, such as 24-hour on-site assistance (alarm) and a warden or house manager.
- Extra care housing or housing-with-care: This usually consists of purpose-built or adapted homes with a medium to high level of care available if required, through an onsite care agency. Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. The intention is for residents to benefit from varying levels of care as time progresses.
- Residential care homes and nursing homes including End of Life, Hospice Care, and Dementia Care Home Accommodation: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living.

The above list is not definitive. Specialist developments may contain a range of different types of specialist housing.

7.8. Our evidence shows there are significant drivers of need for older persons market housing in Hastings. Including:

a. Population projections which show a significant increase in the population who will be over 75 years within the next two decades;

b. A disparity in the availability of all types of specialist market accommodation available to homeowners compared to the availability for those living in social housing;

c. A low level of provision of specialist market accommodation when compared to the proportion of the over 75 population presently residing in the market sector but who experience limited mobility or poor or very poor health.

7.9. Our evidence also tells us that this specialised provision is predominantly driven by the need to supply many existing residents with a more appropriate type of accommodation for their old age.

7.10. Planning for the housing needs of older people can help facilitate 'rightsizing' by creating a range of accommodation options which means that moving later in life becomes a realistic and positive choice, helping to improve quality of life and reducing the need for residential care.

7.11. Enabling 'rightsizing' can also help release general market family accommodation, thereby improving accessibility for all. In addition, more specialist forms of housing for older people, such as extra care housing, has the potential to provide the level of support needed to help people remain connected to their communities and maintain independence for longer through the integration of accommodation and care.

7.12. Whilst needs will be met by providing support for people to live in suitable homes within the general housing stock, there needs to be a widening of the choice of the type of provision of specialist housing for older persons so that a variety of accommodation is available.

7.13. Increasingly specialist open market accommodation is now taking the form of 'housing with care' as opposed to older style 'housing with support' such as sheltered housing. Housing with care allows occupiers to escalate the level of care they need whilst remaining in their homes and maintaining their independence.

7.14. Many older people want to retain as much independence as possible and want to remain in their own homes. Community based health and support services enable many people to do so. Accessibility is often a key issue for older people and Policy SC2 Design – Housing Mix, Accessibility and Adaptability seeks to ensure that new residential development can appropriately cater for the needs of residents throughout their life.

7.15. Our evidence indicates there is a considerable range in the potential future need for care home accommodation and shows a possible downward trend in institutional care needs[xxxviii]. However, it is appropriate to plan for and recognise that there will be a loss of care home bed spaces as older properties become outdated, for example those with shared bedrooms or shared washing facilities. This need for the renewal of current stock is recognised in Policy H1.

7.16. Regard should be had to meeting the growing number of people living with dementia and complex care needs[xxxix]. Hybrid housing and nursing care models can cater for those who will need this type of support to end of life.

7.17. For planning purposes, specialist housing for older people includes development falling within both Use Classes C2 (Residential Institutions) and C3 (Dwellinghouses). Indeed, some schemes can include a mix of Class C2 and C3. The PPG states that it is for the local planning authority to consider

which use class a particular proposal falls within. It is for this reason that the council will need a firm understanding of the level of care to be provided within a scheme. Consequently, each application will be assessed on its own merits.

7.18. Where a proposal is considered to be, or contains, Class C3 accommodation, affordable housing or a financial contribution will be expected to be provided in accordance with Policy SP2: New and Affordable Housing.

7.19. Proposals considered as Class C2 accommodation, will be exempt from the need to provide affordable housing provision due to the level of care and level of communal facilities provided to the residents. In the case of C2 accommodation, as a minimum, daily assistance should consist of help with personal care, such as washing and preparing food. Planning applications including C2 proposals should be supported by relevant and robust evidence, including the need and details of the minimum care package that all residents are expected to sign up to.

Policy H1: Specialist Housing for Older People

Development proposals should have regard to meeting the housing needs of older people. The housing needs of older people can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. Regard should be had to good practice design principles[5] and proposals should show how these have been adhered to.

1. Proposals for new residential care homes and nursing homes (Use Class C2), and extensions to existing homes should:

a. Provide details of the minimum care package be provided to residents in order to meet use class C2; and,

b. be accessible by sustainable and active travel;

2. Housing for older people where appropriate should incorporate amenity or garden space. Housing schemes for older people will not be required to make contributions to provide for equipped play space.

3. Site specific parking arrangements may be required, for staff, residents and visitors, and should not diminish the character of the street scene.

4. Where proposals contain Class C3 accommodation affordable housing should be provided in accordance with the affordable housing Policy, Policy SP2: New and Affordable Housing.

[5] Housing our Ageing Population Panel for Innovation (HAPPI) principles https://www.housinglin.org.uk/Topics/browse/Design-building/HAPPI/ , and the Royal Town Planning Institute's guidance document Dementia & Town Planning, Dementia & Town Planning, RTPI 2020

Policy H2: Shared Housing

7.20. National planning policy provides the context for ensuring that future housing delivery leads to the creation of sustainable, inclusive and mixed communities. Shared housing, or now more frequently known as Co-living is a form of housing where unrelated individuals rent private rooms within a larger shared property. This includes access to communal facilities, such as kitchens, lounges, workspaces and outdoor space. Services such as cleaning, broadband and utilities are also typically a feature of these properties. Modern formats aim to foster a strong sense of community, convenience, and social connection. This form of housing is often appealing to young professionals, key workers, remote workers seeking a social connection, and those who have recently relocated for work purposes.

7.21. Shared housing is important in meeting the needs of residents, including young people starting out on their careers and those on low incomes. It is likely that the level of shared housing in the town will need to increase, driven by the cost of housing and the shortfall in affordable housing. Whilst this shortfall extends across all sizes of homes, it is most acutely impacting single people. The existence of the shared accommodation rate of housing benefit restricts single people to a lower level of housing benefit. This means that single people who rely on housing benefit to help pay their rent are at a significant disadvantage when trying to secure a property. Furthermore, the assessment of housing benefit entitlement is based on the age of the claimant not the reality of their housing, with claimants under the age of 35 receiving a lower 1-bedroom rate in comparison to those in the over 35 age group.

7.22. New developments of affordable housing have prioritised larger homes for viability reasons, and existing 1-bedroom social housing has been prioritised for current social housing tenants looking to downsize and free up larger social homes.

7.23. In short, shared housing is an important housing option which can and does provide good quality homes when well run. However, it is important to avoid situations where existing neighbourhoods become dominated by a particular housing type, such as shared housing.

7.24. Policy H4 provides guidance for developers and landlords regarding future shared housing schemes. In planning and housing legislation shared housing is referred to as housing in multiple occupation (HMOs).

7.25. Planning Use Class C4 (Houses in Multiple Occupation) covers small, shared houses or flats occupied by between three and six unrelated individuals who share basic amenities such as a bathroom and/or kitchen. Larger shared properties occupied by 7 or more unrelated people are unclassified by the Use Classes Order and are therefore considered to be ‘sui generis’.

7.26. Whilst space provision for HMOs is likely to be less than self-contained dwellings, the council does need to ensure there will be an adequate standard of living for occupants, enabling them to live a healthy lifestyle. Appropriately sized and equipped communal areas and adequate bathroom and cooking facilities should be provided, relative to the expected number of occupants.

7.27. The council will need to consider the usability and configuration of communal space, which should also be proportionate to the number of residents to be accommodated. In line with Policy SC2, HMOs will be required to provide useable private outdoor amenity space appropriate to the scale and character of the development.

7.28. Acceptable standards for HMO accommodation will therefore be measured by compliance with all relevant housing legislation and statutory guidance that it applicable to the premises. This includes but is not limited to;

- The Housing Act 2004
- The Management of Houses in Multiple Occupation (England) Regulations 2006
- The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007

7.29. Amenity standards will be measured against those set by the council[xl].

7.30. HMOs should contain adequate provision for waste and recycling, cycle storage and resident amenity space.

7.31. Where permission is granted for an HMO, the council will require the property to be appropriately managed. A management plan, submitted in support of a proposal, should set out how this will be achieved and well secured via planning condition.

7.32. Continuing to accommodate the need and demand for HMOs also means managing the potential negative effects that high concentrations of this type of housing may have on local communities. HMOs may generate greater amounts of refuse or greater parking pressures, compared to a typical family home. Cumulatively the effect of incremental intensification in an area caused by numerous changes of uses or new build HMOs can be significant, affecting both immediate neighbours and the wider area. A balance must be struck between maintaining this sector of the housing market whilst ensuring that local communities are mixed and balanced in terms of both housing tenure, and the people that live there.

Policy H2: Shared Housing

In order to support mixed and balanced communities and maintain an appropriate housing mix within the Borough, applications for new buildings or the conversion of existing buildings into non-self-contained residential accommodation to:

- **Class C4 (House in Multiple Occupation), or;**
- **House in Multiple Occupation in a sui generis use (more than six people sharing)**

must demonstrate the following:

1. An acceptable standard of residential accommodation can be provided;

2. Communal living space and cooking and bathroom facilities are provided appropriate in size to the expected number of occupants, and retained throughout the lifetime of the development;

3. Adequate storage facilities can be provided for cycles, waste and recycling along with adequate functional provision for the collection of waste from the site;

4. The scale and nature of the use would not harm neighbourhood amenity, for example by way of noise, general disturbance, waste management, on-street parking or impact on visual amenity; and

5. There is supervision by a resident owner or manager, or an appropriate alternative level of supervision. The ongoing management will be secured via a planning condition where appropriate.

This Policy will not apply to care homes, children's homes, bail hostels and properties occupied by students managed by educational establishments.

This Policy will not apply to households who have foreign students staying as guests for a set period of time.

Policy H3: Conversion of Existing Dwellings

7.33. It is an aim of the Plan to both increase the supply of new dwellings and at the same time promote an appropriate mix of dwelling types and sizes in the Borough, with an emphasis on increasing the supply of larger and family sized units. The Plan seeks to meet the housing needs of all sectors of the community. This can be achieved through new development and/or the conversion of existing dwellings. The conversion of large single dwelling houses into flats can provide a useful source of new dwellings, but at the same time care needs to be taken to ensure that valuable family housing is not lost or, that as a result of inappropriate conversions poor living environments are created either for the occupiers of such units or existing neighbouring residents. Policy SC2 requires housing developers to have regard to housing mix in new development. Even in a conversion scheme there is the potential to provide good quality family accommodation.

7.34. Policy H6 supports Policy SC2 with regard to housing mix and quality. Judgements about a house and whether it should be retained as a single dwelling will be made based on the existing number of bedrooms within the dwelling, and amenity factors such as whether the proposed layout of rooms reflects, as far as practicable, the existing room layout. The subdivision of floorspace to create internal rooms to provide facilities will not normally be acceptable, for example. Also, the desirability, and necessity (in respect of family dwellings) of preserving front and rear gardens and other landscape features will be important. Marketing evidence should also be provided in support of proposals in order to help demonstrate that it can no longer be retained as single-family dwelling house.

Policy H3: Conversion of Existing Dwellings

1. **To support the provision of quality homes and dwelling mix, planning permission will be granted for the conversion of all or part of a dwelling into multiple self-contained dwellings, provided that;**

   a. **the applicant has justified robustly that the building can no longer be retained in its entirety for single family housing occupancy;**

   b. **a high standard of accommodation is provided that complies with requirements set out in Policy SC2: Design - Housing Mix, Accessibility and Adaptability;**

   c. **it would not involve the self-containment of basement areas or other parts of any property having inadequate light or low ceilings or which would result in a poor outlook from habitable rooms;**

   d. **adequate storage facilities can be provided for cycles, waste and recycling along with adequate functional provision for the collection of waste from the site;**

   e. **adequate car and cycle parking is provided that does not result in hardstanding dominating the layout.**

Policy H4: Self build and Custom housebuilding

7.35. Self build and custom housebuilding has the potential to contribute positively to the delivery of new dwellings. As set out in the Hastings Housing Strategy (2025) and its action plan, the council is supportive of self-build and custom housebuilding. Such development widens choices in the local housing market and enables local people to design and build their own home that will meet their bespoke needs.

7.36. Self-build and custom housebuilding are homes where the initial owner of the home will have primary input into its final design and layout.

7.37. Off-plan housing, homes purchased at the plan stage prior to construction and without input into the design and layout from the buyer, are not considered to meet the definition of self-build and custom housing.

7.38. Fully mutual housing co-operatives and community-led housing schemes, where the initial owners will collaboratively design, occupy and manage a development, can be considered a form of self-build and custom housebuilding. They can also be a vehicle to support the delivery of affordable housing that reflects local circumstances.

7.39. In order to support potential self-builders, the council has developed a Self-Build Portal which provides information, advice and guidance. This service is available to all prospective self-builders and not limited to those currently on the register.

7.40. Based on evidence of demand through the Self Build Register, the Housing and Economic Development Needs Assessment and past delivery trends, it is expected that the number of serviced plots to satisfy the demand in Hastings is minimal compared to the critical need for market and affordable homes. It is likewise expected that provision for self-build and custom plots will come forward on small sites, single plots on infill sites and other Windfall sites. It is anticipated that small Windfall sites will play a key role in meeting this demand. Self and custom build homes must therefore achieve an appropriate density.

7.41. Self-build properties are exempt from certain planning obligations. An obligation from the self-builder that they qualify as a self-builder pursuant to The Self-build and Custom Housebuilding Act 2015 will be secured by condition for a period of three years to confirm this exemption. Planning obligations will be required when occupancy of the premises by the self-builder as a primary residence ceases, upon sale of the premises or other activity outside of the definitions set out within the Act.

Policy H4: Self build and Custom housebuilding

Proposals for self and custom housebuilding will be supported in appropriate locations where there is demonstrable demand for plots and all other relevant planning policies are satisfied.

Developments that seek self-build and custom housebuilding exemptions from planning obligations will have their occupancy secured by condition or legal agreement for a suitable period.

Policy H5: Accommodation for Traveller Communities

7.42. Under national planning guidance, all Councils are required by law to assess the future housing needs in their area. This involves assessing the types of housing needed for different groups in the community. Councils need to reflect these requirements in local planning policies, including the accommodation needs of Gypsy Roma and Travellers.

7.43. The East Sussex Gypsy and Traveller Accommodation Assessment (2022) identified a need for up to 12 permanent pitches during the plan period.

7.44. As such, the council recognises the need for a criteria-based policy that clearly sets out our approach to applications for the development of previously unidentified ('Windfall') sites for use as permanent pitches by the traveller community.

7.45. Accommodation for Gypsy Roma and Traveller communities will need to provide a safe environment with good amenity for residents and neighbours. Although many of the characteristics sought are similar to those sought for mainstream housing, permanent traveller pitches may have additional locational and site requirements, such as the ability to access main transit routes and store work and travelling vehicles, inclusion of shower and utility blocks and the need to fully secure the entire site to safeguard against theft or damage to property. Additionally, permanent traveller pitches are considered a 'highly vulnerable' use and as such will be incompatible with flood zone 3 in all cases and will require an exception test to be performed if a site within flood zone 2 is proposed.

7.46. The council wishes to maximise community cohesion, traveller sites should integrate well with their locality and encourage positive interaction with other members of the wider Hastings' community.

Policy H5: Accommodation for Traveller Communities

1. **The council will support proposals that address the permanent pitch need set out in the most recent Gypsy and Traveller Accommodation Assessment where:**

    a. **Proposals are for a site of at least 0.05ha in size; and,**

    b. **No part of the site is in Flood Zone 3 and flood risk from all sources can be appropriately mitigated; and,**

    c. **The site is free from environmental hazards, either now or as a result of the development process; and,**

    d. **Incorporates a 3m or greater firebreak from pitch boundary and between touring and static caravan standings; and,**

    e. **There is good access to the road network for pedestrians and vehicles, including emergency services and waste collection; and,**

    f. **It is possible to fully secure the site without loss of amenity to the occupants or surrounding residential communities; and,**

    g. **The site has no constraints that would prevent residential or commercial development from being appropriate within this location, including environmental; and,**

    h. **Both residential and entrepreneurial or employment activity can take place on the site with no loss of amenity to the occupants or surrounding residential communities.**

Policy H6: Housing Renewal

7.47. There is a pressing need to maximise the provision of affordable housing within the borough. Whilst new development can help address this need, with limited development opportunities improving and / or modifying the existing stock of social housing is also important. This will ensure the existing stock continues to meet future needs in respect of size and tenure. Policy H6 supports the upgrading of the existing social housing stock and the effective use of land within existing social housing areas. Utilising a master planning approach is recommended in order to ensure that the improvements required by this policy can be clearly demonstrated.

7.48. Renewal proposals in the first instance should consider prioritising retrofit over demolition. Where demolition is proposed, applicants will need to provide an appropriate explanation as to why the existing building cannot be retained. Policy SC3 provides detailed guidance on the form such a report should take.

7.49. Effective community consultation ensures that local housing renewal projects can take account of community needs and priorities in their design. It is recommended that community consultation takes place at an early stage, and a community consultation statement is provided alongside any proposals for housing renewal projects.

7.50. The use of time-limited permissions as an enabling mechanism for housing renewal projects can reduce delay and mitigate disruption to residents. Such temporary homes should be located in suitable locations as close to the renewal area as is reasonably practical in order that the intended residents continue to be able to access local schools, jobs, shopping areas and essential services and must be in compliance with other relevant policies of this plan to ensure a good standard of amenity is achieved.

Policy H6: Housing Renewal

1. **Proposals for housing renewal will normally be supported where they result in improvements to the housing mix, quality of design, deliver other public benefits and align with other policies of this plan, including those on retrofit. Proposals should provide a detailed masterplan to clearly demonstrate how this will be achieved.**

2. **Proposals which result in a net loss in affordable housing will only be supported in exceptional circumstances.**

3. **Proposals should be accompanied by a community consultation statement, that sets out how and when consultation has taken place, and in what way this has informed the proposal.**

4. **Proposals for temporary (via time-limited permissions) homes for the purpose of enabling housing renewal activity will be supported in appropriate locations subject to compliance with other policies of this plan.**

Policy H7: Temporary Residential Uses

7.51. There may be circumstances where it will be appropriate to allow the use of a site for Temporary Residential Uses. This may apply to vacant or underused sites and buildings and may take place as part of the phased development of development sites, and within other vacant premises where a longer-term use is still being resolved.

7.52. Some developments and regeneration projects can take a period of years to reach the point of delivery. Providing Temporary Residential Uses within these locations can contribute positively to meeting temporary accommodation needs, to the safety and security of the site, and support the delivery of enabling works and essential infrastructure required for a sites' substantive use.

7.53. In some cases, Temporary Residential Uses may be used where there is a period of hiatus of an established lawful use - for example, where a new lease is being negotiated, or part of a site is currently underoccupied by existing occupiers.

7.54. Within existing housing estates, it may be appropriate to consider Temporary Residential Uses as a precursor to future regeneration schemes.

7.55. The delivery of temporary community facilities either accompanying Temporary Residential Uses or as a standalone is set out in Policy SC20 of this Plan.

7.56. Temporary Residential Uses may include residential dwellings and temporary stopping places for van dwellers with no permanent residence and gypsy, traveller and travelling showpeople communities.

7.57. This Policy does not apply to receptor sites, highways mitigation land, adopted or unadopted highway, or other transport corridors.

7.58. This Policy provides a set of criteria to support these uses coming forward in appropriate locations and where evidenced by a demonstrable local need for temporary dwellings.

Duration of Temporary Residential Uses

7.59. Permission may be granted for no less than 6 months, and no more than five years from date of first occupation. Permissions may be renewed where there is evidence that the remediation of the site to enable the allocated or lawful use will not yet need to be implemented at the end of the initial period. A remediation plan must be provided as part of any proposal that sets out how the site will be remediated and returned to an agreed condition. Any groundworks, servicing, access or planting delivered as part of any proposal must not prejudice the ability of the land to be used for its allocated or lawful use.

7.60. This duration is intended to ensure that the lawful use of the site is not prejudiced by unnecessary delay within the planning and delivery process. It also helps to maximise the efficiency of the planning process and the deliverability of temporary residential uses by enabling them to benefit from national policy exemptions applicable to permissions of this length, including exemptions from the requirement to deliver biodiversity net gain[6]. Remediation plans must include information regarding the future reuse or recycling of units, landscaping or infrastructure removed from the site during remediation, to demonstrate that the lifecycle of proposals delivers against the council's net zero carbon objectives.

7.61. The granting of permission for a Temporary Residential Use does not establish the principle for permanent residential development.

Amenity, Safety, Wellbeing and Community

7.62. The temporary nature of housing proposals submitted under this Policy does not obviate the need to adhere to housing quality, sustainability and design standards as set out in Part 7 of this plan. Applications for temporary residential uses must demonstrate that high quality housing will be provided and that any unacceptable impacts on health, safety and amenity have been mitigated.

7.63. In some cases, Temporary Residential Uses may have additional locational and site requirements, including onsite shower and utility blocks, firebreaks, instant access self-storage and the need to fully secure the entire site to safeguard against theft or damage to property. Adequate storage and collection requirements must be provided for waste, recycling, cycle and carparking. The inclusion of community facilities to support community cohesion is desirable. Proposals should state how they have sought to meet the basic needs of intended occupiers.

7.64. Proposals must demonstrate how heating, lighting, potable water, sewerage, internet and mobile network services will be provided.

7.65. Where permission is granted for a Temporary Residential Use, the Council will require the site to be appropriately managed. A management plan, submitted in support of a proposal, should set out how this will be achieved and will be secured via planning condition.

7.66. As the Agent of Change, any proposal must set out how any negative amenity impacts including, but not limited to, noise, odour, nuisance lighting and air quality have been mitigated to a standard that complies with National and Local Planning Policy. Proposals for Temporary Residential Uses must not prejudice the lawful operation of nearby uses or sites allocated for future uses.

7.67. Proposals for dwellings utilising a raft, pad or other form of perched or shallow foundation, or for residential vehicles, will be considered a 'highly vulnerable'

[6] **Subject to eligibility**

use in terms of flood risk vulnerability and as such will be incompatible with flood zone 3 in all cases and will require an exception test to be performed if a site wholly within flood zone 2 or greater is proposed, or where a site is considered to be at high risk from other sources of flooding- ground, surface, artificial or sewer. Site specific Flood Risk Assessments will be required where policy triggers are met.

7.68. Proposals must ensure that ground conditions are understood in terms of stability, potential for contamination and hydrology in accordance with National and Local Planning Policy. Where mitigations are proposed, their maintenance and management must be secured for their intended lifetime by condition. Mitigations should consider both the Temporary Residential Use and the allocated or lawful use of the land.

7.69. Construction management guidance set out within the policies of this plan must be adhered to for all proposals. This will be demonstrated through an agreed construction management plan.

7.70. Where policy thresholds are met, a Transport Plan will be required for each site and vehicle access should meet appropriate highways standards.

Natural Environment Considerations

7.71. Access to open space and sports facilities is a key pillar of the Local Plan and National Planning Policy and as such, permission will not normally be granted where a proposal for a Temporary Residential Use would reduce or compromise the lawful use of playing pitches, recreation grounds, Local Green Spaces, or public open space as identified on the policies map.

7.72. Appropriate ecological surveys must be provided alongside any proposal. Where feasible, existing green and blue infrastructure should be incorporated into any scheme.

Policy H7: Temporary Residential Uses

1. **The council will support proposals for Temporary Residential Uses where:**

   a. **The use will meet a demonstrable need to provide Temporary Accommodation in the form of:**

      i. **Dwellings;**
      ii. **Temporary stopping places for gypsy, travellers and travelling showpeople;**
      iii. **Van dwellers with no permanent residence.**

   b. **Permissions will be granted for no less than 6 months and no more than five years from first occupation except where the proposal is to enable a wider housing renewal scheme as defined in Policy H6 where a maximum of 10 years from first occupation may be granted.**

   c. **The proposal will not prejudice the lawful operation of nearby uses or sites allocated for future uses in a Local Plan.**

   d. **A remediation plan is agreed and secured by condition, setting out:**

      i. **How and within what timescale the site will be returned to an agreed condition;**
      ii. **How units, landscaping or infrastructure will be reused or recycled once removed from the site.**

   e. **Any groundworks, servicing, access or planting delivered as part of any proposal must not prejudice the ability of the land or building to be used for its allocated or lawful use.**

   f. **The proposal demonstrates alignment with policies of this plan that apply to residential development, including but not limited to those relating to design, safety, health, amenity, environment and developer contributions.**

   g. **The proposal demonstrates that essential services, including digital connectivity, will be provided onsite from first occupation.**

   h. **The proposal demonstrates how it will meet the needs of occupiers through the provision of appropriate on-site facilities. Proposals incorporating community facilities are desirable.**

   i. **The proposal includes an agreed site management plan that will be secured by condition.**

j. **The proposal sets out how negative amenity impacts including, but not limited to, noise, odour, nuisance lighting and air quality have been mitigated to a standard that complies with National and Local Planning Policy.**

k. **An assessment of ground conditions informs the design of the proposal taking into account stability, potential for contamination and hydrology in accordance with National and Local Planning Policy.**

l. **The maintenance and management of mitigations are secured for their intended lifetime by condition. Mitigations must be suitable for both the proposal and the allocated or lawful use of the land or building.**

m. **Firebreaks are incorporated as appropriate commensurate to the intended occupancy and design.**

n. **There is good access to the road network for pedestrians, cyclists and vehicles, including emergency services and waste collection.**

o. **If a fully secured site is proposed, this can be achieved without loss of amenity to the occupants or surrounding residential communities.**

p. **A construction management plan is agreed and secured by condition.**

q. **A transport plan is submitted, taking into account sustainable and multimodal means of travel.**

r. **Vehicle access meets appropriate highways standards.**

s. **Existing green and blue infrastructure is incorporated into the scheme, or appropriate compensation made for its loss.**

t. **Appropriate environmental assessments are provided, taking into account both the proposal and allocated or lawful use of the land or building.**

2. **Permission for Temporary Residential Uses will not be granted on land identified as Sports Field and Playing Pitches, Local Green Spaces, or public Open Spaces as shown on the policies map; nor will they be granted for recreation grounds, highway, highway mitigation land or agreed receptor sites.**

Part two - Economic Development

7.73. These policies focus on driving necessary economic development activity that must take place in order to provide employment opportunities for residents of Hastings and the wider functional economic market area, while at the same time protecting amenity by directing economic activity to the most appropriate location, and ensuring amenity is not compromised.

7.74. Economic development policies provide detailed guidance setting out our approach on matters including employment land and premises, drinking establishments, hot food take aways, retail and town centres, tourism and the visitor economy and skills development.

Policy E1: Protecting and Enhancing Employment sites, areas and allocations.

7.75. Hastings is the largest urban economic area within the Hastings and Rother Functional Economic Market Area (FEMA)[xli] and is home to a number of organisations that are of national and international renown including Kurt J Lesker, AAK BD Foods, Focus SB and Medica Group. However, the local economic structure continues to be dominated by the public sector and education, which is gradually reducing its local share due to an ongoing trend of shrinkage[xlii].

7.76. Overall, the Borough has a comparatively low job density of just 0.7[xliii]. In order to achieve economic rebalancing, build resilience and support investment in local jobs Hastings must plan for growth in sectors where there is an established or expected trend of growth potential.

7.77. The impact of the Covid-19 pandemic on the local economy was significant. Although the economy is recovering, it is predicted that this recovery will be gradual throughout the plan period. To plan for this slow but sustained growth, the safeguarding of employment land is of significant importance throughout the plan period. Therefore, the loss of employment land or premises must be fully justified to ensure that opportunities for occupation and/ or redevelopment in a market with so little headroom are not lost. The prevailing character of an area being generally residential is not in itself a justification for loss of employment uses.

7.78. The National Planning Policy Framework (NPPF) places substantial[xliv] weight on the need to support economic growth and productivity[xlv]. In planning for economic development, a key focus should be addressing barriers or weaknesses[xlvi] that limit the economic potential of an area. In addition to low job density, Hastings has high unemployment and an uneven local skills profile, which acts as a barrier to investment[xlvii]. Hastings is unsuited to reinvention as a commuter town and relies heavily on local job opportunities for economic development.

7.79. By successfully supporting our growth industries, we will create a more vibrant economy, benefitting other sectors including the construction industry and service industries. The Hastings Towns Fund prospectus (2021)[xlviii], the East Sussex Economic Prosperity Strategy (2024)[xlix] and the developing Pride in Place (2025)[l] set out how economic rebalancing should be targeted and what the benefits to the town and wider FEMA will be when goals are achieved.

7.80. Improving the condition and quality of our employment stock is also a key local priority, to support our wider health, wellbeing, climate and employment goals. Much of the existing employment stock is older and in poor condition and low energy efficiency associated with stock of this age[li]. The layout, size and servicing of older units may also be incompatible with modern methods of working and logistics profiles.

7.81. A key part of our local strategy is therefore to encourage the redevelopment and enhancement of existing Industrial Employment Locations, opportunity sites and land last in use for employment purposes to improve the overall quality and quantity of the stock, layout and servicing to generate additional floorspace and improve the energy efficiency and green infrastructure associated with these locations.

7.82. Hastings was already moving ahead of the curve when it came to the delivery of flexible workspaces which was accelerated by the Covid-19 pandemic, with flexible, co-working and virtual office spaces already established and with high occupancy rates. We will continue to welcome innovation by accommodating mixed use development where it is appropriate, sustainable, well-serviced and will not negatively impact on existing and future industrial processes or employment generating uses.

7.83. The loss of employment land and premises, even where not currently operational, will be resisted. Loss will only be acceptable where both marketing evidence and financial evidence indicates that there is no future prospect of delivering employment or employment compatible uses as defined in this policy.

7.84. The marketing evidence should clearly demonstrate that an appropriate marketing campaign has taken place by providing copies of:

- Site Particulars: External photo(s); a description of the site/premises; current permitted use and potential uses subject to planning; price and tenure; dimensions of: - building - internal rooms - gross internal area - size of the total site including any land - location of services; restrictions and covenants that may affect the site; location map extract; contact details for viewings (other relevant information to attract potential commercial investors should also be detailed).

- Advertisement details: Advert indicating the size and format together with confirmation of where including online advertising For sale/to let board and use of commercial agent; Confirmation that a for sale/to let board will be/ has been erected on site; duration of marketing period and why this is appropriate.

- Evidence based information: Details of negotiations, independent valuation and sales particulars prior to start of campaign; information regarding interested parties; copies of advertisements placed the date and publication; the methods and format of reporting the final marketing campaign and its results.

7.85. Financial evidence will be required to demonstrate a case that the costs of refurbishment/redevelopment exceed the likely returns from the site in the form of:

- A full structural survey of the existing premises highlighting the matters that require refurbishment, or which are incapable of refurbishment. This survey should be prepared by a suitably qualified professional;
- A survey of the site from an operational point of view indicating any exceptional or site-specific costs. These costs to be prepared by a suitably qualified professional;
- A detailed cost breakdown of the works required to refurbish/redevelop the site. These costs to be prepared by a suitably qualified professional;
- Written evidence from 3 recognised separate financial institutions of the likely cost of borrowing over a fifteen-year period to fund these costs;
- Written evidence from 3 recognised separate financial institutions that they would not be prepared to advance finance for refurbishment/redevelopment, with the applicant to bear any costs involved in obtaining this information; an indication (in the case of a prospective landlord) that the anticipated rate of return from the premises would not cover the costs of refurbishment/redevelopment;
- Any attempts made to approach support agencies to identify whether additional funding may be available to support redevelopment;
- An indication (in the case of a prospective owner occupier) that the level of income needed to cover both the costs of refurbishment/redevelopment and other necessary overheads would be unsustainable.

7.86. Managing employment growth in a sustainable way to meet current and future needs contributes to Sustainable Development Goal 8 ‘Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all’, Goal 10 ‘Reduce inequality within and among countries’ and Goal 11 ‘Make cities and human settlements inclusive, safe, resilient and sustainable’. Improving the condition of employment stock contributes to Goal 12 ‘Ensure sustainable consumption and production patterns’.

Policy E1: Protecting and Enhancing Employment Sites, Areas and Allocations

1. **Within Strategic and Local Employment Areas (SIEA and LIEA) and land or premises last in employment use, development proposals will be supported where:**

    a. **It would result in the one or more of the following: retention, intensification, conversion, redevelopment, enhancement, and/or extension of employment generating uses including offices, research and development, light industrial processes, general industrial, storage and distribution, and other compatible uses*;**

    b. **In areas that will accommodate mixed use development it will promote the successful integration of residential, commercial and employment space, optimising physical layout and servicing to reflect the mix of uses proposed and taking into account the need to safeguard residential amenity alongside existing employment uses;**

2. **In exceptional circumstances, the loss of land or premises last used for employment purposes may be acceptable where there is no reasonable prospect of retention or redevelopment of the site as set out in 1. This must be demonstrated through a detailed evidence-led supporting statement that addresses the following:**

    a. **Marketing evidence indicating that occupants are not proceeding with the purchase due to the condition and/ or suitability of the land or premises for employment or other compatible use as set out in 1a above; and,**

    b. **The costs involved in refurbishing or redeveloping the land or premises for employment use are greater than the return that could be anticipated.**

3. **Employment uses required by this Policy will be secured and where necessary, retained, through the implementation of conditions in accordance with the tests set out in national policy.**

*** Currently use classes E(g), B2, B8 in the Use Class Order (Amended) 2020 or sui generis uses that are identified as employment generating uses similar to those listed in Policy E1, Part 1, Limb a.**

Policy E2: Skills, Employment and Supply Chain

7.87. The National Planning Policy Framework places significant weight on the need to support economic growth in plan making, including countering any weaknesses and addressing barriers to investment[lii]. These barriers will be specific to individual functional economic market areas and may change over time.

7.88. Hastings has a low job density of just 0.7[liii]- in simple terms, this means that there are too few jobs for the working age population. A low job density can be a barrier to investment, as it limits opportunities for career development and change and limits the pool of available workforce that may have transferrable skills for new employers. Jobs growth must be a priority for the local plan for the period until 2041.

7.89. The low job density in Hastings is coupled with the additional barrier of a high unemployment rate and a generally low level of formal qualifications amongst the working age population, especially at level 3 or above[liv]. When choosing an area in which to do business, access to a suitably skilled workforce to perform the roles created by the investment is key for inward investor employers. A lack of a skilled workforce can be a major deterrent to the delivery of economic objectives and must be addressed in tandem with employment space delivery goals.

7.90. Increasing local employment opportunities also allows residents the opportunity to work locally instead of out commuting to jobs outside of the area, which supports the council priorities of working towards a low carbon future for the town and keeping local people and the local economy at the heart of council policy[lv]. This extends to providing reasonable options for young people who at present leave the area to study and then stay away to access employment opportunities with decent pay and prospects for progression[lvi].

7.91. Local labour and procurement agreements should work towards a goal of 50% locally supplied labour, goods and services and should report on the success or failure of measures upon the completion of development in order that the benefits to the local economy can be evaluated.

7.92. The Get Sussex Working Plan (GSWP 2025-3035)[lvii], the employment and skills strategy for Sussex and Brighton, sets out an ambitious, collaborative vision for the future of employment and skills across Sussex. It sits alongside the Sussex Local Skills Improvement Plan (LSIP 2026-2029)[lviii], that identifies the skills most needed by residents and businesses to support local economic growth and boost productivity. Both Plans bring together employers, education and training providers, local authorities, the voluntary and community sector, health, job centres and other strategic partners to address employment and skills needs collaboratively.

7.93. People not in education, employment or training may be hindered by a variety of barriers to upskilling including cost and access to opportunities. To capitalise on the successes created by the development of new or improved employment spaces and local employment and procurement, it is important that those furthest from the labour market are given support to gain the skills and confidence needed to engage in a growing job market. By developing a local skills development plan, developers or employers where the intended occupier is the developer can engage with existing initiatives or highlight the benefits of their own skills development programming. A completion statement outlining the key outcomes should be provided upon completion of the local skills development plan commitments.

7.94. East Sussex County Council (ESCC) Employment and Skills Team will support developers to prepare, monitor and deliver local skills development plans if the developer does not already have a preferred approach. Developers should engage with ESCC at the earliest opportunity to discuss potential options, and skills development plans must be agreed prior to occupation phase. Local skills development plans should be proportionate to the development proposed. The developer contributions schedule carries additional detail on expected levels of engagement.

7.95. Supporting more people into education, employment and training contributes to Sustainable Development Goal 8 ‘Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all’, Goal 4 ‘Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all’, Goal 10 ‘Reduce inequality within and among countries’ and Goal 11 ‘Make cities and human settlements inclusive, safe, resilient and sustainable’. Seeking local procurement opportunities for goods and services contributes to Goal 12 ‘Ensure sustainable consumption and production patterns’.

Policy E2: Skills, Employment and Supply Chain

1. **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;**

   c. **A project completion statement for a and b above.**

   to be secured by condition.

Policy E3: Primary Shopping Areas

7.96. In accordance with the NPPF the Local Plan designates Primary Shopping Areas and identifies the range of uses considered acceptable in such locations, as part of a positive and flexible strategy for the future of the key centres within the Borough. Primary Shopping Areas (PSAs) are identified for all of the shopping areas and are shown on the Policies Map. These areas are intended primarily for Class E Commercial uses which support the function of the town centre. Class E uses ensure a competitive and attractive town centre offer, which will underpin healthy and thriving town centres.

7.97. It is considered that a relatively flexible approach to uses within the town centres is advantageous to allow the centres to adapt to new and emerging town centre trends, rather than applying an overly prescriptive approach that has been used historically in such centres, to take account of recent significant changes to the retail sector and likely longer-term trends.

7.98. The council recognises that the flexibility provided by the current permitted development rights for commercial uses means that some changes of use would not require planning permission. Where planning permission is required the retail and town centres policy will apply.

7.99. Residential development plays an important role in the vitality and viability of our centres, bringing people into the town at different times of the day, increasing footfall and supporting a more vibrant evening and night time economy. It is however important to provide a balance between protecting town centres from an overall erosion of those characteristics which make a vibrant town centre and enabling residential uses through appropriate parameters. Residential uses at ground floor level within primary shopping areas would be harmful to the overall vitality of the Borough's town centres, both in terms of fragmenting retail and commercial uses, and also by creating incompatible living conditions for potential occupiers. Proposals for change of use of ground floor premises to residential within the primary shopping areas will not therefore be supported.

Policy E3: Primary Shopping Areas

Primary Shopping Areas are defined for all town centres, as set out on the Policies Map. 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, where proposals:

1. **Maintain and enhance the vitality of these centres; and,**

2. **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, or,**

3. **Accept other related uses, providing a robust case is made.**

Proposals must:

   a. **Attract vibrancy, activity and pedestrian footfall to the town centre;**

   b. **Have an active frontage immediately accessible by the public;**

   c. **Not harm the character and function of the town centre.**

4. **Where appropriate, the council will support proposals to bring upper floors back into use, including for residential use.**

5. **Changes of use to residential will not be permitted on the ground floor of any unit within Primary Shopping Areas.**

Policy E4: Food, Drink, Entertainment and the Night-time Economy

7.100. Evening and night-time economy uses can become a source of unwanted environmental nuisance or pollution if not subject to appropriate controls. This may include noise nuisance, odour, anti-social behaviour, disorder, disturbance, nuisance lighting, or danger to pedestrians and other road users due to frequent stopping and manoeuvring of vehicles. When assessing proposals for new Food, Drink, Entertainment and Night-time Economy uses, it is necessary to take into account the cumulative impacts within a locality and whether the addition is likely to result in harm or loss of amenity.

7.101. Proposals should provide clear and detailed information in a supporting statement, including a detailed description of the proposed use, benefits, potential for harm and demonstrate that any harmful impacts have been identified and mitigated appropriately.

7.102. Proposals for some uses covered by this Policy may also require separate consents with other schemes and regulations in addition to the granting of planning permission. This includes for example premises licences, personal licences, pavement licences, food premises registration. The granting of planning permission does not automatically convey compliance with other operational requirements, and the opposite is also true.

7.103. Home-delivery and platform-based delivery services frequently form part of the delivery model of Cafes, Restaurants and Hot food Take-aways, allowing businesses to access a wider catchment for their services. However, their use can cause disturbance or hazards. The economic benefits these services bring needs to be balanced with the impact on safety and amenity resulting from their use. Proposals including home delivery should likewise ensure that any potential for harm and appropriate mitigations are included in a supporting statement.

7.104. It is becoming increasingly important to prevent commercial waste products such as food waste, oil and grease from entering the sewer system. Sewer flooding arising from such waste products, can result in a significant loss of amenity, health hazards for households, be economically damaging for businesses, and potentially cause pollution events such as sewer flooding, or collapse where a blockage results in a sewer burst. In order to prevent the build-up of deposits in sewers and drains, proposals for food service establishments must clearly set out where grease traps will be installed and set out how often these will be maintained and managed.

7.105. Hastings has high volumes of alcohol related harm, with high levels of hospital admissions for alcohol-specific conditions for both adults and children (under the age of 18). The prevalence is particularly high in under 18s. Alcohol harm is multi-faceted and also includes accidents, violent behaviour, economic and social harm (e.g. as a contributor to loss of employment or secure housing). Levels of consumption are heavily influenced by access,

including the availability of alcohol through off-licence. Hastings has a number of restrictions in place to limit and/ or control the availability of alcohol, and personal licensees are legally required to refuse service where a customer is intoxicated or otherwise restricted from alcohol purchase.

7.106. Vaping products are intended to offer a substitute for tobacco products, such as cigarettes and rolling tobacco to aid smoking cessation. Vaping is not for children and young people and while it is less harmful than smoking, it is not risk-free and is generally addictive due to the majority of vaping products containing nicotine. Vaping exposes users to a range of toxins and the long-term effects are not yet understood.

7.107. Access to both vaping products and alcohol through platform-based or home delivery services can undermine local restrictions, controls and messaging, bypass visual warnings, facilitate underage access and normalise impulsive purchasing and indoor, hidden consumption. In order to support local alcohol controls, including those related to the personal welfare of purchasers, home delivery of alcohol, vaping and tobacco products from premises where the sale of these products is the sole or primary function will be prohibited, to be secured by condition.

7.108. Supporting sustainable economic growth in these industries without compromising amenity contributes to Sustainable Development Goal 8 ‘Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all’.

7.109. Proposals for new hot-food take aways within the Sui Generis class should additionally refer to Policy SP11, which sets out expectations to enable healthy food options and to consider the potential for negative impacts on health and wellbeing.

Policy E4: Food, Drink, Entertainment and the Night-time Economy

1. **Development proposals for new Cafes, Restaurants, Drinking Establishments and Hot-Food Take Aways will be supported in Town, District and Local Centres where:**

    a. **the proposal would not, on its own or cumulatively with other such uses, be likely to result in harmful impacts either on the character of the area or other residents and businesses, such as odour, noise, disturbance, anti-social behaviour, or public disorder and taking into account any evidence of harm caused by these uses;**

    b. **it would not cause inconvenience or danger on the public highway as a result of the additional stopping and manoeuvring of vehicles. If home delivery services form part of the proposal, details must be specified as part of the planning application, including where loading and unloading is proposed to take place;**

    c. **proposals for food service establishments must include the installation of grease traps in wastewater drainage systems to prevent the build-up of deposits in sewers and drains.**

2. **Proposals must be accompanied by a supporting statement providing additional detail relating to the proposal including:**

    a. **Public opening hours (if different to hours of operation);**

    b. **Cooking facilities proposed on site;**

    c. **Any outdoor seating arrangements, with proposed hours of access or use;**

    d. **Overall customer capacity for both internal and external areas;**

    e. **Refuse management plans to prevent waste spill onto highways or other public areas;**

    f. **A management plan for late night uses, setting out how entry and exit to the premises during night-time hours will be managed to prevent excess noise or disruption.**

5. **Proposals for new Cafes, Restaurants, Drinking Establishments and Hot-Food Take Aways outside of these areas will be determined based on 1 and 2 above and the overall sustainability of the location.**

6. **Proposals for new Vapor/ Tobacco Products Retailers and/or Off Licences where this is the sole or primary function and not ancillary will only be granted where the use of delivery services is prohibited by condition.**

Policy E5: The Visitor Economy

7.110. Hastings is a coastal resort town, and popular with visitors due to a wide-ranging visitor offer including purpose-built attractions, natural assets, leisure, culture, the heritage character and shopping areas all appealing to the interests of a diverse range of visitors. More generally, tourism in Hastings is reliant on the wider cultural destination offer across East Sussex, acting as a draw for visitors and the local community alike to participate in cultural and creative activities.

7.111. Accommodation and Food Services is one of the strongest forecast growth sectors, alongside wider growth in hospitality, recreation and tourism-related activities. This suggests continued potential for growth in overnight stays and visitor expenditure, particularly where investment supports higher-value accommodation, year-round tourism and linked cultural and leisure offer[lixlx]. Although much of the employment is seasonal, these sectors still provide a range of job opportunities for local people at entry level and above.

7.112. Serviced visitor accommodation, such as hotels, bed and breakfast, inns and pubs, plays an important part in the visitor economy for both Hastings and the surrounding hinterland. Overnight visits contributed positively to the visitor economy for the period 2019-2022. As well as providing accommodation for visitors, serviced accommodation also provides employment opportunities for local people. Supporting and planning for a sustainable visitor economy contributes to Sustainable Development Goal 8 'Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all'.

7.113. The visitor accommodation and food services sectors have the largest sector specific projections for jobs growth during the plan period. The element of this growth related to the accommodation sector has the potential to come from both new and enhanced visitor accommodation. To enable investment, the council will be supportive of proposals for new, enhanced and extended serviced visitor accommodation and will resist the loss of existing accommodation unless it can be demonstrated that this use is no longer viable or possible.

7.114. Non-serviced accommodation, including that provided through the sharing economy, provides flexibility for visitors who are seeking a more independent experience when visiting the area, and provides an important part of the overall visitor accommodation offer. It is important that non-serviced accommodation of all types in the Borough is well regulated, safe, accessible, meets amenity standards and does not result in a loss of dwellings in an area of already constrained housing supply.

7.115. The council is not supportive of the development of new visitor accommodation including purpose built short-term lets within the curtilage of existing residential dwellings. This is partially due to the potential of purpose-

built visitor accommodation to be used as a permanent dwelling under existing permitted development rights. A building originally designed and built as visitor accommodation may not conform to the residential amenity, size, access and transport standards set out elsewhere in this Plan which could result in a poor standard of accommodation for permanent residents.

7.116. The HEDNA identifies a deficiency in all sizes of self-contained housing stock. This includes 1-2 bedroom and studio accommodation as well as larger homes to accommodate families. The ability to retain smaller accommodation as dwellings is of particular importance to accommodate an aging population and households without dependants[lxi] and to respond to affordability pressures within the 'rent/buy gap' at local level.

7.117. Therefore, while the council is supportive of new and enhanced serviced and non-serviced visitor accommodation, this should not be at the expense of the loss of a residence. The council may seek to implement Article 4 directions to restrict permitted development rights where it would result in the loss of one or more dwellings. Such a direction would establish a legal definition of short-term holiday lettings that will supersede any prior definition utilised by the council.

7.118. The council considers that whole premises leased as short-term holiday lets currently fall into the *Sui Generis* category due to the material differences between use as visitor accommodation and use as a dwellinghouse. Residential properties advertised as short-term holiday lets that meet the criteria to be liable for rates under the business rates regime[lxii] will be considered to have exceeded the *de minimis* threshold, operating *Sui Generis* visitor accommodation in a residential area.

7.119. Short-term lets that meet the criteria for business rates no longer have access to residential services provided by the council, such as domestic waste and recycling services, and are considered to be fully operational as a visitor accommodation business that the NPPF and the policies of this plan would consider a 'main town centre use' and not normally compatible with primarily residential locations. To protect residential amenity, operational housing stock, and the sequential approach to town centres and the resort area, the council will refuse applications for change of use in these circumstances.

7.120. Due to the acute local housing needs, where a proposal is submitted to bring *Sui Generis* units formerly used as permanent dwellings back into use as a dwellinghouse, the council would not require the loss of visitor accommodation to be justified.

7.121. This process will ensure better control of the housing stock, ensuring provision of housing to contribute towards local needs. There is a need to implement innovative measures to ensure that the existing housing stock is protected for the intended use.

7.122. However, short-term lets do make a positive contribution to the visitor economy through some operating models, including as a marketing strategy

for static caravans within caravan and camping sites, as purpose-built or premises or converted spaces above commercial premises within parts of the Resort Area where residential amenity standards associated with permanent dwellings would be challenging to meet, and as a revenue stream for households with spare bedrooms and/ or where the main occupant may be absent for periods of time – such as for work or holiday.

7.123. Our approach to outdoor accommodation such as caravan sites, camping and glamping (such as yurts and log cabins) and touring sites is set out in Policy E6.

7.124. Visitor accommodation should be located centrally and sustainably to encourage low carbon travel options, or within a location with a well-established visitor accommodation or tourism presence. Appropriate locations for new visitor accommodation include Hastings Town Centre and the Resort Area, the District Centres, site allocations at Seaside Road and Cinque Ports Way as part of a mixed-use development, and within the resort area, as shown on the Policies Map.

7.125. All visitor accommodation, including hostels, should meet amenity and safety standards, including those related to size, access and living conditions.

7.126. The visitor economy is supported by the resort area, which has potential for growth both through new developments as part of mixed-use schemes in West St Leonards, through regeneration of premises to alternative uses and through the enhancement of existing attractions. The resort area encompasses the entire length of the seafront from Rock-a-Nore to Glyne Gap and the Town, District and Local Centres at The Old Town, Hastings Town Centre, St Leonards and Bexhill Road.

7.127. Amusement arcades, scenic and novelty rides, gaming centres, theme parks, aquariums and other similar uses can present unique challenges if poorly sited due to their nature. In particular, there is the potential for harm to residential amenity and the amenity of occupiers of other commercial premises, such as office space.

Policy E5: The Visitor Economy

1. **New and extended serviced visitor accommodation, including hotels and bed and breakfast, but excluding outdoor accommodation, will be supported where:**

    a. **It is appropriately located, within Hastings Town Centre, the resort area or another established tourism location,**

    b. **It is of a scale, type and appearance and with suitable infrastructure appropriate to the character of the local area; and,**

    c. **It will not compromise residential amenity; and,**

    d. **The proposal will result in an acceptable level of amenity for occupiers, and,**

    e. **It will not result in the loss of residential accommodation.**

2. **Proposals that would result in the loss of existing visitor accommodation will only be supported where there is no reasonable prospect of retention of, or investment in, the existing use. This must be demonstrated through a marketing exercise in line with current guidance before any justification for alternative uses may be considered.**

    a. **Within Hastings Town Centre, the Resort Area, on main arterial transport routes (A21/ A259) and for larger accommodation in excess of 5 beds, proposals must provide:**

        i. **Evidence of performance and costs for the prior 36 months;**

        ii. **Evidence of investment, including business planning and promotional activities, or otherwise to improve viability for the prior 12 months;**

        iii. **Evidence repositioning is not viable;**

        iv. **An independent opinion by a qualified specialist;**

        v. **Evidence of an appropriate marketing campaign to dispose of the asset as visitor accommodation, including direct and targeted marketing, use of industry specialist brokers, and marketing materials that adequately reflect the condition and current operating practice of the business.**

b. **Operators operating outside of the criteria set out in 2a must provide:**

   i. **Evidence of performance and costs for the prior 12 months;**

   ii. **Evidence of investment, including business planning and promotional activities for the prior 12 months;**

   iii. **Evidence repositioning is not viable;**

   iv. **Evidence of an appropriate marketing campaign to dispose of the asset as visitor accommodation, including direct and targeted marketing, use of industry specialist brokers, and marketing materials that adequately reflect the condition and current operating practice of the business.**

3. **New and extended non-serviced visitor accommodation, including but not limited to, holiday apartments, short-term holiday lets, but excluding outdoor accommodation, will be supported where:**

   a. **It is appropriately located, within Hastings Town Centre, the resort area or another established tourism location,**

   b. **It is of a scale, type and appearance and with suitable infrastructure that appropriate to the character of the local area; and,**

   c. **It will not compromise residential amenity; and,**

   d. **The proposal will result in an acceptable level of amenity for occupiers, and,**

   e. **It will not result in the loss of residential accommodation;**

   f. **Is not within the curtilage of a residential property.**

4. **Where proposals involve purpose-built short-term lets, permission will be granted using the *Sui Generis* use class;**

5. **The use of residential dwellings, including ancillary accommodation such as annexes, as short-term visitor accommodation for periods exceeding the *de minimis* threshold identified by the Valuation Office Agency will not be supported.**

6. **Where a proposal is for short-term holiday let previously lawfully used as a dwellinghouse back to a dwellinghouse, Part 2 of this Policy does not apply.**

7. **Proposals for new and upgraded visitor attractions will be supported in the Resort Area, where they will not compromise residential amenity. Proposals that include evening or night-time public opening hours must submit supporting information in line with Policy E4.**

8. **Proposals seeking to introduce a new use in close enough proximity to an established use that would harmfully impact the operation of the incoming use must include mitigation of the negative impacts. Where mitigation is not possible, the incoming use may not be compatible with its proposed setting.**

Policy E6: Outdoor Visitor Accommodation

7.128. The tourism sector is a significant part of the Borough's local economy, providing investment opportunities and generating employment. Outdoor accommodation such as caravan and camping sites provide an important part of the overall visitor accommodation offer, accounting for 34% of Hastings' total visitor accommodation stock.

7.129. The standard of caravan sites is improving continually but given the sensitive location of several of the town's caravan sites, the council will encourage proposals which will mitigate their visual impact and enhance their appearance, such as tree or hedgerow planting for screening or the replacement of static caravans with less visually intrusive holiday accommodation. Any such development must be sympathetic to the surrounding area.

7.130. Caravan, camping and chalets accommodation should be provided on a seasonal basis only. Assurance that the premises shall not be occupied as a person's sole place of residence will be dealt with by condition of any planning permission.

Policy E6: Outdoor Visitor Accommodation

Proposals for the provision of new, expansion of, or improvement to existing lawful caravan, chalet and camping sites and other forms of outdoor visitor accommodation will be supported subject to the following:

1. **acceptable impact on local and landscape character, particularly in relation to the impact on the High Weald National Landscape;**

2. **the proposal would not have an adverse impact on the living conditions and amenity of nearby residents;**

3. **facilities on site directly relate to and are required by the holiday use of the site;**

4. **accommodation provided through the proposal would have an acceptable standard of amenity;**

5. **the anticipated traffic generation will not harm highway safety and the location is accessible by a range of means of transport, including walking, cycling and public transport;**

6. **provision of pitches for touring caravans or campers is retained;**

7. **the proposal retains and incorporates new green and blue infrastructure appropriate to the setting;**

8. **The accommodation is occupied on a seasonal basis, secured through a planning condition or Section 106 legal agreement.**

The proposal will be assessed against all other relevant policies in the Plan.

Part three - Sustainable Communities

7.131. National planning policy makes it clear that local plans should reflect the presumption in favour of sustainable development and the strategic policies set out in Chapter 4 respond to this requirement.

7.132. This section of the Plan sets out the council's planning approach on a range of issues underpinned by the principles of sustainable development, in order that we can deliver truly Sustainable Communities. Policies in this section are prefixed with 'SC' to reflect their contribution to the development of sustainable communities, both now and in the future.

7.133. These policies focus on ensuring development within the Borough is resilient to the effects of climate change, both now and in the future, and work to safeguard the health and amenity of all residents. Policies also safeguard our most important natural and man-made spaces and habitats.

7.134. Sustainable communities' policies provide detailed guidance setting out our approach on matters including design and access, biodiversity net gain, green and blue infrastructure, sport and recreation, open spaces, community facilities, heritage and conservation, Ancient Woodland, pollution, nuisance and hazards, and flooding and coastal change.

7.135. The policies in this section are grouped by thematic area in the order set out through the strategic policies in Chapter 4. There are five thematic policy areas that correspond to Delivering Good Design; Protecting and Enhancing the Historic Environment; Conserving and Enhancing the Natural Environment; Managing Environmental Risk and Hazard and Supporting Communities.

7.136. A number of these policies require technical assessments. It is recommended that these are not produced in exclusivity of each other. For example, land stability reporting, contamination assessments, flood risk and drainage reports can be produced together. These reports in turn may inform green and blue infrastructure designs, Urban Greening and arboriculture plans. Unless otherwise stated within the policy, there is the potential for all policies within this section to apply to all sites.

Delivering Good Design
Policy SC1: Key Design Principles Policy SC2: Housing mix, Accessibility and Adaptability Policy SC3: Sustainable Design and Construction Policy SC4: Alteration and Extension of Dwellings
Protecting and Enhancing the Historic Environment
Policy SC5: Proposals Affecting the Significance and Setting of Heritage Assets Policy SC6: Sustainable Development and Heritage Protection Policy SC7: Changes to building elevations and roofs in Conservation Areas Policy SC8: Shopfronts, Advertisements and Commercial Frontages
Conserving and Enhancing the Natural Environment
Policy SC9: The High Weald National Landscape and Other Areas of Landscape Value Policy SC10: Habitat Protection, Biodiversity and Net Gain Policy SC11: Trees and Woodland Policy SC12: Green and Blue Infrastructure Policy SC13: Urban Greening Factor Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities
Managing Environmental Risk and Hazard
Policy SC15: Ground Behaviour, Geodiversity and Land Stability Policy SC16: Flood Risk and Drainage Policy SC17: Coastal Change Management Policy SC18: Pollution and Hazards Policy SC19: Environmental Nuisance
Supporting Communities
Policy SC20: Community Facilities

Policy SC1: Key Design Principles

7.137. Good design is a vital component of sustainable development and helps to create a sense of place and enhance the lives and health of those who live, work and visit our borough. New development, which demonstrates a good design standard, will ensure that Hastings will be recognised for its architectural merit, and the high quality of its built environment.

7.138. Creating high quality buildings and places is fundamental. Policy SC1 sets out the key design objectives that we consider critical in delivering high quality development. These must be considered at the outset and throughout the design process. The council will support development that meets these objectives. Developers should take account of all relevant guidance including the Government's priorities for well-designed places set out in the National Design Guide (2019) or any updated versions of this document and future locally produced design guides or codes and neighbourhood plans as applicable.

7.139. All proposals should take account of the local context, including the local character and existing features and should promote and reinforce local distinctiveness. Important local features, both within the landscape and built environment, should be retained as part of the proposal. This context-led approach should be set out clearly in the Design and Access Statement for major developments and demonstrate how they reflect the local character.

7.140. Where an innovative architectural approach is proposed, such schemes will be assessed on their merit. Contemporary designs and high-quality modern interpretations of distinctive and significant local characteristics will be welcomed where they are demonstrably appropriate to the site context and make a positive contribution to the wider environment.

7.141. The High Weald Housing Design Guide has been prepared by the High Weald National Landscape Partnership to give succinct, practical and consistent advice to set clear urban design expectations for new housing development within, or affecting the setting of, the HWNL. It aims to help to ensure higher quality and landscape-led design that reflects intrinsic High Weald character, and is embedded with a true sense of place, without stifling innovation and creativity, including responding to the historic pattern and character of settlements in the siting, form, layout, grain and massing of development, along with high quality architecture.

7.142. Securing high quality design is about more than just aesthetics. It is important that new development delivers sustainable, healthy, inclusive and mixed communities in order to create successful places where people want to live, work and play. New development should be designed to be accessible and connected to ensure that the needs of all users including for example, elderly, those with disabilities, those with dementia, and the needs of parents and carers are met. Proposals should consider incorporating the guidance around

‘Active Design’[lxiii], the ‘Building for a Healthy Life toolkit’[lxiv] and the ‘Dementia and Planning Practice Guide’[lxv] to ensure these needs are met.

7.143. It is important that the places that we create are safe. To ensure that the development we deliver is designed to reduce the opportunity for crime, as well as the fear of crime itself, proposals should consider incorporating design principles of crime prevention through environmental design.

7.144. New homes should be designed to ensure adequate privacy and amenity for existing and new residents to enable them to enjoy their homes without undue intrusion from neighbours or the public. National guidance supports the ‘agent of change’ principle and new developments should ensure that they will not create an adverse impact on existing neighbouring uses and mitigate against potential adverse impacts for future occupiers.

7.145. While other policies of this plan set out how mitigating and adapting to the effects of climate change should be addressed with regard to specific themes and building typologies, SC1 sets out the need to design a public realm that is capable of achieving a comfortable micro-climate from the point of first occupation, for example without the need for green and blue infrastructure measures to mature over a period of years. Likewise, private outdoor areas should be designed with the potential for year-round use in mind.

7.146. Applicants are encouraged to use the council’s pre-application service to ensure that clear advice is given regarding development prior to the submission of a planning application. This could reduce overall cost and time to develop a project, reduce risk by identifying and addressing potential issues early on and help to highlight alternative solutions that would be more acceptable.

Policy SC1: Key Design Principles

1. **Development should make a positive contribution to the quality, character, local distinctiveness and sense of place in Hastings. The council will support high quality development that:**

    a. **Responds to:**

        i. **the existing character and appearance, including layout, scale, massing, siting, building lines, landscaping, materials, urban grain and street pattern; and,**

        ii. **the complex topography of Hastings considering the impact from key viewpoints; and,**

        iii. **enhances the landscape character of the area, with regard to the High Weald Housing Design Guide where residential development is proposed in or affecting the setting of the High Weald National Landscape.**

    b. **Maximises opportunities for active travel that supports and encourages walking and cycling. 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.**

    c. **Ensure developments maximise opportunities to be accessible for all, including but not limited to people with a physical, psychiatric, cognitive or sensory impairment.**

    d. **Provides a high standard of living conditions ensuring a healthy environment for future occupants including a comfortable micro-climate, account should be taken of the local climatic conditions. This should include consideration as to how this will be achieved within the public realm and private outdoor areas from the point of first occupation.**

    e. **Ensures that biodiversity, climate adaptation and mitigation measures have been incorporated into the overall design and not just at building level, including through the delivery of multifunctional green and blue infrastructure within the public realm and transport corridors.**

2. **By virtue of its design, scale, built form, height, mass, density or proposed use would not result in adverse impact on the amenity (privacy, over shadowing, loss of daylight, noise, light pollution, crime and disorder) of neighbouring residential and or commercial properties or the local environment including public realm;**

3. **Have regard to the principles of crime prevention through environmental design, with reference to any relevant design guidance;**

4. **In addition to the above, where taller buildings are proposed in the Borough, these should be supported by modelling of views and should:**

   a. **Avoid negative impacts on the skyline and any landscape views and views to and from heritage assets or on the setting of heritage assets; and,**

   b. **Avoid/mitigate against any adverse micro-climatic effects such as sun, reflection/glare, wind and overshadowing of open spaces or waterways; and,**

   c. **Demonstrate that there is no harm to residential amenities of nearby properties.**

Policy SC2: Housing mix, Accessibility and Adaptability

7.147. This policy is the second of two policies that deal with the accessibility of new development. Whilst SC1 relates to delivering fully inclusive design, this policy (SC2) deals with providing an appropriate mix of different types and tenures which are capable of meeting the needs of occupiers at different stages of their lives. New homes need to be future proofed in terms of accessibility and adaptability. The Hastings and Rother Strategic Housing and Economic Needs Assessment (HEDNA) identifies a need for all housing types and tenures within Hastings to address demand for housing[7]. It includes an overall housing mix range of:

- 1-bedroom: 20-25%
- 2-bedroon: 30-35%
- 3-bedroom: 30-40%
- 4+-bedroom: 10-15%

7.148. New housing must support the needs of the borough's existing and future population by including affordable and market homes of the type, size and tenure needed by residents. However, specifying housing mix can have implications, both for development feasibility and viability as well as for local character. Therefore, whilst it is important to manage the mix of housing provided on new developments, this should not be a formulaic exercise, and a practical balance must be taken.

7.149. How this housing mix is applied to individual development sites should therefore take account of the nature and location of the site. For example, larger sites are more likely to be capable of delivering a range of dwelling size and tenure types. Conversely smaller sites, such as infill development or conversions may reduce the housing mix. Where a proposal includes on-site affordable housing as part of a mixed-tenure development, it should be well-integrated with market housing. Good integration benefits community cohesion and increases the legibility of a site by creating open and inclusive public spaces. It is the council's expectation that all residents should experience the same build quality and design features including, but not limited to, equal access to communal spaces (including those for play and recreation), transport and access routes, main residential entrances and circulation routes free from any form of segregation.

7.150. Affordable housing requirements are set out in Policy SP2. The council will also support a range of open market tenures to meet different needs including both build to rent and self-build development subject to proposals complying with other Plan policies.

[7] Housing and Economic Needs Assessment (2023)

7.151. Housing is more than just delivering numbers, and the council expects that homes should be designed to ensure that sufficient space is available for future occupiers to ensure a high-quality standard of living. The Government has produced a 'nationally described space standard' which local plans can adopt to ensure that homes are designed with sufficient internal space. The standard sets out the minimum acceptable gross internal area in square metres depending on the number of bedrooms, the number of intended occupiers and the number of storeys. The council has produced a Housing Space and accessibility Standards document which evidences the requirement for the implementation of the nationally described space standards in Hastings. Any deviation from the minimum space standards must be robustly justified.

7.152. The council expects proposals for residential development to demonstrate how the proposed accommodation is functionally fit for purpose and has been designed to meet the specific needs of the occupants with reference to the national standard. To allow assessment of compliance of a development against the Nationally Described Space Standard it would be helpful if planning applications clearly state on all appropriate plans:

- The internal area (m^2) of every bedroom and the number of intended occupants for each bedroom in each different type of dwelling on the site;
- All specific storage spaces and its internal area (m^2) in each different type of dwelling on the site; and
- The overall gross internal area (m^2) of each different type of dwelling on the site.

7.153. The continuing trend towards working from home is resulting in a corresponding desire for dedicated homeworking space within new homes. The desire to accommodate office space at home is expected to be reflected in a demand for extra or larger bedrooms or additional reception rooms. To ensure a flexible approach the council will be supportive of dedicated home office space which meet minimum standard requirements set out by the Health and Safety Executive to ensure reasonable working conditions for occupants.

7.154. The Hastings population is living longer and there is an increasing proportion of those aged between 65-79 reflecting an ageing population[8]. The associated health risks, such as dementia, and mobility issues require development to consider accessibility and adaptability issues for all users. The Housing and Economic Development Needs Assessment (HEDNA) (2024, addendum 2026) identifies that there is currently not enough housing which is flexible and adaptable enough to provide a suitable living environment for people as their needs change to promote independent living. Inclusive housing design is about ensuring that new housing is easily adaptable and capable of meeting the needs of a wide range of people,

[8] Housing and Economic Development Needs Assessment (2023)

including those with a physical disability. In particular, inclusive design should make access possible for all potential occupants and visitors by making the entrance and ground floor step-free, making sure that doors and stairs are wide enough for disabled users and allowing easier and cheaper adaptations to take place.

7.155. To allow assessment of compliance of a development against the M4(2) and M4(3) wheelchair adaptable building regulations, submitted drawings should clearly state on all appropriate plans:

- The required number and mix of M4(2) and M4(3) wheelchair adaptable and wheelchair accessible dwellings;
- Provide measurements of the specific design requirements both regulations require, as outlined in the relevant sections of the established 'Access to and use of buildings: Approved Document M' in each different type of applicable dwelling on the site; and
- For M4(3) accessible dwellings, the combined floor area for living, dining and kitchen space (m^2) in each different type of applicable dwelling on the site.

Policy SC2: Housing mix, Accessibility and Adaptability

1. **The council will require 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.**

2. **Affordable housing should be well-integrated with market housing in terms of site layout, appearance, detailed design, build quality, materials and with equal access to residential entrances and communal spaces.**

3. **Development should provide adequate indoor and outdoor space for occupants. Proposals for new residential development will be required to:**

   a. Meet the Nationally Described Space Standards, or any successor.

   b. Ensure attractive, well designed, useable private outdoor spaces (balconies or gardens) are provided unless:

   - **Safety considerations mean this is not feasible; or**
   - **in respect of balconies, it would harm neighbouring residential amenity or space limitations would prevent the provision of a balcony.**

   c. Where a home office is proposed as part of a dwelling, the internal floor area must comply with the size requirements set out in the L24: Workplace Health, Safety and Welfare Regulations 1992: Approved Code of Practice[9]

4. **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. Proposals for residential development will be required to:**

   a. Target all new homes to meet M4(2) Accessible and Adaptable standards; and,

   b. Where there is an identified need on the council Housing Register, sites that provide affordable housing in line with Strategic Policy SP2 will, as part of the affordable housing requirement, need to provide 10% of the total housing requirement to meet M4(3): Category 3 - Wheelchair Accessible Dwellings; and,

[9] Workplace health, safety and welfare - L24 (hse.gov.uk)

c. Provide powered lift systems to all floors, for any new flatted or commercial buildings of three storeys or more. The lifts should be designed to allow for their use by disabled people, people with mobility impairments and particularly those who use wheelchairs.

Policy SC3: Sustainable Design and Construction

7.156. Strategic Policy SP5 sets out the council's overarching position that new homes and commercial premises should be net zero carbon and use as little electricity and water as possible to help ensure that residents and businesses benefit from greater financial security. It is the council's position that a key consideration in whether housing is truly 'affordable' should not only refer to the tenure of a building, but the cost of operating it.

7.157. The same is true of commercial premises, with low operating costs being essential to the ability of local businesses to thrive. Hastings' business profile is dominated by small and micro enterprises and the visitor economy, which is typical of the East Sussex administrative area[lxvi]. These smaller businesses have increased vulnerability to economic shocks and the impacts of climate change. The East Sussex Prosperity Strategy[lxvii] identifies a need to build business resilience to climate change, citing the 'profound uncertainties' that are likely to characterise the period to 2050.

7.158. Carbon budgets are limits on greenhouse gas emissions that help guide the transition to net zero. For Hastings, this means operating within a steadily decreasing allowance of carbon dioxide equivalent (CO2e) emissions over time. Based on 2023 emission levels of 0.22 million tonnes of CO2e (MtCO2e), current emissions reductions are not occurring quickly enough to remain within the borough's remaining carbon budget, making achieving net zero out of reach if every effort is not made to reduce local emission levels.

7.159. Buildings are the largest source of carbon emissions in Hastings, with housing the largest source of all, and improving their energy performance is vital to tackling climate change, cutting running costs, and improving health and wellbeing. Planning policy should therefore be strengthened to promote the design and construction of new homes that are climate-resilient, energy efficient, and aligned with net zero ambitions. This should include encouraging the use of the most sustainable materials, low carbon technologies and high energy-efficiency standards available.

7.160. Achieving net zero carbon development isn't only linked to environmental objectives, but to the quality of life experienced by local residents. Many of Hastings' older homes have poor energy efficiency, resulting in higher heating costs and increased vulnerability to rising energy prices. Improving the energy performance of residential properties through retrofit and low-carbon heating measures has the potential to reduce household energy bills, improve thermal comfort and health outcomes, and help alleviate fuel poverty while simultaneously reducing carbon emissions.

7.161. Operational carbon emissions associated with new buildings (that meet current building regulations) are still very significant. They are not energy efficient enough, they continue to use fossil fuels for heating and hot water, and likely generate very small amounts of renewable energy, if any. In

summary, they keep contributing to the problem of climate change and are not compliant with international, national and local carbon reduction and Net Zero commitments. They keep on using far too much of the local carbon budgets and that is not sustainable. They also create a retrofit burden, likely to require retrofit before 2050 to support the transition to net zero.

7.162. Addressing the energy efficiency of the housing stock by ensuring new buildings achieve net zero carbon is therefore a key component of achieving both the Council's climate objectives and wider social and economic priorities. As stated in the opening paragraph, in the context of 'affordable housing', it is the council's position that this should refer to housing 'in the round' and include the affordability of both tenure and household bills in order to address twin levers driving the local housing crisis described in the policy justification of SP2.

7.163. In the Hastings context, a Net Zero Carbon building uses a fabric first approach, has a low level of total energy use, is fossil fuel free, generates its own renewable energy (enough to match its energy use where this is possible), and minimises embodied carbon.

7.164. National Planning Policy resists setting standards that exceed or deviate from the standards set out in the Building Regulations (Part L) other than where it is locally justified and viable and has a clear calculation methodology, with the exception of water efficiency standards which are justified through a clear local need.

7.165. Policy SC3 sets specific and measurable local standards informed by the council's Net Zero Policy – Technical Evidence Base, to be set out in an Energy Strategy Report to accompany major development proposals[10] including:

a. Space heating demand (SHD) and energy use intensity limits (EUI), through predictive energy modelling to be calculated using PHPP[11] for domestic typologies and following CIBSE TM54 methodology for non-domestic typologies;

b. Renewable energy generation, calculated annually and provided in comparison to the EUI;

c. Lean building design, including a justification and elemental analysis of upfront embodied carbon expressed as KgCO2e/m2;

d. Whole life carbon reporting, using WLC calculation results carried out in line with RICS WLCA PS v2 2023, or subsequent version;

[10] Major residential developments are between 10 or more dwellings or a site area of 0.5 ha or more where the number of dwellings is unknown. Non-residential major development are of floorspace of 1,000 m2 or more.
[11] Passive House Planning Package

7.166. As set out in the justification to SP13, Hastings has an intricate relationship with water consumption and effluent discharge. Hastings is an area that is both subject to serious water stress (as classified by the EA) and susceptible to sewer flooding in localised areas during periods of heavy rainfall. Increasing the water efficiency of dwellings through measures such as rainwater and greywater capture and recycling through SuDS, and reducing consumption through other measures to limit the amount used allows for a reduction of impact on local water demand and increases available sewer capacity during these periods of heavy rainfall. A local water efficiency target will ensure that new development contributes to the long-term sustainable management of water resources. By reducing household water consumption, the policy will help address regional water scarcity, reduce pressure on water supply and wastewater infrastructure, support climate resilience, and align development with national planning policy and Southern Water's long-term water resource strategy.

7.167. Heavy water consumers, like data centres, must seek to meet their water demand with as neutral an impact as possible in order to both reduce burden on water resources and sewer systems and to prevent a higher than anticipated volume of treated effluent entering sensitive marine waters.

7.168. Hastings is already highly developed, and existing buildings offer opportunities to have an extended productive life through retrofit. Developments involving existing buildings must prioritise retrofit over demolition and rebuild, thoroughly exploring the potential for retaining and retrofitting where this is possible. This may include through extension or alteration to the existing building.

7.169. Where partial or total demolition is sought, full justification is required. This must include:

7.170. Explanation as to why the existing building cannot be retained, providing evidence to this effect. This should go beyond saying a building is ‘low quality’ or ‘not fit for purpose’ and can include an assessment of:

- Structural condition - by means of a structural engineers report
- Contamination (e.g. asbestos)
- Visual/importance of the architecture in streetscape/location
- Meeting needs of users – Is there bespoke operational requirements, or compliance with other legislation/regimes which could not be provided through the repurposing, adaptation and/or extension of the existing building(s)?
- Service life/maintenance of fabric and systems – by means of an architectural and building services report.

7.171. The purpose of the new building and whether this is a change of use. How much demolition is proposed?

7.172. Percentage of envelope and structure to be retained?

7.173. Justification of partial or total demolition by building layer (skin/shell, foundations/ structure/frame, building services, and space plan/interior).

7.174. For large-scale new and retrofit developments (50 dwellings or more or a minimum of 5,000m2 of non-residential floorspace), if the existing building on-site is considered for demolition, a material analysis of the existing building should be carried out and include recommendations for reuse of building materials in a pre-demolition audit.

7.175. Justification of demolition is not required in certain rare cases, where rapid demolition may be necessary due to an immediate threat to the safety for people, infrastructure or habitat. For example, the safe and swift removal of overhanging buildings following a serious landslide event, where demolition has been ordered by a regulatory body.

Policy SC3: Sustainable Design and Construction

<u>Approach to retrofit</u>

1. **Where it is not in the interests of resolving immediate threats to public safety, the council operates a presumption against the demolition of buildings in favour of their re-use through retrofit. Proposals involving the partial or total demolition of existing residential or non-residential buildings must provide a justification for this approach. The justification must include:**

    a. **The purpose of the new building and whether this represents a change from previous use; and,**

    b. **The amount of demolition proposed; and,**

    c. **The percentage of envelope and structure to be retained; and,**

    d. **Justification of partial or total demolition by building layer; and,**

    e. **Evidence backed explanation as to why existing building cannot be retained.**

2. **Proposals for major development of 50 or more dwellings or 5000sqm of non-residential floorspace involving the partial or total demolition of an existing building must comply with 1a-e above and provide a material analysis of the existing building and include recommendations for re-use of building materials in a pre-demolition audit.**

<u>Approach to new buildings</u>

3. **Proposals for major development must be supported by an Energy Strategy Report produced by a suitably qualified person demonstrating that:**

    a. **The proposal is capable of being fossil fuel free in the respect that:**

        i. **The proposal does not connect to the gas grid, with the exception of provision for green gas export as set out in Policy ID4;**

        ii. **The proposal does not utilise fossil fuels on-site to provide space heating, domestic hot water or cooking.**

        iii. **Space heating and domestic hot water must be provided through low carbon fuels.**

b. **The proposal meets Space Heating Demand (SHD) and Energy Use Intensity (EUI) limits, as demonstrated by predictive energy modelling using Gross Internal Area (GIA) that:**

   i. **Flatted dwellings must achieve a SHD of no more than 15 kwh/sqm/yr and houses of no more than 20 kwh/sqm/yr; and,**

   ii. **All dwellings must achieve an EUI of no more than 35kwh/sqm/yr.**

   iii. **Non-domestic buildings must achieve a SHD of no more than 15kwh/sqm/yr; and,**

   iv. **Non-domestic buildings must achieve an EUI of no more than the following by building type or nearest equivalent: Offices, 70 kwh/sqm/yr and Industrial, 35 kwh/sqm/yr.**

c. **Upfront embodied carbon has been considered and reduced where possible through efficient design, evidenced through:**

   i. **A non-technical summary of efforts made to design a lean, low carbon structure and building design; and,**

   ii. **A clear justification where large volumes of material are proposed to be used due to specific design features; and,**

   iii. **An elemental analysis of the upfront embodied carbon (kgCO2e/sqm) associated with two external wall options and two structural options; and,**

   iv. **A non-technical summary of steps taken to design for and drive a circular economy.**

d. **Renewable energy must be generated on-site for all proposals. The amount of energy generated in a year should match or exceed the predicted annual energy use of the building. Where this is not technically possible, it must be demonstrated through the Energy Strategy Report how on-site renewable energy generation has been maximised.**

4. **Proposals for minor development should seek to demonstrate compliance with 3a-d above.**

5. **Minor and major proposals for residential development must be capable of achieving a maximum water use of 100 litres per person per day as built. Proposals capable of achieving further reductions in water use, to a maximum use of 85 litres per person per day will be supported.**

6. **The Energy Strategy Report for proposals involving large major development of 50 or more dwellings or 5000sqm of non-residential floorspace must also:**

    a. **Calculate and report against life cycle stages A-C (including B6/B7); and,**

    b. **List the top five materials by weight and by life cycle embodied carbon emissions (A-C, excluding B6-B7); and,**

    c. **List the expected replacement cycle lengths for the top five highest embodied carbon materials; and,**

    d. **Make recommendations regarding how the highest embodied carbon materials will be treated at end-of-life, and provide circular economy metrics for the materials identified through 4(b).**

7. **Confirmation that the development has been constructed as designed shall be secured by condition, to be discharged upon the receipt of an as-built Energy Strategy Report.**

8. **To preserve water supply, safeguard sewer capacity and reduce potential for impact on protected habitats, proposals for data centres must additionally seek to demonstrate that:**

    a. **They are capable of meeting their water used demand through the recycling of greywater and rainwater, including from the municipal system with consent from the undertaker; and,**

    b. **They will achieve zero liquid discharge to the sewer system.**

Policy SC4: Alteration and Extension of Dwellings

7.176. The majority of planning applications involve extensions and alterations to existing dwellings, although many extensions can be carried out under permitted development rights.

7.177. While it is important that people are able to adapt existing accommodation to suit their needs, it is equally important that any alterations do not detract from the character of an area, individually or cumulatively. Careful design of home extensions and alterations, however, can enhance both the appearance of the individual property and local character, so creating desirable places to live. Applications for householder developments therefore need to particularly consider issues of amenity, lookout, proportion, scale and harmony with the street scene and have regard to biodiversity.

7.178. Existing buildings may support biodiversity, for example, roosting bats and nesting birds, the presence of which must be assessed with appropriate mitigation and/ or compensation secured.

7.179. Amenity is usually understood to mean the effect of a development on visual factors in the immediate neighbourhood or vicinity of a site. Relevant factors include loss of privacy, light, outlook, parking, landscaping and open space; overshadowing; and the creation of an overbearing sense of enclosure.

7.180. Unsympathetic extensions can affect the outlook of and light to habitable rooms of neighbouring homes. Natural light is an important element in a good quality living environment. Effective orientation of buildings and windows can reduce the need for electric lighting, while sunlight can contribute towards meeting some of the heating requirements of homes through passive solar heating.

7.181. The Building Research Establishment's (BRE's) document ‘Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2011) sets out a helpful 45 degrees test for determining the acceptability of an extension in terms of its potential impact on neighbouring dwellings. The 45-degree test is used for extensions that are perpendicular to a window, as shown in Figure 39:

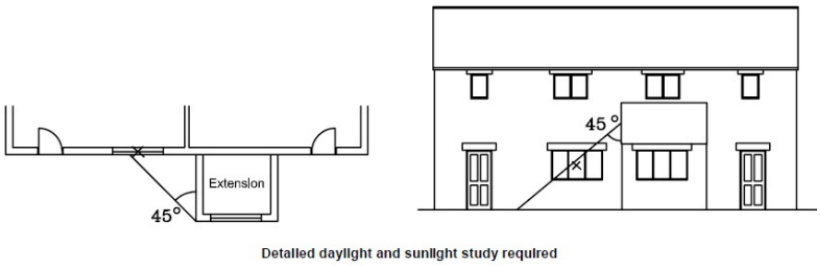

Figure 39: Diagram of the 45 degrees test.

7.182. Where the 45° test is not met, it may still be shown that natural light levels are acceptable, subject to checking using the BRE's detailed tests, including:

- Vertical sky component;
- Daylight distribution / no skyline (where room layouts are known);
- Average daylight factor; and
- Annual probable sunlight hours.

7.183. The same general principles will also apply in assessing the impact of new build residential development on existing dwellings neighbouring or close to the new proposal.

7.184. The proportion and scale of extensions and alterations should generally be subordinate to the original building. For the purposes of this Policy, 'original' means as existing on 1 July 1948 or in relation to a dwelling built after that date, as so built, unless the dwelling has subsequently been replaced. This is to avoid the impact of cumulative extensions over the consequent years.

7.185. The overall balance and harmony of a street scene can aid the overall legibility. Proposals for extensions and alterations should reflect the reflect the form, scale and architectural style of the original building and area. This can be achieved by:

- Respecting the proportions, integrity and character of the original house;
- Using an appropriate roof form;
- Matching or reflecting materials and details; and
- Matching and reflecting window styles and positions.

7.186. As with Policy SC1 above, where an innovative architectural approach is proposed, such schemes will be assessed on their merit. Contemporary designs and high-quality modern interpretations of distinctive and significant local characteristics will be welcomed where they are demonstrably appropriate to the site context and make a positive contribution to the wider environment.

7.187. In circumstances where extensions or alterations are within the curtilage of a listed building, a building that is a heritage asset or a conservation area, it may be difficult to achieve an acceptable design. Where these proposals cannot be sited and designed in an acceptable way they will not be supported.

7.188. Where a proposed extension site is in Flood Zone 2 or 3, a site-specific Flood Risk Assessment is required that is appropriate to the scale, nature and location of the development. Householder development is not subject to a flood risk sequential test or exception test but should still meet the requirements for Flood Risk Assessments. The Flood Risk Assessment should be proportionate to the scale of the proposal.

7.189. Increased rainwater discharge, either directly or indirectly, into the foul sewer network is detrimental to the network as a whole and has the potential to lead to increased sewer flooding and harm the environment. To minimise the risk of sewer flooding and to protect water quality, rainwater drainage for extensions and annexes will not be permitted to discharge into the foul network. Southern Water, in its capacity as the sewerage undertaker, will expect all proposals to comply with National and Local Standards for SuDS and will resist new connections of surface water to public networks unless evidence demonstrates that no other options are technically feasible.

7.190. Policy SC4 should be read in conjunction with other key design policies in the plan including Policies SC1, SC2 and SC3.

Policy SC4: Design - Alteration and Extension of Dwellings

1. **Alterations and extensions to dwellings should:**

   a. **Reflect the scale, proportions, materials, roof line and detailing of the original building; and,**

   b. **Not have a detrimental impact on the street scene, either by themselves or cumulatively;**

   c. **Protect the residential amenity of neighbouring properties and avoid unacceptable overlooking and loss of privacy;**

2. **Applications for extensions to dwellings will be supported where:**

   a. **The extension does not cause undue overshadowing of neighbouring properties and allows adequate natural light and ventilation to existing rooms within the building.**

      i. **Single storey extensions should be designed to fall within a 45-degree angle from the centre of the nearest ground floor window of a habitable room or the kitchen of the neighbouring property.**

      ii. **In the case of two-storey extensions, the 45-degree angle is taken from the closest quarter point of the nearest ground floor window of a habitable room.**

This applies to rear elevations of the neighbouring property and conservatories, if they meet standards for use as a habitable room. Patio or fully glazed doors will be treated as windows for this test;

   b. **Single-storey flat-roofed extensions are well-designed, and the proposed extension would not be generally visible from a public place and would serve only to be supplementary to the main building. Use of intensive 'green/ blue' roofs will be encouraged. Two-storey flat-roofed extensions will generally not be supported, unless the host building itself is of a flat roof design;**

   c. **Loft conversions requiring dormer extensions will be in proportion to the existing roof, thus maintaining overall building proportions. They should avoid presenting a top-heavy and flat-roofed appearance. Planning applications for extensions in roof spaces which front a highway will ensure that the proposed structure avoids damage to the architectural and aesthetic character of the existing building and maintains the integrity of the street scene;**

d. **The proposed scheme includes policy compliant biodiversity and greening interventions, such as Swift or other nesting boxes where appropriate;**

3. **To maintain the visual quality of the street scene and allow adequate private amenity space, extensions in advance of the principle elevation must meet the following criteria:**

    a. **The width of the extension should be less than or equal to half the width of the original frontage of the building;**

    b. **The depth of the extension should be less than or equal to half the depth of the garden;**

    c. **The extension should respect the building line to all streets onto which the building faces;**

    d. **The extension should be subservient to the building;**

    e. **The extension should be of materials that complement those of the existing building;**

    f. **Fenestration should complement the proportions and alignment of fenestration in the existing building;**

4. **Alterations and extensions to dwellings should not impact negatively on the amenity of other habitable buildings within the curtilage, for example self-contained annexes;**

5. **Alterations and extensions to dwellings must include policy compliant flood risk adaptation and mitigation for all sources of flooding, providing sustainable drainage solutions for surface water management;**

6. **Where there is potential for land instability, proposals should be informed by a suitably qualified structural engineers report;**

7. **Alterations and extensions must respect the character of the host building and its location and should not result in unacceptable harm to heritage assets (whether designated or not) or their setting.**

Policy SC5: Proposals Affecting the Significance and Setting of Heritage Assets

7.191. The NPPF stipulates that the council should take into account the desirability of sustaining and enhancing the significance of all heritage assets when determining planning proposals. Therefore, conserving the heritage interest, character, and appearance of locally important as well as nationally significant heritage assets is a material consideration in assessing planning proposals. The level of consideration and weight given to their preservation should be proportionate to the asset's significance.

7.192. Non-designated heritage assets will be identified through early discussions with applicants and, in the case of archaeological sites through partnership working with the County Archaeologist.

7.193. A key requirement of any proposal that may affect heritage assets is that the applicant demonstrates a detailed understanding of the significance of the heritage assets and the impact of their proposed development on both the heritage asset(s) and it's setting in the form of a Heritage Statement. The detail contained within the assessment should be proportionate to the proposed works.

7.194. The significance of a heritage asset is a measure of its cultural value to present and future generations because of its special interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from the heritage asset's physical presence, but also from its setting. Identifying and understanding significance will enable an applicant to assess the impact of a proposed development and to prepare an appropriate design that would preserve or enhance the heritage asset.

7.195. The council will encourage proposals for sensitively designed, high quality developments that preserve or enhance the significance of heritage assets and their settings. The reason for this is that historic areas and their setting have a significant local distinctive character and appearance which is part of their special interest. Development proposals that are guided by these values, and which are designed using appropriate materials and details, will be supported by the council where all other material considerations are acceptable.

7.196. Dependent on location, contemporary designs that utilise material and colour palettes to reflect local distinctiveness, and which respect the mass, scale, rhythm, and proportion of the prevailing historic context, will be supported by the council where all other material considerations are acceptable.

7.197. In addition to local distinctiveness, proposals will need to take into account the local topography. The hilly nature of the town, intercut with valleys, means that there are many areas or buildings which have extensive settings as they can be visually prominent from a distance, or they can be appreciated from

glimpsed views. This also applies to Hastings and St Leonards seafront, almost all of which is covered by conservation area designation. This area currently enjoys relatively unimpeded long views, which are a key element of area character. Proposals for development on or close to the coast must show that consideration has been given to the impact of new development on the setting of the Hastings and St Leonards seafront.

7.198. Early identification of key views will be essential and in more complex cases a formal views analysis will be required. Views and visual considerations are part of an assessment of the impact of proposals on the setting of heritage assets. Therefore, applicants will need to show that their proposals take in to account both the impacts of views towards their development and on the setting of heritage assets.

7.199. The council's objective is to retain existing heritage assets wherever possible. Where the loss of the whole or part of a heritage asset is permitted, the council must take reasonable steps to ensure the new development will proceed after the loss has occurred. Where consent is required for demolition of a heritage asset or building in a conservation area the council will only support this where detailed, well-designed proposals for the viable re-use of the site have been approved. Such schemes will need to be supported with robust evidence that there is a reasonable prospect of the development going ahead, in a timely manner, following the demolition. The council may seek to enter into an agreement, or impose a condition upon a decision, to ensure that demolition does not take place until a programme of works is agreed that ensures that development commences as soon as practical after demolition.

7.200. Where the loss of the whole or part of a heritage asset is permitted, the council must take reasonable steps to ensure the new development will proceed after the loss has occurred. The council will only grant planning permission for the demolition of a heritage asset where detailed proposals for the viable re-use of the site have been approved. Such schemes will need to be supported with robust evidence that there is a reasonable prospect of the development going ahead, in a timely manner, following the demolition. The council may seek to enter into an agreement, or impose a condition upon a decision, to ensure that demolition does not take place until a programme of works is agreed that ensures that development commences as soon as practical after demolition.

7.201. Relevant demolition in a conservation area requires an application for planning permission. This can include the removal of part of a building such as a significant architectural feature that provides a positive contribution towards preserving the character and appearance of a conservation area. Therefore, it is important that development proposals in conservation areas should seek to retain significant architectural features as part of the design to avoid the loss of significance and to preserve the historic area.

7.202. There are 6 scheduled monuments in the town, which are identified on the Local Plan Policies Map. In addition, the Policies Map identifies various areas

of the town recognised as being of particular archaeological importance. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. The council will therefore seek to ensure that where proposals affect a known archaeological asset or an area or building having archaeological potential, the archaeological importance of the site is suitably examined and evaluated. The council will therefore seek to ensure that where proposals affect a known archaeological heritage asset (including paleoenvironmental evidence) or an area or building having archaeological potential, the archaeological importance of the site is suitably examined and evaluated. Where possible, the council will encourage the preservation of significant archaeological heritage assets in situ.

Policy SC5: Proposals Affecting the Significance and Setting of Heritage Assets

Proposals that would affect the significance or setting of designated or non-designated heritage assets will be supported where they:

1. **Show that they have responded to the distinctive topography of Hastings and considered significant townscape views, to be demonstrated by a View Analysis.**

2. **Demonstrates how the proposal relates to the asset and its setting.**

3. **Respond sensitively to the historic context, street patterns, plot layouts, established building lines, boundary treatments, green space and landscaping, site levels, block sizes, siting, scale, height, massing, appearance, materials and finishes, and avoid the loss of significant architectural features.**

4. **Provide clear and convincing justification for the development, show a full understanding of significance of the heritage asset, and do not result in unacceptable harm to the significance of the asset.**

Policy SC6: Sustainable Development and Heritage Protection

7.203. It is the council's view that mitigating climate change and conserving heritage assets are compatible goals. This Policy aims to help applicants balance and reconcile these two objectives in a positive way, by promoting the role of heritage assets in achieving sustainable development in the Borough, and by encouraging development proposals that secure the sensitive adaptation of heritage assets to mitigate the challenges of climate change.

7.204. To combat the threats posed by climate change, our heritage assets need to be made more resilient as they will be at a greater risk to water damage, flooding, changes to ground conditions resulting from increased rainfall or drought, and changes in sea levels, which may cause damage to historic features or undermine the structural stability of a building.

7.205. Therefore, our heritage assets must continue to change and evolve if they are to contribute to a greener future and remain fit for purpose for present and future generations. Well-designed, sustainable proposals, based on a sound knowledge and understanding of heritage significance and traditional construction, both protect our built heritage, and help with progress towards achieving a low carbon economy and adapting to climate change.

7.206. Most traditionally constructed, older buildings are inherently sustainable: they are long lasting, robustly constructed, generally built from low-carbon materials and technologies, and are easily repairable. Therefore, keeping existing buildings in good repair and active use is one of the most beneficial and sustainable ways to preserve our heritage assets and lower our carbon emissions.

7.207. Buildings are one of the largest contributors of UK carbon emissions and can emit carbon dioxide throughout their whole lifecycle. Whole-life carbon is the sum of embodied and operational carbon emissions resulting from the construction and use of a building over its life (including its demolition).

7.208. Embodied carbon emissions are generated during construction, repair, maintenance, alteration, or demolition of buildings, including carbon emitted through the extraction, processing, and transportation of materials.

7.209. Adapting historic buildings appropriately to combat climate change does not just mean moving away from the use of fossil fuels and reducing carbon emissions, it also means adapting buildings in ways that protect the historic character and support the local economy. Many historic buildings are vernacular structures that can be maintained and repaired using locally sourced, durable, low-carbon materials. The use of locally sourced and locally manufactured materials, and the employment of local heritage craftspeople in carrying out specialist historic building repairs, is a sustainable approach that has local economic benefits, and which contributes to making beautiful and locally distinctive places.

7.210. Work on an existing building to improve its energy efficiency, by making it easier to heat, to retain that heat for longer, and by replacing the use of fossil fuels with renewable energy sources is commonly referred to as retrofit. The council recommends that a retrofit project should be in accordance with the 'whole-building approach' advocated by Historic England that uses an understanding of a building in its context to find balanced solutions that save energy, sustain heritage significance, and maintain a comfortable and healthy indoor environment.

7.211. When considering any retrofit works to a heritage asset the proposed works should:

- be effective in reducing carbon emissions without causing unintended consequences to the asset, such as causing damp and mould by impeding the breathability of the fabric.
- avoid harm to the significance of the asset. Where harm is identified, it must be reduced or mitigated by choosing retrofit options that cause the least harm possible.
- be a bespoke design for the individual building, as technical considerations and significance vary greatly from building to building.

7.212. A whole building, fabric first approach prioritises repairs, insulation, draught-proofing, and ventilation before introducing Low or Zero Carbon technologies. This is because a building that leaks heat wastes energy, whether it is from a renewable source or not.

7.213. Well-designed retrofitting proposals for heritage assets, and the installation of appropriate Low and Zero Carbon technologies, which help towards reducing carbon emissions and tackling the impact of climate change will be supported by the council. Development proposals that impact on heritage assets are more likely to gain support if their design is informed by an understanding of the impact of the proposal on the significance of the heritage assets they may affect.

7.214. In assessing the benefits of renewables and retrofit for heritage assets the proposals need to be assessed for their potential impact on the significance of heritage assets and their setting. Any harmful impact on the significance of a heritage asset would require clear and convincing justification that demonstrates that the benefits would outweigh the harm caused.

Policy SC6: Sustainable Development and Heritage Protection

The council will support development that achieves a sensitive balance between reducing carbon emissions locally and the statutory requirement to give special weight to preserving significance and securing the long-term survival of our heritage assets. Therefore, to ensure a sustainable future for heritage assets, sustainable development proposals for heritage assets should:

1. **Use sustainable building materials that are appropriate to the individual building, and which help towards preserving the character and appearance of the heritage asset. Where possible, the materials should be traditional materials that are distinctive to Hastings.**

2. **Adopt a whole building approach which incorporate measures to reduce energy consumption and / or generate energy supplies on site, provided the proposal would not result in unacceptable harm to a heritage asset.**

3. **Where appropriate, incorporate measures to protect assets from increased physical threats such as flooding, land instability, increased rainfall, and overheating, provided the proposal would not result in unacceptable harm to a heritage asset.**

Policy SC7: Changes to building elevations and roofs in Conservation Areas

7.215. There are circumstances where planning permission is required to change the building elevations and roofs of historic properties in a conservation area. The architectural features on visible elevations and roofs can be key elements of historic streetscapes, contributing greatly to the character and appearance of a conservation area, and so enhancing its overall significance.

7.216. Traditional windows and doors are crucial elements of historic streetscapes. Their size, style, proportions, detailing, opening arrangement and materials define the architectural style, period, and use of the building. Alterations to windows and doors can have a dramatic effect on individual buildings, and cumulatively, on whole streets and historic areas.

7.217. Windows and doors are the architectural features most vulnerable to inappropriate alteration and replacement in historic buildings. Historically, traditional windows were predominantly timber vertical sliding sash windows with proportionate sections and apertures that had a distinctive vertical emphasis, and doors were predominantly made from solid timber, sometimes with four or six timber panels. Over time other features were introduced such as glazed upper panels, fanlights, and side lights. These important architectural elements should be preserved as they provide a positive contribution towards preserving historic buildings and areas.

7.218. Traditional dormers or roof lights were located to provide a small amount of daylight and ventilation to the loft or attic rooms. Larger ones were sometimes used to light a stairwell. Lantern lights were often also used where more light was required to stairwells and other areas. Original dormers, rooflights and lantern lights can contribute to the building's character and the wider street scene.

7.219. As well as its shape and profile, the material used to cover a roof can contribute greatly to the significance, character and appearance of a building and the wider area. The hilly topography of Hastings means that the appearance of the roof often needs to be considered when looking down on the building from higher ground. Roofing material, will from time to time require replacement, having reached the end of its life. Where consent is required, permission will be given for replacement roof coverings where the material proposed is a close replica of the original roof covering in terms of materials, size, profile, pattern, and coursing. Alternative replacement roofing materials may be considered where the material satisfactorily reflects the existing material and would be used on a less prominent roof slope.

7.220. Other significant features at roof level, include for example, dormers, chimney stacks, turrets, party wall upstands and decorative ridge tiles, all of which can provide a positive contribution towards preserving the character and appearance of heritage assets.

7.221. These historic architectural features should be retained wherever possible, in order to preserve the significance of historic places. Where these features are incomplete or require replacement, the council will support proposals that include their repair and reinstatement so that the character and appearance of the building and the wider setting is preserved or enhanced.

7.222. The introduction of a roof light can be one solution to providing natural daylight and ventilation to a room in a roof. It may be preferable to constructing a dormer, where it is important to retain the original roof profile, or where dormers would be out of character with the building.

7.223. Due to the hilly nature of Hastings, roof lights, particularly when duplicated and arranged in a discordant fashion can have a negative impact on visible roofscapes in conservation areas. In these situations, roof lights should be kept to a minimum quantity and have a scale that is subservient and proportionate to the roof slope and the elevations below. To minimise their impact on the external appearance of the building and the wider area the roof lights should be restricted to roof slopes that are hidden from public view or positioned so that they do not dominate the roof slope.

7.224. Where dormers are proposed they should have a built form that reflects the character of the building and the wider setting, be of a modest scale, normally only a single or pair per roof slope, set down from the ridge, set back from the face of the building, and positioned so that they do not dominate the roofscape. The dormer windows should be modestly sized in comparison to the windows on the main building elevations and reflect the window style of windows on the lower storeys of the building.

Policy SC7: Changes to existing building elevations and roofs in Conservation Areas

In conservation areas, the council will seek to maintain the form and appearance of original features including windows, doors, roofs, and other significant architectural elements where these contribute to the character of the building and the significance of the wider conservation area.

Historic architectural features should be retained and repaired. Where this is not possible, and where appropriate, they should be reinstated to match existing features.

To ensure building alterations and development would preserve the character and appearance of heritage assets and their setting they should be designed in accordance with the following:

1. Windows, doors, and roof lights:

a. **Proposals for new windows or doors on existing elevations that are publicly visible within conservation areas will be expected to be a close replica of those originally fitted in the building in respect of size, form, appearance, proportions, materials, finishes, and opening arrangements.**

b. **uPVC and aluminium replacement windows and doors would only be acceptable where clear and convincing justification is provided for their use, they would reflect the original design, and they are either:**

    i. **on building facades hidden from public view; or,**

    ii. **part of a total replacement fenestration scheme on an isolated or detached building and where the replacements on the visible elevations do not harm the character and appearance of the conservation area. This does not apply to terraced or semi-detached buildings where the continuity of fenestration is important; or,**

    iii. **slim section windows are proposed that accurately reflect the original design and that would not harm the character or appearance of the building or the area.**

    iv. **In the case of replacement doors, the design must replicate the panel form and overall proportions of the original door.**

c. **New roof lights will require clear justification and should be restricted to roof slopes that are hidden from public view or positioned so that they do not dominate the roof. They must:**

i. **Sit flush with the roof covering;**

ii. **be kept to a minimum quantity and have a scale that is subservient and proportionate to the roof slope and the elevations below and;**

iii. **Be of traditional design in respect of size, proportions, appearance, materials (normally slender steel or cast-iron frames), finish, and opening arrangement.**

2. Changes to roofs:

i. **Where planning permission is required, permission will be given for replacement roof coverings where the material proposed is a close replica of the original roof covering in terms of materials, size, profile, pattern, colour, and coursing. Alternative roofing materials may be considered acceptable where the proposed roofing materials would not harm the significance of heritage assets.**

3. Chimney stacks and other architectural roof features:

i. **Proposals should maintain the existing visible silhouette of the roof where this contributes to building character and is a positive feature within the conservation area.**

ii. **There is a general presumption in favour of retaining prominent chimney stacks, which make a positive contribution to the character and appearance of the conservation area.**

iii. **The council will support the retention, repair, or restoration of architectural features at roof level such as turrets, party wall upstands and decorative ridge tiles where they contribute to significance. Where these features are incomplete or require replacement, the council will support proposals that include their repair and reinstatement.**

iv. **Where the removal of chimney stacks and other architectural roof features is proposed, clear and convincing justification must be provided for the loss.**

4. Roof dormers

There are circumstances where dormers are not acceptable. Where acceptable new roof dormers should be:

i. **of a design that reflects the character of the building and the wider setting;**

ii. **normally only a single or pair per roof slope;**

iii. **subservient to the existing roof and positioned so that they do not dominate the roofscape;**

iv. **are set down from the ridge and set back from the face of the building;**

v. **Designed with windows that are modestly sized in comparison to the windows on the main building elevations and reflect the style of windows on the lower floors of the building.**

Policy SC8: Shopfronts, Advertisements and Commercial Frontages

7.225. Hastings' shopfronts and commercial frontages are predominantly street facing elements with entrance doors, windows, and other significant features that contribute to the character and appearance of the host building and the wider townscape.

7.226. New and replacement shopfronts and commercial frontages, both individually and collectively, can significantly impact on the streetscape. Therefore, these elements must be designed to reflect the character and appearance of the host building and the wider area. A standardised approach may not be acceptable, especially in conservation areas, where a more sensitively designed, traditional scheme that sits comfortably into the site context may be required.

7.227. Historic shop fronts are traditionally constructed in timber, with slender, elegant, and ornate moulded details that add visual interest to the street scene. These architectural features, which are difficult to replicate using other materials, often provide the appearance of structural support to the upper floors of the host building and tend to be purpose made to fit large openings within the ground floor frontage of the host building. They have significant windows and doors, as well as other ornate architectural elements such as stallrisers, columns, facias, mullions, transom lights, pilasters, console brackets, panelled soffits and characteristic recessed entrances with decorative floor tiles.

7.228. They can also include integral fabric awnings to provide shading to the window(s), and hanging signs, all of which add visual interest to the host building and help to preserve the character and appearance of the street scene and the wider area.

7.229. Good quality, well-designed shopfronts and commercial frontages, that do not have vivid modern colours, and unmodified, garish, or detrimental corporate colour schemes and logos, can make a noticeable and positive contribution to the significance of a shopping area or street particularly when it is located within a Conservation Area. It can also provide a distinctive character and high-quality brand image for the business operating from the premises.

7.230. Hastings has several locally distinctive shopping areas that each have a high concentration of attractive traditional shopfronts and commercial frontages, including Old Town, Hastings Town Centre, and St. Leonards, all of which are designated Conservation Areas.

7.231. The decision on whether to repair or replace an existing frontage will depend on its age, quality, condition, its relationship to the host building and whether the original building's use is to continue or change. Although, there is a presumption in favour of retaining an existing traditional shop front where it contributes to the quality and character of a shopping area, a high quality, well-designed contemporary replacement frontage could be acceptable if the

design would contribute to the quality and character of a shopping area. However, for listed buildings and for buildings in Conservation Areas, the removal of an historic frontage would require clear and convincing justification.

7.232. Wide and bulky fascia boards, and those manufactured from inappropriate reflective or textured materials can harm the character and appearance of a shop / commercial front and the wider townscape. Facias must respect the character of the host building, generally be kept to a modest depth and be finished in a colour that is harmonious with the frontage. Security alarms, surveillance cameras, and exterior lights, can lead to clutter and should not generally be fixed to fascia. However, the use of small-scale LED lighting units and miniature cameras may be acceptable in certain circumstances.

7.233. Signs can have a major impact upon the character and appearance of a shopfront, especially when they are amalgamated to span across multiple buildings. Signage on shopfront facias must be kept to a modest scale and must reflect the character and appearance of the host building. Projecting or hanging signs that are of a good design quality and relate well to the size and scale of the shop façade will be acceptable when the need for them is supported by clear and convincing justification. Where projecting signs are acceptable, traditional painted hanging signs with appropriate lettering and symbols are recommended. Proposals for projecting box signs will be assessed on size, appearance, design quality, type of illumination, materials and finishes, and positioning.

7.234. The use of widespread, poorly designed illumination can be detrimental to the visual character of a shopfront, the host building, and the wider townscape. Illumination of frontages in sensitive locations, such as Conservation Areas and on listed buildings, should be mostly from the street lighting or achieved through sensitively located internal lights within the frontage window or host building.

7.235. New and replacement shopfronts and commercial frontages should be designed to provide full access for all users. Where this would cause harm to a heritage asset's significance, full access for all users should be weighed against the need to preserve significance, a range of options should be explored, and a balanced approach to access will be required.

7.236. The deterrence of shop break-ins and vandalism to shop windows require appropriate security measures. However, solid security shutters on the outside of shopfronts are discordant elements that obscure the shopfront and have a deadening effect on the street scene. The council will support designs that make the security measures integral to the shopfront design such as using laminated security glass, internally mounted open lath lattice roller shutters, and reinforced stallrisers. In less sensitive locations, other approaches may be acceptable.

Policy SC8: Shopfronts, Advertisements and Commercial Frontages

The council will require a high standard of commercial frontage design, particularly for proposals in Conservation Areas and/or affecting listed buildings.

Where an existing frontage contributes to the character and visual amenity of the building or area, this should be kept and repaired in a like-for-like manner using traditional materials, which is usually timber, with purpose run mouldings that match the existing, traditional sections.

Proposals for new shopfronts and commercial frontages, or the replacement of existing, will be supported where:

1. **they are well-designed, respect historic plan form and openings, include appropriate architectural detailing and features that reflect the age and character of the host building, and are free of visual clutter. They must also respect the host building's symmetry, vertical or horizontal emphasis, appearance, scale, materials and finishes, character, and upper floor fenestrations to form an integral, harmonious facade.**

2. **High quality, well-designed contemporary frontages are proposed that preserve or enhance the character and quality of a building or Area.**

3. **Fascias respect the character of the host building, have a colour finish that is harmonious with the frontage, and have a height that is proportionate to the frontage below.**

4. **Measures such as security alarms, surveillance cameras and exterior lights, are generally not fixed to the fascia. The use of small-scale LED lighting units and miniature cameras may be acceptable on frontages in less sensitive locations.**

5. **Signs should be kept to a minimum quantity and preserve the significance of the street scene and signage information limited to the name of the business, the nature of the business, and the street number.**

6. **In the case of traditional frontages, they are finished with traditional rich, recessive paint colours.**

7. **The shop frontage spans across several individual buildings the identity of the individual building or façade is maintained.**

8. **External illumination is integral to the overall design of the frontage, discreetly sited on the building and has a stable light source (non-**

flashing), with an intensity that does not cause harm to the setting and takes into account highway safety.

9. **Access is provided for all users, and that any harm caused to a heritage asset's significance is minimised and supported by clear and convincing justification.**

10. **Designs for security measures are integral to the design.**

Policy SC9: The High Weald National Landscape and Other Areas of Landscape Value

7.237. The High Weald National Landscape (NL) covers approximately 18% of the Borough and has the highest status of protection nationally in relation to landscape and scenic beauty.

7.238. The NL closely follows the Borough's administrative boundary to the north but to the east takes in the whole of Hastings Country Park Nature Reserve and the Hastings Cliffs Site of Special Scientific Interest and Special Area of Conservation. Hastings Country Park Nature Reserve represents the only place the NL is exposed to the sea.

7.239. Major developments should not take place in the NL save in exceptional circumstances.

7.240. In addition, the Combe Haven Valley and Combe Valley Countryside Park, in the west of the Borough, are recognised locally as a distinct landscape character area which will be protected and enhanced.

7.241. Development that is proposed in the High Weald NL, or affecting its setting, will need to have regard to the potential impact to the landscape character. Development proposals within the NL need to have regard to the purposes of the NL designation and will need to demonstrate how the proposal protects and enhances the landscape in accordance with NPPF policy.

7.242. Any development that is proposed in the Combe Valley or Combe Valley Countryside Park will need to have regard to the potential impact to the landscape character.

7.243. A suitable report will be required to support relevant planning applications. Assessments will demonstrate an understanding of the impact of any potential development, both within areas of landscape value and in their locality. Landscape and Visual Impact Assessment reports, assessments of impact on scenic beauty, and Design and Access Statements are all useful tools in this regard. Any scheme presented to the Local Planning Authority must reflect the findings of the landscape assessment and appropriate design of mitigation measures should be incorporated.

7.244. In relation to the NL, such assessments should specifically set out how proposals have been informed by the NL Management Plan and the defining components of character set out in the Management Plan that inform the natural beauty of the NL, and, where relevant, other High Weald design guides.

Policy SC9: The High Weald National Landscape and Other Areas of Landscape Value

1. **The High Weald National Landscape (NL) and other areas of landscape value including the Combe Valley countryside Park, are displayed on the Policies Map. The inherent visual qualities and distinctive character of these areas will be protected. Development 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.**

2. **Where development proposals have the potential to impact on a protected landscape or an area of landscape value, a landscape assessment will be required to understand the level of impact. Where impacts are identified proposals should incorporate the recommendations of this assessment.**

3. **Within the High Weald NL, 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. Development in the NL 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 NL Management Plan. Development proposals should be supported by a Landscape Assessment demonstrating how the scheme makes a positive contribution to the objectives set out with the Management Plan.**

4. **Land within the setting of the High Weald NL will need to take into account the potential impact on the natural beauty of the NL in its location and design.**

Policy SC10: Habitat Protection, Biodiversity and Net Gain

7.245. Biodiversity and well-functioning ecosystems are critical for human existence, economic prosperity, and a good quality of life. They are essential in providing food, energy, shelter, and medicines; sustaining water and soil quality; regulating the earth's climate; and providing opportunities for recreation, recuperation, and inspiration. Yet the UK is one of the most nature-depleted countries in the world. Since the 1970's, 41% of all UK species surveyed have declined while 15% of species within the UK are said to be threatened with extinction.

7.246. Areas of biodiversity and important habitat often overlap with areas designated for their geodiversity value such as the Hastings to Pett Beach SSSI. Hastings is comprised of sandstone, mudstone and clay beds with alluvial deposits in areas that are currently or historically riparian in nature. This geological framework is an important component to local habitats, and contribute to the varied landscape, natural heritage, hydrological regime and topography of the borough as well as in many cases literally providing the foundation for our built environment.

7.247. Within the High Weald National Landscape, BNG proposals should be informed by a robust understanding of the habitat typologies and systems of the High Weald, in order that they are designed to provide a genuine positive contribution to local biodiversity and habitats. Proposed enhanced or new habitats should function as a meaningful part of the wider Management Plan.

7.248. Some areas of the Borough that are particularly important for their contribution to their wildlife habitat should be protected. Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI) and Local Nature Reserve are statutory designations which identify areas of critical importance for biodiversity and must be protected. Local Nature Reserves (LNR) protect wildlife habitats and the natural heritage, but they also have a broader community role.

7.249. Local Wildlife Site (LWS) is a non-statutory designation applying to a site of Borough-wide importance. The designation seeks to provide recognition of the wildlife value of these sites to the local community and, where possible, to prevent significant damage arising from development.

7.250. Proposals will be expected to submit ecology reports appropriate for their scale and context. In addition to the site itself, reports must consider whether an intervention in one location may impact negatively on ecological networks, priority habitats or priority species in an adjacent or nearby site, and whether mitigations within a proposal site might have negative effects elsewhere.

7.251. During the validation process additional reports may be requested which are relevant for the development proposed. Should Preliminary Ecological Appraisals reveal that further surveys are required these will also be expected

to be submitted to the council. All ecology reports and assessments should be performed by a suitable qualified professional, for example members of the Chartered Institute of Ecology and Environmental Managers (CIEEM).

7.252. In the context of geology and hydro-ecology[12], proposals must consider that an intervention in one location may impact negatively on another due to how geological systems and water resources function, and whether mitigations within a proposal site or elements of its design might have negative effects elsewhere- for example, downslope or downstream. It is essential that ecological surveys take into account the findings of any surveys of hydrology, groundwater and ground conditions including land stability when making recommendations. The council's approach to geodiversity is set out in Policy SC15.

7.253. Government is committed to delivering more and better habitats for biodiversity and demonstrating measurable gains from development through the Statutory Biodiversity Metric. The Environment Act contains a mandatory minimum 10% biodiversity net gain condition for planning permissions. Biodiversity net gain is an approach to development, and/or land management, which leaves the natural environment in a measurably better state than beforehand. It should be noted that 10% represents an 'at minimum' position and exceeding 10% is encouraged where this is feasible and viable.

7.254. Development that adopts a biodiversity net gain approach seeks to make its impact on the environment positive, delivering improvements through habitat creation or enhancement after avoiding or mitigating harm.

7.255. Development proposals should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. The council will expect development proposals to demonstrate they are using the Statutory Biodiversity Metric and that the proposals will have positive gains for biodiversity and the natural environment with a minimum 10% threshold for biodiversity net gain. Preliminary Ecological Assessments will only be accepted where it is determined there would be no significant Ecological effects, no mitigation is required, and no further surveys are necessary.

7.256. Many existing buildings have the potential to support biodiversity, such as roosting bats, nesting birds and reptiles, the presence or absence of which must be assessed by a suitably qualified professional when ecological assessments are undertaken.

7.257. The council will expect all developments to comply with the British Standard BS 42021:2022 'Integral Nest Boxes, selection and installation for new developments' by installing integral swift bricks within new housing developments and other suitable developments, or other appropriate measure as informed by site specific surveys and/ or proposals of a typology to which

[12] How water interacts with plant and animal species in terms of importance to their habitat.

the relevant British Standard cannot be applied[13]. In some cases, external bird boxes may provide, either in combination with integral nest boxes or in place of, a more appropriate response to the findings of site-specific ecology reports. The Policy is structured to provide applicants with the information needed when submitting a planning application. When planning for biodiversity net gain and habitat protection, consideration should also be given to how this may relate to the delivery of other local plan policies that seek to protect and enhance the natural environment.

[13] BS 42021:2022 covers the design and installation integral nest boxes associated, principally, with the following bird species: swift, starling, great tit, blue tit, house sparrow. Swift bricks are considered a universal fix for small cavity-nesting bird species as they will be used by house sparrows, starlings, great tits, blue tits, and occasionally house martins and nut hatches. This British Standard does not cover installation of i) integral nest boxes in buildings where the surface is primarily glass, as glass surfaces present well-known and fatal hazards for birds, or in metal-framed buildings with any form of insulated or fire-rated cladding (this would include the majority of industrial building typologies); and ii) exterior bird boxes. Examples of species that might breed in external nest boxes in the built environment include little owl, barn owl, tawny owl, kestrel, peregrine, stock dove, jackdaw, black redstart, pied wagtail, spotted flycatcher, robin, wren, tree sparrow, swallow and house martin. It is therefore accepted that in some cases, dependant on the outcome of relevant ecological reports, alternatives to the British Standard may present a more appropriate response.

Policy SC10: Habitat Protection, Biodiversity and Net Gain

1. **Development proposals will be supported:**

    a. **Where they deliver benefits to wildlife, habitats (including priority habitats) and ecosystem services in line with the measures identified in the East Sussex and Brighton and Hove Local Nature Recovery Strategy and relevant local strategies and action plans.**

    b. **Where they are supported by appropriate ecological appraisals undertaken by a suitably qualified person, showing the potential impact of the proposed development on habitats and species both onsite and in nearby areas of wildlife sensitivity, and where relevant, include recommended measures in accordance with the mitigation hierarchy. Ecological appraisals must take into account the findings and recommendations of any hydrological, groundwater and/ or ground condition and land stability reports.**

    c. **Where feasible, the proposals include integral swift and bird bricks which comply with British Standard BS 42021:2022 Integral Nest Boxes or other appropriate measure as informed by site specific ecological surveys.**

2. **Where proposals will have an unavoidable adverse impact, they must demonstrate:**

    a. **That the proposal minimises the adverse impacts and there are no reasonable, less damaging solutions,**

    b. **The design and layout of the scheme maximises onsite mitigation and compensation.**

3. **Where development is permitted, the council will impose appropriate conditions or seek a legal agreement to secure the protection, enhancement, compensation, and management of the conservation interest of any site affected, directly or indirectly by development proposals or appropriate off-site compensation to ensure biodiversity net gain is achieved, including the cost of monitoring the delivery of biodiversity net gain.**

Policy SC11: Trees, Woodland and Hedgerows

7.258. Trees, woodland and hedgerows are essential parts of our natural landscape and ecosystem services, supporting wildlife, mitigating the effects of climate change and contributing to our well-being.

7.259. Native woodlands in the UK are isolated, in poor ecological condition and show a decline in woodland wildlife. Ancient Woodland is the oldest, most ecologically diverse, and important woodland habitat in the UK. It is estimated up to 70% of the UK's Ancient Woodland has been lost or damaged. All Ancient Woodlands are unique, are distinctive to their locality and cannot be replaced once lost. Hastings has an extensive tree and woodland cover, much of it designated as Ancient Woodland.

7.260. Development affecting Ancient Woodland, ancient trees and veteran trees is a material planning consideration. National Planning Policy places great weight on the protection of irreplaceable habitats advising that development resulting in the loss or deterioration of irreplaceable habitats such as Ancient Woodland and ancient and veteran trees should be refused.

7.261. The council will protect our woodlands and Ancient Woodlands from harm and encourage suitable planting and replacement of trees if they are adversely affected by development.

7.262. Hedgerows provide benefits to wildlife, greater habitat connectivity and restoration of important historic landscape features.

7.263. New areas of hedgerow improve habitat connectivity (either as corridors or stepping-stones between woodland and grassland habitats) and deliver other ecosystem benefits. This includes native species-rich hedgerows created through new development, which are more ecologically important than highly managed ornamental hedgerows.

Policy SC11: Trees, Woodland and Hedgerows

1. **Trees, woodland and hedgerows will be protected where they are:**

    a. **Protected by a Tree Preservation Order (TPO)**

    b. **In a Conservation Area**

    c. **Ancient Woodland, Ancient and Veteran Trees and other forms of irreplaceable habitat**

    d. **In Historic Parks and Gardens**

    e. **Within an area recognised for its biodiversity importance**

2. **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.**

3. **Where a proposal will result in an unavoidable loss of trees[14] and hedgerows:**

    a. **Replacement trees will be planted at a ratio of 3:1* and will be required to be planted and maintained on site;**

    b. **Replacement trees and hedgerow should be native, appropriate for the local area and of local provenance. Non-native trees that support similar assemblages of native species may also be supported;**

    c. **Where on-site provision is not possible, new/replacement provision should be located in the first instance in the Green and Blue Infrastructure network as defined in the council's Green and Blue Infrastructure Strategy*.**

4. **Development resulting in the loss or deterioration of Ancient Woodland and Ancient and Veteran Trees will be refused, unless there are wholly exceptional circumstances, or projects proposed are of national significance, and a suitable compensation strategy developed.**

5. **Development proposals next to woodland will require a buffer area. Minimum buffer areas for Ancient Woodland should be in line with**

[14] **Category A-C as defined by BS 5837 Tree Surveys or its successor.**

Natural England's standing advice. Larger buffer areas for woodland may be required in some cases.

6. **Proposals must demonstrate that the construction phase of development will be carried out in accordance with BS 5837 or its successor.**

7. **Where development is permitted, the council will impose appropriate conditions or seek a legal agreement to secure the protection, enhancement, compensation and management of the hedgerow, tree and woodland interest of any site affected, directly or indirectly by development proposals or appropriate off-site compensation to ensure the towns treescape is not adversely impacted by development.**

*Hastings Borough Green and Blue Infrastructure and Biodiversity Net Gain Strategy 2022

Policy SC12: Green and Blue Infrastructure

7.264. Good quality green and blue infrastructure (GBI) within our Town can make a positive contribution to improving health and wellbeing, water management, nature recovery and resilience to and mitigation of climate change and can help address environmental decline.

7.265. The Hastings Green and Blue Infrastructure and Biodiversity Net Gain Strategy[lxviii] has identified a network of GBI across the borough. These include statutory and non-statutory ecological sites, together with parks, open spaces, playing fields, woodlands, street trees, allotments, private gardens, green roofs and walls, sustainable drainage systems (SuDS) and soils. The network also includes rivers, streams, other water bodies, which can be collectively referred to as 'blue infrastructure'. To maximise benefits associated with Green and Blue Infrastructure it ought to be multifunctional in nature when introduced or enhanced.

7.266. Policy SC12 supports the overarching vision derived from the strategy to protect, develop and enhance a network of multi-functional, highly connected green and blue infrastructure across Hastings Borough, designed to incorporate climate adaptation, is financially sustainable, benefits wildlife and Hasting Borough's diverse local community[lxix].

7.267. The purpose of SC12 is to protect existing GBI ensuring that its integrity and connectivity is retained, restored, and enhanced and to deliver new GBI which will support sustainable development and address corporate priorities to make space for nature[lxx]. New development will contribute to the protection and enhancement of open spaces through sensitive development proposals and financial contributions.

7.268. For major developments, the council will require developers to design schemes in accordance with recognised standards, for example Building with Nature[lxxi] or the National Design Guide[lxxii].

7.269. Biodiversity Net Gain contributions are a key resource in enhancing and extending the GBI network, as well as contributing to the Local Nature Recovery Strategy (LNRS)[lxxiii]. The council will work with key partners to deliver coordinated action for an enhanced and connected network of wildlife rich habitats, species recovery, reduced carbon emissions, water quality improvements, natural flood risk management and recreation.

7.270. GBI features should be maintained for the lifetime of the intervention to ensure they continue to deliver their intended environmental, social, and functional benefits. The council will require all major development proposals to be supported by a maintenance and monitoring plan, proportionate to the scale and complexity of the GBI. This should be secured by a condition or legal agreement.

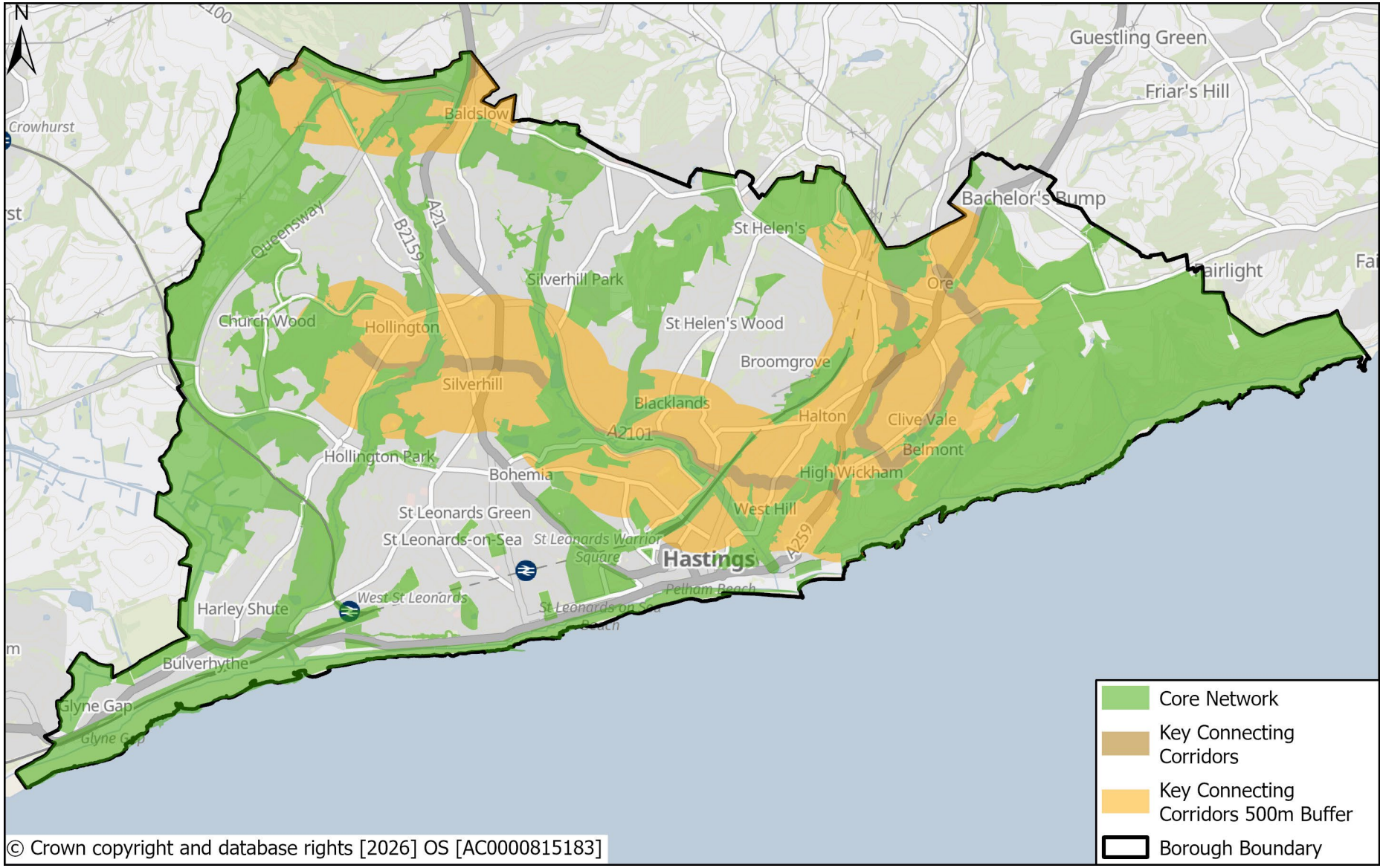

Figure 40: Hastings Green and Blue Infrastructure Indicative Core Network and Buffers

Policy SC12: Green and Blue Infrastructure

1. **Development within the core GBI network must retain, restore, protect, and enhance existing GBI on-site to support climate change adaptation and mitigation, and deliver benefits to wildlife, habitats (including priority habitats), ecosystem services and the health and wellbeing of the local community. Schemes should form part of a wider connected, innovative multifunctional green and blue infrastructure network which includes, sustainable drainage as well as urban cooling. Any new or enhanced GBI must be multifunctional in nature, and schemes should be designed in accordance with recognised standards such as the Building with Nature Standards.**

2. **Development outside of the core GBI network that extends, strengthens or creates new connections will be supported, particularly where it contributes to:**

    - **The creation of new green corridors;**
    - **The delivery of priorities identified in the Green and Blue Infrastructure Strategy and East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS).**

3. **Proposals for onsite Green and Blue Infrastructure schemes must be accompanied by an agreed maintenance and management plan for the lifetime of the intervention. This will be secured by condition or legal agreement.**

Policy SC13: Urban Greening Factor

7.271. The Urban Greening Factor (UGF) is a planning tool used to quantify and improve the provision of on-site green and blue infrastructure (GBI) particularly in urban areas. It supports the inclusion of a diversity of GBI to create a range of benefits such as reducing heat, absorbing pollutants from the air, reducing storm water run-off, and promoting biodiversity.

7.272. The UGF is distinct from the Biodiversity Metric, which measures ecological benefits. While the Biodiversity Metric focuses on habitat quality and distinctiveness, the UGF promotes a broader range of green and blue infrastructure benefits and promotes the retention of existing high-quality GBI. Another difference is that UGF cannot be delivered off-site as it relates to the area of the development proposal itself and cannot be moved offsite or substituted. Both tools should be used for relevant applications, and applicants are encouraged to identify where BNG and UGF interventions can be co-designed to deliver multifunctional outcomes, such as species-rich Sustainable Drainage Systems (SuDS), native tree planting, or wildflower green roofs. For example, the use of biodiverse green walls and roofs can contribute to delivery of the outputs sought by Policy SC3 by acting as insulation and carbon storage and through reducing run-off and the heat island effect.

7.273. The UGF is calculated by assigning a score to all the surface cover types. All UGF surface types should conform to the guidance and specifications set out in Table 2 of Natural England's Urban Greening Factor for England User Guide, including technical specifications. The resulting UGF score for sites should meet or exceed the target factor score as set out in this Policy and should not result in a reduction in score compared to the site's undeveloped baseline score.

7.274. In some cases, it may not be possible to achieve the minimum acceptable score due to viability or conflict with other policy obligations. For example, in some cases areas of impervious surfaces may be necessary to direct water into SuDS features. Where it is not possible to achieve the requisite score, a robust justification must be provided that sets out in detail why the proposed quantum represents the maximum deliverable amount that can be delivered.

7.275. It should be noted that the UGF is not a tool to measure the biodiversity benefits of greening proposals, and not all urban greening may be inherently beneficial for wildlife. Equally, the scoring threshold could potentially be met with interventions that do not deliver in line with locally set green and blue infrastructure priorities if the only consideration is the overall score achieved. In order to ensure that biodiversity and locally set green and blue infrastructure gains may be maximised within developments where the factor is applied, interventions should be prioritised that deliver both high UGF scores and align with the ten objectives of the council's Biodiversity and

Green and Blue Infrastructure Strategy and the Building With Nature Standards.

7.276. The UGF should be considered from the earliest design stage. This includes where appropriate, at the pre-application stage. The urban greening factor tool is used to assess and quantify the amount and quality of urban greening surface cover that a scheme provides, increase the level of greening in urban environments and provide much needed linkages between isolated areas of existing green and blue infrastructure.

7.277. The UGF seeks a locally set minimum score for both residential and commercial sites that are capable of accommodating major development, to be assessed using the Natural England Urban Greening Factor for England tool and supplementary guidance. The UGF affords developers some flexibility as to the interventions that may be used to reach the specified level of urban greening, provided that locally set objectives within the council's Green and Blue Infrastructure Strategy are addressed.

7.278. The resulting UGF score is then compared with the target UGF score for the development site set by the Policy and used to evaluate whether the development's urban greening proposal meets the defined target.

7.279. Minor developments are capable of delivering a range of UGF interventions onsite that are appropriate to the scale, location and type of development for which permission is sought. Examples include green roofs and attenuation measures or other interventions that deliver multiple benefits.

7.280. Opportunities to deliver Urban Greening are various and can be multifunctional, offering a range of benefits with high-scoring commandants including natural features retained within the site, standard or semi-mature trees, mixed hedgerow, flower rich planting and food growing, allotments and orchards. Multifunctional opportunities are to be encouraged- for example, fruiting edible species of native hedgerow can provide screening from noise and intrusion, make space for wildlife and offer opportunities for the community to grow and access seasonal produce. Micro-allotments and community gardens, including roof gardens, can provide opportunities for exercise, create a destination for water from onsite SuDS and make space for pollinators. Fruit trees can provide shade and sensory enrichment in play areas and open spaces. A biodiverse green roof (as part of a biosolar system) can improve the functionality of rooftop solar panels by preventing efficiency loss during the hottest parts of the year. It is strongly recommended that designs maximise the potential for delivering multifunctional urban greening.

7.281. It is essential that Green and Blue Infrastructure delivered through Urban Greening is properly maintained so that it continues to fulfil the functions and meet the standards of quality defined within this Policy. The Policy seeks an appropriate financial and stewardship plan for the lifetime of the development,

such as a Landscape and Green Infrastructure Management and Maintenance Plan.

Policy SC13: Urban Greening Factor

1. **All major development proposals must, and any minor development proposals within the key connecting corridors and their 500m buffer should, demonstrate that:**

a. **The proposal will meet or exceed a target Urban Greening Factor of 0.4 (for residential) or 0.3 (for commercial development*) and;**

b. **There should be no net loss against the baseline undeveloped site score.**

c. **Where a proposal cannot meet its full requirement due to either viability or conflict with other site-specific obligations, a robust justification must be provided indicating that the proposal represents the maximum UGF it is possible to provide.**

d. **Minor development proposals outside of the key connecting corridors and their 500m buffer should seek to incorporate elements of high scoring urban greening appropriate to the site.**

e. **Onsite Urban Greening should be maintained for the lifetime of the UGF measures. Major development proposals must demonstrate this through an agreed maintenance and management plan. This may be secured by condition.**

*Mixed used development scores should be based on the use with the greatest square meterage surface area (Natural England, Urban Greening Factor for England User Guide, 4.5, 2023)

Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities

7.282. The importance of good access to high quality open spaces, sports and recreation facilities to the health and well-being of communities is well recognised. There are also economic benefits of parks and green spaces in terms of creating employment, promoting economic activity and encouraging inward investment across an area by providing a draw and destination for visitors.

7.283. As new development proposals in the Borough come forward, we need to ensure that development addresses any potential impact arising from additional pressure on existing open space, sports and play provision and provides for the needs of the growing and changing population. To understand current provision and to identify future needs for open space, sports and recreation provision, a Strategic Open and Play Space Assessment[lxxiv] and a Playing Pitch and Built Facilities Strategy[lxxv] have been undertaken. The studies have identified a need to protect all forms of provision, improve the quality and value of existing provision, improve the maintenance of provision and a need to increase the provision for specific activities in order to support current and future residents.

7.284. Open space refers to all publicly accessible open spaces within the town, including those used for informal sports and play, equipped play and outdoor socialising. It also refers to designated Local Green Spaces, which are not in all cases publicly accessible. Together with sports facilities, this Policy refers to:

- Parks and gardens
- Natural and semi-natural green space
- Allotments
- Cemeteries and churchyards
- Provision for children and young people (as primary and secondary typologies)
- The beach and seafront promenade
- Natural turf and artificial turf pitches for cricket, football, hockey and rugby, including associated infrastructure including those in private, educational and institutional use as well as those freely open to the public
- Indoor and outdoor built sports facilities, including tennis and bowls
- Local Green Spaces

7.285. The protection and enhancement of existing open space, play provision and sports facilities is important in order to ensure it remains accessible and continues to fulfil its established recreational function and deliver best value.

7.286. Existing open space, sport and recreation provision should not be built on unless proposals include, for example, the consolidation of multiple lower quality or value facilities into a single high-quality, high-value offer; or the onsite or offsite provision of a significantly enhanced replacement facility. It is recommended that consultation mechanisms are used to inform the design of reprovided or consolidated facilities equipped play facilities where possible. Regard should also be had to any relevant design and consultation guidance from Sport England.

7.287. It is recommended that the potential for the presence of polluted ground conditions be taken into account where any proposal involving the cultivation of items intended for human consumption is brought forward, including the potential for pollution as a result of runoff upstream.

7.288. Open spaces, sport and recreation provision have multifunctional benefits. They contribute to the green and blue infrastructure network, can help deliver benefits for nature, the management of surface water, and support active travel. Proposals affecting these facilities will therefore only be supported where they do not adversely impact on other benefits and functions or where these can be sufficiently mitigated.

7.289. Inclusive sport and leisure facilities play an important role in addressing inequalities, improving quality of life and enhancing community interaction. We recognise that it is essential for all residents to have access to a range of leisure opportunities and the importance of maintaining a geographical distribution of facilities to meet local community needs.

7.290. The Hastings and Rother Playing Pitch and Built Facilities Strategy (2023) provides a current and projected level of supply and demand for sports facilities in Hastings which will help inform any future developments. The Strategy is updated regularly to ensure that the information within it remains up to date.

7.291. Protecting the existing stock of playing fields and sports pitches is also important to maintain the health and wellbeing of local people, and in light of increasing pressures for development.

7.292. Ensuring all residents have access to good quality sport and leisure facilities continues to be an important goal for the council and its partners. Participation in sport has rebounded well following the negative impact of Covid-19 and the council's joint Playing Pitch and Built Facilities Strategy with neighbouring Rother District Council.

7.293. The strategy emphasises the importance of enhancing current facilities to meet current and future participation needs, particularly to support growing participation from women and girls. Likewise, built sports facilities will require

ongoing maintenance and enhancement, particularly due to the age and configuration of some facilities no longer meeting local needs to the extent that they have in the past. To address this need, contributions will be sought from developments most likely to accelerate these trends in participation due to their size and scale.

7.294. Hastings largest built leisure facility, with over 80% of its swimming offer, is Summerfields Leisure Centre. Summerfields is over 40 years old, with its most recent refurbishment activity in 2005. Work is now ongoing to identify options for the future, including the potential for a replacement or further refurbished facility, ideally consolidating the facilities currently operated within Summerfields and Falaise Gym. Due to the sub-regional destination status of the current facilities, any replacement facility should be developed with consideration given to the overall offer with neighbouring Rother District.

7.295. It is recognised that in exceptional cases, the loss of a sporting facility may be unavoidable – for example, where a facility will be replaced, consolidated, there is no longer demand or an ancillary function is necessary to support its continued operation. Re-provided facilities should enhance the quality and accessibility of the facility.

7.296. Local Green Spaces are demonstrably special green areas of particular local significance to the community they serve. Local Green Spaces are afforded a level of protection through National Planning Policy equivalent to the Green Belt. The test for an area to be designated as a Local Green Space through a Local or Neighbourhood Development Plan must therefore set a high bar to ensure the designation is used appropriately.

7.297. The Local Plan designates the following areas as Local Green Spaces:

- WSL/LGS/13: Land opposite 60-70 West Hill Road;
- HS/LGS/01: Land at the Corner of Harley Shute Road and Edinburgh Road;
- SW/LGS/01: Land at Victoria Avenue;
- SW/LGS/02: Ore Stream Valley and Wet Woodland
- SW/LGS/03: Southern Valley
- OV/LGS/01: Red Lake Recreation Ground.

Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities

Sports and recreation facilities are identified in the most up-to-date Open Space and Play Strategic Assessment and the Playing Pitch and Built Facilities Strategy. The Playing Pitch Strategy may not identify all existing playing fields. For the avoidance of doubt, this policy should be applied to all playing fields or undeveloped land last used as a playing field unless otherwise specifically allocated for development.

New Provision

1. **Where new publicly accessible open spaces and equipped play facilities are created as a result of development, they should meet local quality and value standards relevant to their typology and anticipated position in the open space and play hierarchy[15].**

2. **Created open and play spaces must be accompanied by a maintenance and management plan for the lifetime of the asset. This will be secured by condition. The council will not adopt newly created open or play spaces other than in exceptional circumstances by negotiation.**

3. **Provision of new sporting facilities, where they meet an identified local need, will be supported subject to compliance with other policies of this plan.**

Retention and Enhancement

4. **Development which seeks to maintain or enhance existing sports and recreation spaces will be supported. This includes:**

    a. **Parks and Gardens**

    b. **Natural and Semi-Natural Green Space**

    c. **Amenity Green Space**

    d. **Equipped play**

    e. **Built sports facilities**

    f. **Playing fields**

    g. **Allotments**

Preventing and Managing Loss

[15] **Policy ID3 sets out required quantity, quality and value standards.**

5. **Development on land with important amenity value including those identified on the policies map as Multifunctional Open Spaces, Allotments and Local Green Spaces will not normally be supported.**

6. **Development resulting in the loss of equipped play facilities will only be permitted where:**

    a. **Replacement equipped play is re-provided onsite, and is of enhanced quality and accessibility; or,**

    b. **Replacement equipped play is provided in a suitable offsite location, is of equivalent or enhanced quality and quantity and will be which will be made available prior to the loss of the original; or,**

    c. **The development is for alternative or consolidated and improved provision of equipped play, the benefits of which can be demonstrated to clearly outweigh the loss of the original provision.**

7. **Development resulting in the loss of outdoor or indoor (civic*) sports or recreation facilities will only be permitted where:**

    a. **A replacement facility is re-provided onsite, and is of enhanced quality and accessibility; or,**

    b. **A replacement facility is provided in a suitable offsite location, is of equivalent or enhanced quality and quantity and will be made available prior to the loss of the original; or,**

    c. **The development is for alternative or consolidated facility for typologies 1e and/or 1f the benefits of which can be demonstrated to clearly outweigh the loss of the original provision; or,**

    d. **The proposed development is ancillary to the current facility and will not adversely impact the continued use of the site for sports or recreation.**

*Public indoor leisure facilities available to all residents

Policy SC15: Ground Behaviour, Geodiversity and Land Stability

7.298. As a result of Hastings' natural geology, hydrology and long history as a settlement, there is the potential for challenging ground behaviour throughout the borough that may lead to instances of instability if not properly assessed and mitigated during the development process.

7.299. Land that becomes unstable may result in creep, landslides, subsidence, ground heave, collapse or other hazard. As well as presenting an immediate hazard to people living, working in or visiting areas experiencing the acute effects of unstable land, the impacts can also extend beyond the immediate area of incident. For example, materials entering water bodies such as lakes, rivers, ponds, streams, the sea as a result of these effects can introduce pollutants that impact water quality or exacerbate flooding due to reducing storage capacity of the water body.

7.300. In coastal areas like Hastings, the effects of land that has become unstable are often most noticeable along cliff faces, or where the effects appear suddenly as opposed to where they make themselves known gradually over time. Land can become unstable due to intrinsic factors (general physical characteristics of the location) and triggering factors (such as extreme rainfall). As a result of climate change some of these triggering factors will intensify during the lifetime of the plan.

7.301. National Planning Policy sets out the need for planning policies and the decisions they inform to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by land instability. It also places development at the heart of providing a solution to problem areas of land instability through the potential for a well thought out proposal to remediate and mitigate unstable land where appropriate.

7.302. National Planning Policy places the responsibility for securing a safe development on the developer and/ or landowner[lxxvi]. It also provides clarity that the impact of climate change should be considered as part of any proposal[lxxvii]. Adequate site investigation should be undertaken before a proposal is brought forward, to inform decision making.

7.303. The planning practice guidance confirms that before a detailed planning application is prepared, a site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development within its anticipated life or damage neighbouring land or property. Such information could be provided to the planning authority in the form of a land stability or slope stability risk assessment report[lxxviii]. Stability reports may be combined with drainage and/ or contamination reports where appropriate.

7.304. Therefore, a safe development is one that considers not only the safety of the development itself, but the potential wider impacts. Failure to do so may present a risk to life, habitat, property and infrastructure[16].

Understanding which sites require assessment

7.305. Locations with the potential for poor ground conditions will require assessment. The gradient of a slope should not be used as the sole basis for investigating ground behaviour, although the presence of a slope within the site or surrounding area can help to define the scope of preliminary assessments.

7.306. Planning Practice guidance identifies a range of data sources that may help to inform an understanding of ground behaviour, including but not limited to:

7.307. Information on previous uses contained in the National Land Use Database.

7.308. British Geological Survey Data, including the National Dataset on landslides, artificial ground and borehole data.

7.309. For the avoidance of doubt, the term 'poor ground conditions' may include, but is not limited to:

- Poorly consolidated, or historic and unrecorded made ground and fill material;
- Soft, weak and wet natural soils[17];
- Subterranean voids or cavities, both natural and artificial;
- Shallow or deep historic mining or mineral extraction;
- Soils at risk of shrink-swell, including where this is due to the effects of trees;
- Historical railway, defence or other spoil locations;
- Recent or historic landslides;
- Faults or subsurface shear;
- Where one or more retaining structures are present.

7.310. Landslide Activity Risk Areas (LARA) are areas in which landslides have recently taken place, remain active or there is reason to believe they will become active in the near future. This includes locations where Article 4 Directions restricting development due to the need to prevent landslides are in force. Proposals at any scale in LARAs will need to incorporate remediation measures in the majority of cases.

[16] This is independent of the requirement under Part A of the Building Regulations, which relates only to the stability of a structure itself and not the surrounding area.
[17] Including compressible ground, collapsable deposits, soluble rocks, running sand.

7.311. There are a limited number of exceptions to this Policy, which include:

- Changes of use (unless the change involves residential development);
- Variation or removal of conditions, unless these conditions relate to ground behaviour or land stability;
- Applications for listed building consent;
- Lawful Development Certificates;
- Tree works requiring planning consent that do not involve the felling of trees.

7.312. Some small-scale works will not require Planning Permission or Building Regulations Approval. Before starting on such works, residents and businesses are strongly advised to take appropriate professional advice.

7.313. Assessments and reports relating to ground behaviour and land stability must be prepared by an appropriately qualified and experienced geotechnical engineer with chartered membership of a relevant professional institution appropriate to the scale of proposed development [lxxix]such as RoCEP, ICE, the Geological Society or IMM.

7.314. When undertaking assessments of ground behaviour and land stability, it is important that the potential impacts of climate change, including soil and materials deterioration, over the lifetime of the proposed scheme are taken into account. This includes, but is not limited to, those that constitute imposed, wind and environmental loads and those that may result in increased ground movement due to changes in the shrinking, swelling or freezing of the subsoil – insofar as the risk can be reasonably foreseen.

7.315. The resulting proposal should therefore incorporate appropriate or special design features as needed following these assessments in order to ensure it can safely tolerate both current and foreseeable future ground conditions also taking into account the temporary condition of the site during construction.

7.316. BS EN 1997-1 and its annexes provide the national standard for geotechnical aspects of the design of buildings and civil engineering works. The standard sets out the recommended approach to the design requirements, the design situation and the durability of proposals. All calculations must be able to demonstrate an appropriate Factor of Safety. It is recognised that in some cases, alternative calculations that yield more conservative results than BS EN 1997-1 may be preferable, and these will also be acceptable provided they can be verified by the council.

7.317. Active systems are areas where evidence shows geological activity is present, for example, areas with or in the locality of a landslide that is still ongoing to any extent. The proposed development must be able to evidence to the satisfaction of the council that it will not exacerbate any existing issues.

7.318. As a result of survey and assessment, remedial works may need to form part of a development proposal where stability issues or ground behaviour concerns have been identified. For the safety of all affected parties, schemes of remedial work must be submitted to the council and approved prior to commencement of development. Where remedial works include elements that will require ongoing maintenance and/ or management, a plan for how this will be achieved must likewise be submitted and approved.

7.319. To ensure the continued safety of all effected parties, all remedial works must be completed prior to occupation phase of the development. This will be secured by condition.

7.320. A framework for the content of a Land Stability report is set out in the Planning Practice Guidance. It is expected that as a minimum, the structure of land stability reports should conform with this format. A non-technical summary should form part of any report.

7.321. The temporary condition of a site[18] should be considered as part of any engineer's report alongside the permanent condition. Measures to safeguard the stability of a proposal site in its temporary condition should be set out and approved by the council as part of the Construction Management Plan.

7.322. Due to the history and geology of the borough, the impacts of climate change and human activity, there is the potential for changes to ground behaviour in areas of the borough that are already developed. It is important that householders seeking to further develop their properties are aware of and able to manage foreseeable risks to land stability in a proportionate way that will demonstrate their proposal to be safe for the householder, others in the locality, and future occupiers.

7.323. In order to achieve this, the advice of a chartered structural engineer and/ or other appropriate specialists[19] should be sought early on in the design process and their advice regarding site ground behaviour should be incorporated into designs at an early stage. This should be evidenced through an engineer's report at application stage. There is no prescribed format for this report.

7.324. The Planning Practice Guidance identifies that in some cases, a Local Planning Authority may need to consider removing permitted development rights in areas of land instability. Where evidence indicates that such a step should be taken, the council will seek to bring forward Article 4 Directions to prevent harm that may be an unintended consequence of permitted development rights.

[18] The condition of the site during construction.
[19] This may include geotechnical or flood risk specialists.

Policy SC15: Ground Behaviour, Geodiversity and Land Stability

1. **Development proposals for major and minor applications will be supported in areas with the potential for poor ground conditions or slope instability, and within Landslide Activity Risk Areas where the proposal demonstrates that:**

   a. **Ground behaviour and land stability have been assessed by a suitably qualified and experienced geotechnical engineer, taking into account both the proposal site and the context of the wider area, and the potential impacts of climate change;**

   b. **A land stability report as a result of this assessment has been submitted and agreed prior to approval of a scheme;**

   c. **Poor ground conditions or instability will not result in compromised structural integrity, as evidenced through appropriately detailed ground investigations, stability calculations, remedial design calculations where necessary, appropriately prepared reports and a stability declaration form all prepared by a suitably qualified and experienced geotechnical engineer;**

   d. **The development as proposed can tolerate the ground conditions for its lifetime and maintain stability without causing adverse effects or impairment;**

   e. **Design calculations conform with BS EN 1997-1, and with an appropriate demonstrable Factor of Safety. Alternative calculations to a standard more conservative than BS EN 1997-1 will also be acceptable;**

   f. **Where an active system is identified, it can be demonstrated that the proposed development will not exacerbate any land or slope stability issues, both on site and in the surrounding area and there will be no risk to a water body including groundwater and aquifers;**

   g. **Where a scheme of remedial work is required, it has been submitted and agreed prior to commencement and carried out prior to completion and occupation. Where appropriate, details of maintenance and management plans for the lifetime of the development must also be submitted and agreed. This will be secured by condition;**

   h. **All remedial works have been completed in line with any approved remediation scheme prior to occupation. This will be secured by condition.**

2. **Land stability reports must include as a minimum a review of sources of geological information used to inform the report, site history, site inspection, the results of any necessary intrusive site investigations, assessment of land stability risks (including those arising from potential impacts of climate change during the lifetime of development) and mitigation measures.**

3. **All major and minor development proposals must provide a construction management plan including details of how ground behaviour relevant to the temporary condition of the site will be addressed and mitigated.**

4. **Proposals for alteration or extension of dwellings must be able to demonstrate that designs are informed by an engineer's report to confirm that the proposal can tolerate the ground conditions for its lifetime and that any foreseeable threats to both the proposal site and surrounding area can be remediated prior to completion.**

5. **If suitable remediation cannot be provided, or the relevant reports indicate that there will be an unacceptable adverse impact on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated then planning permission will be refused.**

6. **Where land is potentially subject to instability, the council may seek to remove permitted development rights in the interests of human health or environmental risk.**

Policy SC16: Flood Risk and Drainage

7.325. Much of the Borough is vulnerable to flooding from a range of sources, the risk of which is expected to worsen over the lifetime of the plan due to the effects of climate change. Policy SC16, together with National Planning Policy, National Flood Management legislation[lxxx] and the most up to date Strategic Flood Risk Assessment (SFRA)[lxxxi] provides the basis for assessing, avoiding, mitigating and adapting to the risks from all sources of flooding.

7.326. Due to the dynamic nature of flood risk, the SFRA and other technical guidance will be updated regularly where new evidence relating to the risks of flooding is identified. The Level 1 SFRA includes maps that identify the current and future risk of flooding from watercourses, the sea, surface water, groundwater, sewer flooding and tidal flooding. It also identifies areas that comprise the functioning floodplain.

7.327. The Level 1 SFRA is not a fully comprehensive document, and therefore under certain conditions as set out in Policy SC16, proposals for non-major and major development may need to be accompanied by a site-specific Flood Risk Assessment. All development will need to provide drainage plans, regardless of size.

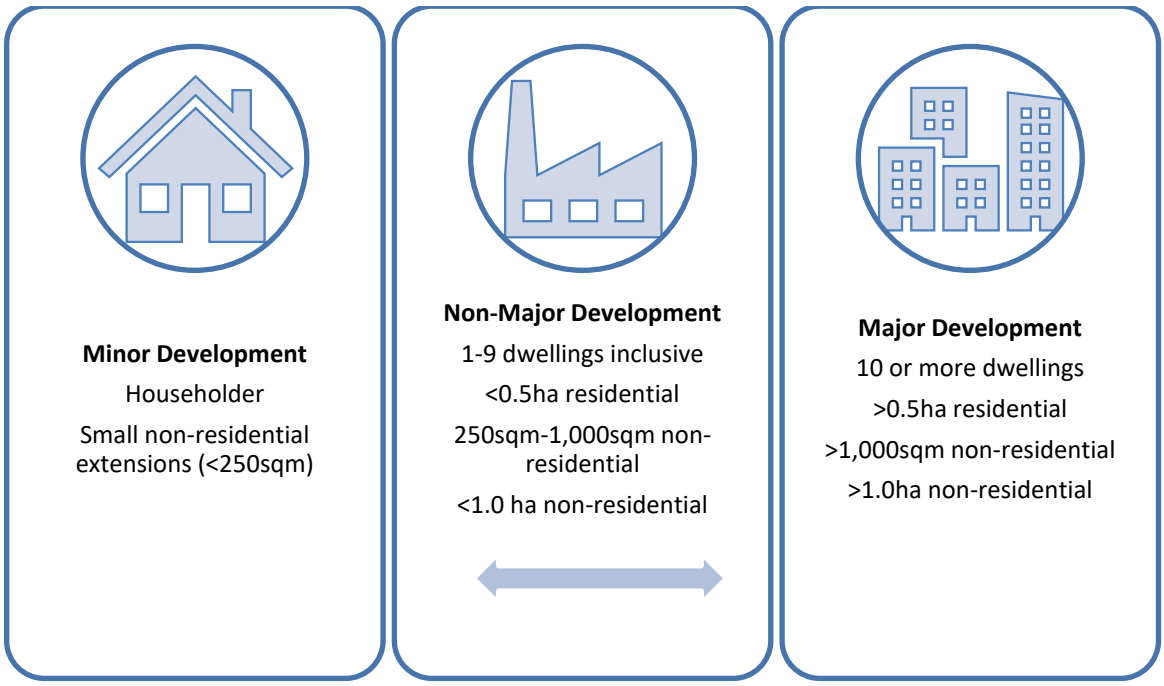

Figure 41: Development typologies for Flood Risk Assessments.

7.328. A Flood Risk Assessment will be required for non-major and major development in flood zone 1 where certain size, drainage or flood vulnerability criteria as set out in Policy SC16, Practice Guidance on Flood Risk and Coastal Change and Guidance on Flood Risk Assessment in Flood Zone 1 apply[lxxxii].

7.329. Flood Zone 3b will be protected as the functional floodplain, and its capacity to attenuate periodic flood events must not be compromised. Essential infrastructure that has passed the Exception test and water-compatible uses will be permitted within Flood Zone 3b, provided the development is designed and constructed to:

- Remain operational and safe for users in times of flooding;
- Result in no net loss of floodplain storage;
- Not impede water flows; and
- Not increase flood risk elsewhere.

7.330. Unless it is otherwise directed by adopted technical guidance, the Environment Agency or Policy SC16, all Flood Risk Assessments should follow the Environment Agency's Standing Advice[lxxxiii].

7.331. The council may require a sequential test to be performed for any development proposals in flood zone 2 or 3, with the exception of:

- Site allocations where the sequential test has already been performed at plan making stage for the proposed use and there have been no significant changes to flood risk in the intervening period;
- Changes of use for existing buildings;
- Minor development[lxxxiv].

7.332. In some cases, it may be appropriate to apply the sequential test to non-major and major development proposals in flood zone 1 where there are flooding issues in the area of the development as identified in the Strategic Flood Risk Assessment (SFRA)[lxxxv].

7.333. Sustainable drainage systems (SuDS) should be designed to manage surface water run off so that it mimics natural run off rates as closely as possible. Well-designed SuDS can help to avoid flooding at site level, attenuate and reduce flows to limit or improve the wider impacts of flooding, filter pollutants from surface water run-off and provide biodiversity and amenity benefits. The National Standards for Sustainable Drainage for the design and delivery of SuDS should be closely followed when proposals are developed, taking into account the position established by this policy regarding the use of infiltration. The SuDS approach put forward by proposals should reflect this local policy position[lxxxvi].

7.334. National Planning Policy advises that SuDS should seek to discharge into the ground through infiltration where it is possible to do so. Due to complex interactions between the groundwater table, the bedrock geology and the overall topography of the Borough it is unlikely that infiltration SuDS will be acceptable[lxxxvii] unless it is demonstrated through a Building Research

Establishment Digest 365 (BRE365) infiltration test, or other agreed testing process.

7.335. Policy SC16 therefore directs applicants to a hierarchy of alternatives that should be considered in the order in which they have been presented. Under certain conditions, where the site itself or the surrounding area may have the potential for land instability, pollution or a high groundwater table, discharge into a surface water body may not be acceptable due to increased risk of environmental or flood hazard.

7.336. Proposals for sites with these characteristics should conduct hydrological monitoring to inform designs. The monitoring period will usually be for six months from October – April. Sites with the potential for drainage systems to be below groundwater levels at times must be built in accordance with standards such that the risk of infiltration is minimised. This must be demonstrated by air testing of joints and at manholes in line with the most up to date guidance on sewerage adoption, or Building Regulations with the most conservative option recommended.

7.337. It is recommended that work with the relevant organisations (the Lead Local Flood Authority, sewerage undertaker, Environment Agency, or internal drainage board) takes place at the earliest possible point when designing drainage plans and SuDS.

7.338. Major developments provide an opportunity to ensure that surface water management measures and SuDS are well integrated into the development as a whole, potentially incorporating existing natural features within the site such as boundary landscaping or ponds. Well integrated SuDS can provide multifunctional benefits, including shade, habitat, active travel opportunities, amenity green space, and increased mental and physical wellbeing of future occupiers/ users.

7.339. Sustainable Drainage Systems (SuDS) are required for all new developments. The council will collaborate with neighbouring authorities and the Lead Local Flood Authority to ensure a unified approach to SuDS requirements, addressing cross-boundary concerns.

7.340. Existing flood water management measures make an important contribution to controlling runoff rates and preventing flooding, both individually and cumulatively. Loss of such measures will therefore be resisted.

7.341. To mitigate the loss of existing management measures, areas of hardstanding must incorporate surface water capture. Additionally, if the proposal is for a driveway that would require planning permission, at least 50% soft landscaping must be retained in order to safeguard natural surface water management processes and preserve green corridors[lxxxviii].

7.342. To reduce the risk of sewer flooding, proposals should adopt the hierarchy of drainage destinations.

7.343. before considering drainage to a surface water only sewer. Proposed designs included with applications should be confirmed with the statutory sewerage undertaker. Early engagement with statutory providers is therefore recommended.

7.344. National Planning Policy advises that development should not result in increased flood risk elsewhere. It should be noted that in some areas of the borough watercourses connect directly into the public sewer system and discharge from development into these watercourses could therefore impact flood risk from these sewers. As such, surface water discharge from a development site into a watercourse should restrict both volume and rates to equal or lower than the pre-development discharge rate and volume. Some small-scale works will not require Planning Permission or Building Regulations Approval. Before starting on such works, residents and businesses are strongly advised to take appropriate professional advice. Extensions and patios/other home improvements increasing the area of impermeable surface must contact Southern Water to agree plans to manage the additional surface water runoff from the development without connecting this to the foul or combined network. Works planning to build within three metres of a public sewer must contact Southern Water to negotiate build over consent or agree a sewer diversion, regardless of whether a grant of Planning Permission is required[lxxxix].

7.345. Early engagement with the statutory wastewater provider (Southern Water) will be required for any proposals that result in discharge of surface water run-off or other greywater to the public network, including proposals intended to offset discharges up or downstream of a proposed discharge.

7.346. Due to limited capacity within some areas of the public sewer system, appropriate discharge rates and connection locations for development discharge must be confirmed via consultation with the sewerage provider as part of initial drainage design works. In some areas of Hastings an appropriate discharge location may result in the need for connectivity works to be undertaken outside of a site's redline boundary, and alternative locations for connection should be explored with the wastewater provider.

7.347. The National Standards for Sustainable Drainage [xc]should be closely followed for all types of development (new, extensions and conversions).

7.348. Surface water management measures will generally require a maintenance and management schedule, to ensure that they continue to operate as intended for their lifetime. Such a plan must be agreed by the council and secured by condition in order to safeguard their operation throughout their lifetime.

7.349. As a coastal location, Hastings experiences elevated flood risk. There are areas of the borough that benefit from existing flood defences, which require maintenance or enhancement over their lifetime. Access and easements should therefore be provided to facilitate this by ensuring development is set

back from existing defences and watercourses. Where a development site is adjacent to or defended by flood or sea defences, it will be expected to contribute to the maintenance, enhancement and management of these defences during its lifetime where appropriate. This may be secured through legal agreement. The lifetime of residential development is assumed to be 100 years, and 75 for non-residential development[xci] .

7.350. It is important to ensure that risk to people or property is not increased during the construction of an approved development. Uncontrolled site flooding or surface water runoff can be a danger both to those accessing the site during development and to people and property positioned downstream. This risk comes not only in the form of the immediate flooding created through excess water, but also from the potential to spread site pollutants that have not yet been remediated.

7.351. To manage and mitigate this risk, proposals must provide solutions in line with the relevant British Standards or an alternative approach agreed with the council and relevant consultees. Plans to avoid, manage and mitigate all sources of flooding and to mitigate and manage surface water runoff during construction should be submitted to and approved by the council prior to commencement. This will be secured by legal agreement or through pre-commencement conditions.

7.352. Accumulation of debris within a sewer system can reduce capacity, cause damage to sewers and result in flooding if capacity is sufficiently reduced. During construction existing sewer and highway networks can become exposed to additional silt and debris unless appropriate silt management is utilised within a development. A development's Construction Management Plan must include details of how silt, debris and contaminants will be appropriately managed on site to ensure they do not enter existing drainage and sewer systems, including those located outside of the site boundary.

Policy SC16: Flood Risk and Drainage

Flood Risk Assessments for non-major and major development

1. **A Flood Risk Assessment will be required as part of a planning application where required by with National Planning Policy.**

2. **Sequential and Exception Tests will be applied where required by National Planning Policy.**

3. **Flood Risk Assessments must incorporate flood threshold checks.**

4. **Flood Risk Assessments should follow the Environment Agency's Standing Advice.**

Surface Water Management and Sustainable Drainage Systems (SuDS)

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

6. **Major developments should ensure that water management and drainage systems form an integral part of the built form and landscape design[20], and seek to safeguard existing natural or engineered surface water management measures and drainage routes.**

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

    a. **New areas of hardstanding must include or be offset by appropriate compensatory drainage to keep runoff to greenfield rates;**

    b. **The council will only support applications for parking in front or rear gardens where at least 50% soft landscaping is retained.**

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

    a. **Drainage designs should follow the National Standards for SuDS including the hierarchy standard when determining an appropriate means of surface water drainage. However, use of**

[20] GBI study 6.5.4 (role of boundary treatments); and P46 'integrate water management systems'

surface water drainage to ground (infiltration) will not usually be considered suitable within the borough due to local ground conditions and the risk of land instability. Use of any infiltration to manage surface water drainage must, at minimum, be supported by appropriate infiltration test results, ground condition surveys and land stability assessments which consider the impact increased ground saturation caused by infiltration drainage could have on and offsite; and,

b. All drainage designs must provide evidence that all potential infiltration, including infiltration from source control assets and exceedance events, has been considered in relation to land stability impacts, both on and offsite; and,

c. All drainage designs that propose discharge offsite must attenuate and release at predevelopment rates; and,

d. Drainage to watercourses must only discharge into its natural drainage catchment.

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

a. That any proposed discharge locations have been identified, and those requiring third-party approval/ agreements have been identified, and,

b. An agreement in principle to connect to the proposed discharge point(s) from the appropriate third-party has been obtained. This must be provided prior to the determination of planning, and,

c. Drainage designs which propose to discharge to a public surface water sewer must also:

i. Engage with the sewerage provider at the earliest opportunity to ensure there is available capacity, and the proposed connection point is acceptable, and,

ii. Provide evidence that the sewerage provider will accept the Greenfield 50% AEP runoff rate in line with national policy or has set a lower allowable discharge rate into the sewer.

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

11. **Proposals involving change of use that would result in a net increase of greywater discharge should seek to ensure that surface water offsetting equal to the increase is provided as a minimum by agreement with the statutory wastewater provider, and early engagement with them is therefore recommended. This may be secured through both onsite or off-site provision either down or upstream where this will alleviate pressure on the affected sewer system.**

12. **Drainage designs must be accompanied by an agreed maintenance and management plan for their lifetime, to be secured by condition.**

General Principles

13. **Development adjacent to or protected by flood and/or sea defences will be required to protect the integrity of existing defences, contribute to new defences where appropriate and be set back from the banks of watercourses and their defences to allow their management, maintenance and upgrading including Natural Flood Management measures;**

14. **Where feasible and viable, proposals should include opportunities to reuse of greywater as part of a holistic approach to flood risk management;**

15. **All non-major and major development proposals must provide a construction management plan detailing:**

    a. **Flood avoidance, management and mitigation measures in line with BS 8533; and,**

    b. **Surface water management and mitigation measures in line with BS 8582; and,**

    c. **Measures to prevent the silting of, or introduction of debris to, sewers, drainage chambers or gullies.**

Policy SC17: Coastal Change Management

7.353. It is understood that development in the coastal strip can be a complex undertaking, with a number of different consenting processes in place. In addition to supporting sustainable development, this Policy aims to simplify the process by providing clear guidance where the Local Planning Authority is acting as first point of entry in line with the provisions of the Coastal Concordat for England[xcii].

7.354. Hastings is located on the South East Coast, with approximately 12km of coastline, 5km of which is a developed frontage protected by sea walls and groynes which help to retain the shingle beaches. 2.2km of the developed frontage forms part of a two-tier concrete promenade from Carlisle Parade in the East to Marine Court in the West.

7.355. A further 5km of coastline to the East of the developed area is composed of sandstone and clay cliffs, which are designated a Site of Special Scientific Interest (SSSI). The remaining 2km to the West is low lying and includes an area of functioning flood plain within the Combe Valley Countryside Park SSSI.

7.356. The Borough has two areas of beach serviced by lifeguards in the high season to which visitors and residents are principally directed for leisure use: Pelham Beach, which is a specially designated family beach, and Marina which is popular for both bathing and water sports. To the east of the Borough is the fishing quarter, home to Europe's largest beach-launched fishing fleet and associated plant, machinery, storage and commerce.

7.357. Hastings lifeboat station is situated on the beach to the west of the Harbour Arm at The Stade and currently houses one Shannon Class and one D Class lifeboat, as well as associated plant and machinery.

7.358. Hastings seafront includes both a large portion of the resort area and number of heritage assets, many of which hold Listed Asset status including the Grade II listed Carlisle Parade Carpark, shelters and sunken gardens, some of which is within the subterranean area created through the construction of the seawall. Nine of the Borough's eighteen conservation areas intersect the seafront.

7.359. The resort area is also located on the seafront and caters to both residents and visitors. Attractions include the built and natural heritage character and historic context of the town, the beach, play spaces, amusements, aquarium, beach huts, bars, restaurants and cafes. Access to the resort area is provided through the main A259 trunk road that runs parallel to the seafront and National Cycle Route 2 that runs alongside the A259. Four carparks for use by residents and visitors providing a total of 1,041 spaces are positioned to the south side of the A259: Rock-a-Nore (450 spaces), Pelham Place (276 spaces), Marina (97 spaces) and Grosvenor Gardens (7 spaces). An

additional two subterranean carparks Carlisle Parade (171 spaces) and The Pier (40 spaces) occupy space under the A259, behind the promenade.

7.360. Other infrastructure and assets that occupy space within the coastal strip include the Ashford – Brighton railway line, utilities infrastructure, public conveniences and changing spaces (including accessible Changing Places provision), medical facilities and storage.

7.361. This economically, ecologically, historically and infrastructurally important area is likely to undergo significant change during the lifetime of the plan and beyond, accelerated by the effects of climate change including sea level rise and extreme weather events. The National Planning Policy Framework recommends that areas likely to be impacted by the effects of physical changes to the coast over both short and long-term time periods should be designated as a Coastal Change Management Area (CCMA)[xciii].

7.362. A review of evidence related to flood risk and coastal change identifies the potential for Hastings shoreline and intertidal area to be significantly impacted by the effects of coastal change between 2025-2105[xciv]. This will include loss of parts of the beach and increased impact on or loss of built and natural seafront assets, including car parking spaces, visitor attractions, conference facilities, subterranean assets, play spaces, sports facilities and active travel routes. Impacts could include these assets being inaccessible for periods of time due to safety concerns, increased marine pollution through inundation and retreat of water from polluted surfaces, damage to facilities and loss of business income due to periods of closure either for safety reasons or to remediate damage to premises.

7.363. The designated CCMA extends from Fairlight Cliffs (East of Coastguard Lane) to Glyne Gap on the border with neighbouring Rother. The CCMA area includes existing buildings and infrastructure and is shown on the Policies Map.

7.364. In line with the National Planning Practice Guidance, new residential development including change of use would be inappropriate in the CCMA and therefore proposals will not be permitted[xcv]. In order to minimise constraints to new residential development as a result of this designation, care has been taken to designate only those areas with the greatest physical, economic, infrastructural and social risk as a result of coastal change and to avoid existing sites currently in use as dwellinghouses.

7.365. Essential infrastructure as identified in the NPPF is appropriate in a CCMA provided any negative impacts on coastal change or the safety of the infrastructure itself arising from coastal change can be appropriately managed. This includes impact further along the shoreline as well as in the immediate area.

7.366. In areas of the CCMA already at risk of severe impacts of coastal change within the next 20 years, certain types of development may be appropriate provided it can be demonstrated that the development will be safe throughout

its lifetime and will not have unintended harmful impacts on coastal change. This would include development directly linked to coastal tourism such as beach huts, cafes, car parks, holiday parks and short-let caravan or camping sites. In all cases, permissions would be time limited to reflect their temporary nature and the need to remediate the site once the permission expires. There is the potential for permission to be renewed provided, once again, the development can be made safe throughout its lifetime.

7.367. In the medium and long term (21-100 years), other time limited development linked to the coastal strip such as hotels, shops, offices or leisure activities that will provide economic and social benefits to the community may be supported as long as it can be demonstrated that it will be safe throughout its intended lifetime, can be appropriately remediated once the permission expires, and will not have unintended harmful impacts on coastal change. There is the potential for permission to be renewed provided, once again, the development can be made safe throughout its lifetime.

7.368. An important part of the character of Hastings comes from the natural environment and built heritage. The CCMA interacts with a number of conservation areas, heritage assets and five archaeological notification areas, a number of protected shipwrecks and military installations, and paleoenvironmental assets including the remains of a Bronze Age Forest.

7.369. The preservation of these assets through adaptation and mitigation against the impacts of sea level rise and coastal change will be important both economically due to their value to the tourist economy and in order to preserve the character and amenity of the seafront. Many natural assets, including amenity green space, Local Wildlife Sites, and formal gardens may be able to be adapted to mitigate and manage the negative impacts of coastal flooding in particular while still fulfilling their core function preserving local amenity and providing habitat.

7.370. There is also potential for development in the CCMA to impact on a number of designated sites within the intertidal or coastal area, including the Combe Haven and Hastings Cliffs to Pett Beach SSSI, the intertidal Marine Conservation Zone (MCZ) and the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA). A proportionate assessment of ecological impact should be included as part of any proposal, alongside or as part of a coastal change vulnerability assessment to ensure the development is protected from the effects of coastal change during its lifetime and will not result in harm to intertidal or coastal habitats.

7.371. Where a proposal includes coastal and/ or flood defence works, Natural England should be consulted at an early stage in order that any identified potential environmental impact on marine designated sites will be addressed.

7.372. As coastal change progresses, existing uses within the CCMA may become unsustainable and unviable in their current location due to the impacts of coastal change. Being able to direct the relocated assets to locations outside

of the CCMA and guaranteeing the reinstatement of the existing site ensures the use continues to be supported and pollution of Marine habitats from abandoned sites is avoided.

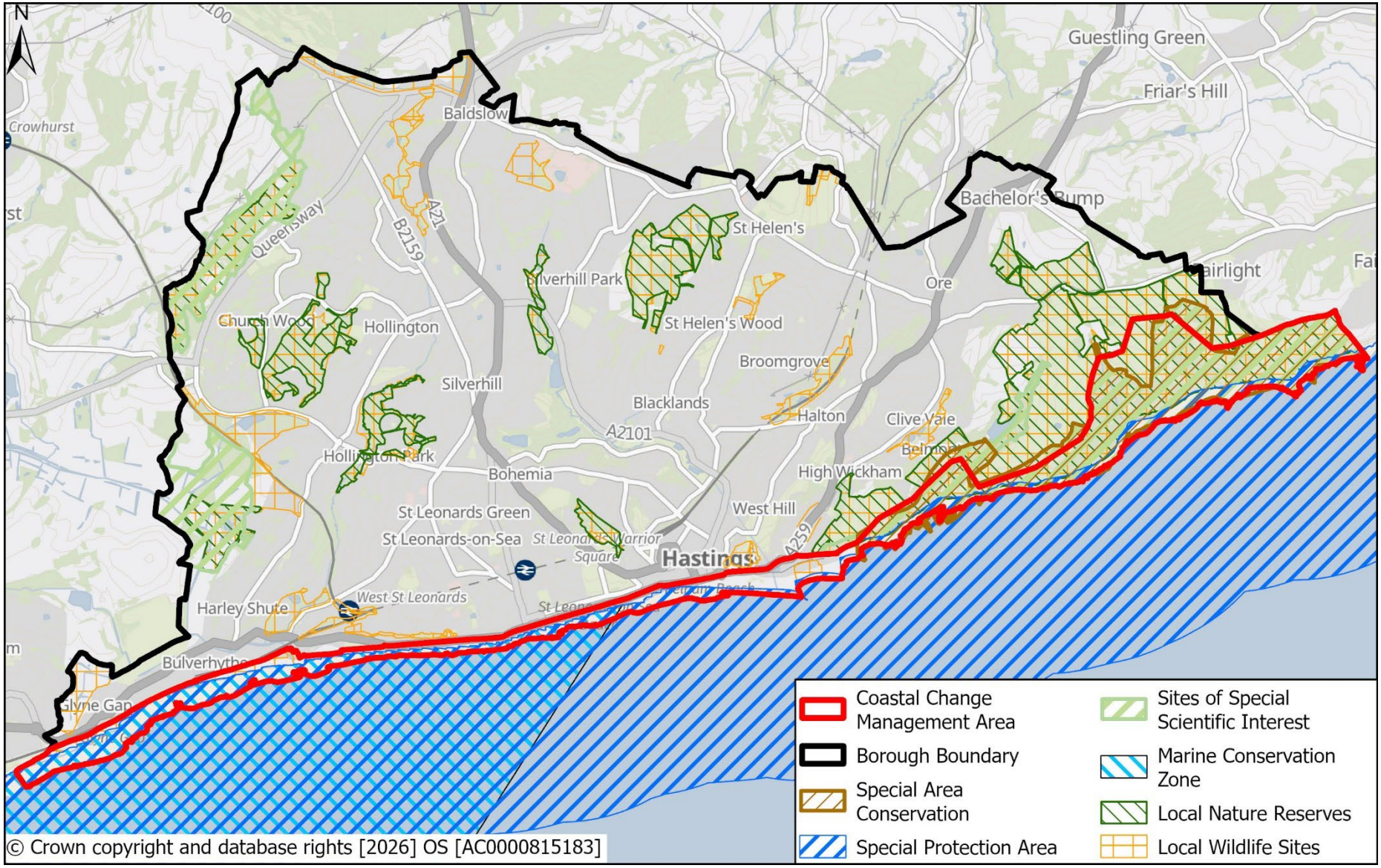

Figure 42: Coastal Change Management Area

Policy SC17: Coastal Change Management

1. **The Fairlight Cliffs to Glyne Gap Coastal Change Management Area (CCMA) as identified on the Policies Map will be a material consideration in the determination of planning applications.**

2. **New residential development, including changes of use, will not be permitted in the CCMA.**

3. **Essential infrastructure may be permitted in the CCMA provided 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.**

4. **Other development may be permitted in the CCMA where it is supported by a proportionate coastal change vulnerability assessment and, where necessary, an ecology report which demonstrates that development will:**

    a. **Be safe over its planned lifetime without increasing risk to life or property and does not require new or improved coastal defences;**

    b. **Not restrict natural processes, communities or the character or designations responding to the impacts of climate change;**

    c. **Not accelerate the rate of shoreline change elsewhere;**

    d. **Not result in harm to coastal and intertidal habitats.**

5. **Proposals to conserve natural, archaeological, paleoenvironmental and built heritage assets within the CCMA will be supported provided that:**

    a. **The character of the asset is conserved or enhanced and;**

    b. **The proposal incorporates appropriate adaptation and mitigation measures.**

6. **Applications to relocate development outside of the CCMA will be supported provided:**

    a. **The existing development is lawful;**

    b. **The site for the proposed development is outside of the CCMA as shown on the Policies Map;**

c. **The type, scale and location of the proposed development is consistent with other policies within this plan;**

d. **A site restoration plan for the existing development within the CCMA is provided.**

Policy SC18: Pollution and Hazards

7.373. Development has the potential to result in negative environmental impacts both during construction and when occupied. New development can also be impacted by existing pollution and hazards. Pollution and hazards can include pollution from airborne particles, contaminated land, and also hazards created by additional risks to property, the environment and people such as flooding, misconnections, or harm to habitats.

7.374. It is not just obviously hazardous substances that can result in the pollution of land, air or water. Any substance that is not naturally found within an environment has the potential to cause pollution. Even natural substances are capable of polluting where they are out of their normal environment[xcvi].

7.375. Development can have impacts on air quality during the demolition and construction phase through the release of dust and particles and then ongoing once development is completed in the form of emissions from transport movements and loss of existing green infrastructure. There is also the potential for negative impacts on occupiers of completed developments through airborne contaminants as a result of pre-existing uses in the nearby area, such as roads or industrial processes. Where air quality is negatively impacted it can result in serious harm to health and wellbeing, including loss of life.

7.376. Air quality in Hastings is generally good, with the 5-year trend indicating a decline in NO2 concentrations. However, air quality fluctuates, and applications should be guided by the most recent available data. Particular focus will be placed on improving air quality and mitigating the effects of poor air quality for everyone. This will contribute to UN Sustainable Development Goal 3 'Ensure healthy lives and promote well-being for all at all ages'. The policies of this plan make allowances for the fact that the local air quality position may change over time, and that Air Quality Management Areas may be identified during the lifetime of the plan.

7.377. Land that may already be polluted can carry risks to health, and in some cases, soils are the final destination for polluting substances. Some of these pollutants break down in soil over time, while others cannot be removed without active remediation. Pollutants also have the potential to accumulate in soil over long periods[xcvii], meaning that some pollution may arise from historic uses, or be present due to natural processes. This means that the last known use of the land may not be the only indicator of the presence of pollutants.

7.378. Land that is found to be polluted can require different levels of remediation depending on the proposed use of a site. Care should be taken to ensure that land within the proposal site and in the surrounding area that is currently free from contaminants is protected from their introduction both during construction and after completion. The borough has complex hydrological and

hydrogeological interactions, and therefore the potential for land to be polluted is not limited to previously developed land. Ground investigations should take place, except where the site is unlikely to be polluted, and the development and associated environment is not sensitive. Protecting land from pollution contributes to the UN Sustainable Development Goal 3 'Ensure healthy lives and promote well-being for all at all ages'.

7.379. Where a proposal includes a use that is potentially polluting, involves the storage of hazardous substances, or may produce contaminated water, environmental permits or compliance with wider regulations may be necessary in addition to the granting of planning permission[xcviii].

7.380. Any liquid waste produced by a business, industrial process or building site may be considered trade effluent, including groundwater dewatering and building site discharges.

7.381. No discharge should be made to any drain without first ensuring the appropriate environmental permit or trade effluent consent (temporary trade effluent consents can be granted by the statutory wastewater undertaker for relevant construction activity) is formally agreed for the nature of discharge that the contaminated water relates to. Surface water drains in particular should be protected from site run-off at all times as these can lead directly to water courses, causing pollution[xcix].

7.382. Southern Water, in their capacity as the wastewater services provider, may issue trade effluent consents where it is possible to connect allowable discharges to agreed points of the public network. Consents are issued provided they will not pose a threat to the public network or the treatment process, safeguarding controlled waters (the sea, tidal water, inland freshwater and groundwater) from contaminants at the point where water treatment works discharge final effluent back into water bodies. There is therefore some risk to controlled waters from effluent. Where a trade effluent consent cannot be granted, there are other options available including tankering to specialist treatment facilities which would need to be arranged by those responsible for the site.

7.383. Protecting surface water and groundwater quality contributes to the UN Sustainable Development Goal 6 'Ensure access to water and sanitation for all', Goal 14 'Conserve and sustainably use the oceans, seas and marine resources for sustainable development' and Goal 3 'Ensure healthy lives and promote well-being for all at all ages'. This may mean carrying out work over and above that required to make the land suitable for the proposed development and to protect human health.

7.384. In Hastings, surface water and groundwater interactions are complex, with much of the Borough highly vulnerable to surface pollutants entering groundwater through the aquifer[c]. Pollutants can likewise enter watercourses or surface water sewers through overland flow, inadequate filtration or improper discharge practices. Both the Combe Haven and Hollington Stream

are currently classified as having ‘poor’ water quality[ci]. Groundwater quality is currently classified as ‘good’, and this standard should be maintained.

7.385. Proposals should seek to improve water quality[cii] where possible and prevent pollution from entering watercourses or groundwater through natural solutions, engineered solutions or a combination of both. Watertight foul systems are crucial for preventing leakage in areas vulnerable to pollution and ground deformation as a result of infiltration, such as locations with a high groundwater table. Examples include the use of fusion jointed MDPE pipes and mass concrete surrounds to inspection chambers, which can prevent ground water infiltration and are easy to maintain.

7.386. Hastings benefits from a number of designated sites that are vulnerable to the effects of both water quantity and quality. These include the Marline Valley Woods SSSI, an ‘irreplaceable habitat’ made up of ancient ghyll woodland, sandstone outcrops and low-lying meadow and Combe Haven SSSI, which includes fen vegetation, alluvial meadows and reedbed. The Combe Haven SSSI also includes areas of functioning flood plain.

7.387. Hastings Country Park Nature Reserve is also a SSSI and SAC. Fairlight Glen, an Ancient Gill Woodland, is within this and is home to rare and scarce species of bryophytes (mosses and liverworts) and invertebrates.

7.388. Due to the compact nature of the Borough, development has the potential to fall within the Impact Risk Zone (IRZ) of one or more SSSI. The SSSI IRZs can help identify whether a proposal is likely to affect a SSSI and choose whether to seek pre-application advice from Natural England.

7.389. Development in Hastings has the potential to impact the water quality of the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) due to the complex hydrological interactions serving the area.

7.390. The South of the borough borders the South Marine Plan[ciii] area and includes a designated Marine Conservation Zone (MCZ) protecting both habitats and species. In addition to impacts on habitat, much of the economic and cultural prosperity of the south marine plan areas is reliant on water quality.

7.391. Due to the geography and topography of the Borough, watercourses and surface water can discharge directly into the MCZ in a number of locations. Likewise, tidal influences can impact on groundwater and create areas of ‘tide locking’ under certain conditions. This creates the potential for flooding, the introduction of marine pollution to rivers and groundwater, and land pollution to rivers and seas as floodwater recedes[civ]. The SFRA identifies these interactions as becoming significant at the bottom of the Combe Haven catchment, within the SSSI.

7.392. In line with the South Marine Plan[cv], proposals should seek to manage impacts on, and in preference improve, water quality and the habitats and species which benefit water quality through the ecosystem service they provide.

7.393. Development near major hazard sites (including high pressure gas mains) and overhead electricity distribution lines can carry considerable risk of injury or death, not only to those working on site during the development process, but also to others. Therefore, the council will need to notify appropriate bodies where development is related to or nearby to these uses.

7.394. Every year, people are killed or seriously injured when they come into contact with overhead distribution lines. Proposed developments within 10m of overhead distribution lines should be able to demonstrate compliance with GS6 guidance or its successor[cvi]. Where it is intended that buildings should be positioned under the current route of a distribution line, alternative routes for the line should be examined with the owner of the infrastructure.

7.395. Major hazard sites refer to sites and infrastructure around which Health and Safety Executive consultation distances to mitigate the consequences to public safety of major accidents may apply. The council will consult with the HSE where a proposal is within the Consultation Distance (CD) of major hazard installations, complexes and pipelines and where it involves:

- Residential development of any size;
- More than 250 sqm of Retail or non-specific Class E floorspace;
- More than 500 sqm of Office floorspace;
- More than 750sqm of industrial floorspace;
- Transport links, including major road and railways;
- A material increase in the number of persons working within, or visiting, a CD where the proposed development is within the CD;
- Other types of development that may result in an increased likelihood of a major accident or incident.

7.396. For high pressure gas mains (operating pressure between 7bar – 16bar), the guidance set out within the Pipeline Safety Regulations 1996 (PSR)[cvii] or their successor should be observed and followed appropriately. The location of underground pipelines should be considered when carrying out building, excavation or dumping or other such work, as these activities may either cause damage to pipelines or prevent access to them for maintenance purposes.

Policy SC18: Pollution and Hazards

1. **Development will minimise and mitigate pollution and hazards and seek to improve air and water quality during both the construction and operation phases of development. To protect human health, wildlife, water and land quality, development is required to:**

    a. **Meet or exceed the standards set out in the Air Quality and Emissions Guidance for Sussex, including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles;**

    b. **Incorporate appropriate pollution control measures where necessary to protect ground and surface waters, and;**

    c. **Incorporate appropriate measures where necessary to remediate or protect land from pollution or contamination.**

2. **Applicants must supply convincing supporting evidence appropriate to the scale and nature of the proposal that any actual or potential pollution or hazard can be overcome through appropriate remedial, preventative or precautionary measures.**

3. **To protect and enhance air quality, an Air Quality Impact Assessment (AQiA) must be provided alongside proposals for:**

    a. **Major development;**

    b. **Development within or with the potential to impact on an Air Quality Management Area;**

    c. **In an area close to exceeding the Air Quality Objectives;**

    d. **B8 storage and distribution use class with a floorspace of 500sqm or more;**

    e. **Development that is located close to areas of wildlife sensitivity;**

    f. **Other commercial uses with high volumes of transport-related movements.**

4. **Development proposals should undertake site investigation for contaminants. This should be evidenced through suitable ground investigation reports that clearly set out any risk to groundwaters during or following construction, and how this will be avoided or mitigated. Where land is found to be contaminated or polluted, remediation proposals must be agreed before permission is granted.**

5. **Development proposals involving contaminating uses or processes, including the storage of potentially contaminating substances or materials, may not be acceptable within or in close proximity to populations and environmentally sensitive locations, including water quality sensitive designated sites.**

6. **To protect water quality, development proposals must:**

    a. **Provide extensive drainage plans for the site;**

    b. **Incorporate multifunctional SuDS systems wherever possible and appropriate to do so;**

    c. **Phase occupation of the development with any reinforcement of the local sewer network identified as needed to provide capacity for the new development. Early engagement with the statutory wastewater services provider is encouraged;**

    d. **Be accompanied by the appropriate environmental permits and/or trade effluent consents, as relevant to each of the construction and operational phases of the development, where necessary including grease and sediment traps where relevant to the proposal[21];**

    e. **Include an oil separator where the proposal creates a risk of oil contamination[22].**

    f. **Ensure they install a watertight foul system in their development where the proposal is within a location with high groundwater.**

7. **The management of dust, air pollution, site waste disposal (where this cannot be recycled or reused), the prevention of transfer of containments from the site to other locations will be set out in a Construction Management Plan with regard to the policies of the Waste and Minerals Local Plan.**

8. **Development proposals should consider the location of overhead distribution lines and major hazard sites, including high pressure gas mains. The council will consult with the Health and Safety Executive and other relevant bodies where development is proposed within 10m**

[21] Food preparation/ production/ commercial kitchens, commercial laundries, commercial cleaning services, hairdressing, pet grooming.

[22] As defined:

- car parks larger than 800m^2 or for 50 or more parking spaces
- smaller car parks that discharge to a sensitive environment, such as a marsh that has been designated as a nature reserve
- vehicle maintenance areas
- roads
- refuelling facilities

of an overhead distribution line or within the Consultation Distance of a major hazard site.

9. **Proposals for buildings under overhead distribution line routes must observe the following hierarchy to prevent risk to occupiers:**

    a. **Replace with underground cables; or if not possible,**

    b. **Permanently divert the distribution line; or if not possible,**

    c. **Allow appropriate levels of clearance as set out in the ENA Technical Specification 43–8 Overhead Line Clearances.**

10. **Easements to provide access to major hazard sites and distribution lines will be maintained at all times.**

11. **All major and minor development proposals must provide a construction management plan including details of how any risk of pollution and hazard relevant to the temporary condition of the site will be addressed and mitigated. Proposals will not be supported unless they contain details of the measures that will be taken in the construction phase to ensure that polluted runoff (including suspended sediment) does not leave the site. Temporary trade effluent consents can be granted by the appropriate wastewater service provider to help ensure lawful discharge from construction sites.**

12. **All major and minor development must provide a maintenance and management plan in relation to any pollution mitigation measures for the lifetime of the system.**

13. **Evidence provided with applications in relation to this Policy must be from a relevant and suitably qualified professional.**

Policy SC19: Environmental Nuisance

7.397. Development can result in a number of negative environmental impacts, both during development and after the development is completed. These collectively and individually are referred to as pollution, hazards and environmental nuisance within the policies of this plan. Environmental nuisance can include unwanted, inappropriate, excessive or harmful light, odour, noise and vibration. Flooding, landslide, pollution and hazards are covered in more detail elsewhere within this plan.

7.398. Noise nuisance takes the form of unwanted sound and includes vibration. Noise can arise from construction activities involved in the delivery of new development or be ongoing as an attribute of the occupied premises or use. In order to protect amenity, proposals will need to include a suitable assessment and propose acceptable mitigations[cviii]. Where a development is proposed close to an existing source of noise or vibration – for example, near a railway line or a live music venue – then the developer as the agent of change will need to show how they will mitigate for this while still delivering an appropriate level of amenity for occupiers[cix].

7.399. Unwanted odours can likewise impact on the amenity of occupiers. As with noise, there is the potential for unwanted odours from construction activities involved in the delivery of new development or be ongoing as an attribute of the occupied premises or use. In order to protect amenity, offensive odour producing uses will need to demonstrate an acceptable scheme of mitigation measures can be adopted. Where a development is proposed close to an existing source of odour – for example, waste treatment works, livestock or commercial food processing – then the developer as the agent of change will need to show how they will mitigate for this while still delivering an appropriate level of amenity for occupiers[cx].

7.400. Sensitive development within 500m of a Wastewater Treatment Works (WTW) should carry out an odour assessment in consultation with Southern Water to agree the 1.5 OdU contour, within which no sensitive development should be located[cxi]. The assessment should be carried out to determine and agree an area of adequate separation between the works and any sensitive development[cxii].

7.401. Light pollution takes the form of unwanted, inappropriate or excessive artificial lighting. It can be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky. Development proposals should ensure that lighting schemes are appropriate for the development, and that where there is the potential for harm that appropriate mitigations are in place. A lighting assessment may be a useful tool for major developments to inform a suitable lighting scheme.

7.402. All development with external lighting should meet or exceed Institution of Lighting Professionals [cxiii] guidance for the environmental zone in which the

development is set to take place – not what it will become. By limiting external lighting to 3000k CCT (correlated colour temperature), harmful impacts on invertebrate pollinators are reduced as are the negative impacts on nesting birds and bats where lighting of 500 lumens or more is fully shielded. Reducing blue light can minimise light spill into protected areas such as Local Wildlife Sites, SSSIs and neighbouring homes. Light spill can further be reduced by ensuring that external lighting is in the right place and on at the right time, and through appropriate glazing solutions. A lighting plan for both the use of site illumination during construction and the mitigations that are proposed for the completed and occupied development will ensure that harmful impacts of excessive lighting are avoided throughout.

7.403. The High Weald National Landscape Area of Outstanding Natural Beauty Planning Technical Advice Note: Dark Skies in the High Weald[cxiv] provides detailed guidance for planners and developers on delivering good lighting design and should be used alongside this Policy when considering lighting schemes.

Policy SC19: Environmental Nuisance

1. **Development will minimise and mitigate environmental nuisance during both the temporary and permanent condition of development. To protect human health and wildlife, development is required to:**

    a. **Control and mitigate odour, noise and vibration arising from both the construction and occupation of the development and any impact on neighbouring uses;**

    b. **Minimise and mitigate light intrusion where this would otherwise result in nuisance or loss of amenity and demonstrate that all opportunities to reduce light pollution have been taken.**

2. **Proposals that are likely to result in a new source of noise or vibration when operational, will require an agreed noise assessment and report following the approach set out in the Planning Noise Advice Document: Sussex 2021 or its successor. Mitigation proposals for noise and vibration must be agreed before permission is granted.**

3. **Proposals that are likely to result in a new source of offensive odour when operational, will require a mitigation strategy which must be agreed before permission is granted. Mitigations where development is proposed within 500m of existing Wastewater Treatment Works must be developed on the basis of an odour assessment undertaken in consultation with Southern Water.**

4. **Proposals that may be negatively impacted by the effects of existing sources of odour, noise or vibration must provide suitable mitigations that will not in themselves compromise the amenity value of the proposal, to be agreed before permission is granted.**

5. **Proposals should avoid or mitigate the impact of light pollution by:**

    a. **Limiting outdoor lighting to 3000k CCT (correlated colour temperature) or less, except where specific standards require a higher CCT, and;**

    b. **Fully shielding any outdoor lighting above 500 lumens, and;**

    c. **Avoiding light above the horizontal, and;**

    d. **Applying suitable mitigation measures, such as proxy sensors or timers, and;**

    e. **Avoiding outdoor lighting with a high spectral content of blue light, and;**

f. **Reducing light spill from interiors where possible through use of suitable glazing, and;**

g. **In sites within, or affecting the setting of the High Weald National Landscape, refer to the High Weald National Landscape Planning Technical Advice Note: Dark Skies in the High Weald.**

6. **A lighting plan for both the temporary and operational condition of the proposed development must be agreed before permission is granted.**

7. **All major and minor development proposals must provide a construction management plan including details of how any risk of environmental nuisance relevant to the temporary condition of the site will be addressed and mitigated.**

Policy SC20: Community Facilities

7.404. Community facilities include buildings used or last used by local people for community purposes. This can include community halls, community centres, meeting rooms, youth centres, social clubs and church halls. Other community facilities, such as open space, built sports facilities and playing pitches are covered in Policy ID3.

7.405. The council will seek to protect community facilities and support their extension or enhancement to ensure they remain able to meet the needs of local communities both now and in the future.

7.406. Community facilities include buildings used or last used by local people for community purposes. This can include community halls, community centres, meeting rooms, youth centres, social clubs, libraries, day nurseries, isolated retail premises or parades outside of the town centre hierarchy, public houses, church halls and other facilities as defined in National Planning Policy. Other types of community facilities, such as open space, built sports facilities and playing pitches are covered in Policy SC14.

7.407. Grassroots community facilities primarily provide access to social capital for the communities they serve and also enable diverse groups to access community organisations and services. The ability to access social capital is an important component in levelling up communities and reducing deep-seated generational inequality. Maintaining access to physical locations is important. An online gathering place is not a community hub.

7.408. In some cases, the role of a community hub may be either formally or informally performed by a commercial facility including public houses, local shops, or social clubs. Day nurseries provide a broader role, allowing children below mandatory school age to build social capital and enabling their parents and carers to access employment or educational opportunities beneficial to the economic wellbeing of the household.

7.409. A shortage of day nursery places in Hastings has been identified through the IDP process. Although day nurseries currently sit within use Class E, and are considered a town centre use, it is beneficial for day nurseries to be located in areas outside of the town centre hierarchy near to schools, community centres, workplaces, and residential areas. However, it is understood that not every Class E use would be appropriate in these locations without causing harm to amenity. To protect the supply of day nursery accommodation, preserve amenity and support the function of the town and district centres, new day nurseries will have changes of use to others within their class restricted by condition.

7.410. Access to community facilities should also be viewed in the context of the council's duty under s149(3) of the Public Sector Equality Duty and proposals that may impact negatively on protected characteristic communities must demonstrate how this impact will be mitigated. Where a proposal may result

in loss of a community facility, applicants are encouraged to work with the community to understand its value to local people and identify appropriate mitigation measures.

7.411. In some cases, as part of a wider development proposal, existing social infrastructure may be reprovided in order to optimise the layout or to consolidate a number of smaller infrastructure elements into a single provision. Where this is the case, the reprovided social infrastructure must continue to meet the local needs of the community it serves, and replacement facilities should be occupied prior to the operational loss of the original. Where a temporary provision is provided during the construction phase, the operational loss is considered to be the cessation of activity within the temporary premises.

7.412. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the loss of existing use will generally be accepted due to the facility being no longer required.

7.413. For proposals that would result in the outright loss of a commercial community facility, information demonstrating that the use is no longer viable must be provided alongside evidence of an appropriate marketing campaign.

7.414. Viability assessments should demonstrate that:

- the existing or recent business is not financially viable, as evidenced by trading accounts;
- for the last three years in which the business was operating as a full-time business;
- a range of measures were tried during this time to increase trade and diversify use;
- the potential for the property to extend the range of facilities offered at the site has been fully explored;
- for public houses, the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes show that the public house is no longer economically viable.

7.415. Marketing campaigns should demonstrate:

- That the facility has been marketed for a minimum of 10 consecutive months or an alternative timeframe agreed with the planning authority;
- Flexibility of tenure;
- It has been marketed by an agent specialising in this type of facility;
- It has been marketed with a high-quality campaign, including the use of accurate interior and exterior photos that reflect the current condition and detailed particulars including estimated potential turnover, dimensions, access and restrictions;
- That there are detailed records of enquiries relating to the premises over the marketing period.

Policy SC20: Community Facilities

1. **Proposals for the provision of new community facilities or enhancement and/or extension of existing facilities will be supported, provided that the development is acceptable in terms of location, design, access (including through active or sustainable modes of travel) and impact on the locality.**

2. **To safeguard opportunities for sufficient early years provision, day nurseries permitted in line with this Policy will be secured through a planning condition. This will have the effect of removing changes to other uses within the same planning use class without a planning consent.**

3. **Planning applications involving the loss of a community facility will only be permitted where it can be demonstrated that the existing community use is either:**

   a. **no longer required; or**
   b. **proposals for its replacement are included in the application; and**
   c. **that negative impacts on protected characteristics under the Equalities Act 2010 have been identified and mitigated where the facility is predominately used by a protect characteristic community.**

4. **Applications that would result in the loss of a commercial community facility must demonstrate that it is no longer commercially viable and cannot be made so.**

5. **Where a proposal includes the replacement of a community facility, the replacement facility should reach occupation phase prior to the operational loss of the existing facility. This may be secured by condition.**

6. **Proposals involving the loss of a shop or service outside of defined commercial areas will not usually be supported due to the vital role they play in community cohesion and placemaking.**

Part four - Infrastructure and Delivery

7.416. To ensure development in Hastings is sustainable, the plan must show that the infrastructure needs of new developments are identified, and steps are taken to ensure that these needs are met. Infrastructure is a broad term and covers a range of areas including:

- Schools, education and skills provision;
- Libraries;
- Open space, play facilities;
- Playing pitches and sports facilities;
- Waste and recycling;
- Burial plots;
- Transport infrastructure, including roads, rail, foot and cycle paths;
- Healthcare Infrastructure, like hospitals and Drs surgeries;
- Emergency services, like police, fire and ambulance;
- Electricity, gas, water and sewerage.

7.417. The Infrastructure Delivery Plan (IDP) is the council's assessment of the infrastructure needs arising from the development proposed in the plan and identifies priority projects that will need to come forward to enable sites to come forward if it is not in place already.

7.418. The IDP is developed with a range of partner agencies and infrastructure providers named within the document and is a living document, with regular updates at different points in plan making and annually thereafter.

7.419. Where a site or broad location is identified as having specific infrastructure requirements above and beyond the global requirements set out within the policies of this plan that apply to all sites, it is set out in the site Policy itself. An example would be a requirement for a new playpark on a site instead of a financial contribution.

Policy ID1: Planning Obligations

7.420. In order to support the level of growth associated with Policy SP1, the Plan must also facilitate the delivery of necessary infrastructure, services and facilities required to support the level of growth over the plan period. All new development has a responsibility to contribute towards the cost of new infrastructure.

7.421. Infrastructure is often funded by developers either through planning obligations or the Community Infrastructure Levy. Planning obligations, also known as developer contributions or Section 106 agreements, are bespoke agreements made between the Council and the developer where the developer either delivers new infrastructure or contributes to funding infrastructure to meet the needs resulting from that development. The Council does not currently have a Community Infrastructure Levy in place, so any development contributions required will be secured through Section 106 Legal Agreements supported by Section 278 highway agreements led by the Highway Authority, or planning conditions as appropriate.

7.422. Infrastructure is provided by a range of organisations. As part of the Local Plan preparation process, the Council engaged with infrastructure providers and undertook a number of studies to understand the range of infrastructure needed to support the Spatial Strategy as set out in SP1. As part of this work, an Infrastructure Delivery Plan (IDP) has been prepared which identifies the infrastructure required to support the Plan's delivery.

7.423. The IDP is an iterative and 'live' document. It will be updated on a regular basis, in accordance with most recent infrastructure service provider plans and updated evidence. Liaison with the service providers will continue beyond the adoption of the Plan.

7.424. The Council and other infrastructure providers, will identify and secure sources of funding to support the delivery of necessary infrastructure, including public sector monies and grant funding. However, there is an expectation that develo1pers contribute towards or deliver infrastructure improvements where these are required to make a development proposal acceptable. Funding may take the form of on and off-site physical infrastructure or a financial contribution depending on the needs of the development.

Affordable Housing

7.425. There is a high proportion of residents that require some type of affordable housing. As such, affordable housing must be provided on all developments or delivered elsewhere through financial contributions. Contributions agreed in this way through Section 106 agreements will go towards the delivery of council homes.

7.426. Where agreement has been reached during the planning application stage on providing less than the full on-site affordable requirement, any reduced affordable housing contributions will be subject to a review mechanism. Property markets do experience change at both the local and national level.

7.427. The viability of a scheme may therefore be notably different by the time of implementation due to changes in market conditions; and uncertainties in relation to aspects of a viability assessment at the application stage. In considering viability matters, regard will be had to best practice, particularly as set out in Planning Practice Guidance (PPG).

7.428. In order therefore, to ensure that the maximum reasonable level of affordable housing is provided, and that other plan requirements are met, the council will require a viability review mechanism through planning condition/obligations on all residential / mixed use schemes which do not meet the affordable housing requirement and / or policy requirements in full at the time permission is granted. Viability reviews will determine whether a development is capable of providing additional affordable housing or meeting other unmet policy requirements.

Securing Small Site Contributions (Less than 9 dwellings)

7.429. Changes to the CIL Regulations in 2019[cxv] now allow for more than five contributions to be pooled together, this is an important change in securing Section 106 funding from smaller sites.

7.430. The council is pursuing a strategy of significant densification as set out within the Spatial Strategy. Due to the existing built form and character of the borough, it is anticipated that a substantial quantity of smaller sites will come forward during the life of the plan both as site allocations and as Windfall. The Spatial Strategy acknowledges that smaller sites may be capable of delivering at densities in excess of the Density Zone (Strategic Policy 1 (SP1): Directing Growth – a Spatial Strategy) in which they are located.

7.431. An important pillar of the Spatial Strategy is ensuring that all policies within the Plan reinforce the need to achieve appropriate densities. No Policy, alone or cumulatively, should restrict, discourage, or incentivise delivery at densities that would fail to contribute positively to housing need. Financial mechanisms in the plan must not reward under-utilisation of land, and where a site is viable, policies should favour effective land use.

7.432. Due to the level of development small sites are expected to deliver over the lifetime of the plan, their cumulative infrastructure needs are likely to result in additional impacts and stress on local systems that together may require contributions towards improving local infrastructure that should be pooled to ensure their effect is mitigated.

7.433. Additionally, the acute need for affordable housing in the borough supports a strategy that fully explores the cumulative potential for all development to contribute to meeting this need.

7.434. The factors set out above weigh in favour of seeking developer contributions for affordable housing on proposals for less than 9 dwellings. For affordable housing, this will always take the form of a financial contribution towards to the delivery of new council homes.

7.435. Accordingly, small sites will not be exempted from the requirements of Policy ID1 and SP2, except that SP2(7) will not apply in light of the financial contributions approach set out above.

Exemptions

7.436. Self-Build and Custom Housebuilding applications are exempt from tariff-based and affordable housing contributions, provided that they meet the definition of Self-Build and Custom Housebuilding as set out in the Regulations or defined by the Secretary of State. A condition or legal agreement will be used to secure their use as Self-Build housing and should the premises cease to be occupied as such within a 3-year period, the full complement of developer contributions will be required.

Contributions required by East Sussex County Council

7.437. With regards to active travel and the development of healthy places, the general strategy is set out in the East Sussex Local Transport Plan 4. East Sussex County Council, as the Highway Authority and their partners, place an emphasis on walking, wheeling and cycling and access to public transport provision, alongside road improvements. Consequently, to help improve connectivity by these modes, the East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) has been developed to guide development proposals alongside the East Sussex Bus Service Improvement Plan (BSIP).

7.438. The IDP prepared to support this Local Plan includes highway and sustainable transport projects identified by the County Council. These may be subject to revisions in terms of prioritisation and available funding but have the potential to be provided or co-funded through planning obligations. The potential sustainable transport infrastructure measures or on-site provision that proposals for major development may be required to provide or contribute towards will be considered on a site-by-site basis. Potential measures include,

but are not limited to, public transport and schemes to enable improvements to connectivity for walking, wheeling and cycling, and highways works.

7.439. If highway related improvements are necessary, the County Council's preferred approach is to seek measures and/or infrastructure for delivery both within and off-site.

7.440. Contributions towards highways, walking, wheeling and cycling, and passenger transport, may be requested by East Sussex County Council and are calculated on a site-by-site basis. There is no minimum dwelling threshold for contributions towards these measures.

7.441. For major development proposals the County Council will request a transport report / statement / assessment to include a non-motorised user (NMU)/active travel related audit to establish what the 'site' requires to support pedestrians and cyclists. Regard should be had to Active Travel England: planning application assessment toolkit - GOV.UK (www.gov.uk). Transport information supplied by applicants in support of proposed development will be required to follow a monitor and manage approach, building on the transport evidence prepared for this local plan. The council will work with the developer, local transport authority, highway authority, and National Highways where development may have an impact on the Strategic Road Network, to review appropriate mitigation measures as applications come forward through the lifetime of the plan.

7.442. Contributions towards education provision, libraries, waste and public rights of way are also administered by East Sussex County Council and are calculated on a per dwelling basis for developments of 15 dwellings or over.

7.443. Table 14sets out indicative contributions (financial or otherwise).

Policy ID1: Planning Obligations (Section 106)

The council will seek to ensure that the right infrastructure is in place at the right time support new development. This will be achieved as follows:

1. **Using planning obligations to address the impacts of development in line with policies set out in this Local Plan. The Council will seek planning obligations where necessary such as those set out in Table 14 below.**

2. **Where a Section 106 Agreement is entered into the Council will secure proportionate and reasonable fees associated with the monitoring of any planning obligation in addition to the Council's legal costs incurred in drafting and completing the Section 106 Agreement.**

3. **All payments secured by planning obligations will be index linked to the construction index or inflation index (as appropriate for the obligation) from the date of agreement to the date when payments are due.**

4. **Other planning obligations may be sought to secure Policy requirements set out in this Local Plan and to mitigate the specific impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations (2010) (as amended).**

5. **Onsite obligations will be managed and maintained by an accountable body for the agreed period, as defined in any Section 106 Agreement. Fees for inspections of onsite measures and maintenance and management plans will be paid by the developer and recovered through the Section 106 Agreement.**

6. **Updating of the Infrastructure Delivery Plan and monitoring the implementation, including setting out the infrastructure needed, the lead agencies responsible for providing it, and the timescales for delivery.**

7. **Requiring that if any such sums are not paid by the Due Date then the Owner shall thereafter be liable to pay to the Council or the County Council (as relevant) interest on the same calculated on a daily basis at a daily rate of 1/365th of the annual rate of interest of 4% per annum greater than the Bank of England base rate in force from time to time from the Specified Date to the date of payment thereof.**

8. **Where the full affordable housing contribution cannot be delivered, the Council will require the applicant to enter into a review mechanism, secured via a planning condition and/or a planning obligation as set out in SP2.**

9. Affordable housing contributions arising from small sites delivering 9 or fewer dwellings will be exempt from the Policy requirement to deliver onsite affordable housing set out in SP2(7) and will fulfil affordable housing delivery obligations in the form of a commuted sum.

Table 14: Indicative planning obligations by threshold

Type of development	Planning Obligation[23]
a. All development, where required	• **Highway related interventions to support active, sustainable (public) and motorised (private) modes of travel (NPPF)** • **Rights of Way (IDP)** • **Biodiversity net gain onsite[24] or a financial contribution towards these where they cannot be met on site* and a biodiversity monitoring fee (Mandatory Obligation)** • **Urban Greening and Green and Blue Infrastructure on site (Biodiversity and Green and Blue Infrastructure Strategy, need derived)** • **Restrictions to on-street parking, or other modal shift schemes in line with Policy ID2** • **Contributions to secure provision for Traffic Regulation Orders (where required) (Mandatory)** • **Maintenance and management plans and construction management plans. (Viability Threshold)** • **Sustainable Drainage Systems (Mandatory Obligation)**
b. In addition to (a), residential development (1 or more homes or bed spaces)	• **Affordable housing in line with Policy SP2 (HEDNA)**
c. In addition to (a) and (b), residential	• **Open Space contribution where open space is not provided on site to pay for upgrades/access improvements to**

[23] **The source, nature and extent of the relevant obligation are found in, or can be ascertained from, the documents or legal sources in brackets in cases where it is appropriate to specify.**
[24] **Subject to exemptions as set out in national Biodiversity Net Gain guidance, including those related to site size, duration of permission and**

Type of development	Planning Obligation[23]
development of 10 or more homes or bed spaces	existing open space (Open Space and Play Audit) • Play space contributions and maintenance contributions to pay for upgrades/access improvements to existing play space (Open Space and Play Audit) • Energy Strategy Report, incorporating Local Labour Agreement. (Viability Threshold)
d. In addition to (a), (b) and (c), residential development of 15 or more homes or bed spaces	• Educations contributions (nursery, primary, secondary) • Public transport contributions (including contributions towards Bus Service Improvement Plan implementation) • Waste management infrastructure contributions • Contributions towards libraries (ESCC) • Contributions towards Policing (IDP).
e. In addition to (a), (b), (c) and (d), larger scale residential and commercial development (40 or more homes or bed spaces, or floorspace of 2,500sqm or more[25])	• Contributions to secure provision for Travel Plan Audits for schemes of 35 units and more (Mandatory) • Healthcare (Primary Care) • Public realm improvements • Provision of on-site open space • Construction phase local employment labour procurement targets and/or employment and skills plans • Sports facilities contributions (Playing Pitch Strategy)

[25] For employment, skills and labour, the commercial floorspace threshold is 1,000sqm.

Policy ID2: Access and Parking

7.444. When new development is proposed, the ways that people move on and through a site are important considerations. The provision of car parking in developments must not lead to vehicles unduly dominating the streetscape. The impact on existing transport networks from a proposed scheme is also an important matter. Dependent on the scale of a proposal, there should include clear access to and routes for alternative modes of transport to the car.

7.445. Design and Access Statements are a prerequisite of certain planning applications. They should explain how proposals are capable of successful integration onto a particular area. Consideration should go beyond the strict boundaries of the site to showing and understanding of how people move between different places and how various uses connect together.

7.446. Proposals for major schemes as defined in the Development Management Procedure Order (DMPO) are likely to require travel plans in line with East Sussex County Council's existing guidance: 'Transport Assessments, Transport Statements and Transport Reports Guidance for Development Proposals in East Sussex' (October 2009) and 'Travel Plans for Development Guidance for Developers', (February 2020), or any successor guidance.

7.447. Where existing transport infrastructure is inadequate to meet the needs of new development, planning conditions or development contributions will be used to ensure that developments are made acceptable through securing the provision of necessary improvements. Designs that put further reliance on travel by private car alone will be discouraged. The promotion of active travel measures and increased use of sustainable forms of transport to help reduce carbon emissions and support health and wellbeing are critical to this Local Plan. Where relevant, proposals will be expected to contribute to improved transport infrastructure, particularly for walking, wheeling, cycling and public transport. This should include consideration for access of public transport to, from and through the site.

7.448. Car clubs are increasingly playing a role in reducing dependence on car ownership by giving member's access to a car for essential journeys without the need to own one. Car clubs can contribute towards reducing congestion, parking problems and local pollution levels.

7.449. Car clubs function efficiently through complementing other sustainable travel modes, rather than a standalone solution and act as an incentive for households to reduce car ownership. Car clubs should be considered early in the planning process and normally in combination with the preparation of a site or company travel plan.

7.450. Particular consideration might need to be given to roads in the town that are, as yet, unmetalled, as further development that uses these roads for access could create a situation that would lead to their deterioration.

Policy ID2: Access and Parking

All development should ensure access, car parking and servicing[26] has been efficiently and creatively integrated into the scheme, minimising land occupancy and ensuring a safe and attractive environment for people walking, wheeling and cycling. Car parking provision should not dominate, unduly shape the design of new development or impact negatively on highway safety and accessibility. Development proposals will be supported where:

1. **Safe access into and within the development for all users is provided, and where required by the Highway Authority, a Transport Assessment / Statement / Report and Travel Plan is provided to support the proposal.**

2. **In respect of major development[27]:**

    a. **streets have been designed to show a street hierarchy where pedestrian movement is prioritised first and private motor vehicles last;**

    b. **transport infrastructure has been designed to maximise opportunities for delivering green and blue infrastructure, and streets are tree lined;**

    c. **street furniture and signage are included only when necessary for reasons of safety, orientation or comfort of residents and visitors and will not cause an obstruction to pedestrian movement;**

    d. **street lighting, where provided, should be provided is angled and shielded to avoid light pollution with regard to the guidance set out in Policy SC19 of this Plan;**

    e. **pedestrian access is provided from the site to public footpaths and/or or cycle networks, in order to ensure the development is permeable and to enable walking, wheeling and cycling;**

    f. **communal and shared parking areas and pathways through the site are overlooked to ensure natural surveillance;**

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[26] **Access for site construction, waste collection services, loading bays, emergency service access and easement for infrastructure maintenance.**

[27] **For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.**

3. **Parking, servicing areas, refuse and cycle storage are provided in a manner that is accessible to all and designed in line with any relevant guidance. Steps or steep slopes to these areas should be avoided;**

4. **Parking, turning/ servicing areas and footpaths are functional, safe for users, close to the homes they serve and use the least amount of space possible on site whilst meeting Highway Authority standards for parking space dimensions (including disabled parking spaces), turning and visibility set out in 'Guidance on parking at new developments' or any successor document. A Road Safety Audit should be used, where appropriate, to demonstrate safety for users and functionality;**

5. **No more than one car parking space is provided for each dwelling. The only exception to this will be where one of the following applies:**

    a. **The site is in the 'Low Car Parking Area' (see 7);**

    b. **It is demonstrated through a Transport Assessment that car parking is necessary to support safety, capacity and access within the highway network;**

    c. **Spaces are for visitor parking, car club spaces or 'tied' parking for the maintenance and management of infrastructure or other onsite services**

6. **Car parking will be restricted for residential and business development in the 'Low Car Parking Area' as shown in Figure 43. Within a 400m radius of Hastings railway station and bus interchange, no new parking should be provided except disabled bays and car club provision unless it is demonstrated through a Transport Assessment that car parking is necessary to support safety, capacity and access within the highway network;**

7. **Accessible parking for disabled people should be provided in accordance with guidance contained in Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure (DfT, Jan 2022) or any successor document;**

8. **Proposals should give consideration to car club use where proposals are likely to generate a large number of travel movements which triggers the requirement for a Transport Assessment / Statement;**

9. **On unmetalled carriageways, the road will be brought up to an acceptable standard to remain private, or be brought up to an adoptable standard capable of adoption by the Highway Authority. This requirement will be secured through a legal agreement.**

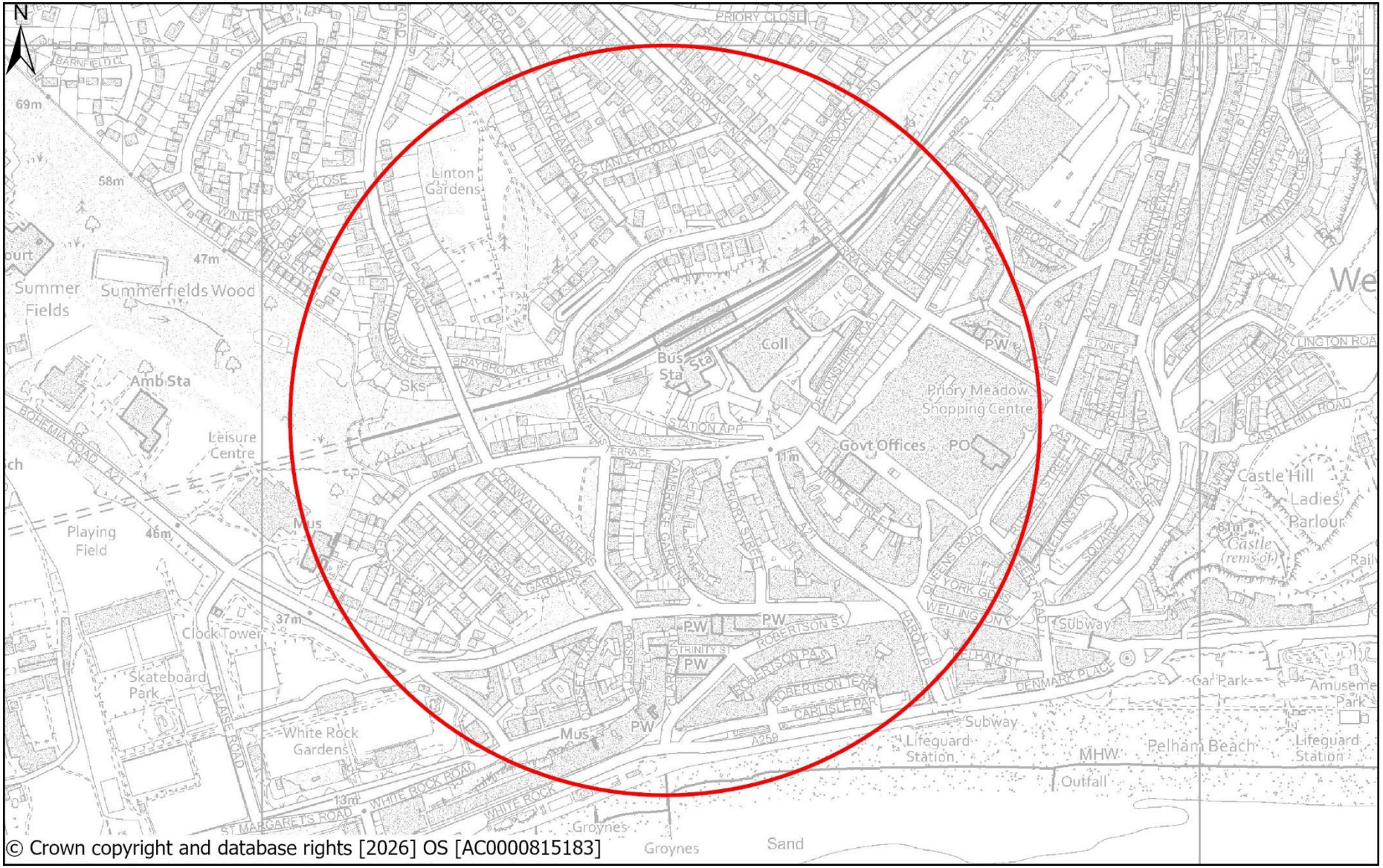

Figure 43: Low Car Parking Area

Policy ID3: Open space, Sports and Recreation

7.451. Development of varying types will lead to increased recreational pressure on local facilities. This includes not only market and affordable housing, but also employment generating development, and houses in multiple occupation. Seeking contributions from a variety of development types ensures that open spaces and equipped play spaces can continue to deliver a safe and welcoming environment for all users even with increased pressure.

7.452. Primarily bedded care provision will generally be exempt from open space and play contributions. Such exemptions however will be conditional on appropriate 'private space' being made available and maintained to the satisfaction of the council to meet those residents' needs and will be secured by legal agreement.

7.453. Open space, equipped play and informal recreation sites including allotments were assessed through the Strategic Open Space and Play Assessment 2020, and a local standard was identified for both quantity and value. Quantity is shown in Table 15. The assessment showed that while most of the Borough had good access to open space, pockets of deficiency could be found throughout, and this deficiency was likely to increase throughout the lifetime of the plan if not addressed.

Table 15: Quantity standards

Type	Proposed standard per 1,000 population
Parks and Gardens	0.78
Natural and Semi-Natural Green Space	5.77
Amenity Green Space	0.21
Allotments	0.125
Provision for Children and Teenagers	0.155

7.454. Similarly, the Assessment identified that parts of the Borough with older style developments and at the Rother fringes had deficiency of access to local equipped play and that large areas of the borough were deficient in doorstep play at existing population levels. By contrast, some newer parts of the borough had a surplus of equipped play, but to a low-quality standard making the case for potential consolidation in order to direct resources toward developing a higher quality offer across a smaller number of sites.

7.455. Different typologies of open space and informal recreation have different standards for quality, quantity and accessibility and therefore developer contributions should seek to mitigate negative impacts across all typologies.

Table 16: Quality and Value Standards

Typology/ hierarchy	Proposed quality standard	Proposed value standard
Parks and Gardens		
District 20.1-60 ha	104	103
Local 2.1 - 20 ha	50	36
Small local <2 ha	38	17
Natural and Semi-Natural Green Space		
Regional 60.1 ha+	53	44
District 20.1-60 ha	39	23
Local 2.1 – 20 ha	20	14
Small local <2ha	17	13
Amenity Green Space		
No hierarchy has been established for Amenity Green Space.	26	9
Cemeteries		
No hierarchy has been established for Cemeteries and Churchyards.	39	11
Provision for Children and Young People – Equipped Play		
Neighbourhood	5	22
Doorstep	5	17
Local	5	11

7.456. Open Space and Play contributions will be calculated using the developer contributions self-assessment tool and will be secured by legal agreement. Further information on developer contributions, including guidance on the use of the self- assessment tool, can be found within the Developer Contributions Schedule.

Playing pitches and built leisure facilities

7.457. Existing sites for investment and maintenance are identified through the Playing Pitch and Built Facilities Strategy Action Plan.

7.458. The strategy emphasises the importance of enhancing current facilities to meet current and future participation needs, particularly to support growing participation from women and girls. Likewise, built sports facilities will require

ongoing maintenance and enhancement. The age and configuration of some facilities means they no longer meet local needs to the extent that they have in the past. To address this need, contributions will be sought from developments most likely to accelerate these trends in participation due to their size and scale.

7.459. To calculate playing pitch requirements and costs for new on-site or new off-site facilities, Sport England's Playing Pitch Demand Calculator should be used.

Policy ID3: Open space, Sports and Recreation

1. **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.**

    a. **Financial contributions for open space and equipped play facilities will be sought from:**
        i. **Residential development, including Houses in Multiple Occupation and Residential Institutions.**
        ii. **Employment generating uses of 2,500sqm or more.**

    b. **Financial contributions for sports facilities, calculated using Sport England's playing pitch calculator, will be sought from:**
        i. **Developments capable of accommodating 40 or more dwellings;**
        ii. **Houses in multiple occupation and residential institutions accommodating 40 or more residents.**

2. **Developer contributions will be secured through legal agreement.**

Policy ID4: Utilities Infrastructure and new connections

7.460. The delivery of the planned sustainable growth set out in this plan is reliant on the provision of adequate utilities infrastructure. Utility services provide heat, light, water, sewerage, power and digital communication to homes and other built facilities[cxvi].

7.461. As a predominately built-up, urban area, Hastings already benefits from a core utilities network that is capable of providing services across the full length and breadth of the Borough. The majority of existing homes and businesses benefit from a direct connection to the main sewer, electricity and gas networks[cxvii]. All site allocations are close to existing gas, water and electricity networks. The Infrastructure Delivery Plan (IDP) identifies the gas and electricity networks as having sufficient capacity overall to accommodate the level of growth. It should be noted that from March 2027, the Future Homes Standard (FHS) will come into force, placing limitations on the potential for new gas connections in new build homes[cxviii].

7.462. The plan covers the period to 2041, and the council recognises the potential for advancements in renewable technologies during this time, including the production of biomethane. By locating production facilities close to the existing gas network, it will allow green gas to be distributed easily to other nearby properties. This does not preclude the use of a third-party network should this be preferential.

7.463. The water and sewerage networks will require investment during the lifetime of the plan, including the reinforcement (upgrading) or replacement of existing assets, and capacity and resilience improvements. Strategic level investment will be delivered by the network operator, with priorities determined in part by growth data provided by local planning authorities through 5-year housing land supply trajectories and individual consultations on planning applications[cxix]. Any reinforcement of the network specifically to accommodate new development is funded through the infrastructure charge to developers.

7.464. Hastings has mobile network and superfast broadband coverage throughout the borough available through the network of at least one major network operator.

7.465. It is essential that the capacity and design of utilities infrastructure is determined prior to the granting of permission in order to ensure that it is sufficient to accommodate the anticipated needs of the development, will not prejudice further utilities provision coming forward and the layout of the proposal will take into account future access to existing or planned utilities infrastructure for the purposes of upgrading or maintenance. As such, the council recommends that utilities providers are consulted prior to the development of detailed designs.

7.466. This policy relates only to the delivery of utilities infrastructure and new connections to be delivered by or in partnership with utility providers and operators. The delivery of water efficiency, energy efficiency, onsite and offsite renewable energy, flood risk management and mitigation, SuDS and green and blue infrastructure measures are covered by other policies of this plan.

Policy ID4: Utilities Infrastructure and New Connections

1. **All proposals must demonstrate that the infrastructure capacity for water supply, wastewater treatment, surface water disposal (including discharge rates), electricity and gas supply or other fuel source will be sufficient to meet the anticipated needs of the development over its lifetime and that appropriate connections can be made to the development prior to commencement. This will be secured by condition.**

2. **Proposals involving the production of green gas must ensure that facilities are well located to optimise the potential for injection to the existing gas network.**

3. **The council will be supportive of proposals for new utilities infrastructure required to support existing communities or support new development, provided it is not in conflict with other policies of this plan or National Planning Policy. Additional weight will be given to proposals that support or provide net zero carbon utilities schemes where that scheme would contribute to the meeting or exceeding of local carbon budgets.**

4. **The utility network should be protected and development proposals that would compromise existing utilities infrastructure, or encroach on future connections for utilities, will be refused. Opportunities should be sought to safeguard the provision of utilities wherever possible.**

5. **Proposals will ensure that site layouts are designed in order to allow easy access to existing and planned utilities infrastructure for maintenance, upgrade and reinforcement purposes. Where necessary, buffer zones and easements must be provided sufficient to allow appropriate plant and machinery access.**

6. **Developer contributions for utilities provision, including new connections charges, will be secured through legal agreement.**

8. Part five - Monitoring

8.1. Monitoring criteria for the local plan.

Thematic Area	Policy link	Indicator	Target / benchmark	Objective	Principal source
Spatial strategy / land	SP1; HA1	Net dwellings completed on previously developed land and greenfield land, number and percentage	Maximise PDL delivery; report annual and cumulative split.	O1, O4	HBC planning monitoring.
Housing delivery	SP2; HA1; allocations	Net additional dwellings completed, annual and cumulative.	At least 2,970 net homes 2023-2041.	O4	HBC planning monitoring.
Affordable housing	SP2; ID1	Net affordable homes completed, by tenure and type.	Maximise annual and cumulative delivery	O4	HBC planning monitoring.
Accessible housing	SC2	Qualifying homes approved and completed to required accessible/adaptable standards and NDSS.	Maximise policy compliance.	O4	HBC planning monitoring.
Self/custom build	H4	Permissions and completions for self-build/custom-build plots compared with register demand.	Sufficient permissions to meet demand.	O4	HBC planning monitoring.
Gypsies and Travellers	SP2; H5; GT allocations	Permanent pitches permitted and completed.	12 permanent pitches by 2041.	O4	HBC planning monitoring.

Thematic Area	Policy link	Indicator	Target / benchmark	Objective	Principal source
Employment	SP3; E1; allocations	Net employment floorspace completed and lost.	Net new employment floorspace by 2041; no loss contrary to policy.	O3	HBC planning monitoring.
Skills and local labour	E2; ID1	Qualifying schemes with agreed Local Skills Development Plan/local labour and procurement agreement, and completion statement.	Agreed outputs delivered or explained.	O3, O5	HBC planning monitoring.
Town centres	SP4; E3	Main town-centre-use floorspace permitted/completed within the centre hierarchy; vacancy rate.	100% location-policy compliance.	O3	HBC planning monitoring.
Biodiversity	SP8; SC10	Qualifying permissions and completions achieving required biodiversity net gain, including on-site/off-site split.	100% achieve policy-required percentage.	O1	HBC planning monitoring.
Urban greening	SC13	Major schemes meeting or exceeding the applicable Urban Greening Factor.	100% achieve policy benchmark.	O1, O4	HBC planning monitoring.
Climate mitigation	SP5; SC3	Major schemes with compliant Energy Strategy Report.	100% policy compliance	O1	HBC planning monitoring.
Water efficiency	SC3	New homes and qualifying non-residential development meeting	100% policy compliance	O1	HBC planning monitoring.

Thematic Area	Policy link	Indicator	Target / benchmark	Objective	Principal source
		policy water-efficiency standard.			
Coastal change	SP9; SC17	Applications and permissions in the Coastal Change Management Area.	Zero new residential permissions; 100% policy-compliant assessments.	O1	HBC planning monitoring.
Land Stability	SC15; SC18	Schemes on potentially unstable land with required investigation and completed remediation/stability measures.	Number of permissions granted within LARA areas.	O1, O4	HBC planning monitoring.
Heritage at risk	SP7; SC5-SC8	Number and condition of heritage assets at risk, including assets removed from/added to registers.	Net reduction in assets at risk.	O3, O4	HBC planning monitoring.
Infrastructure delivery	SP12; ID1; site policies	IDP projects and site-specific infrastructure delivered against programme and occupation triggers.	Infrastructure delivered by required trigger; annual progress on all priority schemes.	O5	Infrastructure Funding Statement and IDP
Developer contributions	ID1	Financial and in-kind obligations secured, received, allocated, spent and overdue	No overdue obligation without action; spend within legal time limits and for specified purpose	O5	Infrastructure Funding Statement

List of Abbreviations

HBC: Hastings Borough Council

HEDNA: Housing and Economic Development Needs Assessment

HIA: Health Impact Assessment

JSNA: Joint Strategic Needs Assessment (Health)

n.d: No date. Used for web page references where the date of publication is not shown.

NPPF: National Planning Policy Framework

PPG: Planning Practice Guidance

SFRA: Strategic Flood Risk Assessment

SHELAA: Strategic Housing and Employment Land Availability Assessment

Definition of key terms (Glossary)

Affordable Housing: Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). This includes affordable housing for rent, either social or affordable, discounted market sales housing, and other affordable routes to home ownership, including shared ownership, relevant equity loans, rent to buy (NPPF, 2024).

Affordable/Social Rent: Affordable rent is rent capped at 80% of market rates. Social Rent homes have rent pegged to local incomes, and provide a truly affordable, secure housing option for people across the country. Affordable Rent and Social Rent homes are provided by housing associations (not for profit organisations that own, let and manage rented housing) or a local council. Affordable housing products such as 'rent plus', which are available for affordable rent in the short-term, but are targeted at home ownership, are considered to meet the same local housing need as affordable or social rent.

Article 4 Direction: As defined in National Planning Guidance (September 2020), this is a direction under article 4 of the General Permitted Development Order which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area. An article 4 direction cannot be used to restrict changes between uses in the same use class defined in the Town and Country Planning (Use Class Order) 1987 (as amended).

Attenuation (water): The temporary storage of water followed by its slow release to reduce runoff velocities.

Blue roofs: A blue roof is designed to allow attenuation and management of rainfall, managing water at its source. They are becoming a common approach to deliver sustainable urban drainage systems and manage local flood risk, particularly in dense urban environments.

Brownfield Land: See Previously Developed Land (PDL)

CCT: The colour correlated temperature of lighting, expressed in Kelvin (K).

Circular Economy: Keeping resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end their life.

Community facilities: Uses include clinics, health centres, creche, day nurseries, day centres, schools, colleges, universities, art galleries (other than for sale or hire), museums, libraries, community halls, places of worship, law courts, non-residential education and training centres.

Comparison goods retailer: Shops that sell items where some comparison is likely to be made before purchasing goods; for example: clothing, carpets or electrical goods.

Construction Management Plan: Sets out project information and how negative impacts will be mitigated and minimised during construction.

Convenience retailer: Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.

Decentralised energy: Energy that is generated close to where it will be used, rather than at an industrial plant and sent through the national grid.

Density Zone: Sets out a range expressed as Dwellings Per Hectare (dph) that is the minimum density housing in this area should be delivered at.

Economically Inactive: People who are neither working, nor looking to work.

Factor of Safety: Also known as Safety Factor. The load carrying capacity of a system beyond what it actually supports. Established through engineer's calculations.

Functional Economic Market Area: The spatial level at which local economies and markets actually operate.

Furthest From the Labour Market: Includes but are not limited to people experiencing: disability, mental health issues, low education attainment, homelessness, care leavers, carers, a criminal record and/ or low aspirations. These people may face additional barriers to accessing employment opportunities, especially in areas of low job density.

Future Homes Standard: The Future Homes Standard is expected to amend Part L and Part F of Building Regulations related to new dwellings. It is anticipated it will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency. It is expected to be introduced in 2027.

Green and Blue infrastructure: A network of green spaces and links designed to promote health and wellbeing as well as other environmental benefits. This includes formally designated open spaces, informal green space, gardens, woodlands, rivers and wetlands, as well as urban greening features such as street trees and green roofs.

Green roofs: Vegetated layers that sit on top of the conventional roof surface of a building, which can support a wide range of plant life. Green roofs can create, or improve, biodiversity, contribute to minimising flood risk, improve thermal efficiency and improve the microclimate.

Green technologies: Technology, the intended use of which, is to mitigate or reverse the effects of human activity on the environment, such as processes to recycle water, purify water, create clean energy or conserve natural resources.

Hastings: Unless otherwise specified, refers to the administrative Borough of Hastings.

Heritage Asset: Building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest.

Heritage at Risk Register: Maintained by Historic England, the register includes buildings, places of worship, monuments, parks and gardens, conservation areas,

battlefields and wreck sites that are listed and have been assessed and found to be at risk.

High Weald National Landscape Area of Outstanding Natural Beauty (AONB): Area of Outstanding Natural Beauty is a legal designation. National Landscape is the new name for these areas. As a designated Area of Outstanding Natural Beauty (AONB), the High Weald is protected by law to conserve and enhance its natural beauty.

Historic Environment: The historic environment covers ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, gardens and designed landscapes, as well as our marine heritage and includes designated and non-designated heritage assets.

Impact Risk Zones (IRZ): Define zones around each SSSI which reflect the sensitivities of the features for which the site is notified and indicate the types of development proposal which could potentially have adverse impacts and need further consideration.

Industrial processes: This includes manufacture of chemicals, manufacture of computer and electronic products, agri-tech, construction, manufacture of food, drink or other consumable products (including pharmaceuticals), fuel refining, manufacture of tools and machinery, manufacture of metal and non-metallic products, printing or recording, telecoms, defence, utilities and other manufacturing processes and their ancillary services.

Irreplaceable Habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Job Density: The ratio of jobs to working age residents (16-64). A job density of 1.0 would mean that there is one job for every working age resident. A job density of 0.5 would mean that there is half a job for every working age resident.

Local Development Order: A local development order (LDO) grants planning permission for a specified type and/or class of development within a defined area. LDOs are made at local authority level by a local planning authority.

Local Industrial Employment Areas: represent important local industrial sites in or adjacent to town and district centres with good access and transport links.

Lumens: The brightness of lights.

Marine Conservation Zone (MCZ): Areas that protect a range of nationally important, rare or threatened habitats and species.

Natural Flood Management: Natural flood management techniques work with natural processes to protect, restore and emulate the natural functions of catchments, floodplains, rivers and the coast. They aim to manage the sources and pathways of flood waters whilst providing wider benefits to people, wildlife and the environment.

Permanent condition (of site): Refers to a development site once development has been completed.

Previously Developed Land (PDL). Also known as Brownfield Land: Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Ramsar: A Ramsar site is the land listed as a Wetland of International Importance under the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (the Ramsar Convention) 1973.

Renewable energy: An energy source derived from natural resources which will not deplete when used. Examples of renewable energy include offshore and onshore wind, solar, geothermal power and tidal power.

Resort Area: A defined area where tourism related activities are supported.

RIBA Stages: The 8 stages of the 'RIBA Plan of Work' organise the process of briefing, designing, constructing and operating building projects into eight stages and explain the stage outcomes, core tasks and information exchanges required at each stage.

Rother: Unless otherwise specified, refers to the administrative District of Rother.

Self-Build and Custom Housebuilding: Self-build and custom housebuilding is for both individuals and associations who themselves wish to design and build a home, in which they will live and own as their sole dwelling.

Shared Ownership: An alternative home ownership scheme which gives first time buyers and those that do not currently own a home the opportunity to purchase a share of a new build or re-sale property. Also referred to as part buy/part rent. Shared ownership allows buyers to purchase a share of a home – usually between 25-75%. Purchasers pay a mortgage on the share they own and a below market value rent on the remainder to a registered social housing provider, along with any service charge as ground rent. As the purchaser only needs a mortgage for the share they own, the amount of money required for a deposit is often much lower compared to purchasing a property outright.

Site of Special Scientific Interest (SSSI): Sites notified for their flora, fauna or geological, physiographical or geomorphological features (in England, these sites are notified under s. 28 of the Wildlife and Countryside Act 1981).

Small Site Windfall: Sites providing a net capacity of four or fewer residential units that are not identified in the Plan.

Special Areas of Conservation (SAC): Designated areas which have been given special protection as important conservation sites (in England, these sites are designated under the Conservation of Habitats and Species Regulations 2017).

Specialist Housing: This category of housing includes the following types of homes: Age-restricted general market housing normally for people aged 55 and over and the active elderly and does not include support or care services; extra care housing or housing with care; and residential care homes and nursing homes.

Strategic Industrial Employment Areas: Represent key industrial sites within the overall functional market area and have potential for densification and new development or renewal of existing stock. Loss of industrial floorspace will not be permitted in these areas.

Surface Water Management Measures (SWMM): Measures to manage the flow of surface water, including measures for capture and later reuse onsite including storm water recycling and water butts.

Sustainable Drainage Systems (SuDS): A form of SWMM. Methods of management practices and control structures that are designed to drain surface water in a more sustainable manner. SuDS are always SWMMs, but SWMMs are not always SuDS as SWMM do not always include drainage.

Temporary Condition (of site): Refers to a development site during the process of development, from commencement to completion.

Temporary Residential Uses: Housing that is intended to be in place to provide a short-term solution.

Town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Ultra Low Emissions Vehicles: A road vehicle that emits 75 grams or less of carbon dioxide per kilometre from its tailpipe.

Unemployed: People who are not working but are looking for work.

Urban Greening Factor: This is an approach which can assist developers and local planning authorities to determine the appropriate level of urban greening needed to address biodiversity conservation in development proposals. Its purpose is to increase the amount of greening in and around buildings. As well as traditional approaches such as planting trees, urban environments benefit from the addition of green roofs, green walls, rain gardens and other features.

Utilities: Utilities are public authorities, public undertakings or other entities ('private utilities') that carry out 'utility activities' in the energy, water and transport sectors.

Viability: The process of assessing viability at the plan-making stage by looking at whether the value generated by a development is more than the cost of developing it.

View Analysis: A digital assessment used to identify specific areas, and/ or historic landmarks can be seen from a chosen observation point.

Windfall: Sites not specifically identified in the Plan.

Appendix 1: Key Evidence Base Items

There are a number of key pieces of evidence that are referred to frequently throughout the plan. These include:

Biodiversity and Green and Blue Infrastructure Strategy (2022): The Biodiversity and Green and Blue Infrastructure Strategy identifies a robust GBI network across Hastings that reflects current GBI assets, and key priorities to increase their resilience.

Densification and Capacity Study (2026): This study puts forward evidence-based conclusions to where and how much densification is appropriate.

Gypsy, Traveller and Travelling Showpeople Needs Assessment (2022): This study provides a summary of accommodation need for Gypsies, Travellers and Travelling Showpeople in respect of both their permanent and transit needs for pitches/plots over the study period.

Hastings and Rother Playing Pitch and Built Facilities Study (2023, Updated 2026): This joint strategy for Hastings and Rother was produced in line with Sport England's latest guidance and is the follow-on document to the Rother and Hastings Playing Pitch Strategy 2016 and the Leisure Facilities Strategy 2009-2020.

Housing and Economic Development Needs Assessment (HEDNA): The HEDNA (2024, Addendum 2026) has been prepared jointly with Rother District Council. Its purpose is to assess future development needs for housing (both market and affordable) and employment across the Hastings and Rother area, to inform the preparation of the two Authorities' emerging Local Plans. The document does not set the housing target for local authorities but provides the evidence to inform its starting position. The HEDNA has been produced in line with national **Planning Practice Guidance**[28].

East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS): Local Nature Recovery Strategies are a new system of spatial plans for nature introduced by the Environment Act 2021. Local Nature Recovery Strategies aim to develop and agree the priorities for nature's recovery in collaboration with local stakeholders including residents, farmers, community groups, organisations and businesses. They provide a set of practical actions that can deliver the priorities and map where actions to create or enhance habitats could be implemented to deliver the greatest benefit for nature and the wider environment.

Strategic Flood Risk Assessment (SFRA) (2024, Updated 2026): The Strategic Flood Risk Assessment provides information on all sources of flood risk in Hastings.

Strategic Housing and Employment Land Availability Assessment (SHELAA) (2025, Updated 2026): The SHELAA assesses the development potential of sites for housing and economic land across the borough and consider whether they are suitable, available and achievable for development.

[28] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

Strategic Open Space and Play Assessment and Audit (2020): This document identifies current quantity and quality of open space and play spaces within the borough and sets quantity and quality standards for future provision.

Appendix 2: Housing Trajectory

Table 17: Housing Trajectory

Supply components	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Total
Completions	128	402	520	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,050
Commitments				166	166	75	10	14											431
Sites Proposed for Allocation				0	56	73	127	109	31	40	25	171	85	189	110	55	30	30	1,131
Small Site Windfall Allowance				45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	675
Total	128	402	520	211	267	193	182	168	76	85	70	216	130	234	155	100	75	75	3,287
Annual Requirement Taking Account of Past Completions	175	178	163	137	131	120	113	107	100	103	105	111	90	80	29	0	0	0	

The housing trajectory is updated annually in order to recalculate the five-year housing land supply and inform infrastructure delivery planning. In the five-year period between 2028/29 and 2032/33 not shown in Table 17 above is the potential impact of the demolition of no.2 high-rise residential blocks comprising 192 homes and their replacement with a minimum of 180 new homes as part of the first phase of an expected housing renewal scheme. Because the impact of this expected first phase of the renewal scheme is largely neutral in terms of this five-year supply period, it will be incorporated into the trajectory in further iterations of the trajectory.

Appendix 3: Retail Impact Assessments

Defining a clear catchment of the proposed development. This should include information on the pattern of trade draw from the catchment to the proposal from different parts of the catchment. It should also provide a clear indication of the likely pattern of trade diversion from existing stores and centres.

Clear information on the scale of the financial impact of the proposed development on defined stores and centres in the catchment of the proposal and how this relates to the trading performance of the convenience and comparison goods sectors in these centres (in order to build up a clear picture of the overall impact on existing centres).

When seeking to understand the overall impact upon a particular ‘town centre’, the scale of trading overlap (in terms of the scale of goods and services) between the proposal and the retail and service sectors in the relevant defined centres, including the contribution that these retail sectors make to the health and attractiveness of the centre.

The applicant’s assessment should provide up to date information on the health of the relevant defined ‘town centres’ in the catchment of the proposal, both now and over time (using the indicators outlined in the PPG).

Appendix 4: Developer Contributions Schedule

Introduction

Hastings Borough Council's Developer Contribution Schedule sets out the scope and range of contributions that we may seek from site owners and developers towards infrastructure delivery when assessing planning proposals to offset the likely impact of development and help deliver sustainable communities[29]. The developer contributions schedule (DCS) is a companion document to the Infrastructure Delivery Plan (IDP)[30] and the Infrastructure Funding Statement (IFS)[31].

This DCS should be used as a guide to support prospective developers and planning officers by providing more in-depth guidance on developer contributions as set out in the Hastings Local Plan 2023-2041, including financial contributions as set out in Policy ID1-ID4 of the Local Plan[32]. It includes a list of infrastructure requirements, links to the corresponding Local Plan policy and details of calculations that will be used to work out contributions where appropriate.

Contributions may be required for any or all of the following, depending on the scale and type of development:

East Sussex County Council Obligations

Education

Highways

Waste Management and Recycling

Public Rights of Way

Libraries

Hastings Borough Council Obligations

Open Spaces

Play Spaces

Playing Pitches

Affordable Housing

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[29] Infrastructure provision will be sought through planning obligations pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended)

[30] https://www.hastings.gov.uk/planning/policy/new-local-plan/evidence/ **background document**

[31] https://www.hastings.gov.uk/planning/AnnualInfrastructureFundingStatement/

[32] **Insert weblink to the location of these in the Local Plan**

Bus shelter maintenance[33]

Monitoring fees

Other Obligations

Biodiversity net gain

Police

Healthcare

Network Rail

The Role of Developer Contributions: legislative and policy context

National planning policy[34] supports the principle that developers should contribute to the cost of services, resources or infrastructure necessary to support their development.

S106 of the Town and Country Planning Act (1990) provides for developer contributions in the form of planning obligations[35]. Planning obligations are secured in the form of a legal agreement (known as a "s106 agreement") usually attached to a grant of planning permission. S106 agreements are used to mitigate any adverse impacts that may otherwise result in the development being unacceptable in planning terms. Other forms of legal agreement, such as Unilateral Undertakings may also be suitable in some instances and where appropriate this will be agreed and checked by the legal team of the Council.

Hastings Infrastructure Delivery Plan (IDP)

The purpose of the Infrastructure Delivery Plan (IDP) is to identify and assist with managing the provision of infrastructure required to support development proposed by the Local Plan.

The IDP consists of a written statement and a schedule which identifies what infrastructure is required; when it is required; the lead body that is responsible for its provision; the cost of provision (if known) and how these costs will be funded. The IDP draws on, and is likely to influence, the investment plans of a wide range of infrastructure providers, particularly the Borough and County Councils.

The IDP brings this information together and helps co-ordinate public and private investment in infrastructure to support future development in Hastings. Information is gathered from a range of organisations to produce the IDP and it can be found on our website[36]. It is updated a minimum of annually.

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[33] **Where a new bus shelter is required as part of the development**
[34] **National Planning Policy Framework - GOV.UK**
[35] **Town and Country Planning Act 1990**
[36] **https://www.hastings.gov.uk/planning/policy/new-local-plan/evidence/**

Hastings infrastructure Funding Statement (IFS)

Under the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019), local authorities must publish Infrastructure Funding Statements (IFS) annually each December covering the preceding financial year (1 March to 31 April)[37].

The purpose of the Infrastructure Funding Statement (IFS) is to provide a summary of financial contributions secured through and spent from planning obligations from developments.

The information that must be provided is set out in the Schedule 2 of the CIL regulations 2010 (as amended) and relates to all the activity in the relevant financial year as well as requiring information on unspent money collected in previous years. The first IFS was required to be published in December 2020 covering the monitoring year 2019/2020 and one has been produced each year since. The IFS helps show how the council is spending it's planning obligation contributions and developing and delivering on its Infrastructure Delivery Plan (IDP).

Information from relevant departments is collated within the IFS and it can be found on our website[38].

Part 2 – Securing contributions

Mechanisms

Legislation and national planning policy provide the tools for local authorities to secure developer contributions through the planning system for infrastructure and affordable housing in order to meet the needs of their area. The main ways of securing developer contributions (either individually or collectively) are through the use of:

- Planning conditions;
- Planning obligations; and
- the Community Infrastructure Levy (not adopted in Hastings)

Planning conditions

Planning conditions[39] are used to enhance the quality of development and enable development to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects.

The National Planning Policy Framework[40] makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests, they must be:

1. necessary;
2. relevant to planning;
3. relevant to the development to be permitted;

[37] The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019
[38] Annual Infrastructure Funding Statement
[39] Use of planning conditions - GOV.UK
[40] National Planning Policy Framework - 4. Decision-making - Guidance - GOV.UK

4. enforceable;
5. precise; and
6. reasonable in all other respects.

Planning obligations

Planning obligations[41] are legal obligations entered into to mitigate the impacts of a development proposal.

This can be via a planning agreement entered into under section 106 of the Town and Country Planning Act 1990 (as amended) by a person with an interest in the land and the local planning authority; or via a unilateral undertaking entered into by a person with an interest in the land without the local planning authority where this is acceptable. The National Planning Policy Framework paragraph 56 provides more information.

Planning obligations run with the land, are legally binding and enforceable. A unilateral undertaking cannot bind the local planning authority because they are not party to it.

Planning obligations are also commonly referred to as 'Section 106', 'S106', as well as 'developer contributions' when considered alongside highways contributions and the Community Infrastructure Levy.

Planning obligations must only be sought where they meet all of the following tests[42]

(a) necessary to make the development acceptable in planning terms;

(b) directly related to the development; and

(c) fairly and reasonably related in scale and kind to the development.

Planning obligations are assumed to be viable. An applicant needs to demonstrate where there are particular circumstances which provide the need for a viability assessment to be submitted alongside the planning application.

An applicant can vary a legal agreement and the obligations it contains. Each application is considered on its own merits and legal services will confirm if an amendment is acceptable or not. Where it is appropriate to vary a legal agreement a Deed of Variation to an existing legal agreement (S106) and planning obligations relating to a planning application site will be executed.

Section 278 highways agreements

[41] **Planning obligations - GOV.UK**

[42] As set out in The Community Infrastructure Levy Regulations 2010

Whether off-site or on-site, highway infrastructure is a critical component to the delivery of any proposed development. Section 278 agreements provide the legal mechanism required to carry out highway alterations on the existing network, whilst Section 38 agreements secure new road adoption by the highway authority. The relevant highway authority will advise upon the relevant highway requirements on a development-by-development basis and confirm any requirement for transport planning obligations in a consultee response to a planning application.

CIL

The Community Infrastructure Levy (CIL) is a charge which can be levied by local authorities on specified types of development to contribute towards required infrastructure in their area.

Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially liable for the levy. Some development may be eligible for relief or exemption from the levy subject to strict rules and procedures.

The levy only applies in areas where a local authority has consulted on, and approved, a charging schedule which sets out its levy rates and has published the schedule on its website. Hastings Borough Council has not adopted the Community Infrastructure Levy (CIL) as the introduction of a charging schedule would be unviable in current market conditions and it therefore relies on planning obligations secured through developer contributions.

Thresholds for contributions (see ID1-4)

Thresholds for developer contributions are set out in policies ID1-4 of this Plan.

Fees, interest and indexation

All planning obligations will be the subject of interest and indexation as appropriate.

Indexation is applicable where a sum payable is required to reflect changing costs, and the obligation will be increased in accordance with the following formula

$$\frac{A=B \times C}{D}$$

where: A is the sum actually payable on the relevant Specified Date[43]

B is the original sum mentioned in the Deed

C is the Construction Index or Inflation index (as appropriate for the obligation[44]) for the quarter immediately preceding the relevant Specified Date

D is the Construction Index or Inflation index (as appropriate for the obligation) for the quarter immediately preceding the date of this Deed

[43] as defined in the relevant legal agreement

[44] **bcis.co.uk**

C divided by D is equal to or greater than 1.

Interest is calculated where sums are not paid by the due date calculated on a daily basis at 1/365th of the annual rate of interest of 4% per annum greater than the Bank of England base rate in force from the specified date up to the date of payment.

Fees

Policy ID1 confirms the Council will secure proportionate and reasonable fees associated with monitoring of any planning obligation in addition to the Council's legal costs incurred in the drafting and completing of Section 106 legal agreements.

All Planning fees and charges including those relating to S106 are confirmed on the website and updated on an annual basis[45].

There is also a legal fee charged for the involvement of the council Planning Solicitor for the drafting and completion of a legal agreement.

Part 3 – list of obligations and contributions

East Sussex County Council Obligations

East Sussex County Council Obligations are calculated on a per dwelling basis using the calculation No. Dwellings (by type) * Cost (£).

More information can be found here: https://www.eastsussex.gov.uk/planning/development-contributions/section-106-planning-obligations

Hastings Borough Council Obligations

Open Spaces

Open Spaces calculations are calculated on a per dwelling cost per occupier basis. An Open Space and Play Calculation Tool will be published to support the execution of this calculation.

The calculation is expressed as (cost per occupier £) * (occupancy rate).

Where onsite publicly accessible open space is provided, the quantum of onsite open space will be deducted from the calculated contribution cost in the form of a pro rata cost per sqm deduction, provided quality and value standards as expressed in ID2 are met.

Play Spaces

Play Space calculations are calculated on a child yield per dwelling basis. An Open Space and Play Calculation Tool will be published to support the execution of this calculation.

The calculation is expressed as (cost per child £) * (anticipated child yield).

[45] https://www.hastings.gov.uk/planning/fees/

Where play space is provided, the quantum of onsite open space will be deducted from the calculated contribution cost in the form of a pro rata cost per sqm deduction, provided quality and value standards as expressed in ID2 are met.

Playing Pitches

Playing Pitch contributions will be calculated using Sport England's Playing Pitch calculator.

Affordable Housing

Affordable Housing is calculated on a percentage basis at 25% of dwellings on Brownfield Land, and 40% on Greenfield Land.

Where onsite delivery is not possible, a Payment in Lieu (PIL) formula will be used to derive a financial contribution towards the delivery of offsite affordable housing.

PIL will be calculated using the methodology below:

- Step 1 – Calculate the average open market value (OMV) per unit.
- Step 2 – Calculate the equivalent unit value if it were to be delivered on site and acquired by an RP.
- Step 3 – Deduct the RP value in Step 2 from the OMV in Step 1.
- Step 4 – Multiply the sum determined in Step 3 by the relevant affordable housing percentage requirement.
- Step 5 – Multiply the adjusted contribution per unit determined in Step 4 by the total number of dwellings proposed.

Bus shelter maintenance[46]

Bus shelter maintenance is calculated based on anticipated costs arising from new dwellings.

Other Obligations

Biodiversity net gain

Biodiversity net gain is calculated using the statutory (official) Biodiversity Metric Calculation Tool: https://www.gov.uk/guidance/calculate-biodiversity-value-with-the-statutory-biodiversity-metric

Police

Contributions are calculated on a per dwelling basis relative to the proposed intervention.

Healthcare

Healthcare contributions for Primary Care are calculated using the formula (Population served by surgery) * (Equivalent number of dwellings (persons per dwelling yield)) = Total cost of required primary care floorspace.

[46] **Where a new bus shelter is required as part of the development**

Larger sites will be calculated on a proposal basis.

Network Rail

Railway contributions are calculated on a per dwelling basis relative to the proposed intervention.

Annex 1 Masterplan and Development Brief for the Former Convent of the Holy Child Jesus, Magdalen Road

Table of contents

1. Introduction - Page 3

2. The Site Vision and Opportunities - Page 5

3. Site Context - Page 7

4. Planning Policy Context - Page 20

5. Project Context - Current Site Conditions - Page 23

6. Guiding Principles for Development - Page 26

7. Landscape Strategy - Page 43

8. Summary - Page 48

1. Introduction

The Former Convent of the Holy Child Jesus is one of Hastings' most significant heritage assets, occupying a prominent position within the town's suburban hillside landscape. The purpose of this Masterplan and Development Brief is to celebrate and safeguard the distinctive character of the Former Convent site while guiding its evolution within a broader vision for Hastings and its relationship with neighbouring St Leonards.

1.1. Hastings is a historic coastal town on the south coast of England, known for its distinctive topography, rich architectural heritage, and long-established cultural identity. Its dramatic landscape has shaped not only the town's physical form but also the pattern of its neighbourhoods, movement routes, and green infrastructure.

1.2. Established in the late 19th century as part of the international network of schools and religious institutions run by the Society of the Holy Child Jesus, the site developed over time into a distinctive educational campus. Its architecture, grounds, and spatial composition reflect both its ecclesiastical origins and its long-standing role as a place of learning.

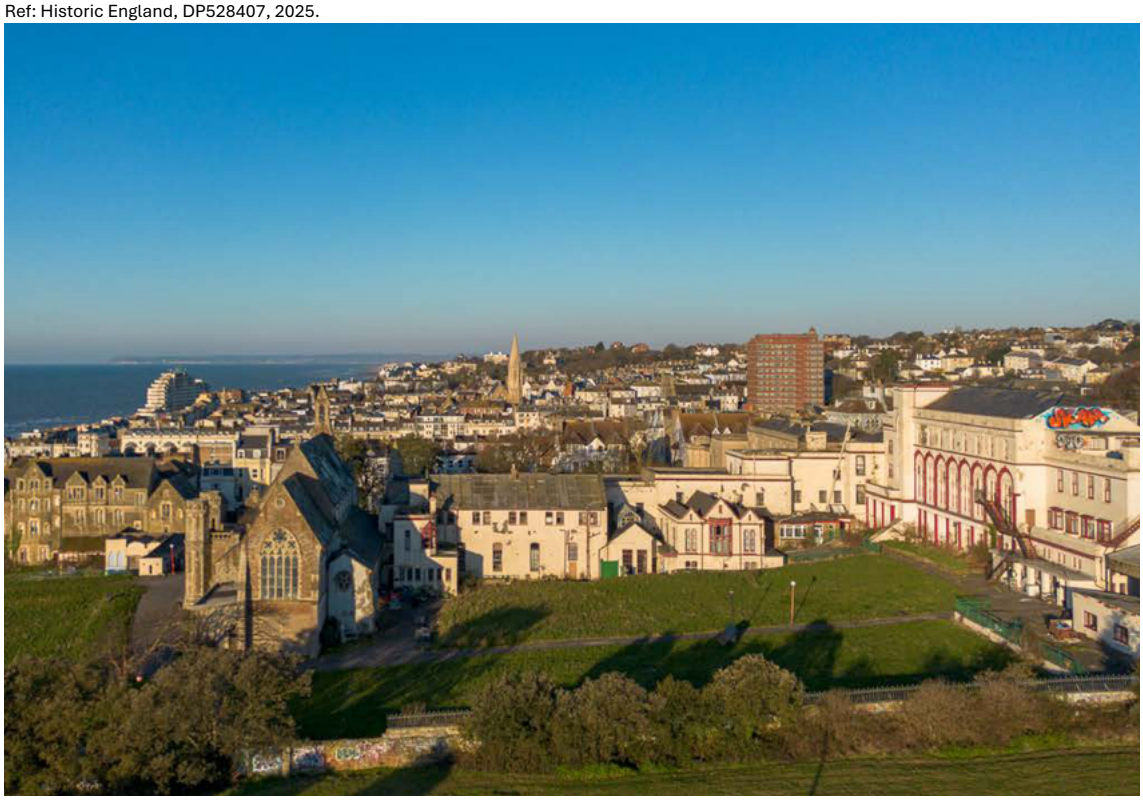
1.3. Today, the now derelict Former Convent stands at a moment of transition. By reinforcing the convent's unique qualities and ensuring they play a central role in shaping future development, this guidance seeks to ensure the historic complex enriches its surroundings and strengthens the area's wider sense of place.

1.4. As an annex to the Hastings Local Plan and linked to **Policy HS25: Former Convent of the Holy Child Jesus, Magdalen Road**, this annex complements policy HS25 and provides detailed guidance on design, heritage, and landscape considerations, helping to ensure that proposals respect the site's historic significance, architectural character, and relationship with the surrounding area. By setting out clear expectations, the annex supports decision-making, promotes high-quality design, and facilitates the sustainable and sensitive reuse of this important heritage asset.

1.5. This heritage- and landscape-led approach is firmly evidence-based, drawing on a comprehensive programme of research, analysis, and engagement with both Hastings Borough Council and Historic England. Technical assessments underpin the recommendations, including detailed topographic surveys, a conditions survey of the existing buildings, a heritage assessment, and a market assessment conducted in order to understand development viability. In addition, a planning policy review was carried out to ensure that the proposals are consistent with emerging Local Plan objectives and wider regeneration ambitions.

1.6. This robust evidence base analysis provides a sound foundation for the masterplan and development brief a supporting informed, sustainable, and sensitive decision-making for the Former Convent of the Holy Child Jesus site.

Site Photograph - North East - White Rock Gardens, parallel to Bohemia Road A21.
Ref: Historic England, DP528407, 2025.



Site photograph - North East - White Rock Gardens, parallel to Hastings Skate Park.
Ref: Historic England, DP528345, 2025.

2. The Site Vision and Opportunities

The Former Convent of the Holy Child Jesus site presents a significant opportunity to create a revitalised heritage campus that celebrates and enhances its exceptional architectural, landscape, and townscape significance within Hastings. The site offers the potential to secure the long-term repair, conservation, and viable reuse of its Grade II* and Grade II listed buildings - particularly the landmark chapel - through a carefully balanced programme of adaptive reuse and sensitively integrated new development.

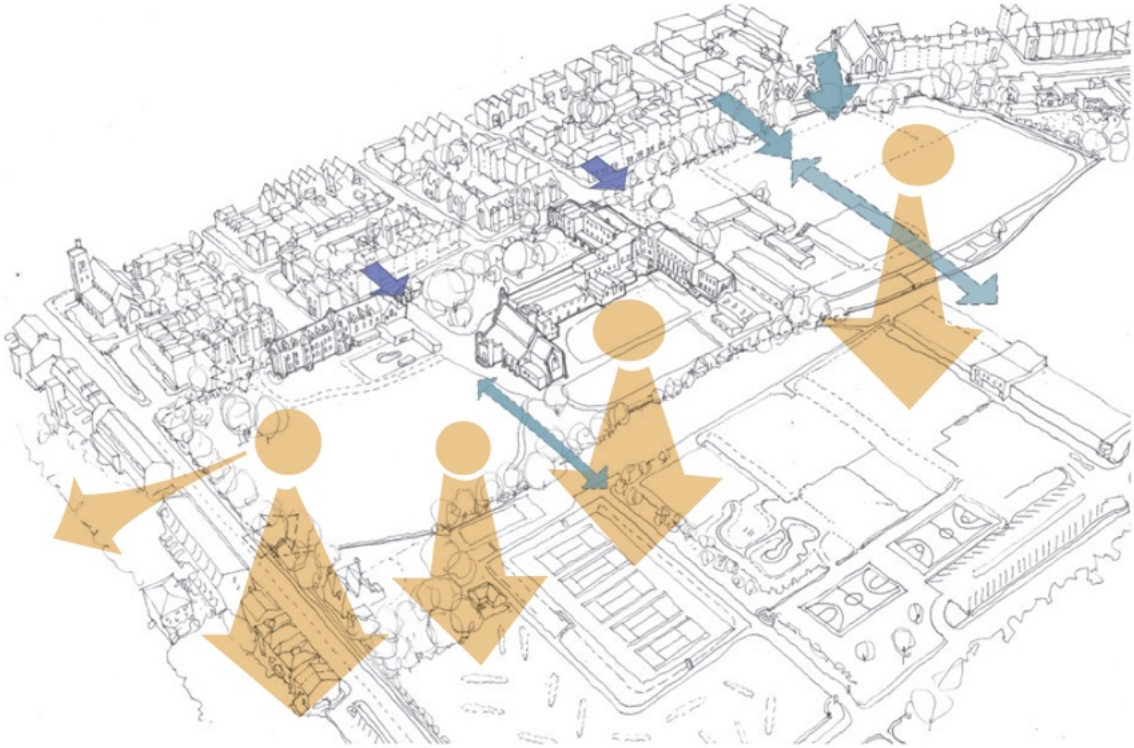
2.1. The transformation of the site presents a significant opportunity to unlock its full potential, supporting new and compatible uses that sustain its historic fabric, strengthen community engagement, and deliver lasting public benefits. The overarching vision is to create a high-quality, mixed-use environment that supports the long-term stewardship of heritage assets while providing meaningful benefits for the wider community.

2.2. Future development should be guided by a heritage-led and landscape-led approach, ensuring proposals respond sensitively to the site's character and historic significance. This includes the restoration of historic gardens, enhancement of green infrastructure, and improvements to sustainable travel links. Development should minimise harm to heritage assets, actively seek opportunities to enhance their significance, and conserve and enhance the Magdalen Road Conservation Area while protecting the setting of neighbouring conservation areas and White Rock Gardens.

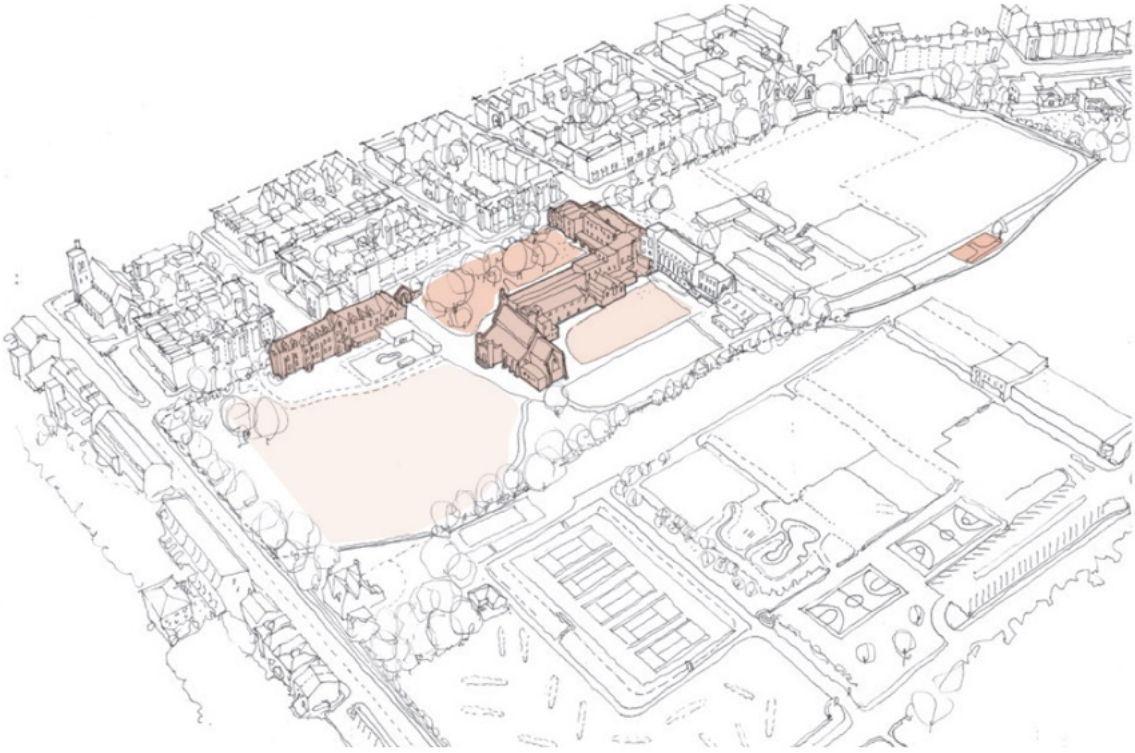
2.3. High-quality design, enhanced landscaping, measurable biodiversity gains, and well-considered public realm improvements should reconnect the estate with its surroundings and encourage public access, engagement, and enjoyment.

2.4. Proposals should also identify viable and sustainable options to secure the long-term repair, restoration, and maintenance of the listed buildings, including the Grade II* listed Pugin chapel, ensuring their continued use and responsible management.

2.5. Collectively, the site vision will be safeguarded through a series of guiding principles that provide a clear framework for delivering sustainable, inclusive, and heritage-led regeneration that reinforces the site's distinctive identity, improves accessibility and connectivity, and secures a resilient and sustainable future for the site within its wider context of Hastings and St Leonards-on-Sea.



Opportunities to maximise sea views, improve site access, porosity and connections with the neighbouring community. Ref: Haworth Tompkins, 2025.



Opportunities for adaptive reuse within the existing Grade II and Grade II* listed buildings and heritage significant landscape. Ref: Haworth Tompkins, 2025.

3. Site Context

Location and site boundary

3.1. The Former Convent site occupies a dramatic 4.78-hectare cliff top location between St Leonards-on-Sea and Hastings. It lies east of Magdalen Road and west of Hastings Skate Park, beyond which are Falaise Road and White Rock Gardens, a locally identified Historic Park and Garden.

3.2. The site is bounded to the south by St Margaret's Road and to the north by St Mary Star of the Sea Catholic Primary School, with Hastings to the east and St Leonards to the west. The seafront promenade lies less than 100 metres to the south, oUering extensive sea views.

Site analysis – Red line boundary former convent site, bounded by Magdalen Road and St Margaret's Road. Ref: Aerial Site Photograph, Google Earth, 2025.

Heritage significance

3.3. The Former Convent site sits within the Magdalen Road Conservation Area. This area historically formed part of the speculative development of land outside Burton's exclusive spa resort, which was largely complete by the 1850s. The majority of buildings in the Magdalen Road Conservation Area date from the 1850s–60s. On the steep slope rising from the seafront, the character of Church Road, Magdalen Road, and the cross streets from Blomfield Road to St Margaret's Road is defined by spacious, 3–3.5-storey Victorian housing set back from the road, with the churches of St Mary Magdalene and St Thomas of Canterbury providing prominent townscape markers.

3.4. Key heritage assets within the area include:

- The Former Convent of the Holy Child Jesus (chapel and college buildings): Grade II* and Grade II listed buildings forming a major landmark on the conservation-area edge and central to its historic identity. Not all elements are of historic interest, as noted in the Statement of Significance.

- Church of St Thomas of Canterbury & the English Martyrs: A Grade II listed church of architectural and historic importance, serving as an ecclesiastical focal point.

- The Old Penny School House (31 Magdalen Road): A locally prominent Grade II listed historic school building with listed features contributing to the street-scape.

- In addition to the listed buildings, the site is in proximity to White Rock Gardens, a locally identified Historic Park and Garden.

3.5. Together, these assets define the historic character of the Magdalen Road Conservation Area and provide a framework for sensitive future development of the Former Convent site.

Site analysis – Conservation Area Plan Ref: Haworth Tompkins, 2025.

The Former Convent of the Holy Child Jesus is a site of considerable historic significance, featuring a collection of Grade II* and Grade II listed buildings that reflect its architectural, cultural, and educational importance within Hastings.

The Chapel (Grade II*)

3.6. The Chapel to the former convent of the Holy Child Jesus is an outstanding example of High Victorian Gothic architecture. While Historic England's listing credits A.W.N. Pugin as the original architect, current scholarship suggests that Charles Parker likely prepared the initial design, with construction beginning in the 1840s and completion undertaken by E.W. Pugin (A.W.N. Pugin's son) in 1868. This interpretation is reflected in Pevsner's description of the building.

3.7. The chapel is of considerable historic interest due to its close association with the Holy Child Jesus Convent, which played a pivotal role in Catholic education and religious life in 19th-century England. It is also an example of an increasingly rare survival of a Roman Catholic chapel retaining the nun's choir. Architecturally, it is distinguished by its intact High Victorian Gothic interior, designed in part by Pugin and Pugin, and its remarkable stained glass by Hardman & Co, which contributes to the richness of its decorative scheme.

3.8. The combination of design sophistication, craftsmanship, and historical association with a pioneering religious institution underscores the building's significance. As a Grade II* listed building, the chapel is recognised for its high heritage importance. Its inclusion on Historic England's Heritage at Risk Register since 2017 highlights the need for careful conservation to preserve its architectural and historic values for future generations.

Site Photograph - Southern elevational view of the former chapel, with historic site photographs.
Ref: Historic England, DP528364, 2025

Site Photograph - De-consecrated former chapel, Grade II* listed.
Ref: Historic England, DP528376, 2025.

The Former Convent (Grade II)

3.9. The Former Convent building is a notable mid-19th century Catholic convent, initially designed by Charles Parker in the 1830s and completed by the distinguished Catholic architect William Wilkinson Wardell in the late 1840s, a close associate of A.W.N. Pugin. The building presents a sophisticated blend of Italianate, Gothic, and classical architectural elements, including arcaded elevations, a loggia, and a west wing, much of which remains attributable to Parker's original design. Internally, murals painted by Cornelia Connelly enhance its artistic and spiritual significance.

3.10. Historically, the convent is highly significant as the original mother house of the Society of the Holy Child Jesus, founded by the Venerable Cornelia Connelly. This congregation was the first new native community of religious women established in England since the Reformation, marking an important moment in the revival of Catholicism and female religious life. The site functioned both as a religious centre and an educational institution, reflecting the society's mission to provide holistic education and spiritual formation for young women.

3.11. The association with Wardell further adds architectural and cultural value, linking the convent to the wider story of 19th-century ecclesiastical architecture in England. Together with Parker's contributions, the building exemplifies the collaboration of prominent architects in producing a structure of aesthetic refinement and social purpose. The convent retains a high degree of integrity, with many original features still legible, offering insight into mid-19th century convent life and architectural practice. Its combination of historic, architectural, and artistic interest underpins its designation as a Grade II listed building, reflecting its heritage importance locally and nationally.

Site Photographs - Former convent, and historic image of the convent gardens to the west of the site 1887. Left - Historic England, DP528396, 2025. Right - Society of the Holy Child Jesus Archive.

Gate Lodge and Gateway (Grade II)

3.12. The Gate Lodge and Gateway on Magdalen Road, designed by the prominent Catholic architect William Wilkinson Wardell in 1849–1850, are notable early examples of Gothic Revival architecture. Built for the Society of the Holy Child Jesus, the Gate Lodge originally functioned as a Girl's Poor School, reflecting the convent's broader educational and social mission.

3.13. Architecturally, the structure demonstrates characteristic Gothic Revival features, including pointed arches and a gabled parapet on the adjoining stone entrance gateway, which together enhance its visual and stylistic significance. The design of the Gate Lodge and Gateway illustrates Wardell's skill in combining functionality with the ecclesiastical Gothic style, contributing to the overall historic character of the former convent complex.

3.14. As a Grade II listed building, the Gate Lodge and Gateway hold heritage importance, representing both the social history of Catholic education in Victorian England and the early work of a significant 19th-century architect.

Site Photographs - Gate Lodge historic site entrance, with historic site photographs, Grade II listed.
Ref: Left - Geoff Wolfe Collection, 1066Online. Right - Society of the Holy Child Jesus Archive. Bottom - Historic England, DPDP528331, 2025.

New Building

3.15. The ‘New Building’ is an early 20th-century extension to the principal Convent complex, arranged over four storeys with a narrow, rectangular plan. It reads as a subsidiary element to the main convent building while dominating parts of the campus due to its scale and massing.

3.16. Historic records indicate that an east dormitory wing was added to the convent in 1895. This was later replaced by the larger ‘New Building’, which incorporated a gym, concert and assembly hall, studio, and bedrooms, with further extensions or rebuilds occurring in the 1920s–1930s. The building is finished in cream render with red-painted detailing. Its south faade is characterised by a bold round-arched arcade embracing tall cross-windows, accompanied on the left by a staircase tower originally surmounted by a square domed roof, now lost. Historic mapping suggests that elements of the 1895 wing may survive within the current fabric, albeit heavily altered and extended.

3.17. Architecturally, the ‘New Building’ presents an eclectic mix of Italianate, Gothic, and Art Deco influences, which have been generally assessed as unsuccessful in creating a coherent aesthetic. Despite this, the building has historic interest for its association with the expansion of the Society of the Holy Child Jesus and its contribution to the creation of quadrangles and courtyards within the convent campus.

3.18. As the New Building lies within the curtilage of the statutory listed buildings on the site, it is considered to be a curtilage listed structure. It therefore forms part of the setting and significance of the adjacent Grade II listed former convent and other listed buildings within the site. While the building is of more recent construction than the principal historic structures, it contributes to the understanding of the site’s development and the evolution of the convent complex over time. Its heritage significance is therefore primarily derived from its historic and contextual relationship with the other listed buildings within the curtilage rather than from its individual architectural merit.

Note: since the compilation of the masterplan and development brief, a significant fire at the site caused considerable damage to the New Building, the full extent of which is yet to be determined. Any future development proposals brought forward would therefore need to consider whether alterations and restoration would be viable or whether an application for demolition would be required.

Site Photographs - ‘New building’ southern elevation prior to July 2026 fire, with historic image 1927.
Ref: Left - Cornelia Connelly Digital Library Resource. Right - Historic England, DP528388, 2025.

Training College / Gothic Building (Grade II)

3.19. The former purpose-built Training College also known as the Gothic Building, located to the south of the Gate Lodge, is a three-storey building of relatively narrow, rectangular plan form. Designed by William Wilkinson Wardell and completed around 1856, it is an example of mid-19th century Gothic educational architecture and reflects the expansion of the Society of the Holy Child Jesus during this period.

3.20. The building is of historic interest as it represents the Society's commitment to education and the professional training of women within the convent's mission. Architecturally, the college exhibits characteristic Gothic detailing, including ogee-headed double lancet windows, trefoil headed windows, towers, and gables, which enhance its stylistic significance and demonstrate Wardell's design expertise in combining functionality with Gothic Revival principles. As a Grade II listed building, it holds high heritage importance.

3.21. Later additions to the Training College (Gothic Building) include single-storey extensions attached to the ground floor, comprising a late 20th-century lean-to structure and early 20th-century cream-rendered additions with features such as period windows and a corrugated iron roof. The listing description notes that "the later buildings attached to the ground floor are not of special interest." While these extensions have limited architectural and historic value, they provide evidence of the growth and adaptation of the educational buildings over time.

3.22. Although these extensions are not identified as structures of particular special interest in their own right, they have not been excluded from the relevant statutory list entries. As a result, they form part of the listed building via attachment. While their individual architectural and historic significance is limited, they contribute to the overall composition and evolution of the listed building complex.

Site Photograph - East elevation of the Grade II listed Training College (Gothic Building) and Gate Lodge.
Ref: Historic England, DP528338, 2025.

Site Photographs - View of the southern gable to the Grade II listed Training College (Gothic Building), with historic site photographs. Ref: Top - Historic England, DP528339, 2025. Left & Right - Cornelia Connelly Digital Library Resource.

Planning history

3.23. The site was built and used as a convent and school from the 1840s until 1974. From 1976 until 2020 it became a summer language school, before becoming a young persons' football training school until recently. Today the site sits unused. The site's planning history goes back to 1950 where the site is described as a 'convent school'. Between 1950 and 1968 there were various planning permissions in connection with the school including extensions and buildings for classrooms, laboratories, staff rooms, gymnasiums, dormitories, a boiler room and several permissions for ablution/bathroom facilities.

3.24. Later planning applications comprise:

- Erection of a classroom, approved in 1972.
- Outline housing proposal, refused in 1975.
- Erection of a residential school building, approved in 1987.
- Erection of a security fence on boundary walls, approved in 1988 & 1989.
- A proposal for 32 dwellings, submitted in 2010 but never determined.
- There were two applications to determine whether use of the Dickens Building (the Gate Lodge) as a dwelling is lawful from a planning perspective (one in 2023 one in 2024). These were both refused.
- HS/FA/10/00207- Restoration and conversion of the gothic building, gate lodge, priory and former convent building to residential comprising 32 dwellings and associated parking areas. Demolition of 20th century buildings, former laundry building and part of listed former convent building (south wing), arcade building to east of gothic building, east wing to convent building, prefabricated and converted classrooms, and club house. Development of 135 new dwellings comprising 70 houses and 65 apartments with associated parking areas. Restoration of the chapel. External works and landscaping and creation of a new access. Application undetermined.
- Listed building consent application HS/LB/10/00206 and conservation area consent application HS/CA/10/00301. Application undetermined.

Historic site photograph / illustration of the terraced convent gardens 1861. Ref: Society of the Holy Child Jesus Archive.

3.25. As part of the evidence based site analysis, a RAG (red, amber and green) assessment was carried out in order to identify the significance of the varying historic buildings and landscape. This is used to inform future development opportunities.

Site analysis – Heritage significance RAG rating plan. Ref: Litchfields Planning Consultants

- Site Boundary
- Retain and refurbish (limited scope for sub-division / alteration to boundary treatment)
- Retain with scope for internal alterations, and sub-division / alterations to boundary treatment
- Demolition and opportunity for replacement buildings / structure / boundary treatment
- Either retain or refurbish or some scope for internal alteration / subdivision
- Potential for redevelopment or retain with scope for internal and external alterations

Site analysis – Heritage assessment. Ref: Litchfields Planning Consultants

- Site Boundary
- 1830s - 1880s
- 1890s - 1920s
- 1930s - 1940s
- 1950s onwards
- Largely intact 1830s wall
- 1830s wall with later alterations
- 20th century boundary treatment

Surrounding context

3.26. St. Leonards was initially developed from 1828 onwards by James Burton and his sons, including the architect Decimus Burton, as an exclusive seaside spa resort for the wealthy. James Burton acquired 10.1 hectares of land, including one kilometre of seafront, from the executors of Charles Eversfield. The Burton estate was largely completed by the 1850s.

3.27. From the 1850s onwards, areas to the east and north of the Burton estate, largely associated with the Eversfield Estate, were developed speculatively. Land and building licences from the Eversfield Estate were sold after Charles Eversfield's death. This period saw the construction of stuccoed terraces, particularly in the grid of streets bounded by Edward Road, Church Road, and Magdalen Road, now part of the Magdalen Road Conservation Area. This marked the first extensive development outside the Burton estate.

3.28. The main shopping streets, London Road and Kings Road, were established in the late 1850s and 1860s, contributing to the transformation of St. Leonards from an exclusive spa resort to a thriving town. By around 1914, the town's development was largely complete. The surrounding streets are predominantly characterised by Regency and early Victorian seaside terraces, typical of St. Leonards and Hastings seafront architecture.

3.29. The predominant style of the surrounding streets is formed largely of Regency / early Victorian seaside terrace style that characterises much of St Leonards and Hastings seafront.

3.30. Typical features include:

- Stucco (plastered) facades, painted light colours.
- Symmetrical sash windows with classical surrounds.
- Balconies with cast-iron balustrades.
- String courses and cornices dividing the floors.
- Rusticated ground floor (stonework eUect on the lower level).
- A sense of grandeur and uniformity, designed for fashionable seaside living.

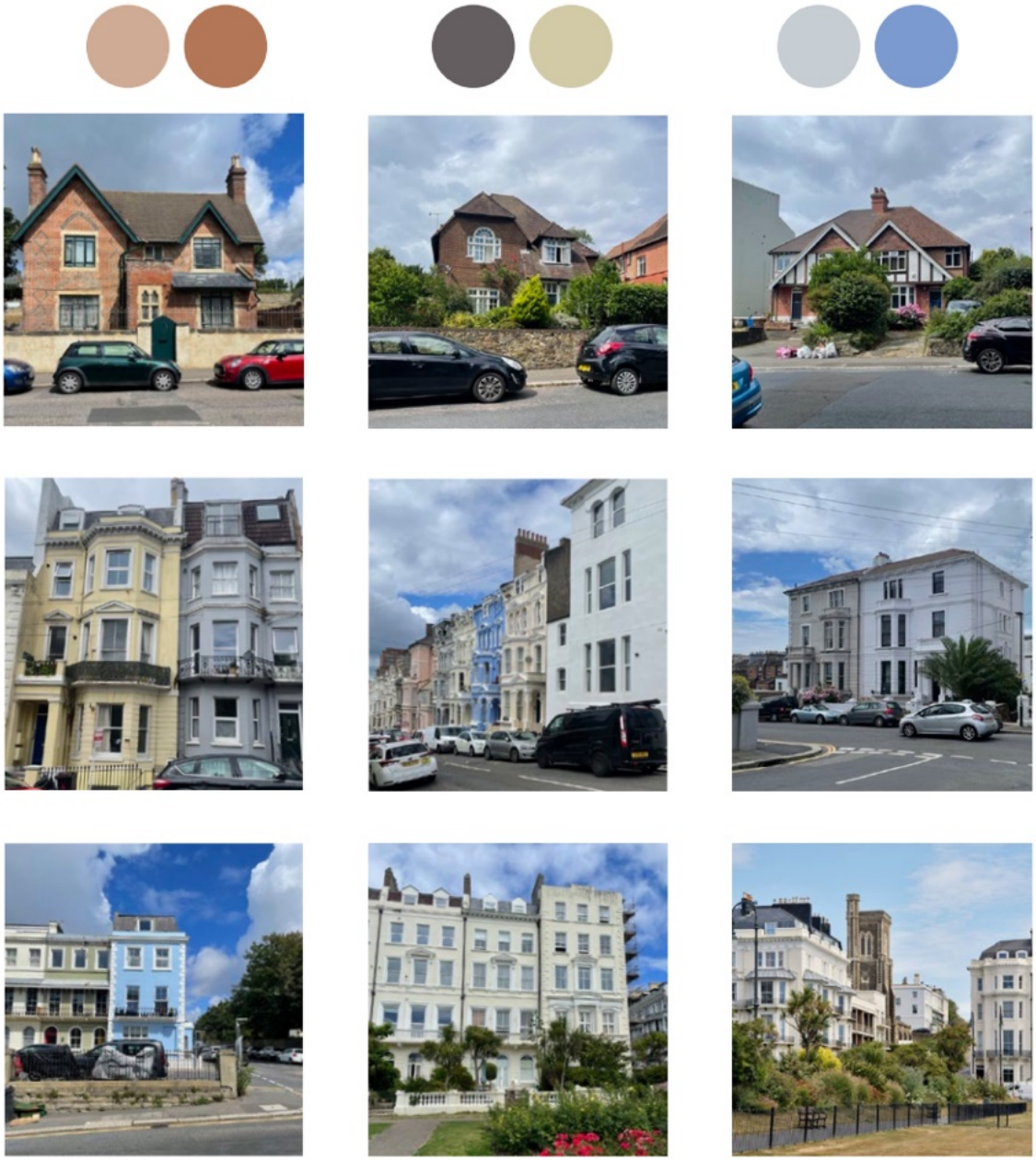
3.31. This style was very much influenced by the Burtons' Regency planning of St Leonards in the 1820s–30s, and then continued into the Victorian Italianate style, which explains the added decoration (like window pediments and quoins on the corners).

3.32. To the north of the site Arts and Crafts / Edwardian suburban domestic architecture (c.1890s–1910s) is found, as seen a lot in the residential parts of St Leonards and Hastings beyond the seafront.

3.33. Typical features include:

- Red brick construction (not stucco, unlike the seafront).
- Steeply pitched tiled roof with complex, asymmetrical shapes.
- Large prominent gable facing the street.
- Casement windows with small panes, including a big round-headed/arched window (a typical Arts and Crafts flourish).

- Chimneys integrated into the design, giving a solid, homely look.
- Use of natural materials (brick, tile, stone).
- Slate roofs.



Site analysis - Surrounding residential architectural character analysis. Ref: Haworth Tompkins Site Photographs, 2025

4. Planning Policy Context

This annex carefully considered the relevant national and local planning policies as set out below, as well as taking account of wider objectives in relation to sustainable development, environmental protection, economic growth and community well-being. By integrating these priorities within the guidance, the annex seeks to support a high-quality development that responds positively to its context.

4.1. Planning Policy; Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that applications should be determined in accordance with the development plan "unless material considerations indicate otherwise". Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard and attention to be given to the desirability of preserving a listed building or its setting and of preserving or enhancing the character or appearance of a conservation area.

4.2. The statutory development plan comprises the:

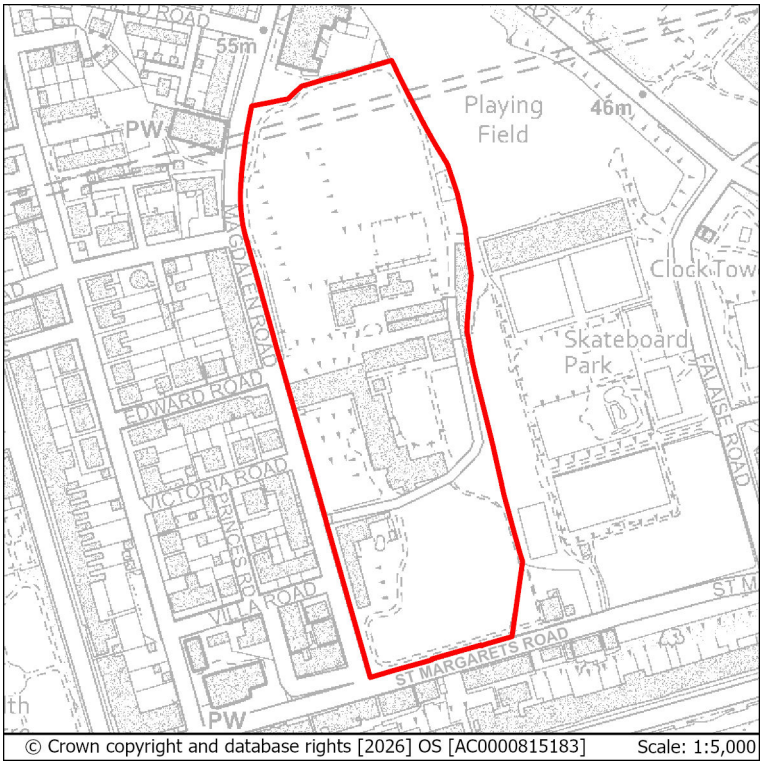
- The Hastings Local Plan
- Waste and Minerals Plan (2013)
- Waste and Minerals Sites Plan (2017)
- Waste and Minerals Local Plan Review Revised Polices (2024).

4.3. The relevant Local Plan Policies that will need to be addressed include: Former Convent of Holy Child Jesus (Policy HS25), Heritage (Policies SP7, SC5, SC6 and SC7), Green and Blue infrastructure, biodiversity, trees and open space (Policies SP8, SC10, SC11, SC12, SC13 and SC14, Ground Behaviour and Stability (Policy SC15).

4.4. The site provides an opportunity for sensitive residential and mixed-use development: Residential development should be designed in accordance with the policies of this Plan, including Policies SP2, SC1, SC2, SC3, ID1 and ID2, reflecting local housing mix, tenures, unit sizes, and affordable housing requirements. Opportunities exist for a range of dwelling types, including family housing and later living accommodation, designed to respond to the site's topography and protect views, sightlines, and heritage settings. Parking, refuse, and cycle provision should comply with Development Plan standards, ensuring that design solutions do not compromise landscape quality or heritage significance.

4.5. The site should be considered in relation to Local Plan policies on visitor accommodation, employment, sustainable design, children's play space, planning obligations and development contributions, including Policies SC1, SC2, SC3, E5, ID1 and ID2

4.6. Listed Building Consent would be required for works which would affect the character of the Grade II* Chapel to the Former Convent of the Holy Child Jesus, the Former Convent Building to the North West of Chapel at the Former Convent of the Holy Child Jesus, the Grade II listed Gate Lodge and Gateway to the Former Convent of the Holy Child Jesus, the Training College, Former Convent of the Holy Child Jesus, or any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948.



Site Analysis: Extract from Policies Map

4.7. The later additions to the Training College remain part of the listed building and Listed Building Consent would be required for works to these extensions if they affect the character of the listed building as a whole.

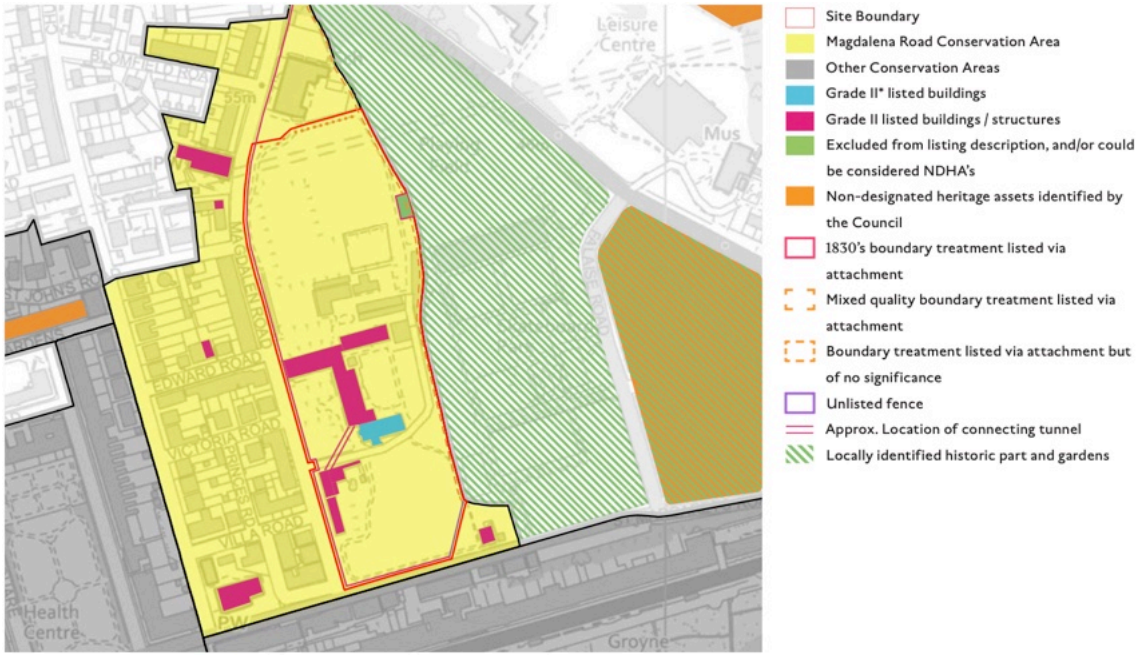
Key planning policy constraints and opportunities are set out below:

4.8
- The effect of development on the Private Open Space designated to the south of the site is a key constraint. Any reduction in size of this area will need to demonstrate that the nature of the open area has not been prejudiced in terms of heritage, visual, recreational, amenity or ecological value or equivalent open space is provided in the locality.
- The visual effect of the proposal on the setting of listed buildings within and surrounding the site and on the character and appearance of the conservation area is a constraint.
- Proposals should ensure the existing natural environment (trees, biodiversity, existing landscaping) should not be harmed or adequately mitigate, or compensate, for unavoidable damage and that the need for development outweighs the nature conservation interest.
- The heritage designations (including listed buildings and conservation areas) and the need to give great weight to the preservation of designated heritage assets and their settings are a key constraint.
- Development will need to seek the restoration of, and secure the long-term future of, the listed buildings. It should seek to remove the Grade II* listed Pugin Chapel from the Heritage At Risk Register. Any heritage harm would need to be justified and outweighed by public benefits

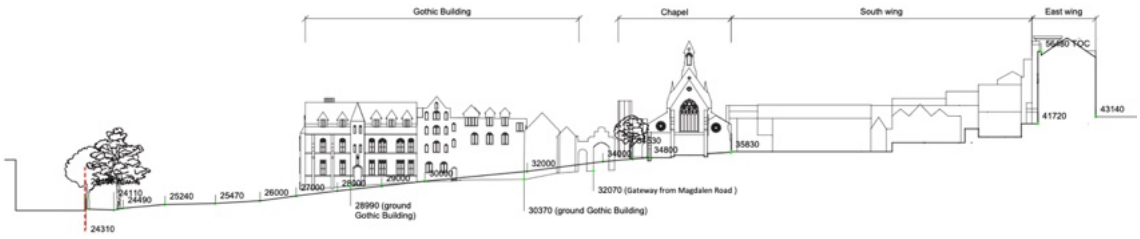
- Demolition of buildings which contribute positively to a conservation area will need to be justified (including a structural report) and evidence of redundancy and marketing of the building will be required.
- Housing proposals will need to meet the adopted policy requirements in terms of mix of housing types, tenures, size of units, affordable housing requirements and general design, landscaping and car and cycle parking standards guidance.
- Any future planning application would need to be supported by a land stability assessment.

4.9. Redeveloping the Former Convent represents a strong strategic fit within Hastings' wider renaissance narrative, aligning regeneration needs with the statutory requirement to conserve the town's exceptional heritage. The Planning Policy Appraisal highlights that while the site is subject to significant policy constraints, most especially in relation to heritage, it also offers a major opportunity to deliver meaningful public benefits.

4.10. Sensitive redevelopment can secure the long-term future of the site's listed buildings,remove the Grade II* Pugin Chapel from the Heritage at Risk Register, and reinstate the integrity of a historically significant landscape. At the same time, new development can help meet identified housing needs, improve access to high-quality open space, enhance biodiversity, and contribute to wider placemaking ambitions. By balancing conservation with positive, plan-led change, the site can support Hastings' regeneration objectives while safeguarding the cultural, architectural, and environmental assets that define the character of the area.



Site analysis - Historic site development, designation plan. Ref: Lichfields Planning Consultants



Existing site topography – north to south

5. Project Context - Current Site Conditions

The existing buildings are generally in a poor and deteriorating condition, reflecting prolonged periods of under use and limited maintenance. Defects to the external fabric and structural elements are evident, including areas of water ingress, material decay, and localised structural movement. Roof coverings, rainwater goods, and openings are compromised in places, increasing vulnerability to further deterioration. Without timely intervention, these issues present an ongoing risk to the integrity and heritage significance of the buildings, underscoring the need for comprehensive repair and stabilisation works as a priority.

5.1. As part of the evidence based analysis for the existing site, a comprehensive building condition survey was undertaken to assess the current state of the listed and historic buildings on the site. The building condition survey identified areas of fabric deterioration that pose a risk to the significance of the listed and historic buildings. Whilst the condition report supports a heritage led approach, it will require updating to support any development proposals brought forward to ensure that repair and restoration works are prioritised in accordance with national and local heritage policy.

5.2. The survey established the condition of the buildings' fabric and structural elements in order to inform an outline scope of repair and restoration works. The findings provided an evidence base to understand the scale and nature of interventions required to secure, conserve, and restore the heritage assets.

5.3. The survey focused on the external and structural fabric of the buildings, including roofs, walls, windows, doors, chimneys, and other significant architectural features. Particular attention was given to areas vulnerable to deterioration, such as water ingress, material decay, and structural movement, which are commonly associated with mid-19th and early-20th-century historic buildings. The assessment identified priority areas for repair, highlighted risks to the integrity and significance of the heritage assets, and established a framework for a phased and managed approach to restoration.

5.4. The survey did not extend to internal fit-out works, building services, or alterations required to facilitate new or alternative uses. These matters are addressed separately within the development brief and subsequent design stages. A clear distinction is therefore drawn between essential fabric and structural repairs necessary to preserve the historic and architectural significance of the buildings, and future fit-out works associated with their adaptation for contemporary use.

5.5. Overall, the condition survey provided a robust understanding of the existing buildings and their conservation needs at that point in time. It supports a heritage led approach to future development, ensuring that repair and restoration works respond appropriately to the historic character of the site while enabling its long-term sustainability and reuse. Given the identified condition of the buildings, this annex supports a phased approach to repair and reuse, with early works focused on weatherproofing and structural stabilisation.

Site Photograph - Deconsecrated former chapel, Grade II* listed.
Ref: Historic England, DP528359, 2025.

Site Photograph - ‘New Building’ a Pre-1948 curtilage listed building prior to the fire in July 2026.
Ref: Historic England, DP528390, 2025.

6. Guiding Principles for Development

Any future development of the site should be shaped by five interrelated guiding themes: adaptive reuse, a landscape-led approach, public benefit, improved site connectivity, and sensitive redevelopment. Together, these principles will ensure that change is managed in a coherent, sustainable, and heritage-led manner that responds positively to its setting within Hastings.

6.1. This annex sets out the guiding principles for the site through a masterplan, translating high-level planning policies into a clear spatial framework that demonstrates how development could be arranged, designed, and delivered while respecting the site's heritage and landscape significance. The guiding principles have been developed using a landscape-led approach, with the site divided into three distinct character areas: the Southern Lawn, Central Area, and Northern Area. Each area offers a unique opportunity to respond positively to its immediate context, heritage assets, and relationship with the wider landscape. This approach ensures that future development is shaped by the site's spatial character, historic value, and environmental qualities, allowing proposals to be sensitively tailored to each area while contributing to a coherent and integrated overall vision.

Southern Lawn

6.2. The Southern Lawn presents an opportunity to create a high-quality, publicly accessible open space that serves as a central visual and social focus for the development. Through carefully considered building heights, massing, and layout, new development can be integrated sensitively within the landscape and its historic setting. Particular regard will be given to the Grade II listed Priory Building, ensuring that its architectural character and prominence within key views are preserved and enhanced. Strategically placed gaps in built form and the retention of the Grade II listed wall can provide connections to St Margaret's Road while safeguarding important vistas towards the Priory Building to the southeast and the gable of the Grade II* listed Chapel. Key approach routes, including the historic Gate Lodge entrance, offer further opportunities to enhance wayfinding, reinforce legibility, and celebrate the site's heritage significance.

Central Area

6.3. The Central Area provides an opportunity to respond to the historic cloistered pattern of development, reflecting the site's incremental and layered evolution. The restoration and reuse of the Grade II* listed Chapel is a central component of the development strategy, enhancing public access to, and understanding of, the site's heritage significance. The Chapel is proposed to be refurbished and repurposed as a community and cultural venue, capable of accommodating performances, exhibitions, heritage interpretation, educational activities, artisans village, and related events.

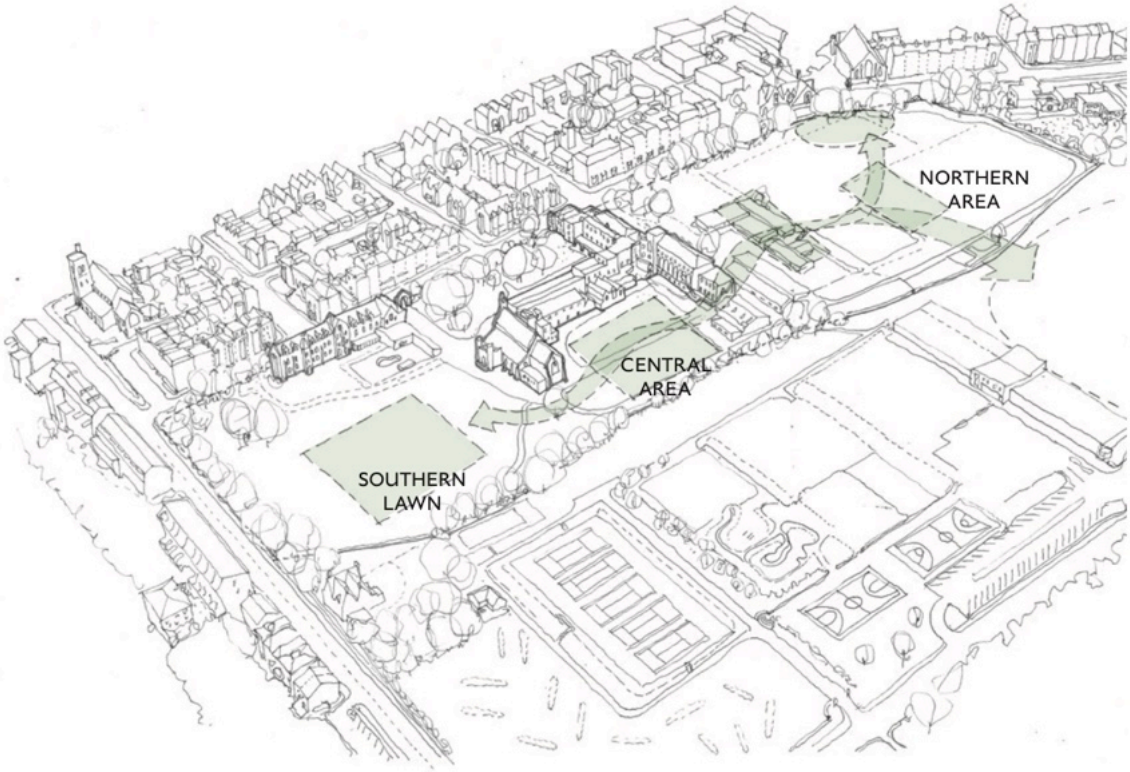
6.4. The retention, restoration, and adaptive reuse of the former convent buildings, including the East and Southern Wings connecting to the Chapel, present a significant opportunity to conserve and reintegrate key elements of the historic built fabric into the future use of the site. Through sensitive refurbishment, deep retrofit, and appropriate adaptation, these

interconnected wings could continue to contribute to the spatial coherence and architectural integrity of the former cloister arrangement.

6.5. The retention of the West Garden ensures the preservation of landscape character and spatial structure, maintaining the site's historic setting while providing a high-quality, generous, and accessible outdoor environment. The East Gardens provide an opportunity to accommodate a series of residential buildings that define and contain the garden edge while maintaining appropriate separation distances. This arrangement should safeguard views of the Chapel's eastern gable and maintain visual connections to key heritage assets.

Northern Area

6.6. The Northern Area presents an opportunity to deliver a cluster of low-rise residential dwellings arranged around shared landscaped spaces, in accordance with the Development Brief and Local Plan policies. The layout should prioritise pedestrian movement and permeability, minimising the visual and functional dominance of vehicles within the public realm. This area offers an opportunity to introduce contemporary homes organised around communal gardens. The scale and grain should reflect the character of residential streets to the west of Magdalen Road, establishing a distinctive yet contextual identity. The arrangement should promote social interaction, community cohesion, and long-term residential amenity.



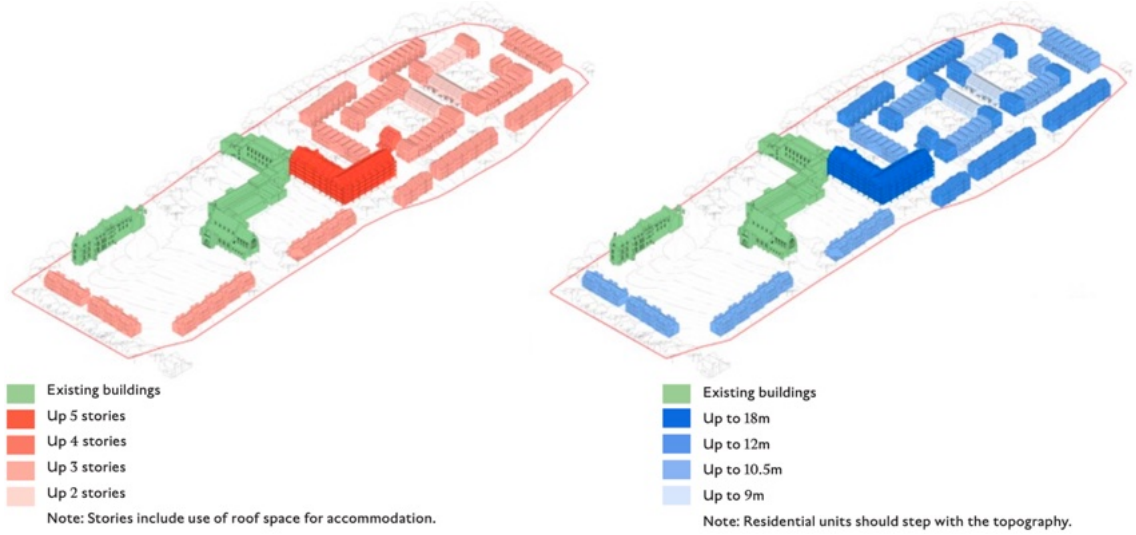
Guiding principles of development - Three distinct but interconnected landscape areas, each designed to support a sustainable and regenerative approach to development.
Ref: Haworth Tompkins, 2025.

Options for New Uses within the Listed Buildings and Tenures Across the Site

6.7. The identified locations for new residential development offer suitable opportunities that can be accommodated without compromising the overall landscape structure or heritage setting. New buildings should be carefully sited, scaled, and designed to respond to the mature trees, historic sightlines and existing topography which steeply drops from the north of the site down to the southern lawn. Their form, materials, and massing should reinforce local character and ensure that new development is clearly legible as contemporary, while remaining sympathetic to the historic context.

6.8. The housing mix should support a balanced community, including homes for sale and potentially later living accommodation, promoting choice, flexibility, and long-term sustainability. Any viable residential development on the site should provide units ranging from one-bedroom, two-person homes to three-bedroom, five-person homes. Buildings should generally be 2–4 storeys, staggered to follow the topography and maximize sea and landscape views. Roofs should reflect the Victorian and Gothic Revival local vernacular with pitched forms and dormers. Setbacks between buildings should prevent overlooking, with layouts that may include shared garden clusters and integrated parking courts accessed from primary or secondary roads. Home Streets should run alongside developments, accommodating low- to medium-low-density parcels of 20–30 metres in width.

Guiding principles of development - New residential or later living development opportunities to the site perimeter, respecting the Grade II listed garden wall, with the majority of the development focused on the existing northern playing fields.
Ref: Haworth Tompkins, 2025.



Guiding principles of development - New residential development, building stories and heights appropriate to the existing heritage setting and topography. Ref: Haworth Tompkins, 2025.

6.9. The restoration and reuse of the Chapel is a central element of the development strategy, offering a key opportunity to enhance public access to and appreciation of the site's heritage significance. Sensitive refurbishment and repurposing of the Chapel would provide an opportunity for the existing building to be used as a community and cultural venue, capable of hosting performances, exhibitions, heritage interpretation, educational activities, and related events. The adaptive reuse of the existing East and South Wings presents further opportunities to accommodate complementary community, educational, workspace, or ancillary uses, strengthening functional connections with the Chapel and supporting the long-term sustainability of the site. The potential inclusion of a café or refreshment facilities would support the venue's viability and encourage broader public engagement. Supporting spaces, including storage, catering, and servicing areas, are proposed within the connecting node to the South Wing, minimising intrusive alterations to the main Chapel space. Taking into account both the temporary and permanent condition of the site, proposals should follow conservation principles to retain and enhance significant architectural features, spatial qualities, and historic fittings, guided by detailed conservation management plans and consultation with relevant heritage stakeholders.

6.10. To meet the sites guiding principles future site proposals should demonstrate:

- A clear strategy for the sensitive reuse and repair of the listed buildings
- A sustainable and viable reuse of the Chapel
- Robust long-term maintenance and management arrangements
- High-quality design including sustainable landscaping, appropriate biodiversity enhancements, incorporating existing trees and permeable landscape
- Connectivity to surrounding neighbourhoods, greenspaces and local services, through new strategic openings within the existing perimeter walls
- Sustainable construction methodologies
- Compliance with parking, refuse and recycling strategies, compliance with the Local Plan

Southern Lawn

6.11. Guiding principles:

- Provision of private open space, green/blue infrastructure and urban greening on the southern lawn in accordance with Policies SP8, SC12 and SC134.

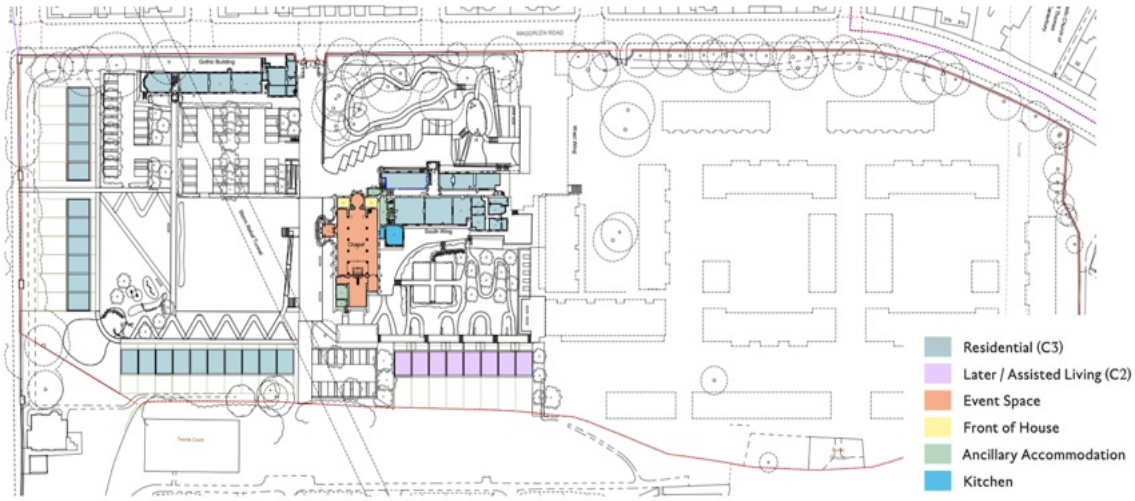
- Opportunities to create a more porous site layout and integrate sustainable landscape strategies
- Adaptive reuse of the existing Grade II listed Training College (Gothic Building)
- Retention of key views and visual connections to the Grade II listed Priory and the Grade II* listed Chapel
- Residential massing should be informed by the heritage significance of existing buildings, remaining subordinate and respectful in height, scale, and form

6.12. Along the eastern boundary of the site, new residential development should respondpositively to existing topography. Dwellings are to be arranged in a stepped and terraced form, enabling the built form to sit comfortably within the landscape. This approach ensures that building massing remains visually subordinate to the natural landform and supports a harmonious relationship between development and adjacent open spaces.

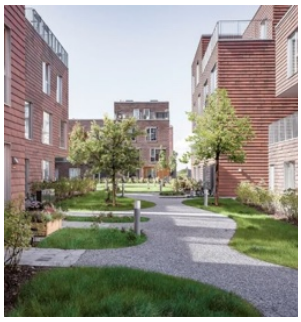
6.13. Dwellings within the southern area, located on the lower plateau, should be positioned to maintain uninterrupted views across the principal lawn. This arrangement reinforces the openness of the southern landscape and sustains visual connectivity between key areas of the site. At the south-eastern corner, building spacing and orientation should be carefully designed to protect important sightlines towards the Priory. These views should be retained from principal approach routes and publicly accessible viewpoints, in accordance with heritage and landscape policy objectives.

6.14. Car parking is to be primarily accommodated within the footprint of the existing swimming pool and associated ancillary structures, which are proposed for removal. The reuse of this previously developed area represents a sustainable and efficient use of land and enables existing site levels to be retained.

6.15. This location positions parking below the principal lawn, allowing natural changes in level and new landscape planting to provide effective visual screening. This approach minimises the visual and physical impact of vehicles on the character of the landscape and the setting of the listed buildings. Detailed design of parking areas should incorporate high-quality planting, appropriate surface materials, and sensitive boundary treatments. These elements should be used to soften the appearance of hardstanding, enhance biodiversity, and ensure that parking provision integrates seamlessly with the wider landscape framework, heritage context, and overall masterplan structure.



Southern Lawn - Site usage and landscape led strategy, ground floor. Ref: Haworth Tompkins, 2025.



Architectural precedents - The development should adopt a sensitive, architectural style that reflects Hastings' historic character and coastal setting, with stepped and terraced forms that respond to topography, respect key views, and integrate harmoniously with the surrounding landscape and heritage assets. Ref: Left - Almenbolig+ (JAJA Architects), Centre - Lovedon Fields (BDP), Right - Tingbjerghusene (Vandkunsten Architects).

6.16. The proposed townhouses addressing the Southern Lawn offer an opportunity to create a compact,distinctive, and cohesive residential cluster that responds positively to the site's heritage setting and landscape framework. Development in this location should balance privacy, residential amenity, social interaction, and engagement with surrounding open spaces and heritage assets.

6.17. Dwellings should be designed with dual principal frontages addressing both the Southern Lawn and the listed boundary wall and its curtilage. This dual-aspect arrangement supports natural surveillance, encourages active frontages, and strengthens visual and physical connections with the wider site context.

6.18. Building height, massing, and roof form should respond sensitively to site topography and the scale of the adjacent Training College (Gothic Building). Stepped massing is encouraged to reduce visual impact and integrate new development with existing land levels. Principal elevations facing the Southern Lawn should incorporate articulated rooflines and chimney features to create visual interest and establish a coherent architectural identity, reflecting traditional almshouse typologies and reinforcing relationships with the historic roofscape.

6.19. Car parking should be accommodated within a discreet shared court to the rear of the dwellings, minimising visual intrusion and supporting a pedestrian-prioritised environment. Parking, servicing, and refuse storage should be integrated within the landscape framework and designed to avoid dominance within public spaces.

6.20. Overall, townhouse development should reinforce the landscape-led and heritage-sensitive principles of the masterplan, contributing positively to townscape quality, residential amenity, and long-term placemaking objectives.

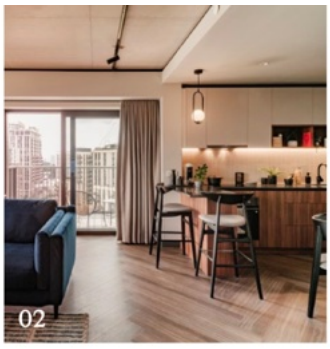
6.21. The former Training College, with its elongated plan form and multiple stair cores, provides a flexible framework for conversion into high-quality residential accommodation. Its linear structure supports dual-aspect dwellings and a range of apartment sizes, enabling adaptability in residential mix and tenure.

6.22. The conversion strategy should retain and work with primary structural and architectural elements. Existing cross walls, chimney breasts, and load-bearing features should be preserved wherever possible, with new party walls aligned to established structural lines. This approach limits intrusive intervention, protects historic fabric, and maintains the building's original proportions and spatial hierarchy.

6.23. All alterations should follow conservation best practice and be informed by detailed heritage assessments. Interventions should be proportionate, reversible where feasible, and clearly legible as contemporary additions while remaining sympathetic to the building's character. By balancing conservation and adaptation, the proposals should secure the building's long-term future as a distinctive and desirable residential asset within the wider masterplan.

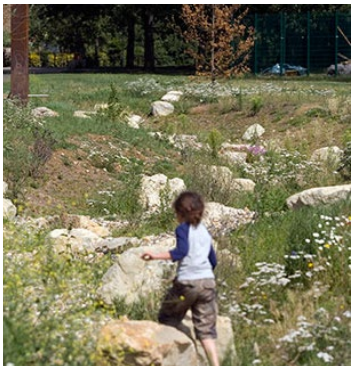
Adaptive reuse - Indicative residential layouts for the Grade II listed Training College (Gothic Building)

Ref: Haworth Tompkins, 2025.



Opportunity for deep retrofit within the existing training college, to create new residential accommodation / workspace and / or cafe.

Ref: 01 - Historic England, DP528339, 2025. 02-06 - Haworth Tompkins.



Opportunities for a landscape led development to the southern lawn creating a sustainable resilient development. (Historic England, JAJA Architects, BDP and Vandkunsten Architects).

Ref: 01 - Historic England, DP5283338, 2025, 02 - Ladywell Fields (BDP), 05 - Almenbolig+ (JAJA Architects), 06 - Lovedon Fields (BDP), 07 - Tingbjerghusene (Vandkunsten Architects).

Central Area

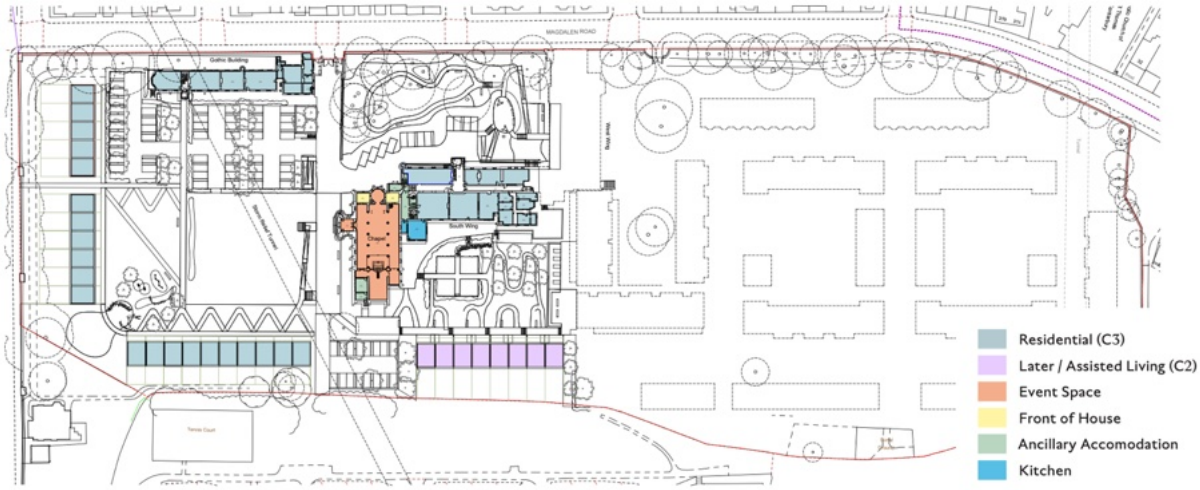
6.24. Guiding principles:

- Adaptive reuse of the existing Grade II* listed Former Chapel, East and South Wings, Heritage led approach
- Opportunities for community / event space within the heart of the site
- Retention of the eastern garden
- Opportunities to create a more porous site layout and integrate sustainable landscape strategies
- Retention of key views and visual connections to the Grade II* listed Chapel
- Residential massing should be informed by the heritage significance of existing buildings, remaining subordinate and respectful in height, scale, and form

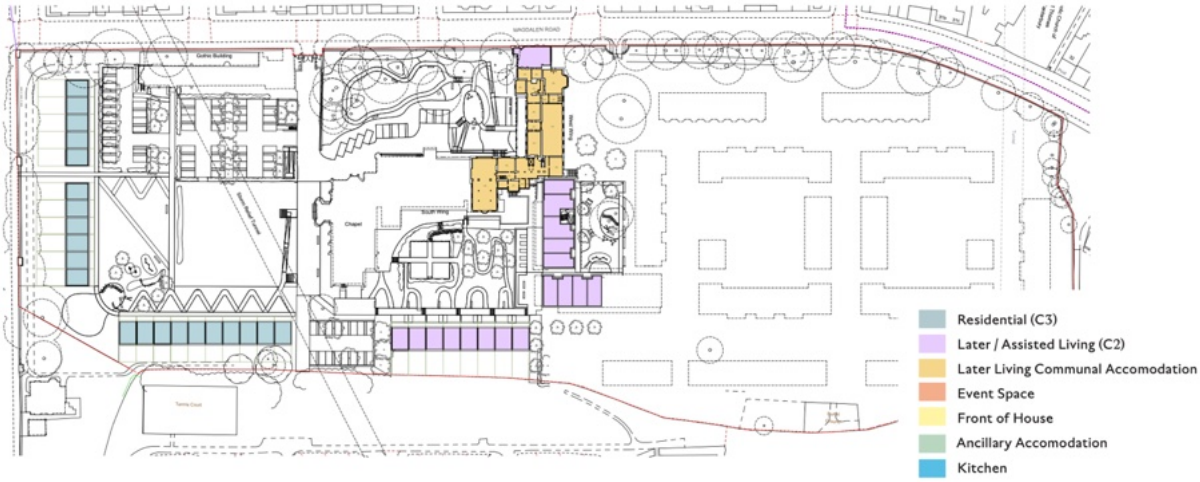
6.25. The Grade II* listed Chapel requires a viable and sustainable long-term use that secures its conservation, reinforces its architectural prominence, and strengthens its role within the landscape framework.

6.26. Any proposed use should be compatible with the building's significance, spatial qualities, and setting, and supported by a comprehensive conservation strategy. The preferred approach is for the Chapel to function as a community, cultural, or event space capable of accommodating a range of public and semi-public activities, subject to detailed design and operational considerations.

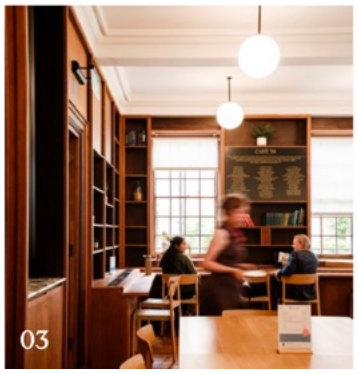
6.27. It is recognised that event-related uses are unlikely to accommodate all required parking within the site boundary in accordance with adopted standards. As a result, the masterplan discourages extensive surface-level parking, which would undermine landscape quality and the heritage setting.



Central Area - Site usage and landscape led strategy, ground floor. Ref: Haworth Tompkins, 2025.



Central Area - Site usage and landscape led strategy, upper ground floor. Ref: Haworth Tompkins, 2025.



Opportunity for deep retrofit within the East Wing, to provide new residential / later living ancillary communal accommodation. New residential accommodation reinstating the historic courtyard garden.

Ref: Left - Cornelia Connelly Digital Library Resource. Centre - Almshouse (Witherford Watson Mann Architects), Right - Pembroke College, Cambridge (Haworth Tompkins).

Options for New Uses for the Listed Buildings

6.28 Development proposals should explore the use of existing off site parking facilities, including those east of White Rock Gardens and the public car park accessed from St Margaret's Road. These facilities should form part of the overall access strategy and be supported by clear signage and effective management. Enhanced pedestrian routes along the southern and eastern boundaries should provide safe, convenient, and legible connections between on-site uses and off-site parking, reinforcing sustainable travel patterns and reducing reliance on private vehicles.

6.29. The eastern garden is proposed as an active, multifunctional landscape that supports community use, ecological enhancement, and visual amenity. It should form a key component of the site-wide green infrastructure network and contribute to environmental and placemaking objectives.

6.30. The retention and adaptive reuse of the existing South and East Wings presents an opportunity to provide supportive accommodation for cultural, later living, or residential developments, including flexible spaces for community, wellbeing, management, or ancillary uses that complement the surrounding landscape and built form.

6.31. A kitchen garden serving the adjacent public building will provide opportunities for education, food production, and community engagement. This will be complemented by orchard planting and meadow grasslands, strengthening biodiversity and ecological connectivity across the site.

6.32. Landscape design should respond sensitively to site topography, particularly in areas of steeper gradient. Residential development in this zone should be integrated with the landscape structure to create a layered environment that supports informal recreation, enhances visual interest, and improves the experience of the eastern edge of the masterplan.

6.33. The existing 'New Building' is proposed for demolition to enable the delivery of more eUicient and higher-density residential development within established height parameters, improving overall site viability.

6.34. Replacement development should maximise functionality, accessibility, and accommodation quality, informed by detailed design studies. EUicient internal layouts will support improved space standards, flexibility, and high-quality living environments.

6.35. The new building arrangement should prioritise dual-aspect units where possible, allowing principal living spaces to face south and maximise daylight and sea views. This approach supports high-quality residential provision and enhances the character and setting of the site.

6.36. New development should be positioned to retain mature trees and existing landscape features wherever possible. In this instance, the proposed arrangement preserves two mature trees that define the centre of a shared landscaped courtyard.

6.37. This courtyard should function as a focal point for residents, providing a sheltered and attractive outdoor amenity space. It should support both informal recreation and social engagement, contribute to microclimatic comfort, and reinforce the landscape-led principles of the masterplan.

6.38. High-quality materials, planting, and management arrangements should be secured through detailed design and planning conditions, ensuring that shared spaces remain attractive, functional, and well-maintained over the long term.

Former Chapel - Opportunities for adaptive reuse, deep retrofit for event space, music hall, exhibition centre and community use.

Ref: 01 - Mercato Mayfair (Greig & Stephenson Architects). 02&03 - Battersea Arts Centre (Haworth Tompkins). 04 - St. Barnabas Jericho. 05 - LSO St. Luke's (Levitt Bernstein). 06 - Yinka Shonibare MBE at the Fitzrovia Chapel.

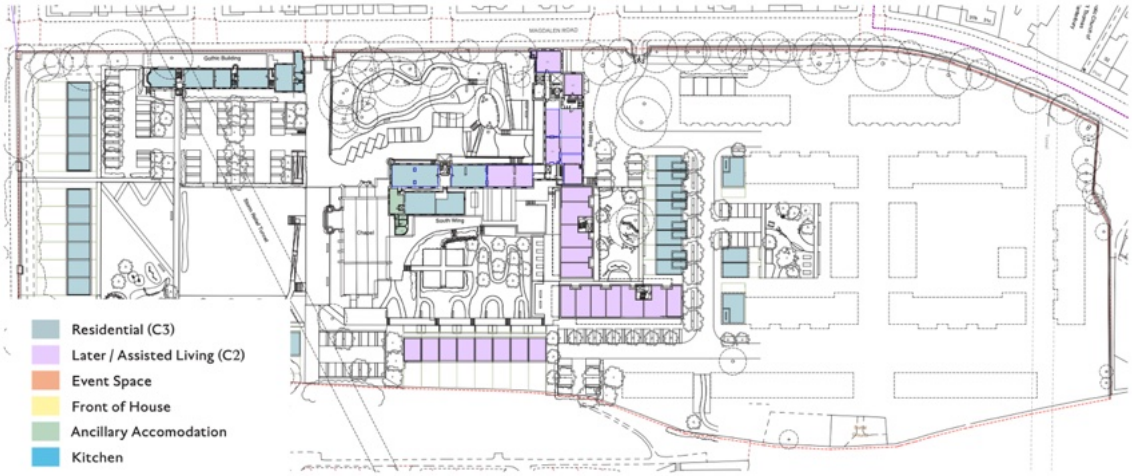
Northern Area

6.39. Guiding principles:

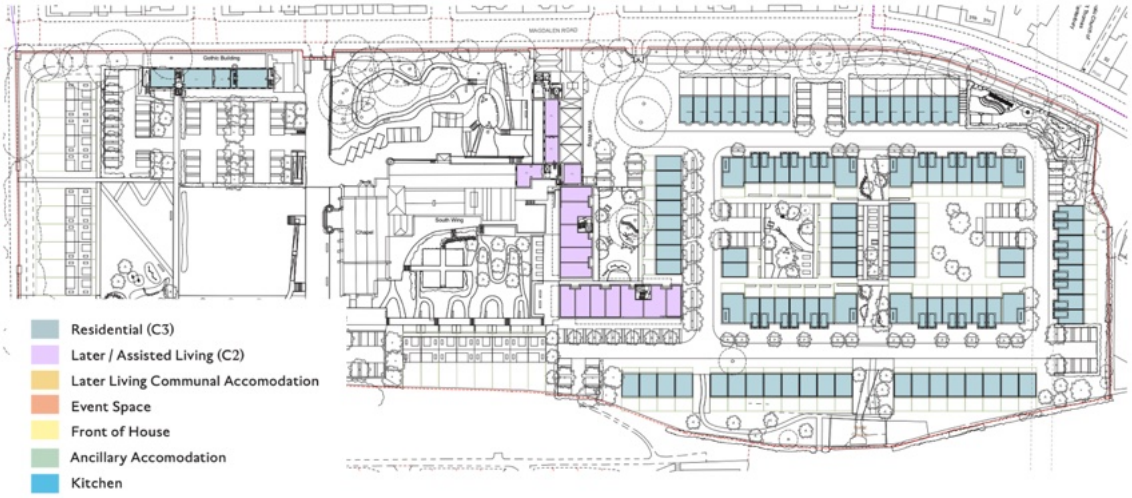
- A landscape-led approach incorporating shared gardens, community interaction spaces, and clustered parking provision
- A series of interlinked landscape courtyards to create connected and legible outdoor spaces;
- Retention of the former Nuns' Cemetery, integrated into a perimeter landscape route around the site
- Retention and protection of existing mature trees along the site boundaries
- Development massing informed by the scale and alignment of the existing railway tunnel in consultation with Network Rail
- Massing along Magdalen Road to reflect the local urban grain and respond to the adjacent listed building;

6.40. Proposed developments should adopt a spatial strategy that responds sensitively to the site's heritage context and delivers a high-quality residential environment in accordance with the principles set out in the National Planning Policy Framework, the National Design Guide, and Manual for Streets. The scheme should seek to promote sustainable development, high-quality placemaking, and the efficient use of land, while conserving and enhancing the historic environment, in line with national policy objectives.

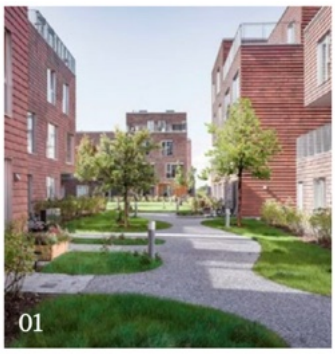
6.41. Conventional speculative housing layouts frequently prioritise vehicular access and plot efficency, often resulting in repetitive cul-de-sac arrangements, extensive areas of hardstanding, and limited functional open space. Such approaches can restrict permeability, undermine residential amenity, and diminish the quality of the public realm through the dominance of vehicle infrastructure. These outcomes are inconsistent with national guidance promoting walkable, inclusive, and characterful neighbourhoods.



Northern Area - Site usage and landscape led strategy, ground floor. Ref: Haworth Tompkins, 2025.



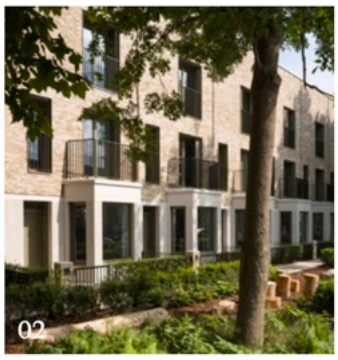
Northern Area - Site usage and landscape led strategy, upper ground floor. Ref: Haworth Tompkins, 2025.

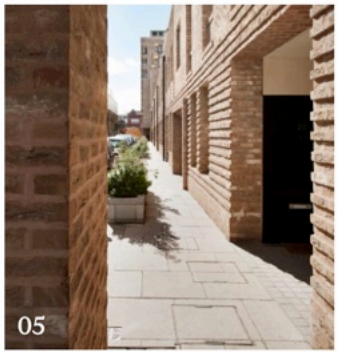


Residential development - Contemporary Townhouses and Terraced Housing Inspired by Local Vernacular.

Ref: Left - Almenbolig+ (JAJA Architects), Centre - South Gardens Townhouses (Maccreanor Lavington) and Right - The South Harbor of Køge (SLA Architects).

Site illustration - Northern development communal gardens and private landscaped entrances.
Ref: Haworth Tompkins, 2025.





Residential development - Contemporary Townhouses and Terraced Housing Inspired by Local Vernacular. Ref: 01&04 - Lovedon Fields (BDP). 02 - South Gardens Townhouses (Maccreanor Lavington). 03 - Cobham Bowers (Coffey Architects). 05&06 - Silchester Housing (Haworth Tompkins).

6.42. In contrast, the development should be guided by a clear set of design principles that reflect both national and local planning policy priorities, as outlined below. Opportunities exist to respect and reinforce the established character of the conservation area through careful consideration of building heights, massing, and orientations.

6.43. New development should respond sensitively to existing rooflines, spatial rhythms, and heritage assets, ensuring that built form complements the surrounding townscape. There is scope to limit vehicular access to essential points, reducing traffic movement within the site and minimising the visual and functional dominance of vehicles. This creates opportunities to establish safe, legible, and attractive internal routes that prioritise walking, cycling, and social interaction, in line with sustainable transport objectives.

6.44. Significant areas of the site offer potential for high-quality communal and private amenity spaces, including landscaped gardens, shared green areas, and informal recreational spaces. These can enhance residential wellbeing, social cohesion, biodiversity, and sustainable drainage, while supporting a positive microclimate.

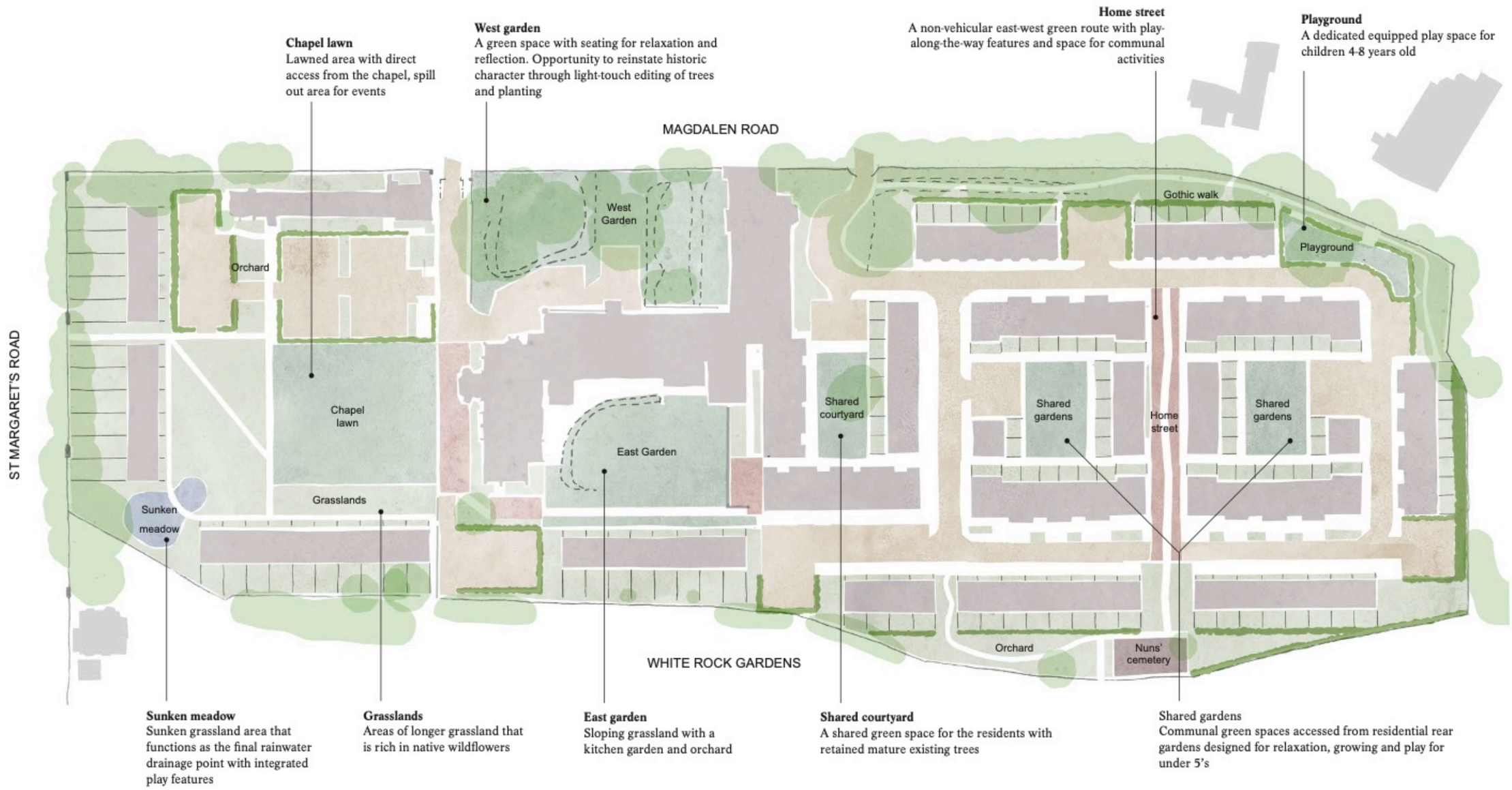
6.45. Design approaches should also ensure practical deliverability and long-term viability. Plot arrangements and building typologies can be shaped to allow efficient construction using established methods, supporting cost-effectiveness without compromising design quality or contextual responsiveness.

Existing site photographs from the adjacent Hastings Skate Park 2025. Ref: Haworth Tompkins, Site Photographs 2025.

7. Landscape Strategy

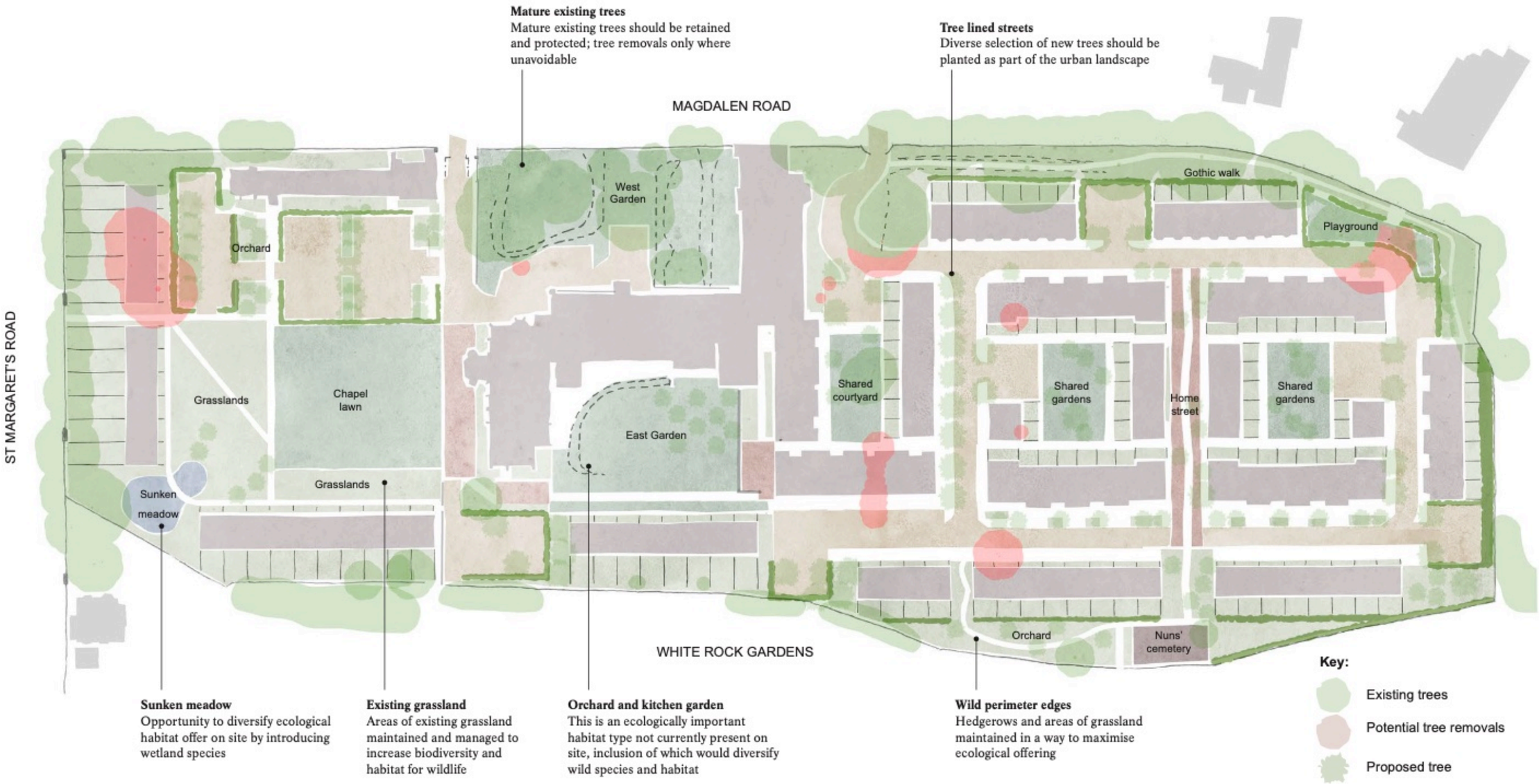
Green Space and Landscape Character

7.1. A landscape led approach to development of this site will ensure provision of well-located and carefully thought through series of green open spaces to benefit new residents, visitors and the local community. The typology of these green spaces will vary from newly established semi-private shared gardens to sensitively restored historic gardens that would become accessible to the public.



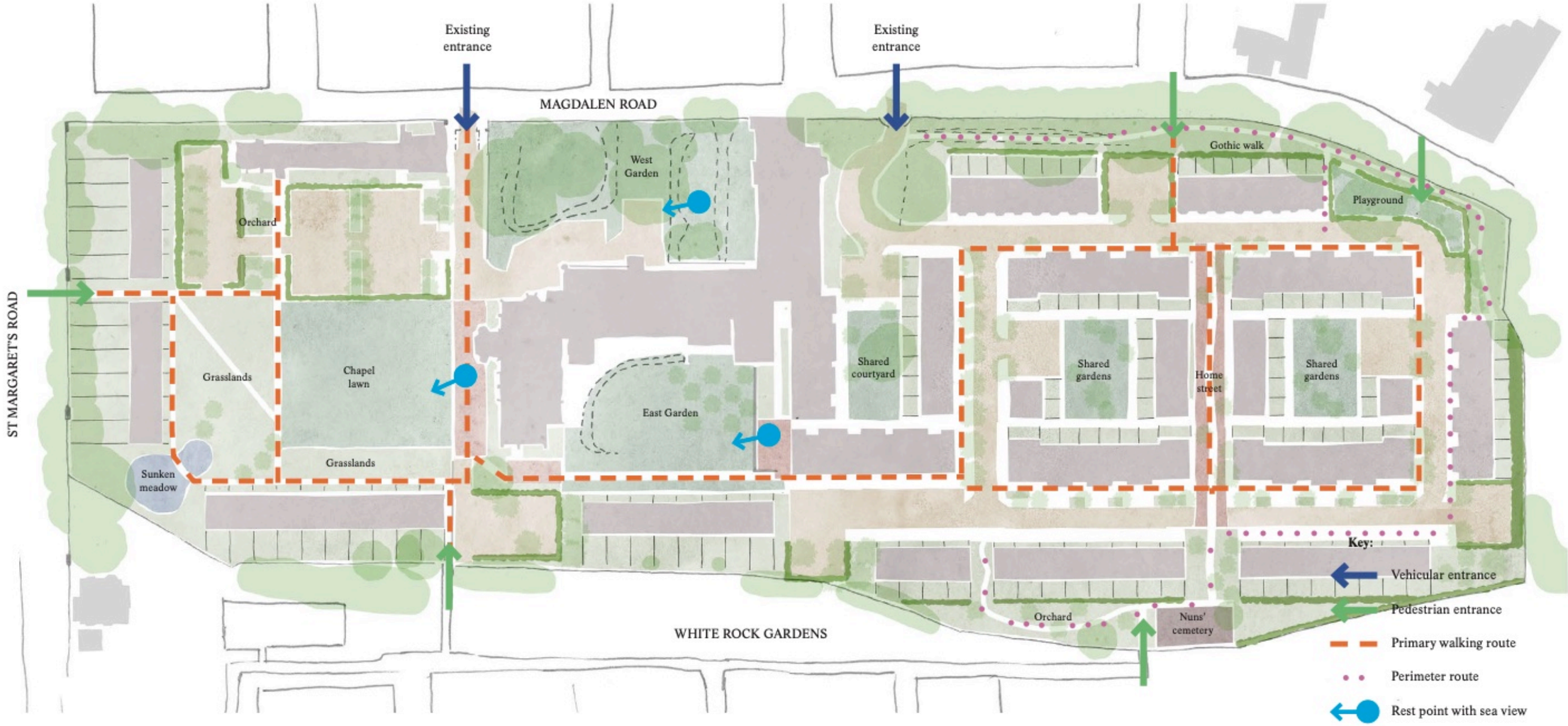
Trees and Ecology

7.2. Development of this site will need to ensure a mandatory 10% biodiversity net gain (BNG). As such the new green spaces should prioritise inclusion of ecologically beneficial habitat typologies to mitigate the loss of areas of existing grassland due to built form and infrastructure. There is a great number of mature existing trees which should be protected.



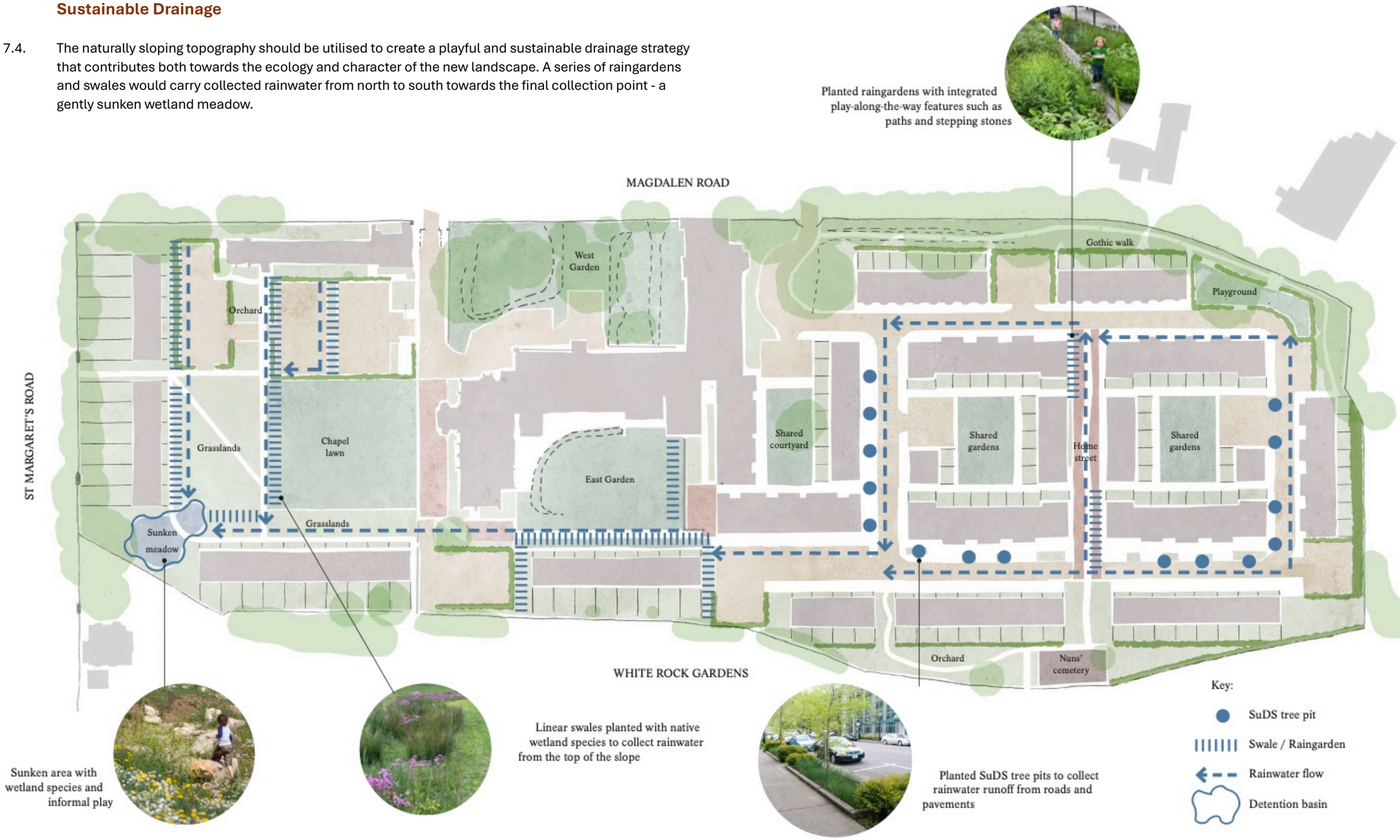
Access and Path Networks

7.3. A number of new access points would need to be created to facilitate pedestrian and vehicular movement and improve connections to nearby sites. Due the site's natural topography it is key that walking routes are well thought out in order to accommodate a range of mobility levels. There are several points where existing sea views from within the site could become publicly accessible rest points.



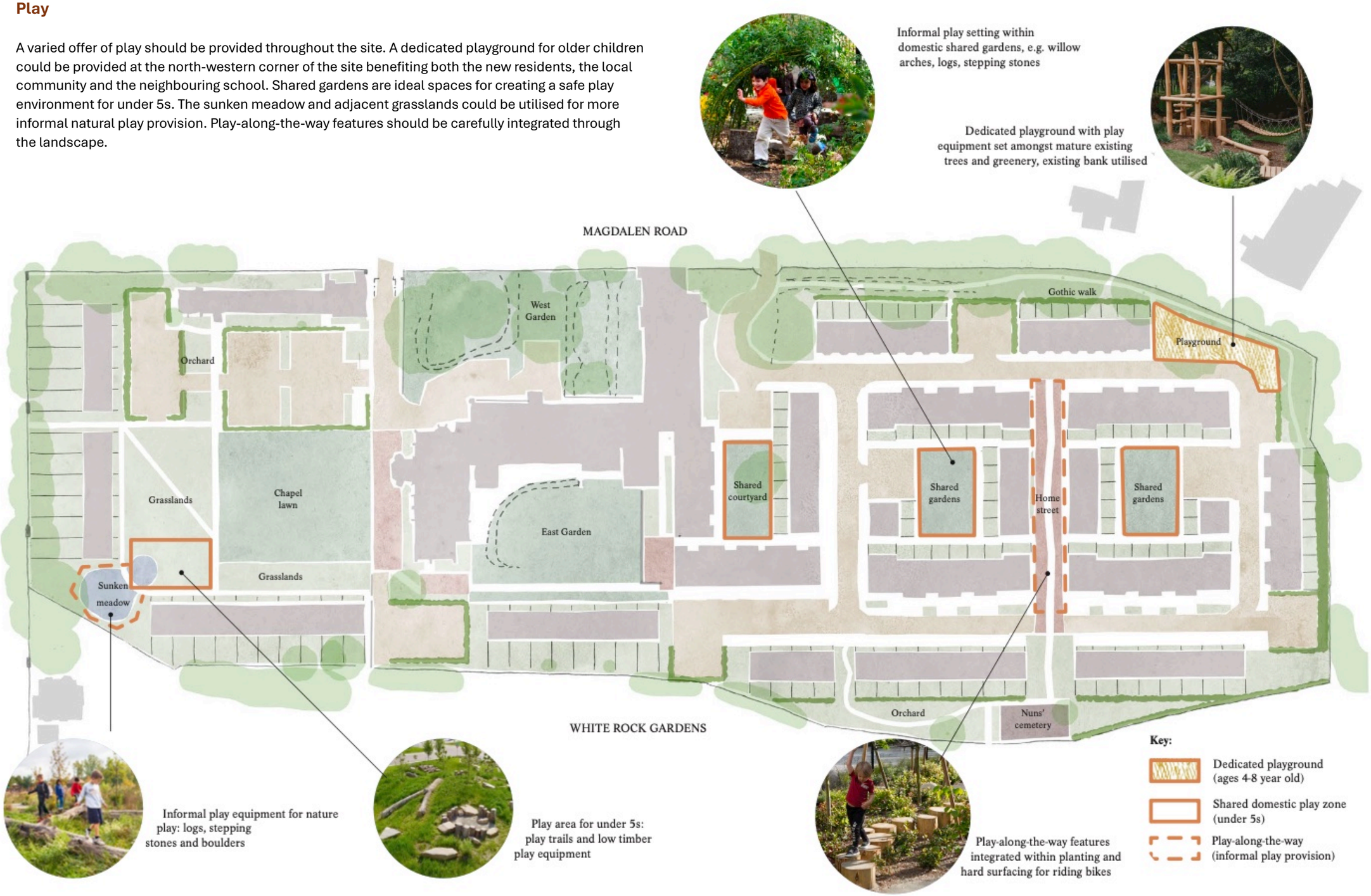
Sustainable Drainage

7.4. The naturally sloping topography should be utilised to create a playful and sustainable drainage strategy that contributes both towards the ecology and character of the new landscape. A series of raingardens and swales would carry collected rainwater from north to south towards the final collection point - a gently sunken wetland meadow.



Play

7.5. A varied offer of play should be provided throughout the site. A dedicated playground for older children could be provided at the north-western corner of the site benefiting both the new residents, the local community and the neighbouring school. Shared gardens are ideal spaces for creating a safe play environment for under 5s. The sunken meadow and adjacent grasslands could be utilised for more informal natural play provision. Play-along-the-way features should be carefully integrated through the landscape.



8. Summary

8.1. This masterplan and development brief establishes a comprehensive, heritage-led framework for the sensitive regeneration of the former convent site. The strategy is guided by a clear set of principles that balance conservation, landscape enhancement, and potential new development, ensuring that any future change responds positively to the site's topography, historic fabric, and wider context within the Magdalen Road Conservation Area. These principles are informed by an appraisal of site-specific constraints and opportunities.

Guiding Principles and Opportunities:

8.2. Heritage-Led Development: The site contains multiple designated heritage assets, including the Grade II* Pugin Chapel and the Grade II Training College (Gothic Building), all within the Magdalen Road Conservation Area. Guiding principles emphasise the retention, sensitive repair, and adaptive reuse of these assets, ensuring long-term viability. Opportunities exist to remove the Pugin Chapel from the Heritage at Risk Register through heritage and landscape-led interventions. Any interventions should preserve historic fabric, maintain architectural legibility, and enhance public appreciation of the site's heritage. Demolition or alteration of buildings contributing positively to the conservation area must be justified, including structural evidence and marketing for redundancy, in line with national and local heritage policies.

8.3. Landscape-Led Approach and Ecological Enhancement: The site's Southern Lawn, Eastern Garden, orchards, and meadowed grasslands offer opportunities for a coherent network of public, semi-private, and private spaces that reinforce biodiversity, sustainable drainage, and recreational use. Trees, hedgerows, and other existing landscape features are key assets. Guiding principles emphasise their protection, or where unavoidable impact occurs, suitable mitigation or compensation. Development should enhance visual and ecological links with the surrounding area, reinforcing the site as an accessible, outward-facing community asset.

8.4. Public Benefit and Access: Opportunities exist to enhance public access and appreciation of heritage assets, including the Chapel and associated gardens, consistent with national planning policy and conservation guidance. Public benefit considerations may include cultural, educational, recreational, and community uses, provided they respect heritage and landscape sensitivities.

8.5. Connectivity and Integration: The site should be connected to its surrounding neighbourhoods, key streets, and open spaces, enhancing permeability and promoting walking and cycling. Layout and design should minimise the visual and functional dominance of vehicles, aligning with sustainable transport objectives and local planning policy.

8.6. Sensitive Residential and Mixed-Use Opportunities: Residential development should be designed in accordance with the policies of this Plan, including Policies SP2, SC1, SC2, SC3, ID1 and ID2, reflecting local housing mix, tenures, unit sizes, and aUordable housing requirements.

Opportunities exist for a range of dwelling types, including family housing and later living accommodation, designed to respond to the site's topography and protect views, sightlines, and heritage settings. Parking, refuse, and cycle provision should comply with Development Plan standards, ensuring that design solutions do not compromise landscape quality or heritage significance.

8.7. Development proposals will need to address the following plan policies:

- Former Convent of Holy Child Jesus (Policy HS25)
- Heritage (Policies SP7, SC5, SC6 and SC7)
- Green and blue infrastructure, biodiversity, trees and open space (Policies SP8, SC10, SC11, SC12, SC13 and SC14.
- Ground Behaviour and Stability (Policy SC15)
- The site should be considered in relation to Local Plan policies on visitor accommodation, employment, sustainable design, children's play space, planning obligations and development contributions, including Policies SC1, SC2, SC3, E5, ID1 and ID2.
- Sustainability and Long-Term Viability: Guiding principles emphasise sustainable construction methods, energy efficiency, and long-term management of landscape and heritage assets. Proposals should demonstrate that the need for development outweighs any unavoidable harm to ecological or heritage interests and that appropriate mitigation or compensation measures are in place.

More detailed planning policy considerations are set out in section 4.

8.8. Conclusion: This document, informed by guiding principles and opportunities provides a clear framework for the site's sensitive regeneration. It ensures that future change:

- Celebrates and safeguards heritage assets;
- Enhances landscape, biodiversity, and public amenity;
- Integrates sustainably with the surrounding townscape; and
- Delivers a balanced, inclusive, and resilient community

8.9. Collectively these principles align with local and national planning policies, conservation requirements, and the strategic vision for Hastings, providing a robust and adaptable framework for the site's future.

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