

Hastings Local Plan – Hastings Planning Strategy Environmental Statement

The Environmental Assessment of Plans and
Programmes Regulations 2004

February 2014

Contents

- 1. INTRODUCTION.....3
- 2. ENVIRONMENTAL STATEMENT3
 - How have the environmental considerations been integrated into the Hastings Planning Strategy?3
 - How has the Environmental Report been taken into account?4
 - How have the opinions expressed as a result of public consultation have been taken into account, and what action has been taken to address the comments made?6
 - Reasons for choosing the Planning Strategy as adopted in light of other alternatives7
 - Measures taken for monitoring8
- 3. FURTHER INFORMATION.....8

1. Introduction

- 1.1 Hastings Borough Council carried out parallel processes in preparing their strategic Local Plan document, The Hastings Planning Strategy, and the supporting Sustainability Appraisal and Habitats Regulations Assessment documents. The Sustainability Appraisal process identifies the social, economic and environmental impacts of the plan and its policies, with the Habitats Regulations Assessment assessing the specific “in-combination” impacts of the Plan on the internationally designated sites of environmental importance, known as Natura 2000 sites.
- 1.2 The Hastings Planning Strategy was adopted on 19 February 2014, following full consideration of the Plan itself, its supporting documents (including the Sustainability Appraisal and Habitats Regulations Assessment) and the representations received, at independent examination. In accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2014, a post adoption environmental statement has been now been produced to set out the following:
- i) How the environmental considerations have been integrated into the Hastings Planning Strategy
 - ii) How the Environmental Report has been taken into account
 - iii) How the opinions expressed in response to consultation have been taken into account
 - iv) What action has been take to address the comments made
 - v) The reasons for choosing the Planning Strategy as adopted in light of other alternatives dealt with
 - vi) Measures taken for monitoring
- 1.3 The Sustainability Appraisal Reports prepared at various stages of the plan making process incorporate the requirements of Strategic Environmental Assessment, and are therefore the main tool used to demonstrate compliance with the Regulations as set out above. Each of these requirements is discussed in turn, below.

2. Environmental Statement

How have the environmental considerations been integrated into the Hastings Planning Strategy?

- 2.1 Environmental considerations have been integrated into all stages of the preparation of the Planning Strategy, in accordance with the requirements of Strategic Environmental Assessment (European Directive 2001/42/EC), Habitats Regulations Assessment (European Directive (92/43/EEC), and government guidance on Sustainability Appraisal.
- 2.2 Environmental considerations were taken into account (alongside social and economic considerations for the purpose of Sustainability Appraisal) in each of the Sustainability Appraisal Reports accompanying the various stages of Planning Strategy preparation, as set out below:

Scoping Report (initial report 2008, update 2011)

The scoping report looked at the main objectives of the Planning Strategy, its relationship with other relevant plans and programmes, the current state of the environment and the likely evolution thereof without implementation of the Plan, the environmental characteristics of areas likely to be significantly affected and any existing environmental problems. It also developed the main environmental protection

objectives, as part of the wider 21 sustainability objectives used in the Sustainability Appraisal Framework.

Sustainability Appraisal of the Core Strategy Issues and Option and Preferred Approaches (May 2008)

Used the environmental protection objectives in the full appraisal of alternatives to determine the likely significant effects on the environment and recommend mitigation measures as appropriate.

Appropriate Assessment (May 2008, March 2010 and March 2012)

Looked at whether the proposed policies would have a significant effect on the environmental protection objectives of sites of international importance as designated by the Habitats Directive.

Core Strategy Informal Consultation Document (June 2011) – Sustainability Appraisal

Used the environmental protection objectives in the full appraisal of alternatives to determine the likely significant effects on the environment and recommend mitigation measures as appropriate.

Hastings Planning Strategy – Final Sustainability Appraisal Report (May 2012)

Used the environmental protection objectives in the full appraisal of the final document to determine the likely significant effects on the environment and recommend mitigation measures as appropriate.

Sustainability Appraisal of Main Modifications (May 2013)

Used the environmental protection objectives in the full appraisal of the main modifications to determine the likely significant effects on the environment and recommend mitigation measures as appropriate.

How has the Environmental Report been taken into account?

- 2.3 The Sustainability Appraisal Report provides for an independent assessment of the sustainability of the proposed policy options, throughout their development. Once this assessment is made at each stage of plan preparation, there is then an opportunity to amend the Plan to ensure that potential negative sustainability effects are addressed and mitigated against as appropriate.
- 2.4 This section of the statement shows clearly how the recommendations of the final Sustainability Appraisal Report were integrated into the adoption version of the Planning Strategy, therefore ensuring the potential negative sustainability impacts were addressed.
- 2.5 Please note that no recommendations for changes were made as a result of the Sustainability Appraisal of Main Modifications, the final stage of the plan preparation process.
- 2.6 Recommendations made by the Sustainability Appraisal, and how they were taken into account, are as follows:

Set out a strategy to ensure that the number of vacant premises is reduced in shopping centres

Policy E3 refers to this and the strategy will be further developed in a future Town Centre Area Action Plan. The draft Development Management Plan also includes a policy to manage the percentage of non-retail uses in these locations.

Policy T3 (Sustainable Transport) to support bus priority lanes and junction approaches

Site policies in Development Management Plan identify site specific requirements for these.

Planning Strategy to make specific reference to supporting the deployment of small scale renewable developments in new and existing buildings

Addressed in paragraph 6.5 of the Planning Strategy.

Planning Strategy to promote the installation of energy efficiency measures in existing buildings

Addressed in policy SC4 of Planning Strategy

Policy SC1 should recognise and support the contribution that sustainable energy and renewable energy technologies can make in moving towards a sustainable way and to mitigate the impacts of climate change. Also be re-worded to “managing flood risk and reducing the potential effects of climate change on *existing and future communities*”

Policy SC3 of the Planning Strategy in particular makes reference to this. Flood risk amendments made in Policy SC1.

Policy SC6 re-worded to make distinctions between large scale and small scale renewable technologies reflecting their different level of impacts

Scale referenced in criteria a) and c)

Policies FA1 and SC4 should refer to CCHP/CHP as appropriate

Policies amended as recommended

Policy FA2 to require development to take account of anticipated future climate change and its impact on flooding; to refer to sustainable drainage ‘systems’ not ‘techniques’

Policy amended as recommended

Policy SC3 could promote the use of the waste hierarchy in specifying building materials for new development.

Included in Policy SC2 as an alternative, as more relevant to Design and Access Statements

Policy FA4 (Strategy for Central St Leonards) to include specific reference to promoting more sustainable modes of transport

Policy amended as recommended

Policy SC7 should clarify term “positive adaptation”. Preference for development to be sited on previously developed land should be incorporated into the policy text

Policy amended to be clearer about adaptation measures. Preference for previously developed land clearly highlighted in housing chapters

The development of tourist attractions and accommodation should be supported providing it does not detract from the local distinctiveness of the site

Policy E4 seeks to ensure that further facilities will be supported, subject to other policies. Further detail provided in Development Management Plan

Promote the use of ‘secure by design’ principles in the design and construction of new buildings

Policy SC1 seeks to reduce opportunities for crime and disorder through innovative design and the clear distinction of public and private space. Further detail provided in the Development Management Plan.

In conjunction with the drive to provide more family sized houses, there is a need to ensure sufficient accommodation for the elderly and student population is provided

Policy H2 seeks to address the needs of older people and provide a proportion of homes to lifetime homes standard. Student Accommodation dealt with in Development Management Plan

- 2.7 The Appropriate Assessment of the Planning Strategy, along with its subsequent updates, shows that the in-combination effects of the policies are not considered to have a significant impact on the Natura 2000 sites, although recommendations for mitigation were included in the environmental policies of the Planning Strategy as appropriate. In particular, this relates to minimising recreational impact on the Hastings Cliffs Special Area of Conservation, and ensuring other open spaces within the Borough can help offset against this impact.

How have the opinions expressed as a result of public consultation have been taken into account, and what action has been taken to address the comments made?

- 2.8 Local Planning Authorities are required to consult with statutory environmental bodies (Natural England, English Heritage and the Environment Agency) in preparing the environmental report. This consultation is usually undertaken at the same time as public consultation on the document being prepared, which in this case is the Hastings Planning Strategy.
- 2.9 A consultation statement has been prepared under Regulation 22 of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended), which sets out the main issues raised during consultation at various stages of the plan making process, and how these have been taken into account in the drafting of the Planning Strategy. This is available on our website at http://www.hastings.gov.uk/environment_planning/planning/localplan/planningstrategy_submission/consultationstatement/
- 2.10 Formal representations were also considered by the Inspector at Examination in Public and addressed in the main modifications where necessary.
- 2.11 Very few representations were received from the statutory environmental bodies in terms of the Sustainability Appraisal documents themselves. Where they were made, this was in relation to:
- Preparing a Strategic Flood Risk Assessment
 - Suggested indicators for monitoring
- 2.12 Both these issues have been addressed as part of the Local Plan evidence base and Planning Strategy monitoring framework.

- 2.13 Please note that the development of the Hastings Planning Strategy did not necessitate transboundary consultation, and as such compliance with Regulation 16(4)(d) of the Regulations is not required in this statement.

Reasons for choosing the Planning Strategy as adopted in light of other alternatives

- 2.14 Sustainability Appraisal is an iterative process, where reports prepared at each stage feed into the next version of the Plan. Alternatives are a key aspect of plan preparation and are assessed through the Sustainability Appraisal process to determine the most appropriate way forward, taking account of the social, economic and environmental sustainability objectives.
- 2.15 In the case of the Hastings Planning Strategy, initial issues and options were subject to sustainability appraisal, which were then refined and recommendations made to form the “preferred options”. These preferred options were taken forward in the Core Strategy Preferred Approaches document, published in May 2008.
- 2.16 An additional assessment of three alternative housing scenarios was also undertaken in 2011, and set out in Appendix B of the Core Strategy Informal Consultation Document (June 2011).
- 2.17 The Final Sustainability Appraisal Report (May 2012) provided a useful summary of these earlier stages, and also focused on several key issues in more detail. These key issues are summarised as follows:

Housing growth – the number of new homes that should be built in the Borough

The chosen way forward of “medium housing growth” was the most appropriate, taking into account regeneration objectives, environmental protection, levels of development in the pipeline, identified housing sites, windfall development, and the ability to mitigate against identified effects

Housing distribution – where new housing in the Borough should be located

Following the evolution of the Plan as demonstrated in the various Sustainability Appraisal Reports, the preferred option was to concentrate housing in the urban area. It was concluded that this option made the best use of urban and brownfield land, and was based on genuine local circumstances and research with regard to windfall development and empty homes

Employment growth – the number of new jobs that should be planned for

In order to meet the level of jobs growth required to support the town’s regeneration, it is important to retain all existing employment sites. Therefore the alternative approach of letting these sites be developed for other uses is not reasonable in this instance

Retail provision – how adequate shopping facilities should be provided

The Plan identified a need for additional retail floorspace to be provided in the town up to 2028. Various alternatives were considered to accommodate this, although none were considered appropriate at this time. It was therefore agreed that the approach of identifying a retail area boundary in the town centre would be the most suitable at this stage, with site identification taking place as part of the Development Management Plan process, which follows on from the Planning Strategy.

Sustainable design and renewable energy

An appraisal of several options to achieving the government's targets for sustainable design and renewable energy was undertaken. The appraisal showed that the most suitable approach would be to focus on a hierarchical approach, focusing on energy efficiency first, before relying on renewable energy installations. However, other policies in the sustainability chapter complement this approach by ensuring sustainable design is at the heart of the decision making process and identifying specific locations where opportunities for large scale energy generation can be identified.

- 2.18 Further information on the alternatives is clearly set out in section 7 of Final Sustainability Appraisal of the Hastings Planning Strategy.

Measures taken for monitoring

- 2.19 Indicators for monitoring the sustainability implications of the Planning Strategy were initially prepared for the Sustainability Appraisal Framework developed at the start of the process.
- 2.20 The indicators have since been taken forward into the Monitoring and Implementation Framework set out in the adopted Hastings Planning Strategy. The Plan makes clear that the implementation of policies will be reported on through the Local Plan Monitoring process and the Local Plan Monitoring Board, who will take action as necessary following the outcome of this monitoring. This action could involve liaison with infrastructure providers or other interested parties, or could necessitate a review of the policy or Plan if necessary.

3. Further information

- 3.1 The documents referred to in this statement can be accessed on our website at the following addresses:

Sustainability Appraisal Scoping Report

http://www.hastings.gov.uk/environment_planning/planning/localplan/sustainability/#scoping

Sustainability Appraisal of Core Strategy Issues and Option and Preferred Approaches

http://www.hastings.gov.uk/environment_planning/planning/localplan/sustainability/#core_sa

Appropriate Assessment (Habitats Regulation Assessment) May 2008 and March 2010

http://www.hastings.gov.uk/environment_planning/planning/localplan/sustainability/#assessment

Informal consultation document (Sustainability Appraisal at Appendix B)

http://www.hastings.gov.uk/environment_planning/planning/localplan/informal_consultation/

Final Sustainability Appraisal of the Hastings Planning Strategy

http://www.hastings.gov.uk/environment_planning/planning/localplan/sustainability/#final_sa