

Hastings Local Plan – Hastings Planning Strategy

Sustainability Appraisal of Main Modifications

May 2013

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Produced by Hastings Borough Council, Planning Policy team, May 2013

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Non-Technical Summary

A Non-Technical Summary of the Planning Strategy Main Modifications Sustainability Appraisal Report has been prepared to provide an overview of the assessment, in line with requirements of Annex I of the Strategic Environmental Assessment (SEA) Directive.

This Sustainability Appraisal of Main Modifications report provides a supplement to the Final Sustainability Appraisal Report submitted alongside the Hastings Planning Strategy in October 2012¹. This supplementary report is required to ensure that the potential social, environmental and economic effects of the proposed Main Modifications are fully assessed for significant sustainability impacts, and reported on as part of the plan making process.

Context and legislation

The earlier Sustainability Appraisal Report (May 2012) considers in detail the requirements of the SEA Directive as listed below, although they are also considered as an integral part of the assessment in this supplement.

- (a) Contents, main objectives of the Plan and relationship with other relevant plans and programmes
- (b) The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan
- (c) The environmental characteristics of the area
- (d) Any existing environmental problems

The remaining requirements of the SEA Directive are explained in turn below.

Sustainability objectives

The objectives used to assess the sustainability implications of the proposed Main Modifications are listed below. These were developed and refined as part of the Sustainability Appraisal Scoping process, preceding this report.

Social objectives

1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need
2. The health and well-being of the population is improved and inequalities in health are reduced
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime

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https://www.hastings.gov.uk/planning/policy/adoptedlocalplan/supportingdocs_evidencebase/sustainability_appraisals/

7. Vibrant and locally distinctive communities are created and sustained

Environmental protection objectives

8. Land and buildings are used more efficiently and the best use is made of previously developed land
9. Biodiversity is protected, conserved and enhanced
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future
11. Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice

Economic objectives

18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved
20. The sustained economic growth of the town is achieved and linked closely to social regeneration
21. Indigenous and inward investment is encouraged and accommodated

Likely significant effects

As part of the Sustainability Appraisal process, we are required to determine the likely significant effects of the proposed Main Modifications on the social, environmental and economic sustainability objectives. It is important to note that the appraisal has focused on the impact of the proposed modifications only, and not the supporting text or policy to which they relate.

The table below provides a summary of the results of the assessment.

Reference	Issue	Likely significant effects
HBC/MM/2	Additional text regarding the Presumption in Favour of Sustainable Development	Mainly positive effects – development in itself could impact negatively on environmental objectives but can be mitigated to some extent
HBC/MM/3 HBC/MM/4 HBC/MM/5	Amendments to supporting text and housing land supply table to explain changes to the sources of supply	Very limited effects – changes in sources of supply will not significantly impact on

	making up the overall housing target – i.e. increase of windfall and removal of empty homes	sustainability objectives
HBC/MM/6 HBC/MM/7	Amendments to text regarding the environmental opportunities in western area, clarifying a positive approach to delivering renewable energy development in the town and the intention to work in partnership with Rother District Council in considering and identifying sites in urban fringe areas .	Positive effects – modification enhances the approach in terms of impact on the environment
HBC/MM/8	New policy regarding Ancient Woodland	Both positive and negative effects – could restrict land available for development but will help ensure environmental improvements
HBC/MM/9	New policies regarding Local Nature Reserves and Local Wildlife Sites	Significant positive effects – modification enhances impact on environmental objectives
HBC/MM/10	Amendments to Visitor Accommodation section of the Tourism policy which seeks to restrict changes of use away from visitor accommodation in areas outside of the ‘core’ zones as well.	Mostly positive effects, particularly in terms of the economy. Potential negative impact in terms of ensuring the most efficient use of land

Table 1: Summary of likely significant effects

Mitigation measures

Given the limited impact of the Proposed Main Modifications on the sustainability objectives no other mitigation measures have been proposed, aside from those already identified in the Planning Strategy Final Sustainability Appraisal Report (May 2012).

Selection of alternatives

The sustainability appraisal process requires us to consider alternative options, and to assess sustainability implications of these. As the Planning Strategy preparation process is now nearing completion, alternatives have already been selected through the earlier Sustainability Appraisal process, and reported on in the Final Sustainability Appraisal Report.

Alternatives to the proposed Main Modifications relate to the existing text or policy, in the submitted Planning Strategy. The proposed Main Modifications as set out in Appendix B have all been selected as the most appropriate option to proceed with.

Monitoring

The detailed information regarding Plan finalisation, adoption and monitoring is set out in the Final Sustainability Appraisal Report for the Planning Strategy (May 2012), and supplemented by proposed main modification HBC/MM/12. Overall however, the Council will continuously monitor the effects of the policies in sustainability term and report on the outcome of this through Local Monitoring Report (or equivalent).

1.0 Introduction

Purpose of this report

- 1.1 This Sustainability Appraisal of Main Modifications report has been produced following the close of the Hastings Planning Strategy Examination hearing sessions, which took place in February 2013. This provides a supplement to the Final Sustainability Appraisal Report submitted alongside the Hastings Planning Strategy in October 2012.
- 1.2 Main Modifications have been proposed subsequent to the Inspector's preliminary conclusions², and are required to help ensure the Planning Strategy is found sound and legally compliant. A further Sustainability Appraisal report is therefore needed to ensure that the potential social, environmental and economic effects of the proposed Main Modifications are fully assessed for significant sustainability impacts, and reported on as part of the Plan making process.

Sustainability Appraisal background

- 1.3 This Sustainability Appraisal report appraises significant changes that have not been appraised previously through the Plan preparation process. The report should therefore be read in conjunction with the following documents:
 - Sustainability Appraisal of the Core Strategy Issues and Option and Preferred Approaches (May 2008)
 - Core Strategy Informal Consultation Document (June 2011) – Sustainability Appraisal (Appendix B of the consultation document)
 - Hastings Planning Strategy – Sustainability Appraisal Report (May 2012)
- 1.4 Collectively these sustainability reports have been prepared in accordance with government guidance on Sustainability Appraisal and incorporate the requirements of the Strategic Environmental Assessment Directive 2001/42/EC. A table signposting how elements of the Directive have been complied with is shown in Appendix A of this report.
- 1.5 An Appropriate Assessment of the effects of the Planning Strategy to accord with the Habitats Directive (92/43/EEC) has also been prepared and was submitted to the Inspector prior to Examination. The effect of the proposed Main Modifications on this assessment has been explained as part of the appraisal matrix in Appendix C.

Consultation

- 1.6 Representations may be submitted in relation to the Sustainability Appraisal of the proposed Main Modifications, as well as on the modifications themselves.
- 1.7 The consultation is running for a period of 6 weeks, from 20 May until 4.30pm on 1 July 2013. Representations can be submitted at any point during this period.

² Inspectors preliminary conclusions available at https://www.hastings.gov.uk/content/planning/planning_policy/local_plan/dm_plan_siteallocations/dmplan_examination/pdfs/information/id9-inspectorspreliminfindings

- 1.8 This is a formal stage of consultation, so representations must be made using the official response form or through our online consultation system. Comments made in any other format cannot be accepted.

Online: The easiest way to submit representations is online. Visit our website at: http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation/#current and follow the links provided.

Paper forms: Paper copies of the response forms are available from the Hastings Information Centre in the Town Hall, or can be downloaded from our website using the address above.

Responses, on the official form, can be submitted by hand or post, or attached to an e-mail, using the following contact details:

Hastings Borough Council
Planning Policy
FREEPOST RSCG-BSTS-GBRZ
Aquila House
Hastings
East Sussex
TN34 3UY

E-mail: fplanning@hastings.gov.uk

- 1.9 Please note that all representations submitted will be made public. This will include the publication of your name but not your address or contact details.
- 1.10 Further information and updates will also be posted on Twitter and Facebook to help ensure you stay up to date with the process:

Twitter: www.twitter.com/ShapingHastings

Facebook: www.facebook.com/shapinghastings

2.0 Appraisal methodology

Assessment

- 2.1 The Sustainability Appraisal of the proposed Main Modifications has been undertaken in two stages.
- 2.2 Firstly, each of the Main Modifications has been assessed to determine whether the modification has been appraised through earlier Sustainability Appraisal Reports (results shown in Appendix B) and subsequently, whether an additional appraisal is required.
- 2.3 Where it was determined that an additional appraisal of the sustainability effects was required, the appraisal was undertaken using the criteria in table 2 below.

Score	Effect
XX	The option will have a significant negative effect on the sustainability objective
X	The option will have a slight negative effect on the sustainability objective
?	The impact can not be predicted at this stage - potential/uncertain effect
-	No effect/direct link at this stage
✓	The option will have a slight positive effect on the sustainability objective
✓✓	The option will have a significant positive effect on the sustainability objective
S, M, L	Short, medium and long term

Table 2: Criteria for assessment

- 2.4 The assessment used the sustainability objectives and Sustainability Appraisal Framework developed and refined through the Scoping process, used in the Planning Strategy Final Sustainability Appraisal Report (May 2012). These objectives are:

Social objectives

1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need
2. The health and well-being of the population is improved and inequalities in health are reduced
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime
7. Vibrant and locally distinctive communities are created and sustained

Environmental protection objectives

8. Land and buildings are used more efficiently and the best use is made of previously developed land
9. Biodiversity is protected, conserved and enhanced
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future
11. Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice

Economic objectives

18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all
 19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved
 20. The sustained economic growth of the town is achieved and linked closely to social regeneration
 21. Indigenous and inward investment is encouraged and accommodated
- 2.5 The outcome of the sustainability appraisal of the proposed Main Modifications is set out in section 4 on page 11.

Considering alternative options

- 2.6 The sustainability appraisal process requires us to consider alternative options, and to assess sustainability implications of these. As the Planning Strategy preparation process is now nearing completion, alternatives have already been selected through the earlier Sustainability Appraisal process, and reported on in the Sustainability Appraisal Report of May 2012.
- 2.7 In light of the need to prepare Main Modifications, the alternatives to these relate to the existing text or policy, in the submitted Planning Strategy. In this respect, it is important to note that where the proposed Main Modification related to amendments or insertions to text of policies, the appraisal focused on the outcomes in terms of the proposed main modification itself, not the original policy or text, which would have already been subject to sustainability appraisal through earlier stages.

3.0 Proposed Main Modifications

- 3.1 The Council has finalised its schedule of Main Modifications, subsequent to the Inspector's preliminary conclusions. These modifications address issues raised by the Inspector, together with further changes proposed by the Council.
- 3.2 The proposed Main Modifications are set out in full in Appendix B. The summary below takes account of the initial assessment of sustainability implications and signposts which modifications require further sustainability appraisal as a result of this initial assessment.

Modification ref	Summary Proposed Main Modification	Additional SA required?
HBC/MM/1	Additional text setting out the Council's intentions regarding the Duty to Co-operate	No
HBC/MM/2	Additional text regarding the Presumption in Favour of Sustainable Development	Yes
HBC/MM/3	Amendments to supporting text and housing land supply table to explain changes to the sources of supply making up the overall housing target – i.e. increase of windfall and removal of empty homes	Yes
HBC/MM/4	As HBC/MM/3	Yes
HBC/MM/5	As HBC/MM/3 & 4	Yes
HBC/MM/6	Amendments to text regarding the environmental opportunities in western area, clarifying a positive approach to delivering renewable energy development in the town and the intention to work in partnership with Rother District Council in considering and identifying sites in urban fringe areas .	Yes
HBC/MM/7	Amendments to text in Sustainable Communities chapter to reflect HBC/MM/6 above	Yes
HBC/MM/8	New policy regarding Ancient Woodland	Yes
HBC/MM/9	New policies regarding Local Nature Reserves and Local Wildlife Sites	Yes
HBC/MM/10	Amendments to Visitor Accommodation section of the Tourism policy which seeks to restrict changes of use away from visitor accommodation in areas outside of the 'core' zones as well.	Yes
HBC/MM/11	Amendments to the Key Diagram to move the location of the Renewable Energy Opportunity Area to within the Hastings borough boundary	No
HBC/MM/12	Insertion of additional text relating to the Council's mechanisms to ensure continuous monitoring and delivery of the Plan	No

Table 3: Summary of proposed main modifications

4.0 Sustainability Appraisal

Assessment results

- 4.1 This section of the report summarised the outcomes of the appraisal of those main modifications that were identified as requiring further assessment.
- 4.2 The initial assessment in Appendix B and summarised in table 3 above, determined which of the proposed main modifications were likely to have sustainability impacts and required further assessment. The full and detailed matrices of the assessment are shown in Appendix C, although a summary of outcomes and potential effects is provided below.

HBC/MM/2

- 4.3 This modification proposes new text to confirm the Council's commitment to the presumption in favour of sustainable development, taking account of the model policy proposed by the Planning Inspectorate. Applying the presumption in favour of sustainable development and working proactively with applicants to secure the delivery of new development results in **mainly positive effects** on most of the social, environmental and economic objectives although some uncertainties and negative impacts have been recorded.
- 4.4 The delivery of new development will in itself result in negative effects on air pollution levels, CO₂ emissions and waste generation through construction and continued use of buildings. However, taken together with other policies in the Planning Strategy mitigation measures can be implemented to address these issues. Delivering new homes, employment and office space will also work towards achieving the overall regeneration aims of the Plan, as well as the overall objective of the government to achieving sustainable development.
- 4.5 No significant negative effects have been recorded. Taking the above into account, no further mitigation measures are proposed.

HBC/MM/3, HBC/MM/4 and HBC/MM/5

- 4.6 These modifications propose amendments to the text supporting Policy DS1: New Housing Development. The amendments take on board the Inspectors preliminary recommendations in terms of the sources of supply that make up the overall housing target. More specifically, these modifications remove the provisions for empty homes in the housing land supply, but increase reliance on small site windfall development throughout the Plan period. There is no change to the overall housing target.
- 4.7 This appraisal has focused on a greater reliance on windfall provision instead of the empty homes quota previously considered, and the effect this increased reliance would have on the sustainability objectives. It has not re-appraised the overall housing target. The proposed change to sources of supply has resulted in **very limited effects on the sustainability objectives**, other than providing some uncertainty over whether additional windfall sites will be on small greenfield or brownfield sites and the difference in effect on the sustainability objectives this will have. Projection work undertaken does not include provision for Greenfield windfall so no negative effects have been recorded. In addition, it is important to note that windfall development and reuse of empty homes will happen in any

event, so there is unlikely to be any change in terms of the impact overall. As a result, no mitigation measures are proposed.

HBC/MM/6 and HBC/MM/7

- 4.8 These modifications are proposed in two separate areas of the Planning Strategy (in the area-based and theme-based policy sections) to ensure consistency between the spatial area policies and the theme based policies. They relate to an area in the Western part of the town and the potential in that location for delivering large scale renewable energy development.
- 4.9 The modifications provide clarification on the approach being taken by both Hastings and Rother Councils to securing renewable energy generation in urban fringe areas, further demonstrate the Council's commitment to this, and highlight the need for any such development to ensure that the objectives of the Combe Valley Countryside Park are considered and maintained. The appraisal is not looking at the principle of renewable energy development in this location, as this has been considered previously.
- 4.10 Overall, the proposed modifications **score positively** against social, environmental and economic objectives, with no negative scores recorded. Specifically, ensuring the consideration of sites takes full account of the objectives of the Park will ensure biodiversity, the countryside and landscape is protected and enhance, and demonstrating more clearly the commitment to this scores positively in terms of renewable energy generation and encouraging inward investment. No mitigation measures are therefore necessary.

HBC/MM/8

- 4.11 This modification proposes an additional policy and supporting text specifically related to ancient woodland. This provides further protection to what is contained within Policy EN3 of the Proposed Submission Planning Strategy, which sought to protect the ancient woodland within its own defined boundary, rather than referring to development adjacent to the ancient woodland as well. The assessment therefore looks at the additional protection this modification provides (the inclusion of a buffer, as well as the effect requiring applicants to submit detailed information with their applications will have), rather than the protection of ancient woodland itself.
- 4.12 The additional protection as proposed by the modification has **both positive and negative effects** on the sustainability objectives. The new policy could restrict the land freely available for development, but performs positively in terms of increasing access to and the availability of woodland. As a result this also has positive effects in terms of improving health and well being; biodiversity and addressing climate change, including reducing the risk of flooding. On balance, it is considered that the potential negative effects are not so significant to warrant further mitigation as housing land supply in particular, is already provided for elsewhere in the Plan. Therefore, no further mitigation measures are proposed.

HBC/MM/9

- 4.13 This modification proposes two new policies specifically related to the protection of Local Nature Reserves and Local Wildlife Sites. Again, these provide more detail about the protection of these areas rather than being grouped within the strategic greenspace policy EN3 of the Proposed Submission Planning Strategy.

The principle of protecting these areas therefore, was already established and appraised through previous versions of the Plan and as such, it is the additional detail and criteria of the policy that has been subject to further appraisal.

- 4.14 Providing separate policies as proposed by the modifications has resulted in a **significant positive effect** in terms of the protection and enhancement of biodiversity as it will help to provide further protection from development. This subsequently scores positively in respect of enhancing access to and protecting the environment.
- 4.15 No negative effects were recorded, and no mitigation measures are considered necessary.

HBC/MM/10

- 4.16 This modification amends Planning Strategy Policy E4: Tourism and Visitors to widen the scope to provide protection to visitor accommodation outside of the core areas. It makes clear that the change of use away from visitor accommodation will be resisted unless it can be demonstrated that continued use is unviable in line with the requirements of the adopted Visitor Accommodation Supplementary Planning Document. The appraisal has therefore focused on the impact of widening the scope of the policy only, rather than the entire policy itself.
- 4.17 The appraisal of this modification has resulted in **mostly positive effects** on the sustainability objectives, particularly in terms of enhancing the economy. Providing further protection to these uses will work towards achieving the Council's aim to build on and promote the existing tourism sector, and help retain jobs in this industry. However, the delay caused by requiring viability evidence before allowing a change of use from visitor accommodation could cause a negative effect in terms of ensuring land and premises are used the most efficient way. However, balanced with the positive sustainability effects recorded, it is not considered that this issue would be so significant to warrant specific mitigation.

Cumulative and synergistic effects

- 4.18 An assessment of the cumulative and synergistic effects is required to ensure that the proposed main modifications are considered in the wider context of their 'in-combination' effect on the sustainability objectives. It is also important to consider these additional modifications in light of existing Planning Strategy policies that remain unchanged. As such, this report should be read in conjunction with submitted Planning Strategy Sustainability Appraisal Report.
- 4.19 Table 4 below provides an indication of the cumulative assessment of the proposed main modifications:

		Proposed Main Modifications					Comments	
		MM/ 2	MM/3, 4 & 5	MM/6 & 7	MM/ 8	MM/ 9		MM/ 10
Sustainability Objectives	1	✓	-	-	X	-	-	The potential restriction of development coming forward through additional protection of land surrounding ancient woodland is well balanced by the presumption in favour of sustainable development as well as other policies in the plan that identify sites and areas for growth.
	2	✓ / ?	-	-	✓	-	-	There is no conflict between these modifications – uncertainty is only dependent on details of schemes. Neither do the proposed modifications affect existing policies
	3	✓ / ?	-	-	-	-	-	No significant effect
	4	- / ?	-	-	-	-	-	No significant effect
	5	✓	-	-	-	-	✓	The in-combination effects of these modification score positively and will enhance the remainder of the Plan
	6	✓	-	-	-	-	-	No significant effect
	7	✓	-	✓	-	-	-	The in-combination effects of these modification score positively and will enhance the remainder of the Plan
	8	✓ / ?	✓ / ?	-	?	-	✓ / X	The uncertainty on the impact on this objective relates to modifications not precluding that Greenfield development may come forward in the future, which is not considered to have cumulative effect as the overall housing target remains the same. The potential negative effect in terms of requiring further viability analysis in terms of retaining visitor accommodation is not considered to happen often enough to be identified as having a potential cumulative (negative) effect.
	9	✓	-	✓	✓✓	✓✓	-	The in-combination effects of these modification score positively and will enhance the remainder of the Plan
	10	✓	-	-	✓	-	-	The in-combination effects of these modification score positively and will enhance the remainder of the Plan
	11	✓	-	✓	✓	✓	-	The in-combination effects of these modification score positively and will enhance the remainder of the Plan
	12	X	-	-	-	-	-	No significant effect
	13	X	-	✓	✓ / -	-	-	The cumulative impacts of new development as a whole have already been appraised as part of earlier documents. Ensuring development is brought forward sustainably and the additional protection provided by other environmental policies in the plan will ensure the cumulative impacts remain neutral as far as possible
	14	?	-	-	-	-	-	No significant effect

15	✓	-	-	-	-	-	No significant effect
16	X	-	-	-	-	-	No significant effect
17	✓ / ?	-	-	-	-	-	No significant effect
18	✓ / ?	-	-	-	-	✓	There is no conflict between these modifications – uncertainty is only dependent on details of schemes. Neither do the proposed modifications affect existing policies
19	✓ / ?	-	-	-	-	-	No significant effect
20	✓ / ?	-	-	-	-	✓	There is no conflict between these modifications – uncertainty is only dependent on details of schemes. Neither do the proposed modifications affect existing policies
21	✓ / ?	-	✓	-	-	✓	There is no conflict between these modifications – uncertainty is only dependent on details of schemes. Neither do the proposed modifications affect existing policies

Table 4 – Cumulative and synergistic effects

4.20 This table is supplemented by an assessment of the cumulative and synergistic impacts in the assessment matrices themselves at Appendix C. There are no significant cumulative or synergistic effects and as such, it is not considered that the cumulative and synergistic effects of the proposed main modification require further action, or the identification of additional mitigation measures.

5.0 Conclusions

- 5.1 Although these Main Modifications go to the heart of the Planning Strategy, they mostly relate to the way we want to deliver the objectives of the Planning Strategy, rather than the objectives themselves. As a result, there has been little change to the Sustainability Appraisal as presented in the previous report dated May 2012.
- 5.2 The assessment of the proposed Main Modifications has resulted in mainly positive effects on the sustainability objectives, and no further amendments or mitigation measures are proposed. The modifications proposed in terms of the renewable energy opportunity area and additional protection policies for Local Nature Reserves and Local Wildlife Sites in particular, result in additional positive impacts that enhance the sustainability of the Planning Strategy.
- 5.3 Whilst this appraisal has highlighted some potential negative impacts, the effects of these can be mitigated to a certain extent by other policies in the Planning Strategy and are not considered significant enough to warrant recommendations for further changes.
- 5.4 The assessment has also demonstrated that there are no significant cumulative (negative) impacts of the modifications, nor is there any impact in on the internationally designated areas as defined by Habitats Regulations Assessment. It is therefore considered that the proposed Main Modifications are the most appropriate alternative, and taken forward into the final Planning Strategy towards adoption.

Monitoring

- 5.5 The detailed information regarding Plan finalisation, adoption and monitoring is set out in the Final Sustainability Appraisal Report for the Planning Strategy (May 2012), and supplemented by proposed main modification HBC/MM/12. Overall however, the Council will continuously monitor the effects of the policies in sustainability term and report on the outcome of this through Local Monitoring Report (or equivalent).

Appendix A – Compliance with the SEA Directive

Environmental Report requirements (SEA Directive)	Where covered in the Sustainability Appraisal process
Preparation of an Environmental report detailed below (Article 5):	This Sustainability Appraisal Report incorporates the environmental report and was published alongside the Proposed Main Modifications
a) An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes	Scoping Report and Hastings Planning Strategy SA Report (May 2012)
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Scoping Report and Hastings Planning Strategy SA Report (May 2012)
c) The environmental characteristics of areas likely to be significantly affected	Scoping Report and Hastings Planning Strategy SA Report (May 2012)
d) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Scoping Report and Hastings Planning Strategy SA Report (May 2012)
e) The environmental protection objectives relevant to the plan, and the way those objectives and any environmental considerations have been taken into account	Section 2, page 9 of this report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Section 4, page 11 and Appendix C of this report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment	Section 4, page 11 and Appendix C of this report
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Section 2, page 9 of this report
i) A description of measures envisaged concerning monitoring	Section 5, page 16 of this report
j) A non-technical summary of the information provided under the above headings	Page 3 of this report
Consult responsible environmental authorities when deciding on the scope and level of detail of the information which must be included in the environmental report (Article 5.4)	Scoping Report
Consult with responsible environmental bodies and the public on the draft plan and the environment report before the plan is adopted (Article 6)	Section 1, page 6
Take into account the Environmental Report and	Significant changes arising

<p>consultation responses during the preparation of the plan before it is adopted (Article 8)</p>	<p>from the formal public consultation will be reported on following this report</p>
<p>When a plan is adopted Responsible Environmental bodies and the public and other relevant bodies will be informed of (Article 9):</p> <ul style="list-style-type: none"> a) the plan is adopted b) a statement summarising how environmental consideration have been integrated into the plan, how any consultation responses have been taken into account and the reasons for choosing the plan as adopted. c) the measures for monitoring (Article 9) 	<p>Will be undertaken in accordance with Regulations following adoption</p>

Appendix B – Sustainability Implications of Proposed Main Modifications

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
HBC/MM/1	Chapter 4: The Development Strategy	New paragraph 4.2	<p>[Insert:] Complying with the Duty to Co-operate</p> <p>4.2 The Council acknowledges the importance of ongoing co-operation with relevant bodies, particularly Rother District Council and East Sussex County Council³. Co-operation will therefore continue with these authorities and with other bodies as appropriate, especially with regard to housing and employment development. This will take place as the Planning Strategy is monitored and reviewed in the light of such considerations as subsequent survey material, national planning policies and their implications for planning policies and proposals for the Borough, District and County. Of special relevance in this regard are likely to be the full, objectively assessed needs for market and affordable housing, explored further on in this chapter, and the implications for them of the completion of the Bexhill – Hastings Link Road.</p>	<p>This is new wording that relates to a procedural issue required by provisions in the Localism Act, so it is not considered necessary to carry out additional appraisal. The implications of this wording, i.e. housing and employment growth and numbers, have been appraised through the Development Strategy and Spatial policies in the Planning Strategy, in earlier Sustainability Appraisal publications.</p> <p>Separate appraisal needed? No</p>
HBC/MM/2	Chapter 4: The Development Strategy	New paragraph 4.3	<p>[Insert:] The presumption in favour of sustainable development</p> <p>4.3 When considering development proposals, we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will continue to work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development</p>	<p>This is new wording that has not been subject to Sustainability Appraisal by the Council before.</p> <p>Separate appraisal needed? Yes (see Appendix C for full assessment)</p>

³ The Duty to Co-operate is required by Section 33A (1) of the Planning & Compulsory Act 2004 (introduced through the Localism Act 2011)

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
			<p>that improves the economic, social and environmental conditions in the area and the wider objectives of this Plan.</p> <p>Planning applications will be assessed in accordance with the policies in the Local Plan as a whole and will be dealt with promptly and approved unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted. 	
HBC/MM/3	Chapter 4: The Development Strategy	Amend paragraph 4.22	<p>4.21 The target is equivalent to 200 net new homes per annum. <i>[Delete:] (as compared to the 210 per annum target contained in the South East Plan).</i> This target will be achieved through the delivery of identifiable development sites between 2011 and <i>[delete:] 2022 [insert:] 2028. [Delete:] After this period some reliance on windfall development will be necessary. In addition, in line with the Council's Empty Homes Strategy, it is planned that the targeted return of long term empty homes back into residential use by this Council will occur across all years of the Strategy and that the re-use of these homes will contribute to meeting the overall housing target.</i></p> <p><i>(N.B. Because of other amendments this paragraph will be renumbered to 4.25. Please see the Main Modifications consultation</i></p>	Main Modifications 3, 4 and 5 relate to the methodology used to calculate the housing target set out in Policy DS1: New Housing Development. The amendments to the sources of supply have not previously been appraised in this context so will need further consideration to assess the effect on the sustainability objectives

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications						
HBC/MM/4	Chapter 4: The Development Strategy	Delete paragraph 4.23 and replace it with amended version of 4.28	<p><i>document for details)</i></p> <p>4.23 <i>On the basis of the current Empty Homes Strategy (2009 – 2013), it is anticipated that approximately 255 long-term empty homes will be returned to use up to 2028</i></p> <p>4.28<ins>3</ins></p> <p>Windfall development has made a significant contribution to housing delivery in the past. Small site windfalls (less than 6 dwellings) will continue to come forward over all years <ins>of the Plan up to 2028.</ins> although it is not necessary to rely on windfall delivery in the first 10 years of the Planning Strategy period. Between 2023 and 2028, an <ins>An average of</ins> 40 <ins>35</ins> windfall dwellings per year has been assumed <ins>between 2016/17 and 2027/28, this potential supply can be seen as providing the necessary flexibility around meeting the housing target which is a minimum, by either increasing the total amount of house building, or as a contingency if allocated sites do not come forward as planned for any reason.</ins></p> <p><i>(N.B. Because of other amendments this paragraph will be renumbered to 4.26. Please see the Main Modifications consultation document for details)</i></p>	Separate appraisal needed? Yes (see Appendix C for full assessment)						
HBC/MM/5	Chapter 4: The Development Strategy	Amend paragraph 4.24 and table 1	<p>4.24 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.</p> <table border="1" data-bbox="853 1270 1610 1407"> <thead> <tr> <th data-bbox="853 1270 1359 1342">Sources of new homes likely to come forward by 2028</th> <th data-bbox="1359 1270 1610 1342">Net number of units</th> </tr> </thead> <tbody> <tr> <td data-bbox="853 1342 1359 1374">Units completed 2011/12</td> <td data-bbox="1359 1342 1610 1374">195</td> </tr> <tr> <td data-bbox="853 1374 1359 1407"><ins>Units completed 2011/12 -</ins></td> <td data-bbox="1359 1374 1610 1407"><ins>343</ins></td> </tr> </tbody> </table>	Sources of new homes likely to come forward by 2028	Net number of units	Units completed 2011/12	195	<ins>Units completed 2011/12 -</ins>	<ins>343</ins>	
Sources of new homes likely to come forward by 2028	Net number of units									
Units completed 2011/12	195									
<ins>Units completed 2011/12 -</ins>	<ins>343</ins>									

Ref:	Chapter	Policy/ paragraph number	Main Modification		Sustainability Implications
			2012/13		
			[Delete:] Sites under construction and/or with unimplemented planning permission as at 1 April 2012 [Insert:] Commitments – sites under construction, with planning permission or resolution to grant planning permission	[Delete:] 1,379 [Insert:] 1,209	
			[Insert:] Small site (5 or less net dwellings) commitments 2013/14 – 2015/16	[Insert:] 157	
			[Delete:] Additional dwellings indicated by the Strategic Housing Land Availability Assessment (not included in the above) [Insert:] Existing Local Plan allocations (excluding those without an extant permission)	[Delete:] 1,378 [Insert:] 747	
			[Insert:] Other sites potentially developable sites - no planning status (informed by the SHLAA and the merging Development Management Plan document)	[Insert:] 771	
			[Delete:] Small site (less than 6) windfall allowance 2023/24 to 2027/28 [Delete:] Long term empty homes brought back into residential use, 2011/12 to 2027/28 [Insert:] Small site (less than 6 dwellings) windfall allowance 2016/17 – 2027/28 (12 years x 35	[Delete:] 200 [Delete:] 255 [Insert:] 420	

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications				
			<table border="1" data-bbox="853 296 1610 408"> <tr> <td data-bbox="853 296 1359 331">dwellings)</td> <td data-bbox="1359 296 1610 331"></td> </tr> <tr> <td data-bbox="853 331 1359 408">TOTAL</td> <td data-bbox="1359 331 1610 408">[Delete:] 3,407 [Insert:] 3,647</td> </tr> </table> <p data-bbox="891 411 1317 432"><i>Table 1: Housing Delivery, as at 1 April 2013</i></p> <p data-bbox="786 461 1671 555"><i>(N.B. Because of other amendments this paragraph will be renumbered to 4.27. Please see the Main Modifications consultation document for details)</i></p>	dwellings)		TOTAL	[Delete:] 3,407 [Insert:] 3,647	
dwellings)								
TOTAL	[Delete:] 3,407 [Insert:] 3,647							
HBC/MM/6	Chapter 5: Spatial Areas	New paragraph 5.19	<p data-bbox="786 564 1688 831">[Delete:] <i>5.19 The Hastings Renewable and Low Carbon Energy Study (2009) has shown some potential for wind energy at Combe Valley Countryside Park (in both the Hastings and Rother areas). We will work with Rother District Council to explore this opportunity further, and identify the potential for renewable energy provision to offset the town's carbon emissions resulting from implementation of the whole development strategy for the town.</i></p> <p data-bbox="786 836 1688 1203">[Insert:] 5.19 The Hastings Renewable and Low Carbon Energy Study (2009) has shown that there may be some potential for wind energy along the urban fringe areas, which may include Combe Valley Countryside Park. We intend to take a positive approach to delivering renewable energy development in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.</p>	<p data-bbox="1718 564 2074 999">Main modifications HBC/MM/6 and HBC/MM/7 both relate to the potential for renewable energy generation on the urban fringes. The text in both paragraphs has been amended to provide further clarification about how decisions will be made in these areas, and to ensure consistency throughout the Plan.</p> <p data-bbox="1718 1038 1984 1171">Separate appraisal needed? Yes (see Appendix C for full assessment)</p>				
HBC/MM/7	Chapter 6: Sustainable Communities	New paragraph 6.17	<p data-bbox="786 1208 1688 1374">[Delete:] <i>6.17 The Council will therefore take a positive approach to delivering renewable energy developments within the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas.</i></p> <p data-bbox="786 1378 887 1407">[Insert:]</p>					

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
			6.17 The Council will therefore take a positive approach to delivering renewable energy developments in the town, and will work in partnership with Rother District Council in considering and identifying sites in urban fringe areas. Any consideration of sites that do come forward within Combe Valley Countryside Park will need to give due consideration to the Parks objectives and purpose of its designation, in line with part b) of Policy SC6.	
HBC/MM/8	Chapter 7: Protecting our Environment	New paragraphs 7.20, 7.21 and new policy EN4	<p>[Insert:]</p> <p>7.20 Ancient Woodland is a nationally important and threatened habitat which is irreplaceable. Most ancient woodlands have been in existence since the end of the last Ice Age. They are of special cultural, heritage and biodiversity value. National guidance and legislation protects Ancient Woodland from development. Development in the vicinity of such woodland, however, may also impact upon it and these impacts will be considered.</p> <p>7.21 Across Hastings Borough there are many areas of Ancient Woodland. These are an important wildlife habitat, have great amenity value for the community and are an asset to the wider heritage landscape. Further information on Ancient Woodland is also set out in background document “Ancient Woodland Inventory of Hastings” (2010), available on our website at http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/evidence_base/. These areas of Ancient Woodland, as shown on the Polices Map, are therefore, protected from the adverse impact of development by policy EN3 and also as described in policy EN4.</p> <p>POLICY EN4: Ancient Woodland</p> <p>Planning permission will only be granted for development near or adjacent to an area of ancient woodland, shown on the</p>	<p>This is a new policy (and supporting text) that has not been subject to Sustainability Appraisal by the Council before.</p> <p>Separate appraisal needed? Yes (see Appendix C for full assessment)</p>

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
			<p>Policies Map, if it can be convincingly demonstrated that the proposals will not adversely affect that ancient woodland and the need for development outweighs the importance of them. The layout of any development encroaching into, or close to, such woodland must take account of the designation and be designed so as to minimise the impact upon it.</p> <p>The Council may impose conditions on any planning permission and/or seek to enter into legal agreement(s) to secure the protection, enhancement and management of ancient woodland affected, directly or indirectly, by development proposals.</p>	
HBC/MM/9	Chapter 7: Protecting our Environment	New paragraphs 7.22, 7.23, 7.24 and New Policies EN5 and EN6	<p>[Insert:]</p> <p>7.22 Some areas of the Borough that are particularly important for their contribution to wildlife habitat should be protected. Local Nature Reserves (LNR) protect wildlife habitats and the natural heritage, but they also have a broader community role:</p> <ul style="list-style-type: none"> • To forge partnerships between the local authority, local nature conservation organisations and local people. • To provide an ideal environment for children to learn about nature. • To increase people’s awareness and enjoyment of wild plants and animals. <p>7.23 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.</p> <p>7.24 Both LNR and LWS, as displayed on the policies map, will be protected managed and enhanced as described in policies EN5 and EN6.</p>	<p>These are new policies and (and supporting text) that have not been subject to Sustainability Appraisal by the Council before.</p> <p>Separate appraisal needed? Yes (see Appendix C for full assessment)</p>

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
			<p>POLICY EN5: Local Nature Reserves (LNR)</p> <p>Areas designated or proposed as Local Nature Reserves (LNR) will be safeguarded and protected. Proposals for development within Local Nature Reserves, or likely to have an adverse effect on them directly or indirectly, will only be permitted if:</p> <p>(a) the need for development outweighs the importance of the site for nature conservation; and</p> <p>(b) any harm to the nature conservation interest of the site is clearly and demonstrably kept to a minimum.</p> <p>Where development is permitted, the Council may attach planning conditions and/or may seek to enter into legal agreement(s) to ensure the continuing protection and enhancement of the nature conservation interest and to provide compensatory measures and/or site management.</p> <p>POLICY EN6: Local wildlife Sites (LWS)</p> <p>Development proposals within or adjacent to Local Wildlife Sites (LWS) will only be permitted where there is a local need which outweighs any harm to the nature conservation interest.</p> <p>The Council may attach conditions to any planning permission and/or may seek to enter into agreement(s) to minimise the harm and/or secure the protection, enhancement and management of the nature conservation interest.</p>	
HBC/MM/10	Chapter 9: Local Economy	Amendment to Policy E4: Tourism and Visitors	<p>POLICY E4: Tourism and Visitors</p> <p>The Council will work to promote and secure sustainable tourism development in the town. A more diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number of visitors, provide job</p>	These amendments expand the spatial coverage of the policy. This represents a significant change that warrants further assessment of the policy on

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
			<p>opportunities and sustain the tourism economy.</p> <p>Visitor Attractions: New visitor attractions will be encouraged and those that already exist will be protected, unless it can be demonstrated they are no longer economically viable either in existing or adapted form. The upgrading of provision will be encouraged where it increases the range and/or quality of tourist facilities.</p> <p>Proposals for new visitor attractions will be considered sympathetically anywhere within the Borough subject to other policies. The Seafront is seen as the core resort area and particular support will be given to measures and proposals which are well related to the seafront.</p> <p>Visitor Accommodation:</p> <p>New visitor accommodation will be directed to the Seafront, the main arterial routes, and close to other generators of demand. Extension to existing visitor accommodation will also be supported, subject to design and location policies.</p> <p>The priority areas for retention of [Insert:] serviced visitor accommodation are the Seafront (including Warrior Square), the Old Town and the Town Centre. In these areas, there will be a presumption against a change of use away from existing facilities unless the facility is no longer viable or is incapable of improvement to a good standard. [Insert:] Outside these areas, change of use away from visitor accommodation (including camping, caravan and chalet sites) will be resisted, unless the criteria of the Visitor Accommodation Supplementary Planning Document (SPD) are adhered to, and the unviable nature of the business can be demonstrated. The SPD contains guidance in</p>	<p>the Sustainability Appraisal objectives.</p> <p>Separate appraisal needed? Yes (see Appendix C for full assessment)</p>

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
			<p>support of this policy approach.</p> <p>Proposals for upgrading caravan and camping facilities will be encouraged where it increases the range and/or quality available to the tourist.</p> <p>Language Schools:</p> <p>In recognition of their importance to the local economy, the Council will also support proposals that improve, protect or make new provision for language schools in suitable locations. Proposals for changes of use of language schools to other uses will be resisted unless it can be demonstrated that the use is no longer economically viable.</p>	
HBC/MM/11	Key Diagram	Amend Key Diagram	<p>Move western Renewable Energy opportunity area to a site within Hastings borough boundary</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="786 850 1167 1139"> </div> <div data-bbox="1308 850 1688 1139"> </div> </div> <p>Extract of Key Diagram as published in Proposed Submission Version 2012</p> <p>Extract of Proposed Main Modification 2013 to Key Diagram</p>	<p>The identification of a renewable energy opportunity area has already been appraised as part of the Planning Strategy. The movement of the icon on the Key Diagram to part of the Combe Valley Countryside Park area within the Local Authority area boundary does not in itself require an additional appraisal as the site has not changed, and will not affect the sustainability objectives – this is still the same broad area of search.</p>

Ref:	Chapter	Policy/ paragraph number	Main Modification	Sustainability Implications
				Additional appraisal needed? No
HBC/MM/12	Part Six – Monitoring and Implementation	New paragraphs 12.3, 12.4 and 12.5	<p>[Insert:]</p> <p>12.3 Continuing monitoring will be essential if the policies of the Local Plan are to be effective and its proposals delivered in a timely manner. Frequent re-assessment of the Infrastructure Delivery Plan and its Schedule will take place, and will assist in securing these objectives. The Council will establish a working group to monitor the progress of the Local Plan, working with infrastructure providers and developers as appropriate. This working relationship will thereby ensure that the Local Plan keeps on target, and its progress is reported through regular Local Plan Monitoring reports. Recommendations will be made where necessary to the Council’s Cabinet should there be any significant failures in performance and/or delivery.</p> <p>12.4 These arrangements demonstrate the Council’s commitment to the delivery of infrastructure at such time as is practicable in current circumstances. Some infrastructure will continue to be provided by developers through, for example, S106 Agreements, in accordance with the NPPF, and the working group will also want to be assured that developers (of major schemes) adhere to S106 Agreements and planning conditions.</p> <p>12.5 In these ways, the Council will continue to co-operate with its partners and the private sector in ensuring that the Local Plan is effective, and that the development which it promotes is carried out as agreed</p>	<p>This is new wording that has not been subject to Sustainability Appraisal by the Council before. It does however relate to the council’s mechanisms for delivery of the plan which are procedural issues, not considered to significantly affect the Sustainability Objectives.</p> <p>Separate appraisal needed? No</p>

Appendix C – Appraisal of Proposed Main Modifications

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
HBC/MM/2: NEW PARA 4.3 - THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT				
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need and the rest of the town	✓	✓	✓	The presumption in favour of sustainable development will ensure new “sustainable” housing development is approved wherever possible. Working closely with applicants as prescribed in the text will ensure timely and efficient decision making in the planning application process.
2. The health and well-being of the population is improved and inequalities in health are reduced	✓/?	✓/?	✓/?	It is not possible to identify the exact improvements to health and well being without details of a particular scheme. However, health and well being will improve as the social, economic and environmental needs of the area are addressed through the delivery of sustainable development.
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings	✓/?	✓/?	✓/?	Providing additional development will help to address issues around housing and employment need, contributing positively to reducing deprivation. However, it is not possible to know whether this development will take place in the more deprived areas of the town.
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	-/?	-/?	-/?	It is unlikely that significant levels of development coming forward will be educational establishments. However, this policy is not restricted to housing development only so the effects are uncertain.
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	✓	✓	✓	To be sustainable, development must improve accessibility. Implementing the presumption in favour of sustainable development will further ensure the effects on this objective are positive.
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	✓	✓	✓	Sustainable development should seek to create safe and secure environments within its design. Implementing the presumption in favour of sustainable development will further ensure the effects on this objective are positive.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
7. Vibrant and locally distinctive communities are created and sustained	✓	✓	✓	Encouraging new development to take place in a sustainable manner will have a positive effect in terms of creating vibrant and locally distinctive communities.
8. Land and buildings are used more efficiently and the best use is made of previously developed land	✓/?	✓/?	✓/?	The presumption in favour of sustainable development should help to secure sites coming forward on previously developed land and making the most efficient use of existing buildings. However, the presumption does not mean that development on Greenfield sites will not be permitted.
9. Biodiversity is protected, conserved and enhanced	✓	✓	✓	Policies in the unmodified Planning Strategy will require the protection, conservation and enhancement of biodiversity as far as possible. Whilst the presumption in favour of sustainable development will encourage further development, such development will need to still meet these requirements and protect biodiversity in order to remain sustainable.
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	✓	✓	✓	Policies in the unmodified Planning Strategy seek to reduce the risk of flooding as far as possible by locating development in areas at the least risk and requiring the implementation of SUDs. Whilst the presumption in favour of sustainable development will encourage further development, such development will need to still meet these requirements and protect biodiversity in order to remain sustainable.
11. Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	✓	✓	✓	To be sustainable, development must improve accessibility and give protection to designated sites and historic assets. Implementing the presumption in favour of sustainable development will further ensure the effects on this objective are positive.
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve	X	X	X	The provision of new homes, jobs and retail space will increase air pollution as a result of the construction and operation of premises, as well as the traffic generated. Working proactively with applicants to mitigate these effects will be helpful, as will ensuring that development is located sustainably, reducing the need to travel by car.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	X	X	X	The provision of new homes, jobs and retail space will increase emissions as a result of the construction and operation of premises. Policies in the unmodified Planning Strategy do however require developers to work towards zero carbon development in line with national policy, and adopt sustainable building techniques as far as possible. Working proactively with applicants to mitigate these effects will be helpful, although there is still likely to be a negative effect on air pollution overall.
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	?	?	?	To be sustainable, development should include measures to reduce water consumption and pollution, although the provision of new homes and other buildings may still have some negative effect. Policies in the unmodified Planning Strategy such as those requiring Sustainable Drainage Systems and addressing water quality will help address these issues but on the whole, the effects are uncertain.
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	✓	✓	✓	Encouraging new development to take place in a sustainable manner will have a positive effect in terms of providing further opportunities for the use of sustainable energy and renewable energy technologies.
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	X	X	X	The provision of new homes, jobs and retail space will increase waste as a result of the construction and operation of premises. Policies in the unmodified Planning Strategy do however require developers to waste reduction methods as far as possible. Working proactively with applicants to mitigate against this will be helpful, although there is still likely to be a negative effect on waste generation overall.
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	✓/?	✓/?	✓/?	Whilst new development may encourage traffic generation in that particular location, applying the resumption of sustainable development will help to ensure that accessibility and reducing the need to travel by car are at the heart of the decision making process, resulting in a slight positive effect on this

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
				objective, amongst some uncertainty around the type of development proposed.
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	✓/?	✓/?	✓/?	Securing development will impact positively on providing employment, although the scale and type of development remains uncertain.
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	✓/?	✓/?	✓/?	Securing development will impact positively on providing employment and the local economy as a whole, although the scale and type of development remains uncertain.
20. The sustained economic growth of the town is achieved and linked closely to social regeneration	✓/?	✓/?	✓/?	Securing development will impact positively on providing employment and the local economy as a whole, although the scale and type of development remains uncertain. In turn, economic growth will positively affect social objectives.
21. Indigenous and inward investment is encouraged and accommodated	✓/?	✓/?	✓/?	Ensuring growth in the town in the most sustainable way will contribute positively to this objective.
<p>Summary: Applying the presumption in favour of sustainable development and working proactively with applicants to secure such development generally performs positively against the social, environmental and economic Sustainability Objectives. Uncertainties over the impact of this modification centre on the type and scale of development that will come forward, although taken together with existing policies in the unmodified Planning Strategy; potential negative effects can be mitigated to an extent. The presumption is likely to have a positive effect on economic objectives in particular.</p>				
<p>Cumulative or synergistic effects: There are no cumulative or synergistic effects in relation to the additional text as proposed.</p>				
<p>Habitats Regulations Assessment: The proposed text does not increase the overall level of development proposed in the Planning Strategy so will not affect the existing Habitats Regulation Assessment undertaken in support of the Plan. The presumption in favour of sustainable development does not prevent additional work being undertaken in this respect, and would not adversely affect the conservation objectives of designated sites within or outside the borough.</p>				
HBC/MM/3, HBC/MM/4 and HBC/MM/5 - : AMENDMENT TO PARAS 4.23 & 4.24 – SOURCES OF HOUSING SUPPLY				
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and	-	-	-	Providing new homes, some of which are required to be affordable, will perform positively against this objective.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
affordable home suitable to their need and the rest of the town				However, changing the sources of supply will not affect the overall number of houses provided and so therefore, there is no link from this modification to the objective
2. The health and well-being of the population is improved and inequalities in health are reduced	-	-	-	Changing the sources of supply that make up the overall housing target previously been appraised under the medium growth scenario does not affect this objective
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
7. Vibrant and locally distinctive communities are created and sustained	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
8. Land and buildings are used more efficiently and the best use is made of previously developed land	✓/?	✓/?	✓/?	The use of both empty homes (as originally proposed to make up the overall housing target) and reliance on windfall sites (brownfield) would impact positively on this objective. Increasing this reliance on windfall and removing empty homes from the sources of supply could have a positive effect in terms of making more and better use of, existing land and buildings rather than empty homes alone. Greenfield windfall projections are not included, although this will not preclude small Greenfield sites coming forward.
9. Biodiversity is protected, conserved and enhanced	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
and in the future				
11. Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
20. The sustained economic growth of the town	-	-	-	Changing the sources of supply that make up the overall

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
is achieved and linked closely to social regeneration				housing target does not affect this objective
21. Indigenous and inward investment is encouraged and accommodated	-	-	-	Changing the sources of supply that make up the overall housing target does not affect this objective
<p>Summary: This proposed modification relates to the sources of supply making up the overall housing target, rather than affecting the housing target as whole. As such there are very limited effects on the Sustainability Objectives, other than providing some uncertainty over whether additional windfall sites will be on small Greenfield or brownfield sites. However, projection work undertaken does not include provision for Greenfield windfall so no negative effects have been recorded.</p>				
<p>Cumulative or synergistic effects: There are no cumulative or synergistic effects in relation to the additional text as proposed.</p>				
<p>Habitats Regulations Assessment: The proposed text does not increase the overall level of development proposed in the Planning Strategy so will not affect the existing Habitats Regulation Assessment undertaken in support of the Plan.</p>				
HBC/MM/6 and HBC/MM/7: NEW PARAS 5.19, 6.19 – RENEWABLE ENERGY OPPORTUNITY AREAS				
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need and the rest of the town	-	-	-	This modification relates to the consideration of large scale renewable energy generation areas on the urban fringes and how the Council will work with Rother on these issues. It does not directly relate to identified development sites.
2. The health and well-being of the population is improved and inequalities in health are reduced	-	-	-	Clarification as proposed by this modification does not affect this objective.
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings	-	-	-	Clarification as proposed by this modification does not affect this objective.
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	-	-	-	Clarification as proposed by this modification does not affect this objective.
5. All sectors of the community have improved accessibility to services, facilities, jobs, and	-	-	-	Clarification as proposed by this modification does not affect this objective.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
social, cultural and recreational opportunities, including access to the countryside and the historic environment				
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	Clarification as proposed by this modification does not affect this objective.
7. Vibrant and locally distinctive communities are created and sustained	-	-	-	Clarification as proposed by this modification does not affect this objective.
8. Land and buildings are used more efficiently and the best use is made of previously developed land	-	-	-	Clarification as proposed by this modification does not affect this objective.
9. Biodiversity is protected, conserved and enhanced	✓	✓	✓	Further consideration to ensuring the objectives of the Come Valley Countryside Park are maintained as proposed by the modification will safeguard against any loss to biodiversity as a result of any potential schemes.
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	-	-	-	Clarification as proposed by this modification does not affect this objective.
11. Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	✓	✓	✓	This modification provides additional protection to the Country Park, ensuring the purpose of its designation is duly considered as part of any future schemes.
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve	-	-	-	Clarification as proposed by this modification does not affect this objective.
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	✓	✓	✓	The amendment to wording that clarifies the intention to take a positive approach to delivering renewable energy scores positively against this objective.
14. The risk of pollution to all water resources is reduced, water quality is improved and water	-	-	-	Clarification as proposed by this modification does not affect this objective.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
consumption is reduced				
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	-	-	-	Clarification as proposed by this modification does not affect this objective.
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	-	-	-	Clarification as proposed by this modification does not affect this objective.
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	-	-	-	Clarification as proposed by this modification does not affect this objective.
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	Clarification as proposed by this modification does not affect this objective.
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	Clarification as proposed by this modification does not affect this objective.
20. The sustained economic growth of the town is achieved and linked closely to social regeneration	-	-	-	Clarification as proposed by this modification does not affect this objective.
21. Indigenous and inward investment is encouraged and accommodated	✓	✓	✓	The amendment to wording that clarifies the intention to take a positive approach to delivering renewable energy scores positively against this objective.
<p>Summary: This modification proposes further clarification on the approach being taken to securing renewable energy generation in urban fringe areas, as opposed to re-appraising such development in these locations, which has been recorded previously. It scores positively against social, environmental and economic objectives, with no negative scores recorded.</p>				
<p>Cumulative or synergistic effects: There are no cumulative or synergistic effects in relation to the additional text as proposed.</p>				

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
Habitats Regulations Assessment:				
The proposed text does not increase the overall level of development proposed in the Planning Strategy so will not affect the existing Habitats Regulation Assessment (HRA) undertaken in support of the Plan. It does however provide further protection to ensuring the objectives of the Countryside Park are maintained, therefore contributing positively to the Park and providing alternative recreational space to help compensate against increased recreational activity resulting from new development. The proposed modifications would not adversely affect the conservation objectives of designated sites within or outside the borough.				
HBC/MM/8: NEW PARAS 7.20-7.21, POLICY EN4 – PROTECTING OUR ENVIRONMENT				
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need and the rest of the town	X	X	X	The new policy provides additional protection to land adjacent to ancient woodland, which was not previously included in the unmodified Planning Strategy. This may have a negative effect in terms of available land for development
2. The health and well-being of the population is improved and inequalities in health are reduced	✓	✓	✓	Improving access to green infrastructure has strong links to quality of life and health
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective. The protection of ancient woodland as a policy has been appraised in earlier documents, and creating a 'buffer' around this would not have any additional affect on this objective.
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
7. Vibrant and locally distinctive communities are created and sustained	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
8. Land and buildings are used more efficiently and the best use is made of previously	?	?	?	Providing additional protection to land adjacent to ancient woodland will impact on this objective in terms of available

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
developed land				land for development, and whether the best use is made of that land. The effect is uncertain without a specific site or knowing the current use of the land being used as a buffer.
9. Biodiversity is protected, conserved and enhanced	✓✓	✓✓	✓✓	The proposed policy and supporting text provides additional protection to ancient woodland, having a significant positive effect in terms of protecting and enhancing biodiversity.
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	✓	✓	✓	Retaining more land as open space will result in less surface water run off, therefore not increasing the risk of flooding.
11. Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	✓	✓	✓	This additional policy will provide further protection to green infrastructure
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	✓/-	✓/-	✓/-	The proposed policy will not have a direct effect in terms of reducing emissions, but will provide protection to existing woodland, which can have positive effects in terms of mitigating against climate change.
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
17. Road congestion and pollution levels are reduced, and there is less car dependency and	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
greater travel choice				
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
20. The sustained economic growth of the town is achieved and linked closely to social regeneration	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
21. Indigenous and inward investment is encouraged and accommodated	-	-	-	There is no direct link between the proposed policy and supporting text, and this objective
<p>Summary: This modification provides additional protection to ancient woodland from development, including the provision of a buffer zone. This additional protection impacts negatively in terms of restricting the land freely available for development, but performs positively in terms of increasing access to and the availability of woodland. Subsequently, this has positive effects in terms of improving health and well being; biodiversity and addressing climate change, including reducing the risk of flooding.</p>				
<p>Cumulative or synergistic effects: This new policy, taken together with existing greenspace protection policies within the Protecting Our Environment Chapter of the Planning Strategy will result in positive cumulative effects in terms of environmental objectives, by providing further protection to ancient woodland. The impact in terms of loss of available land for housing is unlikely to be significant although could result in a negative cumulative effect in this regard.</p>				
<p>Habitats Regulations Assessment: The proposed policy does not increase the overall level of development proposed in the Planning Strategy so will not affect the existing Habitats Regulation Assessment undertaken in support of the Plan.</p>				
HBC/MM/9: NEW PARAS 7.22-7.24, POLICIES EN5 AND EN6 – PROTECTING OUR ENVIRONMENT				
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need and the rest of the town	-	-	-	The new polices provide more detail regarding the protection of Local Nature Reserves and Local Wildlife Sites, and separate these out into separate policies as opposed to being considered as part of the more general, strategic policy in EN3. There is therefore no change in terms of the impact on

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
				this objective
2. The health and well-being of the population is improved and inequalities in health are reduced	-	-	-	The separate, more detailed policies do not change the impact on this sustainability objective
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	-	-	-	The separate, more detailed policies do not change the impact on this sustainability objective.
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
7. Vibrant and locally distinctive communities are created and sustained	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective.
8. Land and buildings are used more efficiently and the best use is made of previously developed land	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
9. Biodiversity is protected, conserved and enhanced	✓✓	✓✓	✓✓	The proposed policies and supporting text provide additional detail and clarification regarding the protection and enhancement of Local Nature Reserves and Local Wildlife Sites, resulting in significant positive effects on this objective.
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
11. Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more	✓	✓	✓	The additional policies provide further detail and clarification regarding the protection of Local Nature Reserves and Local Wildlife Sites, resulting in a positive effect on this objective.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
accessible				
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	-	-	-	The separate, more detailed policies do not change the impact on this sustainability objective.
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
20. The sustained economic growth of the town is achieved and linked closely to social regeneration	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective
21. Indigenous and inward investment is encouraged and accommodated	-	-	-	There is no direct link between the proposed policies and supporting text, and this objective

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
<p>Summary: The proposed new policies provide further detail to existing strategic policy EN3 in terms of protecting and enhancing Local Nature Reserves and Local Wildlife Sites from development as necessary. The principle of protecting these areas therefore, was already established and appraised through previous versions of the Plan. Providing this additional detail has further enhanced the positive effects on environmental objectives relating to biodiversity and access to greenspace.</p>				
<p>Cumulative or synergistic effects: This new policy, taken together with existing greenspace protection policies within the Protecting Our Environment Chapter of the Planning Strategy will result in positive cumulative effects in terms of environmental objectives, by providing further protection to Local Nature Reserves and Local Wildlife Sites.</p>				
<p>Habitats Regulations Assessment: The proposed policies do not increase the overall level of development proposed in the Planning Strategy so will not affect the existing Habitats Regulation Assessment undertaken in support of the Plan.</p>				
HBC/MM/10: AMENDMENT TO POLICY E4 – LOCAL ECONOMY				
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need and the rest of the town	-	-	-	There is no direct link between the policy amendments and this objective.
2. The health and well-being of the population is improved and inequalities in health are reduced	-	-	-	There is no direct link between the policy amendments and this objective.
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings	-	-	-	There is no direct link between the policy amendments and this objective.
4. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	-	-	-	Widening the spatial area covered by this policy does not affect this objective.
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the	✓	✓	✓	Resisting the loss of tourism premises around the town as a whole (rather than just in the core areas) will help to safeguard existing jobs in this sector.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
historic environment				
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	There is no direct link between the policy amendments and this objective.
7. Vibrant and locally distinctive communities are created and sustained	-	-	-	Widening the spatial area covered by this policy does not affect this objective.
8. Land and buildings are used more efficiently and the best use is made of previously developed land	✓ / X	✓ / X	✓ / X	Expanding the spatial area covered by this policy will ensure that visitor accommodation is not lost to alternative uses unless there is a strong case for this in terms of viability. However, it may also mean that a better use (if visitor accommodation deemed unviable) can not be found until an adequate case can be made, which could stop reduce the availability of housing supply in the short term.
9. Biodiversity is protected, conserved and enhanced	-	-	-	There is no direct link between the policy amendments and this objective.
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	-	-	-	There is no direct link between the policy amendments and this objective.
11. Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	-	-	-	There is no direct link between the policy amendments and this objective.
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve	-	-	-	There is no direct link between the policy amendments and this objective.
13. The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	-	-	-	There is no direct link between the policy amendments and this objective.
14. The risk of pollution to all water resources is reduced, water quality is improved and water	-	-	-	There is no direct link between the policy amendments and this objective.

Sustainability Objectives	Assessment			Commentary/proposed mitigation
	Short term	Medium term	Long term	
consumption is reduced				
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	-	-	-	There is no direct link between the policy amendments and this objective.
16. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	-	-	-	There is no direct link between the policy amendments and this objective.
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	-	-	-	There is no direct link between the policy amendments and this objective.
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	✓	✓	✓	Resisting the loss of tourism premises around the town as a whole (rather than just in the core areas) will help to safeguard existing jobs in this sector.
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	Widening the spatial area covered by this policy does not affect this objective, as it not covers the town as a whole.
20. The sustained economic growth of the town is achieved and linked closely to social regeneration	✓	✓	✓	Resisting the loss of tourism premises around the town as a whole (rather than just in the core areas) will contribute positively to retaining the tourism sector in Hastings.
21. Indigenous and inward investment is encouraged and accommodated	✓	✓	✓	Continued focus on tourism in Hastings would positively affect this objective.
<p>Summary: Widening the scope of this policy to provide protection to visitor accommodation outside of the core areas results in mostly positive effects on the sustainability objectives. However, resisting the change of use to alternative uses until adequate viability evidence is provided could cause a negative effect in terms of ensuring land and premises are used the most efficient way.</p>				
<p>Cumulative or synergistic effects: There are no cumulative or synergistic effects in relation to the additional text as proposed.</p>				
<p>Habitats Regulations Assessment: The proposed additional policy text does not increase the overall level of development proposed in the Planning Strategy so will not affect the existing Habitats Regulation Assessment undertaken in support of the Plan.</p>				