



Sustainability Appraisal (SA) of the Hastings Development Management Plan



SA Report: Non-Technical Summary

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Prepared for
Hastings Borough Council

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INTRODUCTION

URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Hastings Development Management (DM) Plan. SA is a mechanism for considering and communicating the likely significant effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse impacts and maximising the positives. The DM Plan, once in place, will guide planning applications that are put forward to the Council. Its role will be to set out clear policies to help shape the design and construction of new development and to allocate sites to deliver the overarching policies in the Hastings Planning Strategy.

WHAT’S THE SCOPE OF THE SUSTAINABILITY APPRAISAL?

An important first step in the Sustainability Appraisal process involves establishing the ‘scope’, i.e. those sustainability issues which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

- What’s the sustainability ‘context’?
 - Answering this question primarily involves reviewing Government’s National Planning Policy Framework; however, it is also important to ‘cast the net wider’ and consider contextual messages established through other plans, policies, strategies and initiatives.
- What’s the sustainability ‘baseline’?
 - Answering this question involves reviewing all available data to establish an understanding of the current state of the environment and ‘socio-economy’ within Hastings. The baseline review highlights that Hastings can be broadly characterised as having: 1) an underperforming economy that has resulted in serious problems of relative deprivation¹; and 2) a tightly contained urban centre mostly surrounded by the High Weald Area of Outstanding Natural Beauty and the English Channel.

Drawing on the findings of the context / baseline review, a list of ‘sustainability objectives’ is identified. These provide a methodological framework for the appraisal, ensuring it remains focused.

Sustainability objectives identified subsequent to review of the sustainability context and baseline
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need
The health and well-being of the population is improved and inequalities in health are reduced
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
Opportunities are available for everyone to acquire new skills , and the education and skills of the population improve
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
Safe and secure environments are created and there is a reduction in crime and the fear of crime
Vibrant and locally distinctive communities are created and sustained
Land and buildings are used more efficiently and the best use is made of previously developed land
Biodiversity is protected, conserved and enhanced
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future

¹ Hastings is one of the most deprived local authorities in England (19th out of a total of 326). 15 of Hastings 53 Super Output Areas are within the most deprived 10% and a further nine are within the most deprived 20% in England. Deprivation is widespread throughout the town. Twelve of the towns 16 wards contain one or more neighbourhoods that fall within the worst 20% most deprived nationally.

Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible

Air pollution from transport and land use planning is reduced, and air quality continues to improve

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 risk of pollution to all **water** resources is reduced, water quality is improved and water consumption is reduced

The use of **sustainable energy** and renewable energy technologies is maximised in new development, and in existing buildings

Through **waste** re-use, recycling and minimisation, the amount of waste for disposal is reduced

Road congestion and pollution levels are reduced, and there is less **car dependency** and greater travel choice

There are high and stable levels of **employment** and rewarding and satisfying employment opportunities for all

Economic revival in the more deprived areas of the town is stimulated and successfully achieved

The **sustained economic growth** of the town is achieved and linked closely to social regeneration

Indigenous and inward **investment** is encouraged and accommodated

WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

It is a legislative requirement that every Sustainability Appraisal process includes an interim appraisal stage. The SA Report published alongside the draft Plan (i.e. this report) must then 'tell the story' of how the interim appraisal has informed development of the draft plan.

As such, Part 2 of this SA Report 'describes how, as an interim step, there was an appraisal² of:

- alternative approaches to addressing a range of general guidance issues; and
- a range of site allocation options...³

... and how the Council then took account of the interim SA findings when preparing the Proposed Submission version of the Plan. The following is a summary.

Appraisal of general guidance alternatives

For a range of 22 general guidance issues there was an appraisal of a suggested policy approach and an alternative approach (or, in some cases, two alternative approaches). In many instances, the Council agreed with the appraisal findings and ensured that they were reflected in the final preferred policy approach (as set out within the Proposed Submission Plan). In several cases the Council disagreed with the SA findings, for example (and notably):

- The Council disagreed with the SA finding that a *less* prescriptive policy approach be taken to protecting retail floorspace in the District's defined shopping areas on the basis that this would be contrary to the strategic objectives of the Council and the Local Plan, which seek to stimulate economic growth, particularly in town and commercial centres; and
- The Council disagreed with the SA finding that a *more* prescriptive policy approach be taken to addressing the issue of 'design' on the basis that, when read alongside Planning Strategy Policy SC1: Strategy for Managing Change in a Sustainable Way, and the adopted SPD on Householder Development, the level of detail in the suggested policy approach is appropriate.

² Specifically - likely significant effects on the baseline associated with the alternative policy approaches and site options were identified, described and evaluated. The 21 sustainability objectives established through scoping were drawn on as a methodological framework.

³ The appraisal of site options posed methodological challenges and as such necessitated the application of a bespoke methodology.

Appraisal of site allocation options

139 site allocation options (126 housing and 13 employment) were subjected to SA and findings taken into account by the Council when determining their preferred approach to site allocations (as set out in the Proposed Submission Plan).

In relation to housing site options, for most of the 79 allocated sites the Council has developed site specific policy to ensure that development will address the constraints flagged by the SA. However, this is not the case for every allocated site. Rather, in some instances site specific policy has not been developed to reflect SA findings on the basis that:

- The Council has been able to draw on further evidence / knowledge to establish that the site is, in actual fact, not constrained in the way suggested by SA, for example, in one instance the SA flags up the distance of a site from open space, but failed to take into account the proximity to the beach;
- The Council is awaiting further evidence, and will change policy wording as necessary once this is available (in particular, the Council is awaiting 'Sequential Test' results for a number of the sites that are 'flagged red' by the SA in relation to flood risk; or
- The constraint can be sufficiently addressed through other – i.e. non-site specific – policy, for example, distance to amenity footpaths will be considered as part of the wider green infrastructure network.

In relation to employment site options the Council has chosen to allocate 11. In most instances the Council has developed site specific policy to ensure that development at allocated sites addresses the constraints flagged by the SA. However, in one instance (Land in Whitworth Road, LRA8) site specific policy has not been developed to reflect SA findings. The Council's justification is that: *It is acknowledged that part of the site is within flood zones 2 and 3. However, the outcome of 'Sequential Test' work is necessary before an appropriate course of action can be determined. At this stage, the only measure taken is to make reference to flood risk issues associated with the site. It is also acknowledged that this is a greenfield site and so does not perform well in terms of some sustainability objectives; however, the Council's evidence base shows that some greenfield sites are required in order to meet the need for employment floorspace in Hastings.*

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

An appraisal of the Proposed Submission DM Plan (i.e. the preferred approach to general guidance and site allocations) is presented under 21 headings; one for each of the sustainability objectives established through scoping. Set out below is a summary of appraisal findings, and then a discussion of broad conclusions and outstanding recommendations that should be taken into account when finalising the plan.

Environment

The approach to general guidance is strong on green infrastructure and biodiversity. A range of policies call for the protection of a variety of spaces and for detailed appraisal of green infrastructure as part of new development proposals, although more could be done to emphasise the need for green space creation in areas of particular need. The site allocations perform less well, potentially negatively affecting a small number of SSSI sites, plus several locally important non-designated sites. Furthermore, several greenfield sites across the Borough will be developed, with uncertain cumulative effects on biodiversity. Overall (at the Borough scale) it is likely that the stringent general guidance policy approach will ensure that potential significant effects associated with allocations acting in combination can be avoided.

The need to reduce greenhouse gas emissions and to prepare the area for the future effects of climate change is given little direct consideration in the plan. Whilst a number of the policies may result in a reduction in per capita emissions from travel and transport, the plan as a whole is otherwise not explicit about the role that design, green infrastructure, and sustainable energy can play in terms of mitigation and adaptation. In addition, over half of the allocated residential sites are some distance from a District or Local Centre. Overall, in terms of climate change mitigation, it is probably the case that the plan's effects are positive; however there is a considerable degree of uncertainty given the lack of prescription (for example, the design policy simply promotes the use of best practice sustainable construction guidance). It is noted that issues relating to climate change are given more explicit consideration in the Hastings Planning Strategy (the overarching Local Plan).

Communities

A range of policies focus on improving community vitality and individual health / well-being through access to local services, cultural opportunities and green space, as well as protection of the Borough’s landscape, townscape and heritage assets. These policies in conjunction with an approach to site allocations that directs housing mostly to areas in close proximity to open space and avoids areas of high landscape sensitivity, should ensure the plan performs positively. This conclusion is, however, somewhat tempered by losses of green space as a result of site allocations, plus the distance of a number of housing sites from District Centres and play facilities.

The economy

The Borough at present features widespread socio-economic deprivation. A number of the policies brought forward place stringent, but not overbearing, restrictions on certain business types with the intention of protecting commercial centres and community facilities and encouraging cultural activities. Taken in conjunction with a high proportion of site allocations in areas of high deprivation, the plan is likely to perform well in terms of bringing about social and economic revival, driven by additional investment and increased employment opportunities. Deprivation could perhaps be further tackled should the plan place greater emphasis on the protection and provision of community facilities, shops, services and green spaces through general guidance policy.

Overall conclusion

The Proposed Submission DM Plan sets out an approach to general guidance and site allocations that performs well from a sustainability perspective. Having said this, SA has highlighted a number of trade-offs, i.e. it has not been possible to maximise performance in terms of all sustainability objectives / aspects of the sustainability baseline.

This is inevitably the case with plan-making, but in the case of the Hastings DM Plan it is clear that due care and attention has been given to maximising ‘win-wins’ and avoiding/mitigating potential negative effects as far as possible. Importantly, there has been an iterative plan-making process that has included opportunity for timely and effective input by the public and stakeholders, and (as detailed within Part 2 of this Report), the preferred approach has also been developed taking into account the findings of an ‘interim’ Sustainability Appraisal stage (at which point a range of alternative policy approaches and site options were subjected to appraisal).

The policies and site allocations brought forward in the plan strike a good balance between the essential need to create new residential and employment sites to tackle the economic underperformance, social deprivation, and affordable housing shortages which are at present affecting the Borough, and the necessity of preserving and enhancing the valuable environment of the area, including its open spaces, its cultural and historic assets, and its attractive landscapes and townscapes. Importantly, the Plan should complement the Planning Strategy, alongside which it will be implemented. For example, whilst Policy DM4 (General Access) of the Development Management Plan calls for the consideration of sustainable modes of travel when laying out development, Policies T1 (Strategic Road and Rail Schemes), T2 (Local Road Improvements) and T3 (Sustainable Transport) of the Planning Strategy take a more strategic view, encouraging the provision of an enhanced road network and improved provision of sustainable transport within Hastings (including the creation of a strategic network of cycle routes).

Recommendations

Recommendation	To ensure performance of the plan is maximised in terms of
Provide a clear statement regarding the extent to which the site allocations will contribute towards ensuring identified housing needs are met.	The sustainability objective to ensure more opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need

Seek to encourage the creation of green spaces in areas of identified need.	Several sustainability objectives, including relating to health and well-being and ensuring vibrant and locally distinctive communities.
Add criteria giving additional weight to the protection and creation of services and facilities in areas of high deprivation	The sustainability objective to ensure 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
Adjust criteria to allow conversion away from A1 use over targeted levels after a certain period of vacancy, where future viability appears unlikely.	Several sustainability objectives, including relating to efficient use of land and building, and sustained economic growth.
Amend criteria on the assessment of onsite ecology to ensure that all of the functions of green space are considered.	The sustainability objective to ensure the risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future; also the sustainability objective relating to climate change adaptation; as well as the objective to ensure the town is prepared for the impacts of climate change.

WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

Following the current consultation the Council will prepare a schedule of modifications to the Development Management Plan and submit this, along with all the representations received, to the Secretary of State for Independent Examination. It is the Council’s intention to have an adopted Development Management Plan by April 2014, although this is dependent on the Inspector’s findings at Examination, and any additional work needed to ensure the Soundness of the Plan.

At the time of Adoption a ‘Statement’ will published that sets out (amongst other things):

- How this SA Report and responses received as part of the current consultation have been taken into account when finalising the plan; and
- Measures decided concerning monitoring.

At the current stage (i.e. within the SA Report), there is a need to present ‘measures envisaged concerning monitoring’ only. Relevant monitoring indicators from the Council’s established monitoring framework are highlighted, and suggestions are made as to how the framework could be enhanced. For example, it is suggested that the Council may wish to work with English Heritage to identify priority indicators to ensure that built heritage assets and the historic environment more generally is well integrated with new development.