

# **Appropriate Assessment of the Hastings Core Strategy**

Final  
March 2010



Prepared for  
**Hastings Borough Council**

## Revision Schedule

### **Appropriate Assessment of the Hastings Core Strategy** March 2010

Rev	Date	Details	Prepared by	Reviewed by	Approved by
01	15/03/10	Draft for client review	<b>Dr James Riley</b> Principal Ecologist	<b>Dr Jo Hughes</b> Technical Director (Ecology)	<b>Dr Jo Hughes</b> Technical Director (Ecology)

This document has been prepared in accordance with the scope of Scott Wilson's appointment with its client and is subject to the terms of that appointment. It is addressed to and for the sole and confidential use and reliance of Scott Wilson's client. Scott Wilson accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided. No person other than the client may copy (in whole or in part) use or rely on the contents of this document, without the prior written permission of the Company Secretary of Scott Wilson Ltd. Any advice, opinions, or recommendations within this document should be read and relied upon only in the context of the document as a whole. The contents of this document do not provide legal or tax advice or opinion.

© Scott Wilson Ltd 2008

**Scott Wilson**  
Scott House  
Alencon Link  
Basingstoke  
Hampshire  
RG21 7PP

Tel: 01256 310200  
Fax: 01256 310201

## Table of Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Current legislation.....	1
1.2	Scope and objectives.....	2
<b>2</b>	<b>Methodology .....</b>	<b>3</b>
2.1	Key principles .....	3
2.2	Process.....	3
2.3	The Hastings Core Strategy .....	4
2.4	Confirming other plans and projects that may act in combination .....	5
<b>3</b>	<b>Pathways of Impact.....</b>	<b>9</b>
3.2	Recreational pressure.....	9
3.3	Air quality.....	10
3.4	Water quality.....	15
3.5	Water resources .....	15
<b>4</b>	<b>Hastings Cliffs SAC.....</b>	<b>17</b>
4.1	Introduction.....	17
4.2	Features of European Interest.....	18
4.3	Condition Assessment.....	18
4.4	Key Environmental Conditions.....	18
4.5	Recreational pressure.....	18
4.6	Air quality.....	22
4.7	Urbanisation.....	23
<b>5</b>	<b>Pevensie Levels Ramsar site.....</b>	<b>24</b>
5.1	Introduction .....	24
5.2	Features of European interest .....	24
5.3	Condition assessment .....	24
5.4	Key environmental conditions .....	24
5.5	Air quality .....	25
5.6	Water quality .....	28
5.7	Water resources .....	28
<b>6</b>	<b>How the Core Strategy has incorporated the protection of Hastings Cliffs SAC .....</b>	<b>30</b>
6.1	Preferred Approaches.....	30
6.2	Hastings Cliffs SAC .....	31

---

6.3	Conclusion .....	32
Appendix 1:	Summary of potential adverse effects of each Core Strategy preferred approach .....	33
Appendix 2:	Plan of Hastings Country Park .....	50
Appendix 3:	European sites covered in this report .....	51

# 1 Introduction

## 1.1 Current legislation

1.1.1 The need for Appropriate Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007). Under these Regulations, land use plans must be subject to Appropriate Assessment if they are likely to have a significant [adverse] effect on a Natura 2000 site (Special Areas of Conservation, SACs and Special Protection Areas, SPAs). It is Government policy (as described in Planning Policy Statement 9: Biodiversity & Geological Conservation) for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites. As such, Appropriate Assessments should also cover these sites.

1.1.2 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

1.1.3 In recent years the term 'Habitat Regulations Assessment' (HRA) has come into common currency to describe the entire assessment process set out in the Regulations, while the phrase 'Appropriate Assessment' is referred to that particular stage. The terms are therefore used in that manner in this report.

1.1.4 In order to ascertain whether or not site integrity will be affected, an HRA should be undertaken of the plan or project in question.

### Habitats Directive 1992

Article 6 (3) states that:

*"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."*

### Conservation (Natural Habitats &c. Regulations) 1994 (as amended)

Regulation 48 states that:

*"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives".*

## 1.2 Scope and objectives

1.2.1 Scott Wilson has been appointed by Hastings Borough Council to assist in undertaking an HRA (specifically the Appropriate Assessment stage) of the potential effects of the Core Strategy on the Natura 2000 network. An initial screening exercise was undertaken by the Council in 2008. This concluded that only adverse effects on Hastings Cliffs SAC and Pevensey Levels Ramsar site could not be screened out as unlikely to result from the Core Strategy development. The purpose of this report is therefore to undertake the Appropriate Assessment of adverse effects of the Core Strategy on Hastings Cliffs SAC and Pevensey Levels Ramsar site. The European sites covered by this report are illustrated in Appendix 3.

1.2.2 Chapter 2 of this report explains the process by which the Appropriate Assessment has been carried out. Chapter 3 described the pathways of impact considered in this document. Chapters 4 and 5 are then dedicated to an exploration of adverse effects on the two European sites that could not be 'screened out' at the preceding stage – Hastings Cliffs SAC and the Pevensey Levels Ramsar site. Each chapter begins with a consideration of the interest features and ecological condition of the site and environmental process essential to maintain site integrity. An assessment of the Core Strategy in respect of each European site is then carried out and avoidance and mitigation strategies proposed where necessary. Chapter 6 then documents the changes made to Core Strategy policy to incorporate an adequate policy mechanism to enable the continuing delivery of necessary measures to avoid an adverse effect.

## 2 Methodology

### 2.1 Key principles

2.1.1 This section sets out the basis of the methodology for the Appropriate Assessment. Scott Wilson has adhered to several key principles in developing the methodology – see Table 1.

Table 1 - Key principles underpinning the proposed methodology

Principle	Rationale
<b>Use existing information</b>	We will use existing information to inform the assessment. This will include information gathered as part of the Sustainability Appraisal (SA) of the emerging Core Strategy and information held by Natural England, the Environment Agency and others.
<b>Consult with Natural England</b>	We will ensure consultation with Natural England on the assessment. We will ensure that we utilise information held by them and others and take on board their comments on the assessment process and findings.
<b>Ensure a proportionate assessment</b>	We will ensure that the level of detail addressed in the assessment reflects the level of detail in the Local Development Framework (LDF) (i.e. that the assessment is proportionate). With this in mind, the assessment will focus on information and impacts considered appropriate to the local level.
<b>Keep the process simple as possible</b>	We will endeavour to keep the process as simple as possible while ensuring an objective and rigorous assessment in compliance with the Habitats Directive and emerging best practice.
<b>Ensure a clear audit trail</b>	We will ensure that the AA process and findings are clearly documented in order to ensure a clearly discernible audit trail.

### 2.2 Process

2.2.1 The Appropriate Assessment has been carried out in the absence of formal Government guidance. Communities and Local Government released a consultation paper on Appropriate Assessment of Plans in 2006<sup>1</sup>. As yet, no further formal guidance has emerged.

2.2.2 Figure 1 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

<sup>1</sup> CLG (2006) *Planning for the Protection of European Sites*, Consultation Paper

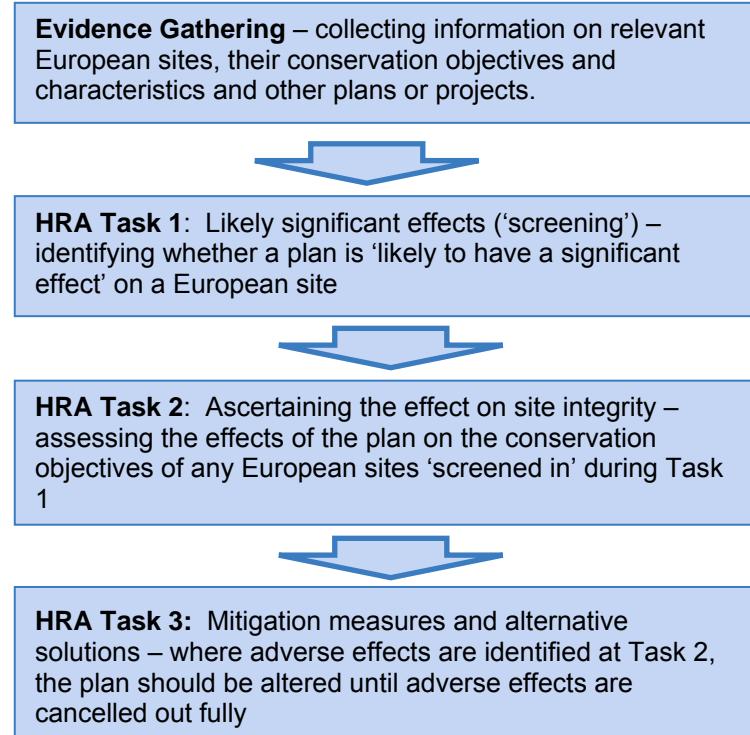


Figure 1 - Four-Stage Approach to Habitat Regulations Assessment  
Source: CLG, 2006

## 2.3 The Hastings Core Strategy

2.3.1 In summary, the Hastings Core Strategy Preferred Approaches provides for:

- 4966 dwellings in the period 2006–2026, averaging at 210 homes per year. The majority of these will be provided on existing sites within the urban area, with one major greenfield release to the north west of the town.
- Employment floor space provision is expected to provide at least:
  - 26,760m<sup>2</sup> in Hastings Town Centre
  - 13,300m<sup>2</sup> on infill sites within the urban area
  - 38,500m<sup>2</sup> on new sites towards the north of the town
- Concentration of new development at Millennium communities sites at Ore Valley and Station Plaza, as well as new development at West Marina and Bulverhythe;
- Active lobbying and support for the Hastings/Bexhill Link Road; and
- A new Countryside Park at Pebsham.

2.3.2 Work on the Strategic Housing Land Availability Assessment (SHLAA) has shown that some 4,055 dwellings are capable of coming forward over the lifetime of the Plan on sites identified in the SHLAA. This figure is a little below the housing requirement set out in the Regional Plan. As a result a modest small site (sites of 5 or less dwellings) windfall allowance of 40 dwellings per annum will be included in the Council's housing supply figures over the next 15 years. This allowance also reflects a 10% contingency figure to allow for the possibility that delivery on identified sites may be subject to delay or lower than expected dwelling numbers.

2.3.3 A brief summary of each Preferred Approach and likelihood of significant adverse effects is presented in Appendix 1. From this it is clear that the following Preferred Approaches require consideration within the Appropriate Assessment since they affect the quantum and location of development or otherwise influence the pathways of impact discussed in the following chapter (particularly recreational pressure):

- Preferred Approach 1 – Location of New Housing;
- Preferred Approach 3 – Employment;
- Preferred Approach 4 – Location of Retail Development (Comparison Goods);
- Preferred Approach 5 – Location of Retail Development (Warehousing);
- Preferred Approach 8 – Hastings Town Centre;
- Preferred Approach 9 – Central St. Leonards (Key Developments);
- Preferred Approach 15 – Ore Valley Millennium Community;
- Preferred Approach 26 – Land Supply;
- Preferred Approach 28 – Tourism; and
- Preferred Approach 34 – Residential Parking.

## 2.4 Confirming other plans and projects that may act in combination

2.4.1 It is neither practical nor necessary to assess the 'in combination' effects of the Core Strategy within the context of all other plans and projects within East Sussex and Kent. In practice therefore, in combination assessment is of most relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial allocations proposed for neighbouring authorities over the lifetime of the Plan.

2.4.2 Plans and projects were identified at the screening stage. Potential impacts of the LDF have been identified according to this knowledge in order to determine any likely significant effects that may result in combination with the Core Strategy, especially those not previously considered to pose significant risk individually.

2.4.3 The South East Plan provides a good introduction to proposals for areas surrounding Sevenoaks. At this stage, we have identified a range of plans and projects that may act in combination with the Core Strategy.

**Table 2 - Housing levels to be delivered within Kent and East Sussex under the final South East Plan**

Local Authority	Annual housing average	Total housing from 2006 to 2026
<b>Kent</b>	<b>6,971</b>	<b>139,420</b>
Ashford	1,135	22,700
Canterbury	510	10,200
Dartford	867	17,340
Dover	505	10,100
Gravesend	465	9,300
Maidstone	554	11,080
Medway	815	16,300
Sevenoaks	165	3,300
Shepway	290	5,800
Swale	540	10,800
Thanet	375	7,500
Tonbridge and Malling	450	9,000
<b>East Sussex</b>	<b>1,500</b>	<b>30,000</b>
<i>Hastings</i>	210	4,200
Eastbourne	240	4,800
Lewes	220	4,400
Rother	280	5,600
Wealden	550	11,000

2.4.4 The following additional projects and plans were also considered for inclusion:

Plan or programme	Summary of key issues	Potential effects in combination with other plans or programmes
East Sussex Sustainable Community Strategy 2008-2026	<p>The East Sussex Local Strategic Partnership brings together several organisations in the public, community delivery mechanism for the land and business sectors, with the aim of working together to use implications of the Sustainable Community Strategy, and the two documents should be prepared in close consultation. No additional effects are considered to result from this Plan in combination with the Core Strategy.</p> <p>The key priorities of the Community Strategy are to:</p> <ul style="list-style-type: none"> <li>• Provide more affordable housing to meet local need</li> <li>• Develop the local economy to provide better job, career, and training opportunities</li> <li>• Provide more leisure and recreation</li> </ul>	

Plan or programme	Summary of key issues	Potential in combination effects with other plans or programmes
	<p>opportunities for all ages</p> <ul style="list-style-type: none"> <li>• Implement major road schemes at Bexhill &amp; Hastings and Newhaven Port</li> <li>• Conserve, enhance and maintain a quality environment</li> </ul>	
South Foreland to Beachy Head Shoreline Management Plan April 2006	<p>The Shoreline Management Plans (SMP) sets out a No "in combination" effects strategy for coastal defence planning, taking account of envisaged as no coastal defence natural processes and human and other environmental works that will affect the influences. The coast is divided into four broad sections; designated section of the Hastings the coast of Hastings is included in the section Cliff End SAC cliffs are envisaged. to Beachy Head. The SMP promotes greater sustainability of the shoreline in keeping with the natural character and processes of the coast.</p>	
East Sussex Local Transport Plan (2006-2011)	<p>The Plan contains the following objectives:</p> <ul style="list-style-type: none"> <li>• improve access to services by providing greater in the Core Strategy where travel choices and influencing land use appropriate. As a result, no decisions</li> <li>• manage demand and reduce the need to travel by private car</li> <li>• improve road safety and reduce fear of crime in communities</li> <li>• reduce congestion and improve the efficiency of the transport network</li> <li>• protect, promote and enhance the environment</li> <li>• improve maintenance and management of the transport network</li> </ul> <p>The plan is supported by a number of area strategies within Local Area Transport Plans, which set out the framework for transport investment in an area.</p>	<p>Elements of this plan that relate to Hastings have been taken forward</p>
Cuckmere and Sussex Havens Catchment Flood Management Plan	<p>The Environment Agency is responsible for preparing No "in combination" effects Catchment Flood Management Plans (CFMP) for all river envisaged catchments in England and Wales. The Cuckmere and Sussex Havens CFMP identifies long-term policies and actions for the next 50 to 100 years to deliver a better, more environmentally sustainable approach for managing flood risk. It will help plan for the likely impacts of climate change, future land use change and further development in the catchment area and provides a strategic direction for guiding future flood risk management investment, efforts and resources in the Cuckmere and Sussex Havens catchment.</p> <p>The Cuckmere and Sussex Havens CFMP include the Cuckmere River; watercourses and Willingdon levels; the Pevensey levels; Wallers Haven and Combe Haven. The catchment of these areas stretch from the South Downs to the High Weald and from Alfriston to Hastings.</p>	

2.4.5 There are other plans and projects that are often relevant to the 'in combination' assessment, most notably South East Water and Thames Water's Water Resource Management Plans. These have also been taken into account in this assessment.

## 3 Pathways of Impact

- 3.1.1 The CLG guidance<sup>2</sup> on Appropriate Assessment of land use plans makes it clear that:
- 3.1.2 *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate ... An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."*
- 3.1.3 In other words, CLG guidance makes it clear that detailed surveys and modelling will normally be inappropriate for the Appropriate Assessment of a Core Strategy. As such, we have used existing data sources to inform this assessment.
- 3.1.4 The following indirect pathways of impact were concluded during the screening stage as being relevant to the Appropriate Assessment of the Core Strategy.

## 3.2 Recreational pressure

- 3.2.1 All types of terrestrial European site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths. Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species.
- 3.2.2 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:
  - Wilson & Seney (1994)<sup>3</sup> examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, It was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
  - Cole et al (1995a, b)<sup>4</sup> conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological

<sup>2</sup> CLG (2006) *Planning for the Protection of European Sites: Appropriate Assessment*, Consultation Paper

<sup>3</sup> Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

<sup>4</sup> Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c)<sup>5</sup> conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
- Cole & Spildie (1998)<sup>6</sup> experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance, but recovered rapidly. Higher trampling intensities caused more disturbance.

3.2.3 Hastings borough clearly lies within the recreational catchment of Hastings Cliffs SAC and the Hastings Cliffs is part of the Hastings Country Park. The Pevensey Levels are not generally used for recreation to the same degree as the Hastings Cliffs. As such, recreational pressure arising from Hastings on this site is not considered likely to result in an adverse effect.

### 3.3 Air quality

3.3.1 Current levels of understanding of air quality effects on semi-natural habitats are not adequate to allow a rigorous assessment of the likelihood of significant effects on the integrity of key European sites.

Table 2 - Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
Acid deposition	SO <sub>2</sub> , NO <sub>x</sub> and ammonia all contribute to acid deposition. Although future trends in sulphur emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.

<sup>5</sup> Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

<sup>6</sup> Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. Journal of Environmental Management 53: 61-71

Pollutant	Source	Effects on habitats and species
Ammonia (NH <sub>3</sub> )	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO <sub>2</sub> and NO <sub>x</sub> emissions to produce fine ammonium (NH <sub>4</sub> <sup>+</sup> )- containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue).	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH <sub>3</sub> is rapidly deposited, some of the most acute problems of NH <sub>3</sub> deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO <sub>x</sub> )	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one-half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (nitrates (NO <sub>3</sub> ), nitrogen dioxide (NO <sub>2</sub> ) and nitric acid (HNO <sub>3</sub> )) can lead to both soil and freshwater acidification. In addition, NO <sub>x</sub> can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive mainly from NO <sub>x</sub> and NH <sub>3</sub> emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O <sub>3</sub> )	A secondary pollutant generated by photochemical reactions from NO <sub>x</sub> and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O <sub>3</sub> above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide (SO <sub>2</sub> )	Main sources of SO <sub>2</sub> emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO <sub>2</sub> emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO <sub>2</sub> acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

3.3.2 The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>). NOx can have a directly toxic effect upon vegetation. In addition, greater NOx or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats. Sulphur dioxide deposition can lead to acidification of calcareous or mesotrophic habitats and thus a change in their species composition away from calcicolous plant species and towards those which are more typical of acidic habitats.

3.3.3 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO<sub>2</sub> or NH<sub>3</sub> emissions will be associated with new housing development. NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NOx (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison<sup>7</sup>. Emissions of NOx could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Core Strategy development.

3.3.4 According to the World Health Organisation, the critical NOx concentration (critical level) for the protection of vegetation is 30 µgm<sup>-3</sup> while the level for sulphur dioxide is 20 µgm<sup>-3</sup>. In addition, ecological studies have determined 'critical loads'<sup>8</sup> of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH<sub>3</sub>).

3.3.5 The National Expert Group on Transboundary Air Pollution (2001)<sup>9</sup> concluded that:

- In 1997, critical loads for acidification were exceeded in 71% of UK ecosystems. This was expected to decline to 47% by 2010.
- Reductions in SO<sub>2</sub> concentrations over the last three decades have virtually eliminated the direct impact of sulphur on vegetation.
- By 2010, deposited nitrogen was expected to be the major contributor to acidification, replacing the reductions in SO<sub>2</sub>.
- Current nitrogen deposition is probably already changing species composition in many nutrient-poor habitats, and these changes may not readily be reversed.
- The effects of nitrogen deposition are likely to remain significant beyond 2010.
- Current ozone concentrations threaten crops and forest production nationally. The effects of ozone deposition are likely to remain significant beyond 2010.

<sup>7</sup> Proportions calculated based upon data presented in Dore CJ et al (2005). *UK Emissions of Air Pollutants 1970 – 2003: UK National Atmospheric Emissions Inventory* [online] available at: <http://www.airquality.co.uk/archive/index.php> (accessed 12 August 2008).

<sup>8</sup> The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

<sup>9</sup> National Expert Group on Transboundary Air Pollution (2001). *Transboundary Air Pollution: Acidification, Eutrophication and Ground-Level Ozone in the UK* [online] [No longer available online](http://www.airquality.co.uk/archive/index.php) (accessed 13 August 2008).

- Reduced inputs of acidity and nitrogen from the atmosphere may provide the conditions in which chemical and biological recovery from previous air pollution impacts can begin, but the timescales of these processes are very long relative to the timescales of reductions in emissions.

3.3.6 Research by AEA Technology suggests that background air quality throughout the UK will improve very significantly over the next 10-15 years, primarily as a result of tightening Euro emission standards for cars and lorries and cleaner energy generation<sup>10</sup>. However, the model used does not include the higher housing figures being proposed in various RSS's, nor recent government proposals for new power stations (for instance it assumes that the number of fossil fuel burning power stations will decrease from 23 in 2005 to 12 in 2010 and 5 in 2020). A recent Defra study<sup>11</sup> also suggests that assumptions about vehicle emissions should add 15% to Euro emission standards to take account of real-world effects such as poor maintenance, low tyre pressure, poor driving, and increasing use of air conditioning. Defra's Air Quality Expert Group (2007) "recommends that local authorities, and any other users of the future-year adjustment factors, currently provided by Defra to adjust monitoring data, should exercise caution, as actual decreases in NO<sub>2</sub> concentrations at some sites may be considerably smaller than those calculated using these adjustment factors"<sup>12</sup>.

### Local air quality

3.3.7 According to the Department for Transport's Transport Analysis Guidance, "Beyond 200m [from the centreline of the road], the contribution of vehicle emissions ... to local pollution levels is not significant"<sup>13</sup> (Figure 2).

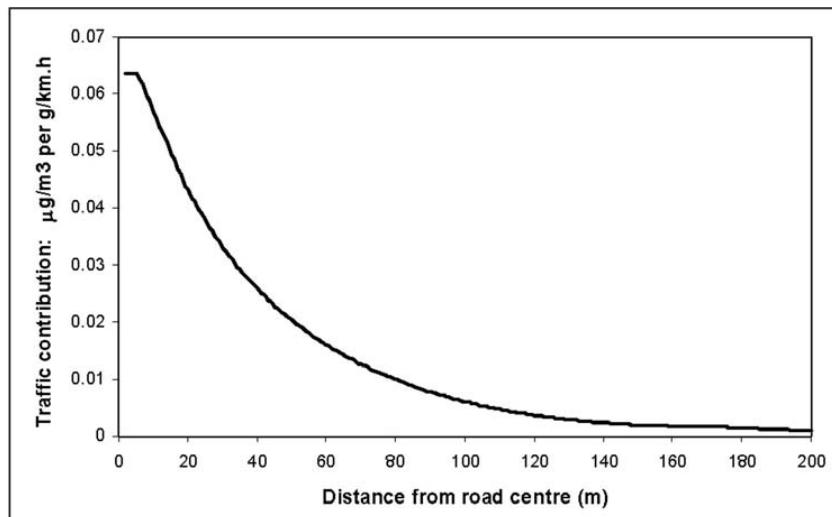
<sup>10</sup> Grice, S. et al (2006). *Baseline projections of air quality in the UK for the 2006 review of the Air Quality Strategy*, report to Defra et al [online] available at: [http://www.airquality.co.uk/archive/reports/cat16/0604041040\\_baselineprojectionsreport5.pdf](http://www.airquality.co.uk/archive/reports/cat16/0604041040_baselineprojectionsreport5.pdf) (accessed 14 May 2008); and Grice, S. et al. (2007). *Updated projections of air quality in the UK for base case and additional measures for the Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007*, report to Defra et al [online] available at: [http://www.airquality.co.uk/archive/reports/cat17/0707171116\\_newbaselineandadditionalmeasuresreport\\_v6.pdf](http://www.airquality.co.uk/archive/reports/cat17/0707171116_newbaselineandadditionalmeasuresreport_v6.pdf) (accessed 14 May 2008).

<sup>11</sup> Defra (2007). *Passenger transport emissions factors: Methodology paper* [online] available at: No longer available online. (accessed 14 May 2008).

<sup>12</sup> Air Quality Expert Group (2007). *Trends in primary nitrogen dioxide in the UK* [online] available at: <http://www.defra.gov.uk/environment/airquality/publications/primaryno2-trends/pdf/executive-summary.pdf> (accessed 7 July 2008)

<sup>13</sup> Department for Transport (2003). *Transport Analysis Guidance (TAG) - The Local Air Quality Sub-objective*, TAG Unit 3.3.3 [online] No longer available online. (accessed 13 August 2008)

**Figure 2 - Traffic contribution to pollution at different distances from the road centre<sup>14</sup>**



3.3.8 This is therefore the distance that has been used throughout this Appropriate Assessment in order to determine whether European sites are likely to be significantly affected by development under the Core Strategy.

### Diffuse air quality

3.3.9 In addition to the contribution to local air quality issues, development can also contribute cumulatively to an overall change in background air quality across an entire region (although individual developments and plans are – with the exception of large point sources such as power stations – likely to make very small individual contributions). In July 2006, when this issue was raised by Runnymede District Council in the South East, Natural England advised that their Local Development Framework ‘can only be concerned with locally emitted and short range locally acting pollutants’<sup>15</sup> as this is the only scale which falls within a local authority remit. It is understood that this guidance was not intended to set a precedent, but it inevitably does so since (as far as we are aware) it is the only formal guidance that has been issued to a Local Authority from any Natural England office on this issue.

3.3.10 In the light of this and our own knowledge and experience, it is considered reasonable to conclude that it must be the responsibility of Regional Spatial Strategies and other higher-tier plans to set a policy framework for addressing the cumulative diffuse pan-authority air quality impacts, partly because such impacts stem from the overall quantum of development within a region (over which individual districts have little control), and since this issue can only practically be addressed at the highest pan-authority level. Diffuse air quality issues will not therefore be considered further within this Appropriate Assessment.

<sup>14</sup> Department for Transport (2007). *Design Manual for Roads and Bridges: Volume 11 – Environmental Assessment*, Section 2, Part 1 Air Quality [online] available at: <http://www.standardsforhighways.co.uk/dmrb/vol11/section3/ha20707.pdf> (accessed 13 August 2008)

<sup>15</sup> English Nature (16 May 2006) letter to Runnymede Borough Council, ‘Conservation (Natural Habitats &c.) Regulations 1994, Runnymede Borough Council Local Development Framework’.

## 3.4 Water quality

3.4.1 Waste water within the district is dealt with by Southern Water. According to the Core Strategy Preferred Approaches, treatment works have been deemed adequate for current and future needs.

3.4.2 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process, as being a major factor in causing unfavourable condition of European sites.

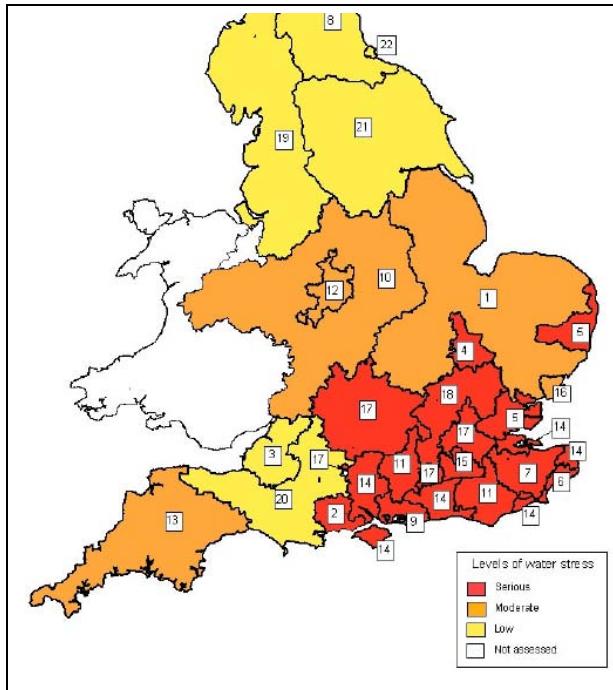
3.4.3 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.
- Increased discharge of treated sewage effluent can result both in greater scour (as a result of greater flow volumes) and in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds.

3.4.4 For sewage treatment works close to capacity, further development may increase the risk of effluent escape into aquatic environments. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

## 3.5 Water resources

3.5.1 The South East is generally an area of high water stress (see Figure 3).



3.5.2 Increased abstraction from watercourses that feed into European sites could result in a reduction in flows sufficient to cause the water supply to drop to damaging levels.

3.5.3 Hastings lies within Southern Water's Sussex Hastings Water Resource Zone (WRZ) and obtains its public water supply from Darwell and Powdermill Reservoirs, with pumped inflows from the Eastern Rother to Darwell and from the River Brede to Powdermill respectively. There is also a transfer pipeline linking this WRZ with the Kent Medway WRZ.

<sup>16</sup> Figure adapted from Environment Agency. 2007. Identifying Areas of Water Stress. <http://publications.environment-agency.gov.uk/pdf/GEHO0107BLUT-e-e.pdf>

## 4 Hastings Cliffs SAC

### 4.1 Introduction

4.1.1 Hastings Cliffs are one of the finest examples of vegetated soft rock cliffs in the UK. It is relatively unaffected by coastal protection and is dependent upon physical processes. The soft rock maritime cliff is composed of a mixture of sand and clays. A combination of toe, precipitation and groundwater erosion has created a diversity of cliff-face habitats. These include landslip debris and shale, exposed rock, detached cliff-top blocks of scrub and grassland, cliff-face and undercliff pioneer communities, trickles, seepages and secondary woodland on large stable areas of undercliff. The SAC is further characterised by three steeply incised ancient wooded glens. The streams of the three glens cut steep sided valleys which are covered in parts by mature woodland dominated by pedunculate oak *Quercus robur*, with beech *Fagus sylvatica*, ash *Fraxinus excelsior* and hazel *Corylus avellana*, and occasional specimens of yew *Taxus baccata*, holly *Ilex aquifolium* and field maple *Acer campestre*. The ground flora varies from communities dominated by bracken *Pteridium aquilinum* on the sands to those dominated by dogs mercury *Mercurialis perennis* and pendulous sedge *Carex pendula* on the clays where the local violet helleborine *Epipactis purpurata* is found.

4.1.2 Alder *Alnus glutinosa* is common along the streams and on wet flushes along with tussock sedge *Carex paniculata*, opposite-leaved golden saxifrage *Chrysosplenium oppositifolium* and ramsons *Allium ursinum*. These wooded streams are sheltered from frosts and support Atlantic bryophytes such as the moss *Fissidens rivularis*, and the liverwort *Dumontiera hirsuta* at its only locality east of Devon, and a number of lichens which are associated with ancient woodland such as *Dimerella lutea*. The woodlands support a range of uncommon and rare beetles, while the Fairlight Glen stream has yielded the only modern records of the rare beetle *Hydraena pygmaea* in south east England.

4.1.3 Near the coast the trees become progressively more affected by salt spray from the sea and at Covehurst Wood there are extremely stunted trees growing on acidic sandstone boulders. Here there is an important bryophyte flora including the liverwort *Lophocolea fragans* at its only locality in south east England.

4.1.4 The woodlands grade into a coastal scrub along the cliff edges, consisting of windpruned thickets of privet *Ligustrum vulgare* and blackthorn *Prunus spinosa*. Within the scrubby areas there are patches of grassland dominated by yellow oat-grass *Trisetum flavescens* and red fescue *Festuca rubra*, common centaury *Centaurium erythraea* and scarlet pimpernel *Anagallis arvensis*. Thrift *Armeria maritima* is common along the cliff edge with the scarce loose silky-bent *Aspera spica-venti*.

4.1.5 Cliff top acid grassland and lowland coastal heathland are two of the UK priority habitats that are of special importance in the SAC. Lowland acid grassland occurs on the nutrient-poor free draining soils overlaying acid rocks or superficial deposits such as sands and gravels. Lowland heathland is characterised by the dominance of dwarf scrub species communities which includes heather, *Calluna vulgaris*, bell heather, *Erica cinerea*, dwarf gorse, *Ulex minor*, and in wetter areas, cross leaved heath, *Erica tetralix*. These two habitats occur together within a mosaic of bracken and scrub, mainly at Warren Glen and the Firehills areas of the SAC.

4.1.6 A few dozen pairs of fulmar, *Fulmarus glacialis*, and herring gull, *Larus argentatus*, nest on cliff ledges as well as smaller numbers of lesser black-backed gull, *Larus fuscus*. Peregrines, *Falco peregrinus*, and kestrels, *Falco tinnuculus*, breed as well as up to three pairs of black redstart, *Pheonicurus ochrurus*. Cormorants, *Phalacrocorax carbo*, are breeding on the cliffs and ravens, *Corvus corax*, frequent the cliffs.

## 4.2 Features of European Interest

4.2.1 The site is designated as an SAC for its:

- Vegetated sea cliffs - Hastings Cliffs are an area of actively eroding soft cliff on the south coast of England. They include the most southerly exposures of the lower Hastings Beds. The site contains three valleys cut into the strata, which support woodland and scrub habitats with an unusual 'Atlantic' bryophyte flora. Closer to the sea the maritime influence stunts the trees, but other bryophytes become important here, with one species, *Lophocolea fragrans*, at its only south-east England locality. Maritime scrub and coastal heathland are found closer to the cliff edge, with grassland supporting maritime species such as thrift *Armeria maritima*. The clay cliff slopes are eroding and support a range of habitats from bare ground and flushes to maritime grassland and scrub, reflecting the successional development of vegetation following cliff-falls.

## 4.3 Condition Assessment

4.3.1 During the 2007 Condition Assessment Process the SAC was found to be in favourable condition.

## 4.4 Key Environmental Conditions

- Balanced grazing regime;
- Minimal trampling;
- Good air quality;
- No direct fertilisation;
- Well-drained soils.

## 4.5 Recreational pressure

### Background

4.5.1 The Hastings Cliffs SAC is part of Hastings Country Park Nature Reserve. The Country Park, SAC, SSSI and an additional area of farmland were consolidated under the designation of the Local Nature Reserve in 2006. The Reserve is heavily used for recreational activity (receiving an estimated 500,000 visits per year<sup>17</sup>, of which a large proportion derive from tourists) and

<sup>17</sup> [http://www.lnr.naturalengland.org.uk/Special/lnr/lnr\\_details.asp?C=0&N=&ID=1189](http://www.lnr.naturalengland.org.uk/Special/lnr/lnr_details.asp?C=0&N=&ID=1189)

contains many footpaths and trails. The Reserve is by far the largest area of accessible natural greenspace in Hastings. The JNCC citation for the SAC does note that “*The SAC includes part of a country park where there are pressures to manage visitors.*” However, that comment was made several years ago and since that time a carefully managed network of footpaths, trails and viewing areas has been developed. These are actively managed by Hastings Council Ranger service and an active group of volunteers.

4.5.2 It can be seen from Appendix 1 that there are 4 main access points to the Country Park. These are off Rock-a-Nore road at the western-most end of the site, Barley Lane (near Shearburn Holiday Park), the lodge off Fairlight Road and the junction between Fairlight Road and Coast Guard Lane. There are also 18 minor entry points. Only the two minor entry points in the Firehills area lead directly into the SAC.

4.5.3 The cliff face vegetation itself is not vulnerable to recreational trampling and indeed erosion is an essential feature to expose new areas of substrate for colonisation. However, the SAC includes a range of additional habitats other than the cliffs themselves and these are sensitive. While the vegetation is sensitive to excessive trampling, the footpaths within the SAC already direct recreational activity in such a way as to minimise damage to these features. Much of the footpath network within the Country Park is actually outside the SAC. The SAC forms the most inaccessible parts of the site thereby naturally protecting the special features of the SAC. The main features within the SAC that are used for recreation are Ecclesbourne Glen, Fairlight Glen, Warren Glen and Firehills.

4.5.4 Each of these areas is crossed by numerous clear and well-signed footpaths. There are strategically placed directional bollards to keep people informed of the footpaths as well as large and instructive map boards around the site showing the entire footpath network of the Reserve. Moreover, three of these areas are woodland which is generally less vulnerable to trampling erosion. Also, due to the restricted access points for the site, illegal use by 4-wheel drive vehicles and motorbikes is not currently a problem. Most access to the SAC is on foot, since there is only 1 cycle route in Hastings (along the Seafront), and there is no cycling allowed anywhere in the Country Park (including the SAC). There is however, an aspiration to bring the National Cycle Network along the northern part of the Reserve, away from the SAC to link cycling from Hastings to Fairlight.

### Adverse effects of the Core Strategy

4.5.5 According to the Core Strategy 4,200 dwellings will be delivered in Hastings. The closest concentration of new housing will be the 350 homes at the Ore Valley Millennium Community, which are situated approximately 900m north of the SAC. Assuming a population multiplier of 2.3 people per household this will result in a population increase of approximately 9,660 people, equivalent to an 11% increase in the population of Hastings (according to census data the population of the Hastings is approximately 86,000)<sup>18</sup>.

4.5.6 Core Strategy Preferred Approaches that will contribute indirectly to increased recreational pressure within the Community Park (and therefore the SAC) are:

<sup>18</sup> In reality this may be an over-estimate. The Core Strategy comments that by 2026 the population is predicted to fall to 84,500 (a 1.85% decrease from 2001); however, this is based on a standard model that doesn't take full account of the potential impact of regeneration initiatives on population growth. It is anticipated that regeneration initiatives will result in a modest increase in the Town's population.

- Preferred Approach 1 – Location of New Housing;
- Preferred Approach 8 – Hastings Town Centre;
- Preferred Approach 9 – Central St. Leonards (Key Developments);
- Preferred Approach 15 – Ore Valley Millennium Community;
- Preferred Approach 26 – Land Supply;
- Preferred Approach 28 – Tourism; and
- Preferred Approach 34 – Residential Parking.

4.5.7 The increase in the local population must also be considered 'in combination' with housing that will be developed in south Sussex and south Kent (particularly the 30,000 + dwellings to be delivered in Shepway, Rother, Wealden and Eastbourne) and which may also result in increased visits to the Country Park. To an extent this will also be increased by Preferred Approach 28 (Tourism) as an increase in tourists may involve increased visits to the Country Park.

### **Positive measures already implemented or within the Core Strategy**

#### **Provision of alternative natural greenspace**

4.5.8 There are several aspects of the Core Strategy or associated planning policy that seek to increase the area of recreationally available greenspace in Hastings. Additional greenspace, if provided in appropriate locations (i.e. close to the developments it is intended to serve), in a timely manner (i.e. before the developments it is intended to serve are occupied), sufficiently well promoted and delivered to an appropriately high standard, will assist in reducing recreational pressure on the SAC elements of Hastings Country Park by providing alternative resources closer to home.

- Considerable investment is earmarked to improve the accessibility, use and management of the designated Sites of Nature Conservation Importance around the Ore Valley Millennium Community development (Preferred Approach 15). A new park to serve the local community will be located within the existing Broomgrove Site of Nature Conservation Importance (SNCI). This new park will preserve and positively enhance the area with 'green improvements', such as protecting the wildlife, developing water areas and planting and 'amenity improvements', such as cycle routes, footpaths, play areas. The space has been developed to specifically to serve the residents of the Ore Valley development, which is the largest single development in the Core Strategy. Indeed, according to Hastings Council, the residents have stated that they want the space in the Ore Valley, rather than having to travel out to the Community Park/SAC. Current greenspace in the Ore Valley is not managed but the new proposals will provide for a managed, quality greens space for the local residents.
- The Council has a planning policy framework to declare and safeguard Local Nature Reserves. There are now 7 LNRs across the town that are supported by community management groups. The aim is to provide a network of designated LNRs, as well as other nature sites, across the town, managed by local communities and promote their use and access by all residents.

- Pebsham Countryside Park will be delivered between 2008 and 2013 (Preferred Approach 14). Hastings Borough Council, Rother District Council and East Sussex County Council have formed a partnership to create a new countryside park at Pebsham, between St Leonards and Bexhill. This will take in the Pebsham landfill site, the fields at Glyne Gap, the Combe Haven Valley SSSI and the coast at Glyne Gap. It will be gradually developed over the next 20 years and will provide an important accessible greenspace between the two towns.

### **Access management**

4.5.9 Access management is an essential counterpart to the provision of alternative greenspace, particularly for a site such as Hastings Country Park, which due to its cliff top location has a certain intrinsic appeal to visitors.

4.5.10 Sensitive habitats such as the main coastal heathland have now been fenced and are actively managed through grazing and mechanical habitat restoration techniques; public access to those areas are now limited or prevented. These investments are aimed at clarifying the footpath network for visitors and to keep people away from the sensitive areas. Further, by taking back the management of 130 hectares of tenanted farmland elsewhere within the Reserve, the Council has been able to increase the access to areas of the Reserve away from the SAC.

4.5.11 The Council employs a Nature Reserve Officer to work with local communities throughout the borough, especially focused on the suite of LNRs (including the Community Park) to encourage access to sites on peoples own doorstep without encouraging further access to the SAC. The Wildhastings web site aims to raise awareness and understanding of the need to safeguard the unique environment of the entire Borough, again deflecting too much visitor pressure to the SAC.

4.5.12 There is a statutorily consented Management Plan 2005-10 for entire Nature Reserve. This Plan has been reviewed and the 2010-2015 Plan is ready for consultation.

4.5.13 Annual monitoring surveys are already undertaken to inform management and record enhanced biodiversity of site, including breeding and migrant birds, reptiles, dormice, invertebrates, vascular plants. In addition, a footpath condition survey of the entire footpath network of the Reserve was undertaken in 2001 and this identified priorities for footpath restoration. As such, there is already a system in place that would identify any impact of footpath deterioration or excessive erosion in its early stages if this did occur as a result of increased recreational visits to the SAC. Moreover, the following access management measures are already in place:

- National NCN2 cycle routes (subject to funds) will be constructed across the East Hill and then from Barley Lane across to Fairlight – this will provide a surface route for cyclists and pedestrians, keeping them away from the SAC.
- Major investment of over one million pounds in site to reclaim public ownership of farm, restore fencing and farm buildings, implement habitat management, undertake biodiversity surveys, install new information boards (clearly identifying existing footpaths)
- Rangers monitor the condition of the footpaths/fences and entire infrastructure

- Major footpath restoration planned for March 2010 at main coastal footpath at Ecclesbourne Glen utilising government funding
- New way marker bollards and map boards installed throughout site to denote footpath network on the ground.
- The site has been awarded a green flag for excellence in management annually since 2006.

## Conclusion

4.5.14 At the time of writing there are no indications that the Country Park is at or close to visitor capacity or that any future increase in visitors cannot be managed. Recreational activity in the Reserve (and SAC) is well-managed and there is an ongoing programme to provide alternative areas of accessible natural greenspace declared as Local Nature Reserves. Moreover, there is sufficient scope to control recreational access to the SAC without preventing people from accessing and enjoying the remainder of the Reserve to enable management of any increase in recreational visitors and a detailed framework and mechanism already exists to ensure that any necessary access management can be delivered.

4.5.15 It is therefore possible to conclude that an adequate framework is in place to enable the delivery of any measures that may be necessary to counter any increase in visitors provided this is correctly reflected in Core Strategy policy. This is evaluated in Chapter 6.

## 4.6 Air quality

4.6.1 While small amounts of the SAC (totalling approximately 6ha or 3% of the total site<sup>19</sup>) lie within 200m of Barley Lane and Rocklands Lane, neither is a major road and vehicle flows are therefore not likely to substantially increase following the implementation of Core Strategy development. As such, it is considered that adverse local air quality effects are unlikely. This is particularly the case when considered within the context of Preferred Approach 32 which seeks to maximise sustainable transport in the Borough.

4.6.2 This Preferred Approach states that the Council will “*Support the draft Hastings and Bexhill Local Area Transport Strategy (LATS) produced by the County Council in October 2006. In particular, support the 5 strategic objectives of maximising accessibility, improving air quality and environment, safety, tackling congestion and promoting regeneration*”. Preferred Approach 35 states that “*Major developments will be required to produce a travel plan, in line with forthcoming guidance from East Sussex County Council, and will be expected to contribute to improved transport infrastructure, particularly for pedestrians, cyclists and public transport. There will be a presumption against development generating significant amounts of traffic on sites, which are not well related to a range of transport modes unless, through improvements to public transport or travel plans, this can be mitigated*”.

4.6.3 A reduction in traffic driving around the Country Park will also be achieved by improving parking in Hastings town centre. Cliff railway serves as a gateway to the Country Park. The current aim

<sup>19</sup> According to the JNCC citation, the total SAC area is 183.72 ha

is to promote access to the Country Park from the foot of the railway, encouraging people to visit by using the steps or the railway rather than by car.

## 4.7 Urbanisation

4.7.1 Urbanisation effects (increased incidence of fires, fly-tipping, littering etc.) are not regarded as an issue for this site due to careful management and wardening of the site. Since the site is already in an essentially urban environment and the new development will only increase the population by 11%, it is considered that urbanisation effects are unlikely to significantly increase.

## 5 Pevensey Levels Ramsar site

### 5.1 Introduction

5.1.1 Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The low-lying grazing meadows are intersected by a complex system of ditches, which support a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates. The site also supports a notable assemblage of breeding and wintering wildfowl. A small area of shingle and inter-tidal muds and sands is included within the site.

5.1.2 Scott Wilson was appointed in late 2008 to undertake a specific Habitat Regulations Assessment exercise relating to air quality impacts on the Pevensey Levels as a result of increased road traffic on the A259 by Hastings, Rother, Wealden and Eastbourne Councils. This was reported in a stand alone report<sup>20</sup> which was itself consulted on with Natural England in June 2009. That report has been drawn upon to produce the air quality section of this chapter.

### 5.2 Features of European interest

5.2.1 The Pevensey Levels are designated as a Ramsar site because they support an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species. Moreover, the site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles and supports an outstanding assemblage of dragonflies. One of Britain's largest and rarest spiders, the fen raft spider *Dolomedes plantarius* has its stronghold at Pevensey. The site also supports a notable assemblage of breeding and wintering wildfowl including wintering lapwing and snipe and breeding sedge warblers and reed warblers which nest in the scrub and reeds in the ditches respectively.

### 5.3 Condition assessment

5.3.1 The most recent Natural England condition assessment indicates that the Pevensey Levels Ramsar site is 98% favourable or unfavourable recovering. Those elements that are unfavourable are in this condition as a result of treated wastewater raising nutrient levels in the site.

### 5.4 Key environmental conditions

5.4.1 The key environmental conditions of importance in sustaining the site integrity are:

- Unpolluted water

<sup>20</sup> See separate Scott Wilson report 'Appropriate Assessment and Air Quality Local to the Pevensey Levels Ramsar site' produced in June 2009 for Rother, Hastings, Wealden and Eastbourne Councils

- Low levels of nutrient enrichment (primarily from surface runoff and hydrological pathways, but also from atmospheric deposition)
- Control of non-native species (e.g. pennywort and Crassula sp.)
- Maintenance of appropriate hydrological regime
- Control of recreational disturbance

## 5.5 Air quality

### Background air quality for the Ramsar site

5.5.1 Using a grid reference of TQ660060, the situation in 2000 according to [www.apis.ac.uk](http://www.apis.ac.uk) (to a resolution of 5km)<sup>21</sup> is depicted in the table below. In order to take account of the fact that the data are historic, Department for Transport Interim Advice Note 61/05 states that “*the total average deposition rates obtained from the Air Pollution Information System for 2000 should be reduced by 2% per year to estimate [background] deposition rates for the assessment years [without the project or plan]*”<sup>22</sup>. If one works on the conservative assumption that improvements will level off after 2010 (the last year for which the 2% reduction has been modelled), this means that the baseline at the time the Core Strategy allocations are complete and operational (i.e. the time when the effects of the four Core Strategies will be strongest) will be 20% lower than the 2000 data.

Year	Habitat	Minimum critical load for Nitrogen deposition	Modelled nitrogen deposition	Critical level of NOx (as NO <sub>2</sub> ) <sup>23</sup>	Modelled NOx concentration (as NO <sub>2</sub> )
2000	Grazing marsh <sup>24</sup>	20 kgNha <sup>-1</sup> yr <sup>-1</sup>	15.5 kgNha <sup>-1</sup> yr <sup>-1</sup> 30 µgm <sup>-3</sup>	15.6 µgm <sup>-3</sup>	
2026 (assuming the 2% p.a. Grazing improvements described in IAN Marsh 61/05 level off after 2010)		20 kgNha <sup>-1</sup> yr <sup>-1</sup>	12.4 kgNha <sup>-1</sup> yr <sup>-1</sup> 30 µgm <sup>-3</sup>	12.48 µgm <sup>-3</sup>	

5.5.2 It can be seen that both background levels of nitrogen deposition and NOx concentrations are well below the critical load and critical level respectively. In 2000, a 92% (14.4 µgm<sup>-3</sup>) increase

<sup>21</sup> APIS data accurate as of 15/03/09

<sup>22</sup> Based on the results of trans-boundary deposition modelling for 1997 and 2010, deposition of reduced and oxidised nitrogen is expected to decrease on average across Britain by 1.5% and 2.6% per annum respectively due to increasingly stringent emission limits. As the deposition of oxidised nitrogen is expected to decrease faster than that of reduced nitrogen, the proportion of the total nitrogen deposited from reduced nitrogen will increase in the future. It is expected to have reached 60% by 2010. If reduced and oxidised nitrogen are assumed to contribute to total deposition in equal proportions, then the annual decrease in nitrogen deposition can be assumed to be 2% (estimated in a non cumulative manner, i.e. decrease over 5 years is 5 x 2% = 10%). The deposition changes will not be linear across the country but 2% should be indicative of the typical change

<sup>23</sup> NOx is referenced on APIS as if it was all in the form of NO<sub>2</sub>. This is partly because the concentrations of NO<sub>2</sub> and NO in air are inextricably linked through their atmospheric chemistry and partly because little is known of the direct effects of NO alone. In rural air, away from sources of NO, most of the nitrogen oxides in the atmosphere are in the form of NO<sub>2</sub> in any case

<sup>24</sup> Grazing marsh has been selected since it is the habitat for which critical loads have been calculated that most closely corresponds to habitats within the Ramsar site. Note that critical loads have not yet been determined for open water habitats such as ditches and as such are not available on APIS

in NOx and 29% ( $4.5 \text{ kgNha}^{-1}\text{yr}^{-1}$ ) increase in nitrogen deposition would be needed in order to exceed the critical level/load. By 2026, a 140% increase in NOx and 61% increase in nitrogen deposition would be necessary.

### **Estimate of increase in vehicle flows along the A259**

5.5.3 Preferred Approaches that would indirectly contribute to an increase in vehicles flows on the A259 are:

- Preferred Approach 1 – Location of New Housing;
- Preferred Approach 3 – Employment;
- Preferred Approach 4 – Location of Retail Development (Comparison Goods);
- Preferred Approach 5 – Location of Retail Development (Warehousing);
- Preferred Approach 8 – Hastings Town Centre;
- Preferred Approach 9 – Central St. Leonards (Key Developments);
- Preferred Approach 15 – Ore Valley Millennium Community;
- Preferred Approach 26 – Land Supply;
- Preferred Approach 28 – Tourism; and
- Preferred Approach 34 – Residential Parking.

5.5.4 According to data collated by National Statistics<sup>25</sup>, 27% of households in Britain have no car, 44% of households have one car and 29% of households have two or more cars. If one applies these statistics to the current numbers of households in the four districts<sup>26</sup>, this equates to 136,626 cars currently within the districts. If one applies the same statistics to the new housing figures for the four districts<sup>27</sup>, there can be expected to be roughly 18,381 additional cars during the plan period, i.e. a 13.5% increase.

5.5.5 In order to enable us to be more precise in our assessment we have been able to obtain traffic modeling from East Sussex County Council for the increased volume of traffic predicted on the A259 between the junction with the A27 and the junction with the B2095 by 2025 (i.e. one year away from the end of the current plan period when vehicle levels will be at their highest)<sup>28</sup>. This corresponds with the stretch of the A259 that traverses the Pevensey Levels Ramsar site. The results of this traffic modeling are shown below.

<sup>25</sup> Office for National Statistics. Census 2001, General Register Office for Scotland. These data do include company cars or vans if used for private journeys

<sup>26</sup> Total housing stock across the four districts is as follows: 41,999 dwellings in Rother, 40,918 dwellings in Eastbourne, 63,439 dwellings in Wealden and 40,803 dwellings in Hastings = 187,159 in total

<sup>27</sup> 25,180 dwellings to 2026

<sup>28</sup> Note that the traffic predictions have not been adjusted to allow for the additional 3,000 homes to be delivered in Wealden district under the adopted South East Plan (May 2009) compared with the draft RSS (2006). The implications of this are discussed later.

Predicted flows for the A259 across the Pevensey Levels from Low/High intensity Smarter Choices measures scenarios (vehicles per hour)

	Low Intensity			High Intensity		
	Morning peak (0700hrs-1000hrs)	Inter-peak period	Evening peak (1600hrs-1900hrs)	Morning peak (0700hrs-1000hrs)	Inter-peak period	Evening peak (1600hrs-1900hrs)
A259/A27 through to A259/B2095	2570	1997	2823	2552	1984	2805

**Note:** Comparison of flows from traffic model with on-street data shows predicted flows likely to be approx 11% low

5.5.6 Assuming one uses the worst case scenario predictions (the Low Intensity figures) and allows for the likely 11% inaccuracy these data indicate that an average of 31,259 vehicles per day is predicted for 2025, which compares with a current baseline of approximately 21,000 vehicles per day<sup>29</sup> i.e. a 49% increase. It is reasonable to assume that a large proportion of this increase will be due to journeys arising from the new housing to be delivered across the four districts, with Eastbourne, Hastings, South western Rother (Bexhill) and southern Wealden (Hailsham) making the greatest contribution due to their greater proximity to this section of the A259. The increased traffic flow also includes increases in heavy vehicle movements over the same period, such as can be expected from the expansion in waste and minerals facilities under the East Sussex Minerals & Waste Development Framework.

## NOx concentrations

5.5.7 If one draws a rough equivalence between the estimated percentage increase in traffic flow and the percentage increase in NOx emissions<sup>30</sup>, this means that NOx emissions from traffic on the A259 could also be expected to increase by 49%. If one makes the generous assumption that all NOx emitted will be deposited within the Ramsar site this will raise the modelled background NOx concentrations for 2026 to approximately 18.6  $\mu\text{g m}^{-3}$ . This is likely to be an overestimate, since in reality a large proportion of the emitted NOx will be carried further afield and this does not take account of the improvements in vehicle exhaust emissions that can be expected after 2010. However, even this generous estimate would still leave the site with a NOx concentration 61% below the levels at which damage can be expected to result to the habitats and vegetation of value to the interest features of this site.

5.5.8 The fact that the additional 3,000 homes to be delivered in Wealden under the adopted South East Plan (a 13% increase on the numbers across the four authorities in the draft South East Plan) were not incorporated into the traffic model means that traffic flows on the A259 by 2025 may have been underestimated. However, there is a sufficiently large margin for error between

<sup>29</sup> traffic measurements for this stretch of road identified flows as 21,000 vehicles per day (which by DfT air quality management classification puts it below the threshold for a 'busy' road). Source: A27/ A259/ A26 Emsworth to Hastings Route Management Strategy - Final Report

<sup>30</sup> Department for Transport Interim Advice Note 61/05 states that "*The change in emissions from traffic can be determined by the change in traffic flow, speed and proportion of heavy duty vehicles (HDV)*". Therefore, if one assumes that the speed and proportion of HDV's remain broadly the same, a 10% change in flow is likely to result in a 10% change in emissions.

the predicted NOx concentration and the critical level that the overall conclusion of no adverse effect is likely to remain despite any underestimate.

### Nitrogen deposition

5.5.9 IAN61/05 contains the following conversion factor<sup>31</sup> for calculating rates of nitrogen deposition from NOx (as NO<sub>2</sub>):

$$1\mu\text{g}/\text{m}^3 \text{ of NO}_2 = 0.1 \text{ kg N ha/yr}$$

5.5.10 An increase of 6.1  $\mu\text{gm}^{-3}$  of NOx as NO<sub>2</sub> would therefore result in an increase in nitrogen deposition of approximately  $0.61 \text{ kgNha}^{-1}\text{yr}^{-1}$  which would result in an overall deposition rate of 13.01 kg N ha/yr which is still 54% lower than the critical load for the habitats on the Pevensey Levels Ramsar site.

### Conclusion

5.5.11 Using this simple appraisal, it seems unlikely that the additional housing to be delivered across the four districts will, even when considered 'in combination' with each-other and the other contributors to a predicted increase in vehicle movements on the A259 (such as the emerging East Sussex Waste & Minerals Development Framework) result in exceedence of the critical level or critical load for the Pevensey Levels Ramsar site, particularly when one considers the increase vehicle flows within the context of current national predictions that exhaust emissions are likely to improve over the plan period. No measures to either avoid or mitigate effects will therefore be required because the predicted increase in traffic is unlikely to cause either NOx concentrations or rates of nitrogen deposition to exceed the critical level or critical load.

5.5.12 Natural England<sup>32</sup> were consulted on this air quality analysis when the work was originally completed in June 2009<sup>33</sup> and commented that they: '*would concur with the conclusion that while there is likely to be an increase in nitrogen deposition and NOx concentrations these will still be below the Critical Levels applicable to Pevensey Levels and therefore there is unlikely to be a significant effect on the Ramsar site from the proposed levels of housing from these pollutants*'.

## 5.6 Water quality

5.6.1 No sewage from development in Hastings will discharge into watercourses that feed the Pevensey Levels Ramsar site. Bexhill and Hastings STW discharges direct to sea. This can therefore be screened out as an impact of the Core Strategy.

## 5.7 Water resources

5.7.1 Hastings lies within Southern Water's Sussex Hastings Water Resource Zone (WRZ) and obtains its public water supply from Darwell and Powdermill Reservoirs, with pumped inflows

<sup>31</sup> Based on a deposition velocity for NO<sub>2</sub> of 0.001 m/s

<sup>32</sup> Nigel Jennings at Natural England to Tondra Thom at Rother Council in June 2009

<sup>33</sup> See separate Scott Wilson report 'Appropriate Assessment and Air Quality Local to the Pevensey Levels Ramsar site' produced in June 2009 for Rother, Hastings, Wealden and Eastbourne Councils

from the Eastern Rother to Darwell and from the River Brede to Powdermill respectively. There is also a transfer pipeline linking this WRZ with the Kent Medway WRZ. Neither the Eastern Rother nor the Brede provide the Pevensey Levels with water and as such abstraction from these sources will not impact on the Ramsar site. Moreover, Southern Water's Water Resource Management Plan (WRMP) does not anticipate any abstraction from watercourses that supply the Pevensey Levels in order to supply Hastings during the Core Strategy period. This can therefore be screened out as an impact of the Core Strategy.

## 6 How the Core Strategy has incorporated the protection of Hastings Cliffs SAC

### 6.1 Preferred Approaches

6.1.1 Preferred Approach 38 (Nature Conservation and the Improvement of Biodiversity) stated that the Council will:

- *'Provide the highest level of protection for nationally and internationally designated sites. The legal protection for the Hastings Cliff SAC is set out in Government Circulars 06/2005 and 01/2005. Paragraph 8 of PPS9 sets out the Government's policies for developments likely to have an adverse effect on SSSIs. The Council will apply the principles set out in these documents when considering planning applications, which affect nationally and internationally designated sites.'*
- *Avoid damage to locally important wildlife and geological sites wherever possible. The Council has identified 30 Sites Of Nature Conservation Importance and these are protected through saved policy NC6 of the Hastings Local Plan 2004. The biodiversity value of these sites and other areas of previously developed land will be reviewed in 2008 and will inform a new policy to be included in the Site Specific Allocations DPD. Ancient woodland is protected through saved policy NC10 of the Hastings Local Plan 2004.*
- *Ensure that unavoidable damage to biodiversity is minimised through mitigation, that any damage is compensated for, and that such measures are monitored. This will be achieved through saved policies NC8 and NC9 of the 2004 Local Plan. These policies will be reviewed as part of a future development control DPD.*
- *Make sure areas of wildlife importance are accessible and well promoted, identifying areas of opportunity for biodiversity importance and setting local targets to contribute to regional biodiversity targets and quality of life. In October 2006 the Council adopted The Hastings Local Biodiversity Action Plan (BAP). This identifies all of the town's national priority habitats, including a description of the habitat and its location along with national targets and objectives relating to the habitat. The BAP shows that the majority of areas of high biodiversity importance in the Borough occur in designated sites – that is the 7 Local Natures Reserves, 3 Sites Of Special Scientific Interest and the Hastings Cliffs Special Area of Conservation. The Council's BAP strategy is to enhance biodiversity by focusing on the management and protection of this green network of designated sites, which are in themselves ecologically diverse and contain priority species and habitats.*
- *Influence and apply agri-environment schemes, forestry, flood defence and other land management practices to deliver biodiversity targets. Each of the SSSIs and LNRs has an approved management plan and the Council works with partners such as the Sussex Wildlife Trust and the St Helen's Park Preservation Society to carry out practical management for the improvement of access, education and biodiversity in these areas. The Council aims to achieve National Nature Reserve status for the Hastings Country Park area by 2015, in conjunction with the biodiversity improvements being undertaken through agrienvironment grant aid.*

- *Maintain and establish accessible green networks and open green space in urban areas. Saved policy NC7 of the 2004 Local Plan identifies a green network of wildlife corridors, SSSIs, LNRs and SNCIs. This policy will be taken forward in the Site Allocations DPD'.*

## 6.2 Hastings Cliffs SAC

6.2.1 In recognition of the multi-functional role of greenspace, the Local Development Framework seeks to rationalise the numerous policies relating to the different types of open spaces into one policy, which will be identified through the forthcoming Site Allocations Development Plan Document. For the Submission Stage Core Strategy the policy 'Nature Conservation and the Improvement of Biodiversity' states (only sections relevant to Hastings Cliffs SAC are cited):

6.2.2 '*The town's biodiversity and geological resources will be protected and enhanced. Priority will be given to:*

- *Protection of the integrity of the Hastings Cliffs Special Area of Conservation, and other European sites near the town ...*
- *Minimising the potential impacts of new development on Hastings Cliffs SAC through the delivery of new greenspaces across the Borough and through appropriate recreation management of Hastings Country Park*

6.2.3 *Potential adverse effects on the Hastings Cliffs SAC arising from new development will be mitigated through the provision of a new park within the Ore Valley Millennium Community development and the improvements to the existing Broomgrove Local Wildlife Site, Pebsham Countryside Park and the green spaces network as a whole.*

6.2.4 *Recreational activity within the Hastings Country Park will continue to be managed to avoid adverse effects on the SAC as a result of any increased recreational demand. Enhanced measures will be introduced if and when necessary, to ensure continued avoidance of adverse effects. Collectively, these measures will spread the recreational load and ensure adverse effects on the SAC will be avoided'.*

6.2.5 The Council Ecologist has provided the following additional confirmation of the measures available to manage impacts on the SAC:

6.2.6 '*Hastings Country Park Local Nature Reserve is owned and managed by Hastings Borough Council and incorporates farmland and the designated SSSI and SAC. A 5-year reviewable management plan, consented by Natural England, informs all management, and much of the site is managed through Countryside Stewardship.*

6.2.7 *The SAC is designated for its vegetated cliffs to which there is no permissible pedestrian access. A footpath condition survey of the site was undertaken in 2000 to identify priorities for improvement. Major coastal footpath restoration at Ecclesbourne Glen will also take place in 2010.*

6.2.8 *Site based Rangers monitor the condition of all footpaths and annual repairs are undertaken within existing resources. The aim is to make footpaths in the Reserve more accessible to*

walkers, provide an enhanced visitor experience and keep visitors to designated paths. Efforts will continue to be made to attract external funding to facilitate major coastal footpath and infrastructure improvements.

6.2.9 *It is proposed the national cycle route, NCN2, be constructed across the Reserve from Hastings Old Town to the Visitor Centre at Fairlight. The proposal is for a surfaced route for cyclists and walkers. The route is to the north of the SAC and once complete will provide a surfaced and preferable walking experience for the majority of visitors, ensuring they remain away from the sensitive habitats of the SAC.*

6.2.10 *Collectively, these measures will spread the recreational load and ensure adverse effects on the SAC will be avoided and ensure the Reserve remains one of the best wildlife sites in Europe and an exemplar of best management practice'.*

6.2.11 There is a clear reflection in this policy of the various elements needed to avoid an adverse effect and a clear indication that these measures are either already in place (i.e. access management) or will be delivered in parallel with the delivery of development (i.e. specific reference to the individual schemes identified within the Core Strategy - the new park for the Ore Valley Millennium Community, Pebsham Countryside Park). It also clearly states the collective role they will play in spreading the recreational load and ensuring adverse effects on Hastings Cliffs SAC can be avoided. In addition, these provisions must be considered within the context of the Green Infrastructure network for the Borough; the provision of a coherent and functional green infrastructure network (even if not specifically triggered by any need to avoid impacts on certain sites) will nonetheless contribute to provide additional recreational resources in the Borough and thereby spread the recreational load. The policy framework for such a network is set out within the 'Green Spaces Network' policy and 'Open Spaces – Enhancement, Provision and Protection' policy.

## 6.3 Conclusion

6.3.1 With the Submission stage policy 'Nature Conservation and the Improvement of Biodiversity' included, it is considered that the Core Strategy will have an adequate and cohesive policy framework through which measures to avoid or mitigate adverse effects on European sites (particularly Hastings Cliffs SAC from recreational pressure) can be delivered.

## Appendix 1: Summary of potential adverse effects of each Core Strategy preferred approach

Preferred approach number	Preferred approach	Likely Significant Effects?
PREFERRED APPROACH 1: Location of New Housing	<p>To meet the draft South East Plan housing requirements of 4,200 net new dwellings between 2006 and 2026, the Council will take forward Option 3, and direct development within the built-up area, plus release of one major Greenfield site at Breadsell Lane in the northwest of the Borough (see map 1).</p> <p>The Sustainability Appraisal has indicated that the development would be more sustainable if it included an element of employment use (up to 10,000m<sup>2</sup>) and provision of community facilities such as neighbourhood shops and good public transport provision.</p> <p>There is also potential for on-site renewable energy provision and homes to be designed to environmental standards which are higher than the general standards set in Preferred Approach 44: Sustainability and Design.</p> <p>Access to the site would be through land in Rother District and this will be reflected in the Rother LDF. ESCC as the Local Education Authority has indicated that there may well be the need for a new primary school in the north west of the town after 2021, should this development take place. However, the need for a new school will depend on whether schools in adjoining areas can provide or be expanded to provide accommodation. This in turn, is dependent upon the rate of house building in this and other parts of the town. This position will be carefully monitored and will be kept under review by the Borough Council and the County Council over the plan period. The detailed planning of this area will be guided by a Supplementary Planning Document to be prepared alongside the Site Allocations DPD.</p>	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new housing. This is therefore considered further in the Appropriate Assessment.
PREFERRED APPROACH 2: The Re-Use of Previously Developed Land	To achieve at least 60% of residential development each year on previously developed land.	Significant effects are unlikely since it will be immaterial whether development is on previously developed land or not
PREFERRED APPROACH 3: Employment Locations	In line with the town's identification as a priority focus for economic regeneration and its role as a regional hub, the Council consider that employment-related development should be concentrated within Hastings Town Centre, within the town's established industrial estates, on land already identified for employment related development and as part of mixed employment/housing development on suitable strategic sites.	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new employment development. Traffic associated with this Preferred Approach could

Preferred approach number	Preferred approach	Likely Significant Effects?
		lead to air quality impacts. These are considered in the Appropriate Assessment.
PREFERRED APPROACH 4: Location of Retail Development – Comparison Goods	To locate the majority of required 30,000 m <sup>2</sup> of additional comparison goods floorspace in Hastings Town Centre, with an element of new provision located in St Leonards District Centre. Site identification for Hastings town centre would be undertaken as part of the Site Allocations DPD. The development would be undertaken by the private sector, and the Council would use its compulsory purchase powers to assist in land assembly where necessary. The development would be phased to occur in the 2016 – 2026 period. If for any reason the retail needs to 2026 cannot be accommodated in the town centre, then the Council will pursue a sequential approach to site selection, looking first for potential sites on the edge of the town centre, and then at out-of-centre sites	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new retail development. Traffic associated with this Preferred Approach could lead to air quality impacts. These are considered in the Appropriate Assessment.
PREFERRED APPROACH 5: Location of Retail Development – Retail Warehousing	To locate 9000m <sup>2</sup> of retail warehousing on edge-of-centre sites or out-of-centre sites, which are well served by a choice of means of transport between 2011 and 2026. Suitable sites will be identified through the Sites Allocation Development Plan Document.	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new retail development. Traffic associated with this Preferred Approach could lead to air quality impacts. These are considered in the Appropriate Assessment.
PREFERRED APPROACH 6: Town, District and Local Centres	<p>The following hierarchy of town, district and local centres as identified in the 2006 Retail Capacity Study will be used in the LDF</p> <p>Town Centre: Hastings The principal centre in the Borough</p> <p>District Centre: St Leonards centre; Ore Village</p> <p>Groups of shops often containing at least a supermarket and a range of non-retail services such as banks, building societies, restaurants, as well as public facilities such as a library</p>	Significant effects are unlikely since this Preferred Approach only considers details of types of retail development and their hierarchy

Preferred approach number	Preferred approach	Likely Significant Effects?
	<p>Local Centre: The Old Town; Silverhill; Bohemia</p> <p>A range of small shops of a local nature, serving a small catchment – could include a small supermarket, a newsagent, sub post office, laundrette etc.</p> <p>Development proposals for town centre uses will be focused within the town and district centres. The scale and type of development will reflect the centre's existing and proposed function and its capacity for new development. A proposal for a town centre use will be required to follow the assessment approach set out in PPS6 in terms of need, scale, sequential approach to site selection, impact on other centres, including those beyond the Borough boundary, and accessibility.</p> <p>The vitality and viability of the town and district centres will be maintained and, where appropriate, enhanced. Measures will include:</p> <ul style="list-style-type: none"> <li>a) Safeguarding the retail character and function of the centre;</li> <li>b) Enhancing the appearance, safety and environmental quality of the centre;</li> <li>c) Encouraging diversity of uses within the centre and the provision of a wide range of retail, leisure, social, education, arts, cultural, office, residential and commercial uses;</li> <li>d) Promoting the reuse of vacant buildings; and</li> <li>e) Maintaining and enhancing access to the centre by sustainable modes of transport, and encouraging multi-purpose trips.</li> </ul> <p>In partnership with other agencies, the Council will protect and enhance local centres to better service the local community. If a local centre ceases to function, the Council will consider rationalisation of its role as a centre, or promotion of other uses.</p> <p>Neighbourhood shops located outside the Borough's centres will be protected where they are important to the day-to-day needs of local communities.</p>	
PREFERRED APPROACH 7: Hastings Town Centre	The overall strategy for the town centre is for it to: be competitive in terms of the range and type of shops operating in the area	Significant effects are unlikely since this simply defines some overall objectives for

Preferred approach number	Preferred approach	Likely Significant Effects?															
– Overall Strategy	<p>be attractive to visitors</p> <p>be accessible by local public transport</p> <p>be accessible by people with disabilities</p> <p>develop a family-based evening economy</p> <p>respond to the diverse needs and tastes of the population</p> <p>be able to cater for the increasing numbers of students studying in the area</p>	redevelopment of the town centre.															
PREFERRED APPROACH 8: Hastings Town Centre	<p>Support the delivery of the existing planned employment, retail, education, housing and healthcare developments in the town centre, and to work with residents, businesses and developers to create a more detailed Town Centre Management Plan.</p> <table border="1"> <thead> <tr> <th>Use</th><th>Floorspace/numbers</th><th>Phasing</th></tr> </thead> <tbody> <tr> <td>Office/Employment</td><td>31,845m<sup>2</sup></td><td>By 2026</td></tr> <tr> <td>Retail</td><td>30,000m<sup>2</sup></td><td>Between 2011 and 2021</td></tr> <tr> <td>Education</td><td>35,885m<sup>2</sup> (4500 students)</td><td>Last phase to commence 2013</td></tr> <tr> <td>Community health centre</td><td>4,221m<sup>2</sup></td><td>By 2010</td></tr> </tbody> </table>	Use	Floorspace/numbers	Phasing	Office/Employment	31,845m <sup>2</sup>	By 2026	Retail	30,000m <sup>2</sup>	Between 2011 and 2021	Education	35,885m <sup>2</sup> (4500 students)	Last phase to commence 2013	Community health centre	4,221m <sup>2</sup>	By 2010	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new non-residential development. Traffic associated with this Preferred Approach could lead to air quality impacts. These are considered in the Appropriate Assessment.
Use	Floorspace/numbers	Phasing															
Office/Employment	31,845m <sup>2</sup>	By 2026															
Retail	30,000m <sup>2</sup>	Between 2011 and 2021															
Education	35,885m <sup>2</sup> (4500 students)	Last phase to commence 2013															
Community health centre	4,221m <sup>2</sup>	By 2010															
PREFERRED APPROACH 9: Central St Leonards – Key Developments Proposed	<p>The following list of key projects and proposals, taken from the Regeneration Framework 2005 and the Renewal Strategy 2004, support the identification of South St Leonards as an area of change. Where appropriate they will be considered in more detail as part of the Site Allocations Development Plan Document:</p> <ol style="list-style-type: none"> <li>1. Supporting the Council's Housing Renewal Investment programme in the area – the renewal programme has been running since 2003 and will hopefully now continue until 2010 (awaiting approval of bid – March 08). The programme primarily focuses on improving the quality of housing available in the private sector (through grants, loans and enforcement actions).</li> <li>2. Housing and retail development (including affordable housing) at the Alpha Café site (47 residential units, 380 m<sup>2</sup> of retail/commercial floorspace) to be developed by Network Rail. Network Rail own the site and would be seeking to progress development on the site by 2009. This would be offered to the market. Housing and Development would follow subject to interest</li> </ol>	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new housing and other development in St Leonards. This development is considered further in the Appropriate Assessment.															

Preferred approach number	Preferred approach	Likely Significant Effects?
	<p>2009/10.</p> <p>3. Enhancing the district shopping centre through improvements to Kings Road, including pavement widening, creation of a public square near the station and support for businesses. These improvements should be delivered by 2010.</p> <p>4. Major housing and retail development in the Crystal Square car park and surrounding area (157 new homes, 2600 m<sup>2</sup> of retail/commercial floorspace). The Council will seek to encourage interest and help progress the scheme through a private/public partnership. There is no firm timetable for delivery of the project at present.</p> <p>5. Major housing redevelopment at the Hastings College site, which will be delivered by 2011. Over 100 dwellings will be provided, including dwellings for sale and affordable housing.</p>	
PREFERRED APPROACH 10: Central St Leonards – Improving Housing Choice and Conditions	To continue to concentrate resources on improving housing conditions in Central St Leonards in recognition of the fact that this is the area with the worst quality housing stock/living conditions in the town.	Significant effects are unlikely since the quality of housing will not affect European sites.
PREFERRED APPROACH 11: Central St Leonards – Creating a Sustainable Community	<p>a) To encourage the building of a range of different sized housing units in Central St Leonards by introducing an area based planning policy requiring all residential build, conversions and change of use to provide a mix of dwelling unit sizes within single developments (rather than being limited to a mix of 1 and 2 bed units).</p> <p>b) To work with the Housing Corporation and Housing Associations to achieve greater levels of housing choice in the area by promoting more affordable housing. General needs social rented housing in the area only amounts to 2% of the total housing stock compared with a borough average of 16%.</p> <p>c) To support and encourage planning applications for family sized accommodation in the area, subject to such applications meeting general planning criteria. Between 2002/03 and 2006/07, 34% of all unidentified (windfall) housing development took place in Central St Leonards. Future windfall proposals in the area will be expected to help meet the objectives outlined above.</p>	Significant effects are unlikely since the housing mix will not affect European sites.
PREFERRED APPROACH 12: Central St Leonards – Improving the Physical	Long-term improvements can only be maintained by attracting private sector investment into the area, as public funding for initiatives such as the Housing Renewal Programme and the Townscape Heritage Initiative are unlikely to continue much into the future, therefore:	Significant effects are unlikely since this Preferred Approach simply discusses encouraging investment and the quality of the

Preferred approach number	Preferred approach	Likely Significant Effects?
Environment	<p>a targeted approach needs to be adopted for all investment programmes to have the maximum visible impact.</p> <p>improvements to the 'streetscape' should be seen as a key driver for attracting new investment into the area</p> <p>planning permission will be granted to suitable proposals to tackle key buildings in central St Leonards which are in need of repair. A flexible approach to their future use will be adopted if this assists in securing their future viability.</p> <p>the Council will actively use its enforcement powers to ensure premises in the area are brought up to a satisfactory standard.</p>	physical environment.
PREFERRED APPROACH 13: Central St Leonards – Economic Development	<p>a) To maintain and enhance the area's role as a district shopping centre through the protection of a retail core – to be identified in the Site Allocations DPD.</p> <p>b) To identify central St Leonards as a social and economic regeneration area - where we would have policies supporting retention, development and conversion of properties for training and small business, community, arts and cultural sector</p>	Significant effects are unlikely since this Preferred Approach simply sets out objectives for St Leonards. The actual scale of development is covered elsewhere.
PREFERRED APPROACH 14: Pebsham Countryside Park	To identify Pebsham Countryside Park as sustainable multi-functional countryside area, with recreation and employment opportunities	Significant effects are unlikely since this is a landscape/ecological delivery project. This Preferred Approach does have a role in delivering additional greenspace to mitigate adverse effects on European sites. This is considered further in the Appropriate Assessment.
PREFERRED APPROACH 15: Ore Valley Millennium Community	Hastings Borough Council supports the plans for Ore Valley Millennium Community, to include the development of nearly 800 homes up to 2026, a new college, park, retail/ office space, health centre and improvements to accessibility. The entire area will be built to the standards required by the "Ore Valley, Hastings Millennium Community Urban Design Codes".	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and location of new housing. This is therefore considered further in the Appropriate Assessment.

Preferred approach number	Preferred approach	Likely Significant Effects?
PREFERRED APPROACH 16: Enviro Enterprise Corridor	To identify and support the Enviro Enterprise Corridor along Queensway towards the A21.	Significant effects cannot be ruled out as unlikely since the Enviro Enterprise Corridor will be a significant location for new employment development. This is therefore considered further in the Appropriate Assessment.
PREFERRED APPROACH 17: The Seafrot	To support the delivery of key projects and proposals taken from the Seafrot Strategy, and to identify the Seafrot as an area of change. Where appropriate, key projects and proposals will be considered in more detail as part of subsequent development plan documents.	Significant effects are unlikely since this basically identifies the seafrot as an area of change, rather than dealing with the quantum or details of development.
PREFERRED APPROACH 18: Bulverhythe Area	To identify the Bulverhythe area as a strategic regeneration location subject to the outcome of studies into the commercial viability of mixed housing/employment uses in the area for the post 2021 period.	Significant effects are unlikely since this basically identifies the Bulverhythe area as a strategic regeneration location, rather than dealing with the quantum or details of development.
PREFERRED APPROACH 19: Wilting	We support the inclusion of this development as a preferred option for Rother, to provide quality housing and jobs for residents of both Hastings and Bexhill.  The area surrounding a new station could be the focus for housing and hi-tech industry. The development would need to fund the rail and road infrastructure needed to support the development. The railway station will be key to the sustainability of such a proposal, and further work is required to assess its feasibility.	Significant effects are unlikely since this Preferred Approach simply identifies Hastings Council's position on a project to be delivered by other authorities.
PREFERRED APPROACH 20: Housing Mix	In response to the needs of the town, and in light of the responses received, it is proposed to promote a mix of dwelling types and sizes and housing tenures in all development. In particular, families, the elderly and those with disabilities will be suitably catered for.  Specifically, we will seek to: <ul style="list-style-type: none"><li>• Ensure the lifetime homes standard is applied to all suitable housing sites. This approach will be</li></ul>	Significant effects are unlikely since this policy simply identifies the housing mix rather than scale or location of development.

Preferred approach number	Preferred approach	Likely Significant Effects?
	<p>developed through the Site Allocations DPD</p> <ul style="list-style-type: none"> <li>• Achieve a more even mix of housing tenure in Hastings Town Centre and Central St Leonards</li> <li>• Encourage the provision of larger dwellings (3 or more bedrooms), and innovative housing schemes that might help to change the perception of the town, particularly in Central St Leonards</li> <li>• Ensure that in suitable and accessible locations, residential schemes of 50 or more dwellings include at least 2% fully adapted for wheelchair users.</li> </ul>	
PREFERRED APPROACH 21: Density	<p>Residential developments should make best use of land by achieving densities of at least 30 dwellings per hectare unless there are very special local circumstances that require a different treatment. Higher densities of at least 40 dwellings per hectare should be achieved in more sustainable locations close to a good range of existing or potential services and facilities and where there is, or there is potential for good public transport. This includes Hastings &amp; St Leonards' town centres, and the district centres of Hastings Old Town, Silverhill and Ore. Guidance on internal space standards and the relationship of the development to the surrounding area may be developed later in the Plan period.</p>	Significant effects are unlikely since this simply identifies the density of development rather than scale or location.
PREFERRED APPROACH 22: Gypsies and Travellers	<p>To include locational criteria for gypsy and traveller site provision in the Core Strategy, as a basis for considering individual proposals brought forward. The Council does however, recognise the national imperative to identify new sites for the gypsy and traveller community and will in the meantime continue to work with our neighbours in Rother District Council to identify potential sites, particularly to meet the need for transit facilities in the eastern part of the County.</p>	Significant effects are unlikely since this basically identifies locational criteria for gypsy and traveller sites rather than scale or location of any development.
PREFERRED APPROACH 23: Overall Target for Affordable Housing	<p>Based on the findings of both the Housing Needs Survey (2005) and the Housing Market Assessment (2006), and taking into account the findings of Housing Sites Viability Study (2007), the Council will secure 25% affordable housing on previously developed sites of 15 or more dwellings and 40% affordable housing on Greenfield sites of 15 or more dwellings. Additional unidentified sites will also be subject to this policy</p> <p>The Core Strategy affordable housing policy will be supported by a supplementary planning document giving further information together with details of section 106 requirements.</p>	Significant effects are unlikely since the proportion of affordable housing is not relevant to European sites.
PREFERRED APPROACH 24: Types of Affordable Housing	<p>The Council's preferred approach is for the greater part of affordable housing to be for social rent, although we would wish to retain a degree of flexibility in terms of widening housing choice. This will enable the provision of different forms of affordable housing where necessary, avoiding the</p>	Significant effects are unlikely since the type of affordable housing is not relevant to

Preferred approach number	Preferred approach	Likely Significant Effects?
Needed	over concentration of social rented housing and improving the economics of provision on marginal sites. This will be relevant where high levels of social rented homes already exist and a degree of tenure diversification is sought.	European sites.
PREFERRED APPROACH 25: Specifying the Size and Form of Affordable housing	The size and form of affordable housing that is likely to be needed in particular locations will be determined in the forthcoming Site Allocations Development Plan Document. Affordable housing will be provided on the application site. However, where the Council determines that off-site provision would be beneficial, off-site provision or a financial contribution in lieu of on-site provision (of at least equivalent value) may be accepted so long as the agreed approach contributes to the creation of mixed communities elsewhere in Hastings. Affordable homes must be well integrated within the development scheme and indistinguishable from those homes for outright sale in terms of style, location and build quality. 'Pepperpotting' or small clusters of affordable housing rather than blocks of a single tenure will be required.	Significant effects are unlikely since the size and form of affordable housing is not relevant to European sites.
PREFERRED APPROACH 26: Land Supply	<p>Local economic growth and diversification will be met through:</p> <ul style="list-style-type: none"> <li>the development of some 41,825m<sup>2</sup> of floorspace on allocated employment land identified in the existing Hastings Local Plan 2004. This includes the development of the Enviro21 Innovation Parks' adjacent to Queensway.</li> <li>the development of new office based employment opportunities in Hastings Town Centre (31,845m<sup>2</sup>),</li> <li>encouraging the redevelopment of the existing out-moded stock and denser development within the primary employment areas, at Ponswood, Ivyhouse Lane, Castleham, The Ridge West and Churchfields</li> <li>the protection of existing employment locations – we will seek to protect all viable employment land/premises and produce a supplementary planning document to support this approach</li> <li>mixed employment/housing development on suitable strategic sites and also as a tool for regeneration in town, district and local centres.</li> <li>Encouraging the provision of live/work units within housing developments.</li> </ul>	Significant effects cannot be ruled out as unlikely since this Preferred Approach dictates the scale and broad location of new retail / employment development. Traffic associated with this Preferred Approach could lead to air quality impacts. These are considered in the Appropriate Assessment.
PREFERRED APPROACH 27: Skills and Training	To support the development of training and education floorspace in the town, through the new Hastings College developments at Ore Valley and Station Plaza, and the further expansion of University Centre Hastings in the town centre. The Council will support proposals that improve, protect and, where needed, make new provision for childcare services.	Significant effects are unlikely since this Preferred Approach simply expresses the Council's support for certain skills projects.

Preferred approach number	Preferred approach	Likely Significant Effects?
PREFERRED APPROACH 28: Tourism	Encourage the provision of new hotels in the area, and the upgrading of existing facilities. There will be a presumption against the loss of bedspaces in the key tourist areas of the Old Town, the Town Centre, the Seafront and Warrior Square, unless the facility is no longer viable or is incapable of improvement to a good standard. A Visitor Accommodation Supplementary Planning Document, to be prepared during 2008, will support this policy approach.	Significant effects cannot be ruled out as unlikely since more hotels in the area will mean more tourists who will potentially visit Hastings Country Park and therefore Hastings Cliffs SAC. This is considered in the Appropriate Assessment.
PREFERRED APPROACH 29: Language Schools	In recognition of their importance to the local economy, the Council will support proposals that improve, protect or make new provision for language schools.	Significant effects are unlikely since language schools will not affect European sites.
PREFERRED APPROACH 30: Strategic Road and Rail Schemes	To support the delivery of strategic road and rail schemes identified in the draft South East Plan Implementation Plan. The Council will continue to lobby to secure their timely provision.	Significant effects are unlikely since this Preferred Approach simply expresses the Council's support for strategic transport projects to be delivered by other authorities.
PREFERRED APPROACH 31: Local Road Improvements	To retain saved policy TR1, until the impact of the Bexhill/Hastings Link Road can be assessed. 'Land between Wishing Tree Road and Sedlescombe Road South is safeguarded for the construction of the County Council's Hastings Spur Road Phase 2 Scheme'	Significant effects are unlikely since this Preferred Approach simply safeguards a corridor.
PREFERRED APPROACH 32: More Sustainable Transport Options	To support the draft Hastings and Bexhill Local Area Transport Strategy (LATS) produced by the County Council in October 2006. In particular, support the 5 strategic objectives of maximising accessibility, improving air quality and environment, safety, tackling congestion and promoting regeneration.	Significant effects are unlikely since this Preferred Approach is positive setting out some strategic objectives including the improvement of air quality.
PREFERRED APPROACH 33: Car Parking	To fully exploit opportunities to improve access to the town centre by means other than the car, before consideration is given to limiting parking provision. One option that will be further considered is park and ride. A facility at Wilting Farm associated with the Link Road could not only cater for vehicles accessing Hastings town centre but could also serve a future station at this location. Another option worthy of consideration is Baldslow near the A21/A28 junction. Either of	Significant effects are unlikely since this Preferred Approach is positive committing the Council to exploring opportunities for non-road transport.

Preferred approach number	Preferred approach	Likely Significant Effects?
	these options could be in Rother District, and it will be necessary for both Hastings and Rother Councils to work together to explore the feasibility of this approach.	
PREFERRED APPROACH 34: Residential Parking	Require provision at, at least one parking space per dwelling, except in the most exceptional circumstances. On street parking problems are already evident in large areas of the town, and experience suggests that to reduce off street provision below this minimal level would merely exacerbate parking problems.	Significant effects cannot be ruled out as cars associated with new residential development can contribute to air quality impacts. This is considered in the Appropriate Assessment.
PREFERRED APPROACH 35: Location of Development	Major developments will be required to produce a travel plan, in line with forthcoming guidance from East Sussex County Council, and will be expected to contribute to improved transport infrastructure, particularly for pedestrians, cyclists and public transport. There will be a presumption against development generating significant amounts of traffic on sites, which are not well related to a range of transport modes unless, through improvements to public transport or travel plans, this can be mitigated.	Significant effects are unlikely since this Preferred Approach is positive committing the Council to opportunities for non-road transport.
PREFERRED APPROACH 36: Community Infrastructure	Provide an up-dated policy on community infrastructure - developer contributions towards community and other infrastructure, which will be supported by the development of a detailed Supplementary Planning Document.	Significant effects are unlikely since this Preferred Approach basically sets out development contributions.
PREFERRED APPROACH 37: Area Co-ordination	The role of area co-ordination will be recognised in the Local Development Framework by clearly identifying in planning documents where it can have a positive impact in policy implementation. In particular the Council will talk to local people about development of new planning policies.	Significant effects are unlikely since area coordination is not relevant to impacts on European sites.
PREFERRED APPROACH 38: Nature Conservation and Improvement of Biodiversity	<p>a) Provide the highest level of protection for nationally and internationally designated sites. The legal protection for the Hastings Cliff SAC is set out in Government Circulars 06/2005 and 01/2005. Paragraph 8 of PPS9 sets out the Government's policies for developments likely to have an adverse effect on SSSIs. The Council will apply the principles set out in these documents when considering planning applications, which affect nationally and internationally designated sites.</p> <p>b) Avoid damage to locally important wildlife and geological sites wherever possible. The Council has identified 30 Sites Of Nature Conservation Importance and these are protected through saved</p>	Significant effects are unlikely since this Preferred Approach is positive, setting out the Council's policy framework on biodiversity protection.

Preferred approach number	Preferred approach	Likely Significant Effects?
	<p>policy NC6 of the Hastings Local Plan 2004. The biodiversity value of these sites and other areas of previously developed land will be reviewed in 2008 and will inform a new policy to be included in the Site Specific Allocations DPD. Ancient woodland is protected through saved policy NC10 of the Hastings Local Plan 2004.</p> <p>c) Ensure that unavoidable damage to biodiversity is minimised through mitigation, that any damage is compensated for, and that such measures are monitored. This will be achieved through saved policies NC8 and NC9 of the 2004 Local Plan. These policies will be reviewed as part of a future development control DPD.</p> <p>d) Make sure areas of wildlife importance are accessible and well promoted, identifying areas of opportunity for biodiversity importance and setting local targets to contribute to regional biodiversity targets and quality of life. In October 2006 the Council adopted The Hastings Local Biodiversity Action Plan (BAP). This identifies all of the town's national priority habitats, including a description of the habitat and its location along with national targets and objectives relating to the habitat. The BAP shows that the majority of areas of high biodiversity importance in the Borough occur in designated sites – that is the 7 Local Natures Reserves, 3 Sites Of Special Scientific Interest and the Hastings Cliffs Special Area of Conservation. The Council's BAP strategy is to enhance biodiversity by focusing on the management and protection of this green network of designated sites, which are in themselves ecologically diverse and contain priority species and habitats.</p> <p>e) Influence and apply agri-environment schemes, forestry, flood defence and other land management practices to deliver biodiversity targets. Each of the SSSIs and LNRs has an approved management plan and the Council works with partners such as the Sussex Wildlife Trust and the St Helen's Park Preservation Society to carry out practical management for the improvement of access, education and biodiversity in these areas. The Council aims to achieve National Nature Reserve status for the Hastings Country Park area by 2015, in conjunction with the biodiversity improvements being undertaken through agrienvironment grant aid.</p> <p>f) Maintain and establish accessible green networks and open green space in urban areas. Saved policy NC7 of the 2004 Local Plan identifies a green network of wildlife corridors, SSSIs, LNRs and</p>	

Preferred approach number	Preferred approach	Likely Significant Effects?
	SNCIs. This policy will be taken forward in the Site Allocations DPD.	
PREFERRED APPROACH 39: Landscape Protection	<p>The overall approach will be to protect and enhance the Borough's landscape including:</p> <ul style="list-style-type: none"> <li>• The distinctive landscape setting of the town, particularly the structure of gills, woodlands and open spaces and the relationship and clear division between the unspoilt coastline of Hastings Country Park and surrounding countryside and the built-up area</li> <li>• The High Weald Area of Outstanding Natural Beauty</li> <li>• The strategic gap between the built-up edge of St Leonards and the western boundary of the Borough</li> <li>• The undeveloped coast - The Council will work with Rother District Council to improve access to and management of urban fringe areas.</li> </ul>	Significant effects are unlikely since this Preferred Approach is positive, dealing with landscape protection.
PREFERRED APPROACH 40: Open Spaces - Enhancement, Provision and Protection	<p>The Parks and Open Spaces Strategy sets out the strategic policy direction for the provision and management of the town's open spaces. Our consultations revealed very high levels of support for the Core Strategy to help implement the Parks and Open Spaces Strategy by:</p> <p>a) The progressive enhancement of existing open space provision rather than the creation of new provision, with priority for sites within or adjacent to the most deprived neighbourhoods. The development process will be one means of funding this enhancement through the pro-active use of planning agreements. In particular this could be used to support the proposals for the Broomgrove Millennium Community, the Central St Leonards Master Plan, play provision and the open space network. However, where major new development is proposed in areas with no access to open space, we'll try to make sure demand generated by the development is met through new provision.</p> <p>b) The Site Allocations Development Plan Document will identify development sites where the provision of new, or enhancement of existing open space will be a requirement. The open space contribution from 'windfall' development sites will be assessed in relation to need identified through the open spaces audit of 2006 and its subsequent updates. All provision will need to be in accordance with the Council's Quality Standard For Open Spaces.</p> <p>c) The protection and enhancement of open spaces. The following spaces have been identified in the Parks and Open Spaces Strategy as being of town-wide significance, and the Core Strategy will develop policies to protect, manage and enhance them. These are: Alexandra Park, BOS</p>	Significant effects are unlikely since this Preferred Approach is positive, setting out the Council's policy framework on open space provision.

Preferred approach number	Preferred approach	Likely Significant Effects?
	<p>Field, Church Wood, Gensing Gardens, Hastings Cemetery, Hastings Country Park, Old Roar Ghyll (part of Alexandra Park), Ponds Wood, St Leonards Gardens, St Helen's Wood, Warrior Square, West Hill, Ore Valley, Summerfields Woods, pedestrian-only streets in the Town Centre, the Seafront, Bexhill Recreation Ground (football), Horntye Park, White Rock Gardens, William Parker Sports College, Sandhurst Recreation Ground (cricket). Currently two Borough wide Open Spaces are subject to further review.</p> <p>With regard to other open spaces including private open space and allotments, these will be identified in the Site Allocation Development Plan Document and will be protected from development which would lead to loss of their open character, biodiversity or accessibility. Planning permission will only be granted for small scale development which directly contributes to or enhances their value to the community. Where this does occur, compensatory provision or a contribution towards further off-site provision will be sought.</p>	
PREFERRED APPROACH 41: Open Spaces – Strategic Network	To develop a strategic network of cycle and pedestrian routes as shown on the diagrammatic network on page 133.	Significant effects are unlikely provided that enhanced strategic pedestrian and cycle routes affecting Hastings Country Park avoid the Hastings Cliffs SAC.
PREFERRED APPROACH 42: Sports and Leisure Facilities	Major sports and leisure facilities should be centrally located and be accessible to all of the community. Provision for casual recreation, such as multi-use games areas should be locally based within communities. Given the importance of accessible sports and leisure facilities to improving health and fitness, the Council will continue to protect and support playing fields, sports pitches and sports and recreational facilities through saved policies SP1 and SP2 of the 2004 Local Plan.	Significant effects are unlikely since provision of sports facilities for the community is unlikely to impact on European sites.
PREFERRED APPROACH 43: Childrens' Play Provision	Local green spaces should be designed in a way that maximises their informal play value. That there should be a relatively small number of large equipped play spaces at key locations around the town that are accessible to all. The Council will require developers to design housing environments in which children have space to play informally and safely and where they have priority over vehicles, and where such spaces contribute to the provision of open space. These are to be developed in accordance with the Council's Quality Standard For Open Spaces	Significant effects are unlikely since this Preferred Approach is positive.
PREFERRED APPROACH 44:	<p>Incorporate a strategic policy that:</p> <ul style="list-style-type: none"> <li>Promotes development that will minimise energy use and consumption through the appropriate</li> </ul>	Significant effects are unlikely since this Preferred Approach is

Preferred approach number	Preferred approach	Likely Significant Effects?
Sustainability and Design	<p>layout and orientation, building form and design, and design to take account of the micro-climate</p> <ul style="list-style-type: none"> <li>Promotes development that incorporates renewable energy production facilities into new developments to minimise carbon dioxide production</li> <li>Manages and reduces the threat of flooding through the consideration of planning applications using the Strategic Flood Risk Assessment and the incorporation of appropriate Sustainable Drainage Systems in new development</li> </ul> <p>Reduces consumption of natural and non-renewable resources</p> <p>Protects against light, air, land, noise and water pollution</p> <p>Promotes development that incorporates recycling facilities, and uses waste as a resource</p> <p>Meets high water efficiency standards</p> <p>Promotes safe, 'Secure By Design' and community safety features</p> <ul style="list-style-type: none"> <li>Encourages equality of access to developments for the whole community</li> <li>Require all developments of 10 or more dwellings to be constructed to meet Level 3 of the Code for Sustainable Homes or its equivalent, subject to viability. Require all business and commercial development above a threshold of 1000m<sup>2</sup> to meet the BREEAM standards subject to viability. Viability testing of a selection of sites in Hastings will be undertaken as part of the preparation of the evidence base for a detailed policy.</li> </ul>	positive.
PREFERRED APPROACH 45: Renewable Energy – Standalone Schemes	<p>Proposals for renewable energy developments, including any ancillary infrastructure or building will be favourably considered if:</p> <ol style="list-style-type: none"> <li>Their scale, form, design, materials and cumulative impacts can be satisfactorily assimilated into the landscape or built environment and would not harm the appearance of these areas; and</li> <li>They would not impact adversely on the local community, economy, biodiversity or historical interests.</li> </ol> <p>The Council will investigate the area's potential for accommodating renewable and low carbon energy sources and supporting infrastructure. Suitable sites will be identified through the forthcoming Sites Allocation Development Plan Document.</p>	Significant effects are unlikely since this Preferred Approach makes it clear that renewable energy schemes will be favourably considered if they do not impact adversely on biodiversity.
PREFERRED APPROACH 46: Renewable Energy - On	We are developing a flexible policy for on site renewable energy provision. This policy will encourage developers to consider a range of renewable energy technologies on their sites, some of which may be more appropriate in different locations. The policy targets may increase during	Significant effects are unlikely since this Preferred Approach only sets out standards for renewable

Preferred approach number	Preferred approach	Likely Significant Effects?
Site Provision	<p>later reviews of the plan, in order to reflect the need to address climate change.</p> <p>Subject to further evidence base work (prior to the submission of this Core Strategy), all new commercial development above a threshold of 1000m<sup>2</sup>, or residential development of 10 or more dwellings, will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation, unless it can be demonstrated that the development will be unviable in terms of development type, location, design or economics.</p>	energy provision.
PREFERRED APPROACH 47: Flood Risk	<p>In accordance with PPS25 The flood risk associated with new development will be taken into account at all stages of the planning process – this includes in the preparation of future DPDs and SPDs and at the planning application stage. Developments will be directed away from flood risk areas in accordance with principles set out in PPS25 and informed by the Council's Strategic Flood Risk Assessment. Positive adaptation of developments to reduce the risk of flooding will be sought through a variety of suitable measures, including the appropriate use of Sustainable Drainage Systems (SuDs).</p>	Significant effects are unlikely since this Preferred Approach is positive, directing development away from areas of flood risk (and therefore minimising the need for new defences).
PREFERRED APPROACH 48: Sense Of Place and Local Identity	<p>To assess design quality in planning proposals for new homes, the Council will require all major planning proposals involving residential development to address the 20 questions that make up the Commission for Architecture &amp; the Built Environment (CABE) and the Home Builders Federation Buildings for Life standard. This information will need to be submitted with planning applications involving ten or more dwellings. Place specific design briefs may also be appropriate, depending on circumstances, suitability and timing.</p>	Significant effects are unlikely since 'sense of place' issues will not conflict with the protection of European sites.
PREFERRED APPROACH 49: Built and Historic Environment	<p>Development proposals will be expected to contribute positively to the character of the built and historic environment of the Borough. The character of the built and historic environment will be protected, preserved or enhanced. Particular protection will be given to the character and special features of: a) Conservation areas; b) Listed buildings; c) Historic parks and gardens; and d) Archaeological sites Development which preserves or, where appropriate, enhances the character of important historic buildings and sites and their settings will be encouraged.</p>	Significant effects are unlikely since built and historic environment issues will not conflict with the protection of European sites.

## Appendix 2: Plan of Hastings Country Park

## Appendix 3: European sites covered in this report