Preferred Approaches

The SEA Directive requires the environmental report to include information on:

"The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors"

This section of the report considers the likely significant, social environmental and economic effects of the preferred approaches, and identifies how any social environmental and economic problems were considered in their development. The outcome of the issues and options appraisal discussed above, was also taken into account in developing and refinement of the preferred approaches.

During the refinement of the preferred approaches, additional options were also considered. These additional options came out of the issues and options consultation, taking into account the responses received, as well as the findings of research reports undertaken by the Council. The assessment of these additional options, and reasons for exclusion (were appropriate) is shown in Appendix F.

The sustainability effects of the preferred approaches were considered throughout the sustainability appraisal process, and regular meetings were held with key stakeholders to discuss emerging policy options. The preferred approaches have now been tested against the social, environmental and economic sustainability objectives. The results of this assessment, and areas of potential conflict, are clearly identified in the colour matrix in table 8 below.

Appendix G lists the Core Strategy preferred approaches, and a full account of the appraisal is provided in Appendix H.

Testing the Core Strategy Preferred Options/Approaches against the SA framework

Core Strategy Preferred Approaches	Sustainability Objectives																				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
PA1	✓✓	✓	✓	-	✓	-	✓	✓✓	X	X	-	-	-	-	-	-	X	-	-	-	-
PA2	✓	-	-	-	-	-	-	✓✓	-	-	✓	-	-	-	-	-	-	-	-	-	-
PA3	-	-	✓	-	✓✓	-	-	✓	X	X	-	-	-	-	-	-	X	-	✓✓	✓	✓✓
PA4	-	-	-	-	✓✓	-	-	✓✓	-	X	-	-	-	-	-	-	✓/X	-	✓	✓	✓
PA5	-	-	-	-	✓	-	-	✓	-	-	-	-	-	-	-	-	X	-	-	✓	✓
PA6	-	-	✓	-	✓	-	✓	✓	-	-	-	-	-	-	-	-	-	✓	✓	-	-
PA7	-	-	✓	✓	✓✓	✓	✓	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓
PA8	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓	-	X	✓	✓/X	✓/X	X	✓/X	X	✓/X	✓✓	✓✓	✓✓	✓✓
PA9	✓	✓	✓✓	-	✓✓	✓	✓	✓✓	-	X	✓	✓/X	X	X	X	X	✓/X	✓✓	✓✓	✓✓	✓✓
PA10	✓	✓✓	✓	-	-	✓	✓	✓✓	-	-	✓	-	?/✓	?/✓	?/✓	-	-	-	-	-	-
PA11	✓✓	✓	✓	-	-	✓	✓	✓✓	-	X	-	✓/X	-	?/✓	?/✓	?/ ✓	?/✓	-	-	-	-
PA12	✓	✓	-	-	-	✓	✓	✓	-	-	✓	-	?/✓	?/✓	?/✓	-	✓/X	-	✓	-	✓
PA13	-	✓	✓	✓	✓	✓	✓	✓✓	-	-	-	✓/X	?/✓	X	?/✓	-	✓/X	✓	✓✓	✓✓	✓✓
PA14	-	✓	-	-	✓✓	-	✓	✓	✓✓	-	✓✓	✓✓	✓/X	?	-	-	✓/X	-	-	?	-
PA15	✓✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓	-	✓	✓/X	✓✓	✓	✓	✓/X	✓/X	✓	✓	✓	✓
PA16	-	✓	✓	-	✓	-	-	X	X	X	-	X	✓	?/✓	✓	-	X	✓✓	-	✓	✓✓
PA17	✓✓	✓	✓	-	✓✓	✓	✓✓	✓✓	✓	X	✓	?/X	✓	?/X	-	-	X	✓	✓✓	✓	✓
PA18	✓	✓	✓	-	✓	?/ ✓	✓	✓✓	X	X	-	?	?/X	?/X	?/X	?/X	X	✓✓	✓	✓	✓
PA19	✓	✓	?	-	✓	?/X	?	?	X	?	?	X	X	?/X	?	X	?/X	✓	?	✓	✓✓
PA20	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	-

		Sustainability Objectives																			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Core Strategy Preferred Approaches	PA21	-	-	-	-	-	-	✓	✓✓	-	?/X	-	-	-	-	-	-	X	-	-	-	-
	PA22	✓	-	✓	-	✓	-	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-
	PA23	✓✓	✓	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-
	PA24	✓✓	✓	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-
	PA25	✓✓	✓	✓	-	-	✓	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-
	PA26	-	-	✓	-	✓	-	✓	✓✓	X	X	-	X	X	-	-	-	X	✓✓	✓✓	✓✓	✓✓
	PA27	-	-	✓	✓✓	✓	✓	-	-	-	-	-	-	-	-	-	-	✓/X	✓	✓	✓	✓
	PA28	-	-	-	-	-	-	✓	✓	-	-	✓	?/X	?/X	X	-	-	?/X	✓✓	✓	✓	✓
	PA29	-	-	-	-	-	-	✓	✓	-	-	✓	-	?/X	?/X	-	-	-	-	✓	✓	✓
	PA30	-	✓	?/ ✓	-	✓	-	-	-	X	?	✓/X	✓/X	X	-	-	-	✓	-	✓	✓	✓
	PA31	-	-	-	-	-	-	-	-	-	-	-	?/ ✓	-	-	-	-	?/ ✓	-	-	-	-
	PA32	-	✓	✓	-	✓✓	✓	✓	-	-	-	✓	✓	✓	-	-	-	✓✓	-	✓	-	✓
	PA33	-	✓	-	-	✓	-	✓	-	-	-	-	✓	✓	-	-	-	✓	-	-	-	-
	PA34	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-
	PA35	-	✓	✓	-	✓✓	-	✓	-	-	-	-	✓	✓	-	-	-	✓✓	-	-	-	-
	PA36	This approach will have its own Sustainability Appraisal through the SPD process																				
	PA37	This approach refers to an established method of community involvement – a process, which cannot be appraised here																				
	PA38	-	✓	-	-	✓	-	✓	-	✓✓	-	✓✓	✓	-	✓	-	-	✓	-	-	-	-
	PA39	-	✓	-	-	✓	-	✓	-	✓✓	-	✓✓	-	-	-	-	-	-	-	-	-	-
	PA40	-	✓✓	✓	-	✓✓	✓	✓✓	-	✓✓	-	✓✓	✓	-	-	-	-	✓	-	-	-	-
	PA41	-	✓	-	-	✓	✓	✓	✓	✓	-	✓	✓	✓	-	-	-	✓	-	-	-	-

		Sustainability Objectives																			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Preferred Approaches	PA42	-	✓✓	✓	-	✓✓	✓	✓	-	-	-	-	✓/X	-	-	-	-	✓/X	✓	✓	-	✓
	PA43	-	✓	-	-	✓	✓	✓	✓	✓	-	✓	-	-	-	-	-	-	-	-	-	-
	PA44	✓✓	✓	✓	-	-	✓	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	-	-	-	-	-
	PA45	-	-	-	-	-	-	✓	✓	-	-	-	✓	✓	-	✓✓	-	-	-	-	-	-
	PA46	✓✓	-	✓	-	-	-	-	✓✓	-	-	-	✓✓	✓✓	-	✓✓	-	-	-	-	-	-
	PA47	✓	✓	-	-	-	-	-	✓	✓	✓✓	✓	-	✓✓	✓✓	-	-	-	-	-	-	-
	PA48	✓	✓	✓	-	✓✓	✓✓	✓✓	✓✓	-	-	✓✓	-	✓	✓	✓	✓	✓✓	-	-	-	-
	PA49	-	-	-	-	-	-	✓	✓	-	-	✓✓	-	-	-	-	-	-	-	-	-	-

Table 8 – Testing the preferred options/approaches against the SA framework

✓✓	Significant positive effects	X	Slight negative effect	?	Potential/uncertain effect
✓	Slight positive effect	?/X	Slight negative or uncertain effect	-	No direct link
?/ ✓	Slight positive or uncertain effect	✓/X	Slight positive and slight negative effect		

Note: The symbol for significant negative effects (XX) has not been used in this appraisal. It was not considered that when appraised against the sustainability objectives, any of the approaches resulted in a significant negative effect.

Significant social, environmental and economic effects of the preferred approaches

Preferred Approach 1 – Location of new housing

Four broad options for the location of new housing were subject to sustainability appraisal. Full details of these options are included in Appendix F of the main Sustainability Appraisal Report (page 265).

Evidence gathered has indicated that the town is able to provide enough housing land to meet the draft South East Plan housing requirements using both greenfield and brownfield sites. In order to retain a degree of flexibility, and to allow for sites not coming forward at the expected rate, these calculations have included a major greenfield site at the north west of the town for release.

The preferred approach therefore, looks at providing the majority of development on sites within the built up area, with a major greenfield release at a later stage if considered necessary. This approach supports the social sustainability objectives and ensures adequate supply of housing for all, including the provision of affordable, and higher standards of sustainable design where possible - in accordance with national planning guidance.

The development of housing sites within the built up area will contribute to the sustainability objective of ensuring the most efficient use of land, and will provide more certainty that development will increase accessibility to services and facilities for the community. The major greenfield release will need to ensure that appropriate infrastructure is provided to contribute to mixed and sustainable communities, including the provision of public transport links, and facilities for walking and cycling. The preferred approach identifies that this development will comprise a mix of uses, including employment, to contribute to these sustainability objectives.

This approach considers the location of housing, rather than the number, or type of housing on a particular site. However, development in any location is likely to have some negative sustainability effects in terms of the potential impact of any form of development on biodiversity, flood risk and the increase in road traffic and congestion. Development at any location as a result of this approach will need to ensure that measures are taken to reduce these impacts and mitigated against, in accordance with other policies in the Core Strategy.

This option has been favoured over the others presented in that it provides further opportunities for infrastructure improvements to support its delivery, and higher standards of sustainable design and construction, subject to further evidence gathering on viability. It also provides the most certainty in terms of deliverability following completion of the SHLAA. However, it should be noted that due to the potential negative effects of this option on the environmental sustainability objectives, the major greenfield site should only come forward during the later stages of the plan, if the total housing completions are not meeting the regional housing requirements.

If the major greenfield release is required, sustainability appraisal through the site allocations DPD will ensure that the impact on biodiversity, flora, fauna, soil and water will be minimised.

The strategic development site in the north west of the town has been subject to the sequential test in terms of flood risk, and has been deemed acceptable. The area is

within Flood Zone 1 – low probability of flooding, and is therefore suitable for all uses. However, early liaison with the Environment Agency will be needed to consider site details and flood risk management requires, ensuring that adequate consideration is given to the distribution of uses in this location, and possible implications for surface water run-off.

Preferred Approach 2 – Re-use of previously developed land

This approach implements the national target of achieving 60% of all residential development on previously developed land, scoring well against the objective relating to the efficient use of land and buildings, and contribution to urban renaissance. Directing development towards brownfield sites will also contribute to enhancing the townscape. No negative sustainability effects have been recorded.

Preferred Approach 3 – Employment locations

The approach looks at providing significant amounts of floorspace in some of the most deprived parts of the town, particularly the town centre and key business locations. This approach will help to ensure that more people have improved access to employment, whilst aiding economic revival in these particular areas and across the town as a whole. The ready supply of suitable employment land in key locations will encourage inward and indigenous investment.

As with housing locations, any development of this nature is likely to result in an increase in road congestion and subsequent pollution levels. In areas outside the town centre, it will be important to ensure that demand management procedures are put in place, and greater travel choice is available for those likely to be accessing the developments.

Negative sustainability effects have also been noted in terms of the potential loss of biodiversity and impact on flood risk. Again, appropriate mitigation measures will need to be explored through the planning application process, or through sustainability appraisal of these sites in the site allocations DPD.

Preferred Approach 4 – Location of retail development – comparison goods

Development in the town centre is not likely to come forward until the later part of the plan period. Providing more retail in this location will improve accessibility to services for the majority of the community, and development of this scale should seek contributions for infrastructure improvements. Directing development to the town centre seeks to ensure the most efficient use of land, complying with national planning policy in PPS6, and will help economic revival in the town centre. Significant investment would be needed to support such a development in the town.

The provision of new retail development in the town centre may result in increased levels of road congestion and pollution. However, the new retail space would be located near strong public transport links i.e. station and bus services, providing alternative modes of travel.

Preferred Approach 5 - Location of retail development – retail warehousing

The development of retail warehousing is unlikely to be brought forward until the later part of the plan period. It will increase access to services for the community, and will contribute to the economic growth of the town.

The approach states that retail warehousing will be located on edge of centre, or out of centre sites that are well served by a choice of public transport. It is recommended that the policy be amended to ensure edge of centre sites are considered first, in order to ensure accessibility and to make the most efficient use of land.

Preferred Approach 6 – Town, district and local centres

This approach seeks to build on national policy, and identifies a hierarchy of centres within the town, scoring well against the social and economic objectives. The identification of key centres and rationalisation of others makes better use of the land available, and will help achieve economic revival of some of the more deprived areas of the town, namely Central St Leonards and Hastings Town Centre. No negative sustainability effects have been recorded.

Preferred Approach 7 – Hastings Town Centre – overall strategy

The preferred approach has scored well against the social and economic sustainability objectives. Continuous investment and funding from both the private and public sectors to support the current and future development will contribute to the economy; provide further job opportunities, addressing accessibility and deprivation. The overall strategy will result in increasing numbers of people visiting the town throughout the day and evening, also helping to ensure a safe environment is created. No negative effects have become apparent from the strategy.

Preferred Approach 8 – Hastings Town Centre

This approach looks at providing a mix of uses on specific sites within the Town Centre. The new Millennium Community development at Station Plaza provides housing built to Eco Homes “Excellent” standards, affordable housing, a new college and community facilities. In addition, further employment, retail and education floorspace is being provided at other sites within the town. This scores well on the social and economic objectives, addressing barriers to housing and providing significant employment opportunities for the town. In particular the stated developments will contribute to a vibrant and distinctive community in that location, and aid economic growth and revival for the town as a whole.

However, new developments will adversely affect various environmental objectives, increasing consumption of waste and water, and contributing to the effects of climate change. The increase of road traffic and congestion and the subsequent effects of air quality can be offset to a degree due to the sustainable location of the development, although mitigation measures, such as the improvement of public transport infrastructure, may be needed to reduce the negative effects.

The town centre as a broad location for development has been analysed as part of the Hastings SFRA, and has been subject to the sequential approach. SFRA findings have shown that the area is located within Flood Zone 1 – low probability of flooding, and that all uses of land will be appropriate in that location. However, a FRA must accompany proposals for development exceeding 1ha in area, and consideration given to the most appropriate sustainable drainage techniques.

Preferred Approach 9 – Central St Leonards – key developments proposed

This approach looks to provide housing (including affordable), retail, and other commercial floorspace, along with public realm and housing improvements. Cumulatively, these projects will significantly help to address deprivation and raise the economy of the area, make more efficient use of the land available and enhance the townscape. Projects will also encourage indigenous and inward investment into the centre.

Negative sustainability effects have again been recorded in relation to the environmental objectives. No mention has been made in the approach with regard to addressing the causes and effects of climate change and its subsequent effects. Such new development will increase water and energy consumption, and increase waste arisings.

The developments are also likely to result in an increase in road traffic and pollution, although they are situated in key locations within an accessible public transport network.

In terms of flood risk, and the sequential test, key developments as proposed have been highlighted as being in an area in Flood Zone 1 – low probability of flooding, and all uses of land would be appropriate in this location. Under PPS25, there is no statutory requirement for a FRA for the specific development of the Crystal Square area as it extends over an area less than 1ha in size.

Preferred Approach 10 – Central St Leonards – improving housing choice and conditions

This approach relates to improving the housing conditions of existing dwellings only, and contributes positively to the social sustainability objectives, particularly in terms health and well being and using buildings more efficiently. Uncertain impacts have been noted as no reference is made in the preferred approach as to how these improvements will be carried out. If this includes the use of energy efficient measures i.e. insulation, water saving technologies etc, then this will maximise beneficial effects of the approach.

Preferred Approach 11 – Central St Leonards – creating a sustainable community

This approach has a significant positive effect in terms of providing opportunities for everyone to have access to a home, by not limiting provision to the current offer in Central St Leonards. The approach positively affects other social objectives, and contributes to the creation of mixed communities, helping to reduce crime and fear of crime and contributing to urban renaissance.

Widening the housing choice available, particularly with regard to the provision of more family housing, may increase car use and ownership in this location. However, Central St Leonards is located accessibly, with good public transport links to other parts of the town.

Preferred Approach 12 – Central St Leonards – improving the physical environment

Improving the physical environment of an area, has strong links with improving the health and well being of residents, as well as creating a safer and attractive

environment, contributing to vibrant and distinctive communities. Such improvements should be undertaken in accordance with sustainable design principles i.e. BREEAM/Code for Sustainable Homes were appropriate to maximise beneficial sustainability effects.

There is potential for negative sustainability effects if the improvements attract more people to the area, in terms of creating additional road congestion and pollution. However, Central St Leonards is a sustainable centre, which could off set some of these effects. Development is unlikely to be of such a scale where additional infrastructure could be provided to provide alternatives to the car.

Preferred Approach 13 – Central St Leonards – economic development

The outcome of Central St Leonards as a social and economic regeneration area will help to reduce deprivation, and contribute positively to the social and economic sustainability objectives. However, if the effects of regeneration are to work, they are likely to bring about additional car use and road congestion, with associated impacts of air pollution. The central and sustainable location of this area will help to reduce these impacts to a certain extent. New businesses created and increased numbers of people are also likely to increase water consumption.

Uncertain effects have been recorded as it is unknown whether conversions of buildings as described will take into account “climate proofing” principles in terms of efficiency and design.

Preferred Approach 14 – Pebsham Countryside Park

This approach provides positive effects for many social and environmental sustainability objectives. The provision of a new park will improve accessibility to recreational opportunities, working positively to improving health and quality of life. A new countryside park will also provide significant opportunities for biodiversity, and increases protection of the landscape and countryside.

Part of the site is currently used for landfill, and the replacement use will see significant improvements to air quality over the medium to long-term. However, visitors attracted to the new park may have a negative impact in terms of climate change and water consumption. Water quality may also be affected due to the existing use of the site and its potential soil contamination

Preferred Approach 15 – Ore Valley Millennium Community

This approach has performs very well against most of the sustainability objectives. The development has been designed in accordance with adopted design codes, produced in partnership with English Partnerships, and the development provides housing built to Eco-Homes “Excellent” standards.

There is potential for negative effect in terms of increased car use and road congestion, although this, and its related issues, have all been considered as part of the design codes.

The SFRA has considered this area in terms of flood risk and the sequential test. The analysis has shown that all uses of land will be appropriate. However, due to the proximity of the Ore Valley stream, it is essential that the FRA for the site includes a detailed analysis of the risk posed by this source.

Preferred Approach 16 – Enviro-Enterprise Corridor

This was a new approach that came about following the Issues and Options consultation. As such, it has not been appraised before.

The approach seeks to provide further employment opportunities and business locations along a key transport route, to support the overall regeneration of the town. Developments will be built to high environmental standards, with the provision of renewable energy generation within the area. This is essential to compensate for the loss of greenfield sites and the potential negative environment effects in terms of increased car use and air pollution. Existing transport infrastructure in Hollington, and the proposed Bexhill/Hastings Link Road, will serve the 'corridor'.

Sites at Queensway North and Queensway South were considered as part of the SFRA and sequential test, as forming part of this area. The analysis showed that both sites are located within Flood Zone 1 – low probability of flooding, and that all uses are appropriate in that location. However, a FRA would have to accompany development proposals over 1ha in area, and appropriate taken to ensure effective use of sustainable drainage systems.

Preferred Approach 17 – The Seafront

The approach to the Seafront as an area of change looks at increasing opportunities for leisure and recreation and improvements to accessibility and connectivity. This will have various social and economic benefits, particularly in terms of economic revival, aiding the existing tourist economy and urban renaissance.

There is potential for negative effects, arising from the increased visitor numbers to this key tourist destination. Road congestion and pollution levels could increase, although the improved cycle routes and access improvements proposed will help to mitigate against this. Increased activity along the coast may present problems in terms of water consumption and the coastline water quality – this will have to be monitored.

Preferred Approach 18 – Bulverhythe

This proposed mixed-use development would not be brought forward until the later part of the plan period. The provision of housing and employment uses in this location contribute positively to social and economic sustainability objectives, by providing housing and job opportunities on an existing brownfield site, to support the overall regeneration of the town. Housing would need to be affordable, and all development built to high environmental standards, incorporating renewables on site where possible to mitigate against the likely increase in waste and water consumption and potential loss of biodiversity.

The development may impact negatively in terms of increased car use and road congestion/pollution. Infrastructure would need to support development in this location, including public transport and other alternatives to the car - including walking and cycling.

The Bulverhythe area has been considered as part of the SFRA, and has been subject to a Level 2 assessment. This has shown that the site falls within a mixture of Flood Zones, varying between low and high flood risk areas. This has not precluded development in this location - further work will be needed to assess the

suitability of uses in different locations within the site, and the most appropriate flood risk management measures.

Preferred Approach 19 – Wilting

The proposed mixed-use development would support the overall regeneration of Hastings, by providing additional housing/business development, despite its location in the Rother District. Housing would need to be affordable, and all development built to high environmental standards, incorporating on site renewables, to mitigate against the potential loss of biodiversity, increase in waste and water consumption. The overall scheme has potential for increased road congestion and pollution. However, the proposed station would go some way to alleviating this, providing an alternative way to travel.

Preferred Approach 20 – Housing mix

This approach contributes significantly to achieving the social sustainability objectives. It specifically looks at improving conditions in deprived areas, namely the Millennium Community sites, and will help to create vibrant and mixed communities in line with national policy. There is no link with this approach and the remaining environmental and economic sustainability objectives.

Preferred Approach 21 – Density

This approach follows national planning guidance and seeks to provide higher densities in the most sustainable locations, whilst providing a minimum level in the remainder of the town. This approach will ensure the most efficient use of land, but brings with it potential for negative effects. Increasing densities mean increases in the numbers of residents, which has associated risks of increased car use, congestion and pollution. The approach recognises the need to locate such development in sustainable locations to reduce reliance on the car, and to provide design statements to help minimise these risks.

Whilst any development is likely to have an impact on surface runoff, and increasing densities may increase this risk, the appraisal considered that building at higher densities is likely to decrease the footprint of the development and consequently, reduce the amount of hard surfacing that contributes to the run-off.

Preferred Approach 22 – Gypsies and travellers

The focus of this policy is to develop criteria for site selection, and to continue current work being undertaken to identify suitable sites. The commitment to provide sites in accordance with regional and national guidance provides further opportunities for gypsies and travellers to access housing, which should be sustainably located, allowing accessibility to all services and facilities. This will help to tackle social exclusion, and works towards the creation of mixed communities.

Preferred Approach 23 – Overall target for affordable housing

The 2005 Housing Needs Survey, 2006 Housing Market Assessment and 2007 Housing Sites Viability Study identified that there is a significant need for affordable housing within the town. The proposed targets are higher than those set in the previous local plan and contribute significantly to the social sustainability objectives, providing more opportunity for the community to access affordable housing. The provision of affordable homes will also contribute to tackling social exclusion, by

helping to remove barriers to housing, and has strong links with health and well being.

Preferred Approach 24 – Types of affordable housing needed

This approach builds on the overall target, and provides flexibility in terms of providing different forms of affordable housing where appropriate. This ensures there is a greater range of affordable housing types available to serve more members of the community. The provision of affordable housing in this manner will also help social inclusion and make the best use of available land.

This appraisal did not note any links with the environmental or economic sustainability objectives.

Preferred Approach 25 – Specifying the size and form of affordable housing

Integrating affordable homes within a wider development as proposed in this approach also scores well against the social sustainability objectives. As well as providing opportunities for housing for more people, it also promotes social inclusion, and will reduce fear of crime in these developments.

The individual site-by-site considerations of the size and form of affordable housing will be appraised as part of the Site Allocations DPD.

Preferred Approach 26 – The local economy – land supply

It is important for the town to have adequate employment land supply to support the regeneration of the town in line with the overall spatial strategy.

This approach presented to fulfil these requirements scores well against the social and economic objectives. Significant job opportunities will be provided, and development will work towards raising the economy of the town, and contributing to alleviating deprivation. The employment land will be located in areas with good transport links, improving accessibility for all to job opportunities.

The approach identifies the amount of floorspace that will be brought forward, and in which strategic locations. These developments will take place on both greenfield and brownfield sites, which will have implications in terms of the potential loss of biodiversity, and increased levels of traffic generated by this development. As with most forms of development, this will have subsequent impacts on air quality and pollution, contributing the effects of climate change. The approach needs to ensure that appropriate infrastructure is in place to support these developments if they are not in accessible areas, and that transport needs should be addressed by the use of travel plans and limiting parking provision where necessary.

Preferred Approach 27 – Skills and training

The approach looks to support the development of training and education floorspace in the town, and scores well against the social and economic sustainability objectives. This will play a part in reducing deprivation within the town and work significantly to improve skills and education of the population, as well as resulting in a marked rise in the number of people in these areas – contributing to increased footfall and its links with reducing crime and fear of crime.

There is potential for a negative effect in terms of increased car use, as more people will be attracted to the town. However, all these developments are located in accessible locations with good public transport links, which helps to mitigate this as far as possible.

Preferred Approach 28 – Tourism

This approach seeks to strengthen the town's tourist offer, which will in turn build on its existing distinctiveness. The existing coast and townscape should be enhanced through this approach, which will also contribute significantly to the local economy and provide further job opportunities, through both new hotels, and the retention of existing bed spaces.

The attraction of more people through new hotels however, is likely to increase water consumption, road congestion and pollution. It will be important to ensure that new tourist accommodation considers water and waste minimisation, and is located in accessible locations, which will reduce the need to travel by car.

Preferred Approach 29 – Language schools

Language schools play a relatively unrecognised role in the local economy. A policy to protect, or make provision for new facilities will contribute positively to the economic sustainability objectives, helping economic growth and revival in some of the most deprived areas of the town. Ensuring the continued use of language schools also helps to make the best use of land and contribute to urban renaissance.

Uncertain effects have been recorded against the objectives relating to climate change and water consumption. New build or alterations to existing buildings would have to take account of sustainable design and construction techniques to maximise energy and resource efficiency.

Preferred Approach 30 – Transport and accessibility – strategic road and rail schemes

The approach supports the delivery of strategic road and rail schemes, which have been identified in the draft South East Implementation Plan. These schemes will improve the accessibility within and to the town, whilst supporting its regeneration. It states that the Council will continue to lobby for the timely provision

It is anticipated that the provision of these strategic road and rail schemes will help to reduce travel times and ease access to workplace. The proposed link road will have the most positive effect in achieving this (although not until the medium to long term), as it will result in the reduced number of cars in areas of poor air quality and increase accessibility in the town. However the building of new roads will have a negative impact on the landscape, with the potential to encourage increased car use. If this occurs, it will increase emissions and have a negative effect on climate change.

Preferred Approach 31 – Local road improvements

This approach looks at safeguarding land for future transport improvements, if considered necessary. The development of this land is dependent on the implementation of the link road, and as such, would not be coming forward until the later half of the plan period, if at all. Uncertain effects have been recorded due to this uncertainty. However, if the scheme is brought forward, its intention is to direct traffic

away from areas with high levels of pollution and poor air quality, which may have some longer-term positive effects.

Preferred Approach 32 – Transport and accessibility - more sustainable transport options

This approach supports the draft Hastings and Bexhill Local Area Transport Strategy (LATS) which is produced by the County Council. It seeks to maximise accessibility, improve air quality and environment, safety, tackle congestion and promote regeneration. No negative sustainability effects have been recorded.

Preferred Approach 33 – Transport and accessibility – car parking

This approach seeks to fully exploit the opportunities to improve access to the town centre, before limiting car parking. The promotion of public transport links closely with improving health and accessibility, and will contribute positively to reducing congestion and air pollution. No negative sustainability effects have been recorded.

Preferred Approach 34 – Transport and accessibility – residential parking

This approach retains an element of parking provision in new housing developments. Limiting parking provision more severely would enhance the sustainability effects, but the circumstances within the town do mean that this approach will reduce the likelihood of congestion on existing roads due to high levels of on street parking. No negative sustainability effects have been recorded.

Preferred Approach 35 – Transport and accessibility – location of development

This approach results in significant positive effects in terms of social and environmental objectives. It promotes accessibility and travel by sustainable modes of transport, and helps to ensure the community have access to employment/housing areas. Travel plans and improved transport links will reduce the need to travel by car, reducing air pollution and contribution to climate change. This approach is integral to all forms of development.

Preferred Approach 36 – Community infrastructure

This approach proposes an SPD, which will have its own sustainability appraisal. As such it has not been appraised here.

Preferred Approach 37 – Neighbourhood planning – area co-ordination

This approach refers to an established approach for community involvement – a process that cannot be appraised here.

Preferred Approach 38 – Nature conservation and improvement of biodiversity

This approach puts in place measures to protect and improve important biodiversity areas within the town. This will be done by vigorous enforcement of existing protection measures and greater encouragement in identifying new areas of protection and improvement. There will be positive and significant positive effects that specifically relate to improving peoples health and wellbeing, increasing access to open space and reducing the need to travel by car.

Preferred Approach 39 – Landscape protection

The preferred approach aims to protect and enhance the countryside and landscape of the town, therefore scoring well against the environmental sustainability objectives. The biodiversity within these areas will be protected as a result of this approach, and the natural, archaeological, historic environments and cultural assets will be enhanced. No negative sustainability effects have been recorded.

Preferred Approach 40 – Open spaces

This approach deals with the enhancement, protection and provision of open spaces. In line with the Parks and Open Spaces Strategy it puts in place details of how existing open spaces will be protected and enhanced and what instances we would require a provision of open space. There are many positive and significantly positive effects of this approach and they include improvements to health and wellbeing, increased access to open space, ability to reduce crime and fear of crime, increased protection of biodiversity, reductions in pollution and also the reductions in car travel through increased pedestrian and cycle links.

Preferred Approach 41 – Open space – strategic network

This approach will increases peoples access to open space. It will therefore have positive effects on strategic objectives including those aiming to improve health and wellbeing through cycling and walking, reduce crime and fear of crime with well designed access routes and reduce pollution by reducing the need to travel by car.

Preferred Approach 42 – Sports and leisure facilities

The protection of sports and leisure facilities including playing fields, sports pitches and recreational facilities is key to improving public health and wellbeing in the short, medium and long term. This approach benefits communities too by securing facilities for sports and recreational opportunities, which in turn promotes social inclusion and creates vibrant communities where crime and fear of crime are reduced. The existence of sports and leisure facilities also encourages employment and new economic activities, which will help with inward investment.

There are potential conflicts with this approach. Centrally located facilities could reduce the need to travel therefore reducing congestion and air pollution and improving air quality but an increased number of visitors could increase the number of people travelling by car and reversing those potential benefits.

Preferred Approach 43 – Children's play provision

This approach aims to continue with the Councils commitment to providing play space within the town. There is a shift away from formal to informal play spaces in line with the Parks and Open Spaces Strategy and this should improve health and wellbeing among the young. This approach will also help with creating better communities by reducing crime and fear of crime with safer, more accessible play environments and enhancing areas of biodiversity for wider enjoyment.

Preferred Approach 44 – Sustainability and design

Good sustainable design is fundamental to ensuring good sustainable communities are created. This approach has potential for positive and significant positive effects in terms of most strategic objectives. Benefits include sustainable design and

construction that reduces the impacts of climate change, reduced fuel/running costs to relieve fuel poverty, good design that creates safer communities, efficient use of land, design that reduces/mitigates against flooding, and the inclusion of energy efficient and renewable energy technologies and other design aspects that help to achieve sustainability goals.

Preferred Approach 45 – Renewable energy – stand alone schemes

This approach favours the submission of sites for renewable energy schemes, subject to certain criteria. This has significant positive effects in terms of increasing the amount of energy generated from renewable resources, and will help to address the causes of climate change. Standalone schemes will also contribute to making Hastings locally distinctive if brought forward. No negative effects have been recorded.

Preferred Approach 46 – Renewable energy – on site provision

This approach seeks renewable energy provision on large scale developments. It is subject to further evidence base research but it has the potential to have significant positive effect on all climate change related strategic objectives. There is increased opportunity for people to live in decent, sustainably constructed home with reduced fuel costs. Could be more beneficial if applied to all new dwelling homes.

Preferred Approach 47 – Flood Risk

This approach seeks to ensure that developments are not increasing the risk of flooding elsewhere in the town, are not being developed in flood risk areas unnecessarily or have measures to reduce/mitigate any future change in flood risk. It has many positive effects, and these include sustainably constructed homes where climate change has been considered and water efficiency has been incorporated.

Preferred Approach 48 – Sense of place and local identity

The use of the “20 questions” set out in this approach scores significantly well against the social and environmental sustainability objectives. The approach takes into account good design, accessibility and sustainable construction methods in development, contributing strongly to the improvement of local distinctiveness and sense of place. No negative effects have been recorded.

Preferred Approach 49 – Built and historic environment

This approach specifically looks at preserving the historic environment and townscape, scoring significant positive effects against the sustainability objective relating its protection and enhancement. The approach will help to encourage urban renaissance, and will contribute to distinctive communities. No negative sustainability effects have been recorded.

Proposed mitigation measures

The SEA Directive requires the Environmental Report produced as part of the Sustainability Appraisal to provide information on:

“The measures envisaged to prevent, reduce and as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme” (Annex 1 (g))

To mitigate against the potential negative effects of the preferred approaches, and to maximise the beneficial effects, mitigation measures have been recommended as a result of the assessment. Table 8 above uses the results of the appraisal shown in Appendix H to show the compatibility of the preferred approaches with the sustainability objectives, and where a negative score is proposed (shown in variations of red) mitigation measures are proposed.

In undertaking this assessment, it became apparent that several 'cross cutting' issues were repeatedly revealed as mitigation measures. These include the requirement for high levels of sustainable design and construction where appropriate, the provision of suitable infrastructure, particularly in terms of sustainable transport, and the need to consider flood risk in development. It is recommended that these should be fully integrated within revised policy approaches.

Preferred Approach 1 – Location of new housing

Planning applications will need to consider the most appropriate way to mitigate against the loss of biodiversity on either greenfield and brownfield sites across the town, and in particular, consider the environmental constraints on land adjacent to the site at the north west of the town, which include a SSSI and Ancient Woodland. Any further development will need to consider the implications of flood risk, particularly in terms of increased run-off, and sites identified within flood zones should conform to the FRA requirements. Sustainable Drainage systems should be incorporated within developments as appropriate.

Preferred Approaches (PA) 35, 44 and 46 relating to transport (location of development), sustainability and design, and flood risk should be applied in conjunction with this approach, to ensure effective mitigation of the negative effects identified.

Preferred Approach 2 – Re-use of previously developed land

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 3 – Employment locations

Planning applications will need to consider the most appropriate way to mitigate against the loss of biodiversity on either greenfield and brownfield sites across the town, and in particular, consider the additional environmental constraints on newly identified greenfield sites. Further development will need to consider the implications of flood risk, particularly in terms of increased run-off, and sites identified within flood zones should conform to the FRA requirements. Sustainable Drainage systems should be incorporated within developments as appropriate

PA 35, PA 44 and PA 46 relating to transport (location of development), sustainability and design, and flood risk should be applied in conjunction with this approach, to ensure effective mitigation of the negative effects identified.

Preferred Approach 4 – Location of retail development – comparison goods

Hastings town centre has experienced some past flooding problems, and in conjunction with other development in the town, it will be important to assess and minimise risk of flooding through the use of the SFRA, and detailed Flood Risk Assessment. To mitigate against increase in traffic, it is recommended that

contributions are sought to improve or provide additional transport infrastructure, and that the development is designed to encourage more sustainable modes of travel including walking and cycling.

PA 35 and PA 46 relating to transport (location of development) and flood risk should be applied in conjunction with this approach, to ensure effective mitigation of the negative effects identified.

Preferred Approach 5 – Location of retail development – retail warehousing

Locating development out of centre or on edge of centre sites will increase the need to travel by car, having subsequent impacts on road congestion and pollution. It is recommended that contributions are sought to improve or provide additional transport infrastructure, and that the development is designed to encourage more sustainable modes of travel including walking and cycling.

PA 35 and PA 46 relating to transport (location of development) and flood risk should be applied in conjunction with this approach, to ensure effective mitigation of the negative effects identified.

Preferred Approach 6 – Town, district and local centres

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 7 – Hastings Town Centre – overall strategy

Part of the overall strategy for the town is to improve education and skills through the development of UCH and the new college at Station Plaza. To improve the beneficial effects of the approach, reference to improving education and skills should be inserted.

Preferred Approach 8 – Hastings Town Centre

Negative sustainability effects need to be mitigated against by promoting higher levels of sustainable design and construction in town centre developments, where possible. This could include the provision of renewable energy technologies and energy efficiency techniques within developments. Waste and water minimisation within the developments would need to be fully integrated within the development, and storage for waste and recycling provided. PA 44 relating to Sustainability and Design would be effective if applied in conjunction with this approach to ensure effective mitigation of these effects.

A FRA must accompany proposals for development exceeding 1ha in area, and consideration given to the most appropriate sustainable drainage techniques.

Preferred Approach 9 – Central St Leonards – key developments proposed

To maximise the beneficial effects of the new housing and commercial developments, PA 44 relating to sustainability and design should be applied in conjunction with this approach, and include the provision of renewable energy where appropriate. Will need to provide infrastructure improvements to support new developments, and in particular, methods to reduce car dependency and provide greater travel choice.

Preferred Approach 10 – Central St Leonards – improving housing choice and conditions

Although no areas of conflict arise from this approach, it is recommended that the policy be amended to ensure that the improvements carried out take account of energy saving and efficiency measures in accordance with PA 44 relating to sustainability and design. This will maximise beneficial effects and reduce running costs of the building, further contributing to addressing issues such as fuel poverty and deprivation.

Preferred Approach 11 – Central St Leonards – creating a sustainable community

Further development may increase flood risk, an issue that would need to be further considered on particular development sites (the SFRA has however, identified Central St Leonards as a low flood risk area). The approach does not refer to the need to encourage high levels of sustainable design and construction in new builds or conversion, and as such, should be applied in conjunction with PA 44 relating to sustainability and design to mitigate against these effects.

Preferred Approach 12 – Central St Leonards – improving the physical environment

No specific mitigation measures are proposed for this approach, although consideration must be given to reducing the impact of increased traffic generation to the area as a whole.

Preferred Approach 13 – Central St Leonards – economic development

No specific mitigation measures are proposed for this approach, although consideration must be given to reducing the impact of increased traffic generation to the area as a whole and to the consideration of water minimisation measures and sustainable design in new and alterations to existing, development. PA 44 should be applied in conjunction with this approach to ensure that these considerations are taken into account.

Preferred Approach 14 – Pebsham Countryside Park

No specific mitigation measures are proposed for this approach, although it is recommended that the policy recognises that improvements to public transport will be needed to increase accessibility to the site, and discourage car use from visitors.

Preferred Approach 15 – Ore Valley Millennium Community

Due to the proximity of the Ore Valley stream, it is essential that the FRA for the site includes a detailed analysis of the risk posed by Ore Valley stream on the site and vice versa.

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Preferred Approach 16 – Enviro-Enterprise Corridor

No specific mitigation measures are proposed for this approach. However, it is recommended that the policy be applied in conjunction with PA44 relating to sustainability and design, to reflect the need to provide higher environmental standards in terms of the design and construction of the development.

Preferred Approach 17 – The Seafront

No specific mitigation measures are proposed for this approach, as it is supported as an area of change. However, this approach will have to be applied in conjunction with PA 46 to ensure that the impacts of flood risk are taken into account.

Preferred Approach 18 – Bulverhythe

All development built to high environmental standards, incorporating renewables on site where possible to mitigate against the likely increase in waste and water consumption and potential loss of biodiversity. The risk of flooding is also a significant issue in this area, although research has concluded that development in this location is appropriate.

Infrastructure would also be needed to support development in this location, including public transport and other alternatives to the car - including walking and cycling to mitigate against the effects of increased car use, congestion and air pollution.

To facilitate implementation, this approach should be applied in conjunction with PA35 (transport – locations for development), PA 44 (sustainability and design) and PA46 (flood risk) to ensure the mitigation of the negative sustainability effects identified.

Preferred Approach 19 – Wilting

No specific mitigation measures are proposed, as this option will be appraised through the Rother District Council appraisal process. However, it is recommended that the proposed approach be amended to recommend to Rother that the development be built to high environmental standards, including the provision of on-site renewable energy where appropriate.

Preferred Approach 20 – Housing mix

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 21 – Density

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 22 – Gypsies and travellers

Whilst no specific mitigation measures are proposed for this approach, it is recommended that the criteria based policy ensures that the sites selected are located in sustainable locations, with good accessibility to local amenities, services and facilities.

Preferred Approach 23 – Overall target for affordable housing

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 24 – Types of affordable housing needed

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 25 – Specifying the size and form of affordable housing

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 26 – The local economy – land supply

This approach proposes significant development on both greenfield and brownfield sites, which could lead to a loss of biodiversity through development. Planning applications will need to consider the most appropriate way to mitigate against any loss on these sites, and in particular, consider the additional environmental constraints on greenfield sites. The replacement of greenfield land with employment development will increase the level of surface run off, so it will be essential to apply this approach in conjunction with PA 46 – flood risk, and incorporate the most suitable sustainable drainage techniques.

There is also the need to minimise the effects of the increased traffic levels arising from the developments. The requirement for travel plans should be incorporated within the policy in accordance with PA 35, and infrastructure provided to support the developments in less accessible locations.

Preferred Approach 27 – Skills and training

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 28 – Tourism

No specific mitigation measures are proposed for this approach, although consideration will have to be given to the location and design of any new hotels, in terms of accessibility and consumption of resource – the approach should be applied in conjunction with PA 44 to mitigate against these potential effects.

Preferred Approach 29 – Language schools

No specific mitigation measures are proposed for this approach, although consideration will have to be given to the design of any new language schools, in terms of energy efficiency and consumption of resources - the approach should be applied in conjunction with PA 44 to mitigate against these potential effects.

Preferred Approach 30 – Transport and accessibility – strategic road and rail schemes

Following the appraisal there are two areas where mitigation may be needed. The potential for impact on biodiversity as a result of the strategic road and rail schemes will need to addressed, and recognised in the policy. This may include translocation of existing biodiversity in areas where there will be a negative impact, whilst providing the opportunity to increase biodiversity in areas of deficiency.

There is also potential to increase the risk of flooding from surface water run off – the application of PA 46 in conjunction with this approach will contribute to mitigation of these effects. The development of the LATS should also take into account the local transport issues as discussed.

Preferred Approach 31 – Local road improvements

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 32 – Transport and accessibility - more sustainable transport options

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 33 – Transport and accessibility – car parking

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 34 – Transport and accessibility – residential parking

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 35 – Transport and accessibility – location of development

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 36 – Community infrastructure

This approach has not been appraised.

Preferred Approach 37 – Neighbourhood planning – area co-ordination

This approach has not been appraised.

Preferred Approach 38 – Nature conservation and improvement of biodiversity

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 39 – Landscape protection

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 40 – Open spaces

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 41 – Open space – strategic network

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 42 – Sports and leisure facilities

It is envisaged that an increase in sports and leisure facility users could increase traffic. To mitigate this it is recommend that contributions be sought to improve transport infrastructure and encourage walking and cycling through the application of PA35. It may also be appropriate to take forward this approach in conjunction with PA46 – flood risk, depending on the location and scale of development.

Preferred Approach 43 – Children's play provision

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 44 – Sustainability and design

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 45 – Renewable energy – stand alone schemes

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 45 – Renewable energy – on site provision

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 46 – Flood Risk

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 47 – Sense of place and local identity

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Preferred Approach 48 – Built and historic environment

Following the appraisal, no recommendations for mitigation to this policy have been proposed.

Uncertainties and risks

The Sustainability Appraisal process involves making judgements on the basis of often limited and inadequate baseline data, and is by nature an uncertain process. For example, the population and workforce forecasts cannot be fully relied on, as they are policy based and do not take account of the substantial investment in the

town. We are also reliant on external bodies to collect a significant amount of the data needed, and therefore have little jurisdiction over the scope, frequency and availability of such information.

The sustainability appraisal process has aimed to limit this risk by reviewing the baseline data on a regular basis, and consulting with specialist organisations to identify and collect the most relevant information.

The environmental, social, and economic effects of the preferred approaches have been identified above. However, there are various other factors that may influence the outcomes that have been appraised. For example, technological advances and changes in the regional and national economy may influence how these policies are implemented. To overcome this, the monitoring framework reported on in the Annual Monitoring Report will provide an up to date picture of the sustainability issues, enabling these uncertainties to be addressed as they arise.