

Sustainability Appraisal (SA) of the Hastings Development Management Plan



SA Report

November 2012

Prepared for
Hastings Borough Council

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Hastings Development Management Plan. SA is a mechanism for considering and communicating the impacts of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of the Development Management Plan is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²
- 2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that *'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'*.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as the 'SA Report'. Essentially, there is a need for the SA Report to answer the following four questions:
1. What's the scope of the SA?
 - This is an opportunity to present a review of sustainability issues that exist in relation to the plan and identify those that should be a particular focus of the SA (given that issues are potentially numerous, and SA should be focused and concise)
 2. What has Plan-making / SA involved up to this point?
 - Prior to finalising the draft plan there must be (as a minimum) one plan-making / SA iteration at which point alternative approaches to addressing key plan issues are subjected to SA.
 3. What are the appraisal findings at this current stage?
 - i.e. what are the predicted sustainability effects of the draft plan and what changes might be made to the plan in order to avoid or mitigate negative effects and enhance the positives.
 4. What happens next?
 - In particular, there is a need to think about how the effects of the plan will be monitored once it is adopted and being implemented.
- 2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report under a list of ten points. **Table 1.1** makes the links between the ten Schedule 2 requirements and the four SA questions. **Appendix I** of this SA Report explains the process of 'making the links' in more detail.

3 STRUCTURE OF THIS SA REPORT

- 3.1.1 The four SA questions are answered in turn across the four subsequent parts of this Report.

¹ The Development Management Plan is a 'Local Plan' as defined by the Town and Country Planning (Local Planning) (England) Regulations 2012 and hence an SA Report must be published for consultation alongside the 'Proposed Submission' Plan document.

² Directive 2001/42/EC

³ Regulation 12(2)

Table 1.1: Questions that must be answered within the SA Report

SA REPORT QUESTION	SUB-QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The relevant environmental protection objectives, established at international or national level
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
	What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable') The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next (including monitoring)?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

- 4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations⁴, this Chapter answers the series of questions below.

Table 4.1: Scoping questions answered

SCOPING QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan
What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes' The relevant environmental protection objectives, established at international or national level
What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan'
What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

4.2 Consultation on the scope

- 4.2.1 The Regulations require that: *'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'*. In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.⁵ As such, these authorities were consulted on the scope of this SA in 2005. This consultation was achieved by providing a 'Scoping Report' for their comment. In order to allow wider participation, consultation also included a workshop with key stakeholders. A revised version of the Scoping Report was then published in 2008 to reflect changes in Hastings and the policy context.
- 4.2.2 The Scoping Report was again comprehensively updated during Spring 2011 and was sent to statutory consultees for further comment between 27 June and 8 August 2011. No changes to the updated Scoping Report were recommended as part of this consultation. The revised Scoping Report is available at:

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

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme'.*

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan

5.1.1 The Development Management Plan (DMP) for Hastings has the purpose of guiding planning applications that are put forward to the Council. Its role is to set out clear policies to help shape the design of construction of new development, and to allocate sites to deliver the overarching policies in the Planning Strategy. It therefore shares the same strategic objectives as the Planning Strategy, which are:

- **Objective 1:** Achieve and sustain a thriving economy
- **Objective 2:** Ensure everyone has the opportunity to live in a decent home, which they can afford, in a community in which they want to live
- **Objective 3:** Safeguard and improve the town's environment
- **Objective 4:** Addressing the impacts of climate change
- **Objective 5:** Supporting sustainable communities
- **Objective 6:** Provision of an efficient and effective transport system
- **Objective 7:** Making best use of the Seafront and promoting tourism

5.1.2 The DMP is divided into two distinct parts:

General Guidance

5.1.3 This first part of the plan presents policies in relation to:

- **Development management** – the issues that arise when assessing planning applications – covering design, access, ground conditions and more
- **Housing and Community** – covering issues such as the conversion of houses
- **Historic and Natural Environment** – defining areas in the town for the specific protection of things like nature conservation
- **Economy** – helping to identify and protect retail areas, employment sites and other economic activities.

Site Allocations

5.1.4 The second part of the document sets out development sites that have been identified to meet the overall housing and employment needs of the Borough. These have been organised by planning focus area, and present allocations for housing, employment and mixed use sites.

5.2 What's the plan not trying to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relationship of the plan with other relevant plans and programmes
- The relevant environmental protection objectives, established at international or national level

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate 'scope' of an SA involves reviewing 'sustainability context' messages (e.g. issues, objectives or aspirations) set out within relevant published plans, policies, strategies and initiatives (PPSIs). Sustainability context messages are important, as they aid the identification of the 'key sustainability issues' that should be a focus of the SA. Key messages from this review are summarised below.

6.2 Key messages from the 2011 context review

Communities and well-being

- The need to create mixed, sustainable communities was highlighted in the review. This draws on the objective of national Planning Policy Statement (PPS)⁶ 1 to create safe, sustainable, liveable and mixed communities. The creation of sustainable communities is also a priority of Securing the Future: Delivering the UK Sustainable Development Strategy (2005). The provision of decent, affordable homes and the re-use of existing buildings are acknowledged as particular concerns. PPS3's states a commitment to improving the supply and affordability of housing, whilst the local Housing Strategy (2009-2013) established an aim to deliver housing improvements. An emphasis on reuse can be found in the Empty Homes Strategy 2008-2013.
- Communities must have access to a range of shopping, employment, leisure, cultural, and local services; with access by public transport, walking and cycling available. This message draws from a number of wider policies, including the goal of PPS1 to provide good access to key services and the Local Housing Strategy's goal of improving health and supporting independent living. Access to facilities and services by public transport, walking and cycling is an objective of PPG13.
- The Government's 'World Class Places' vision is one of places that are planned, designed, and developed to provide everyone with a decent quality of life. In particular, the context review highlights the need to encourage developments that design out crime and reduce the fear of crime. The Hastings Community Safety Plan (2008-2011) emphasises such 'secure by design' principles.

The environment

- The protection and enhancement of, and access to, the environment form the basis for a number of the messages highlighted through the context review. Generally, this reflects the goal of PPS1's to protect and enhance the natural and historic environment. Specific messages under this theme address biodiversity, geodiversity, the historic environment, parks, open spaces and the coastal and marine environment. These messages draw upon a wide variety of policies including the EU Habitat Directive, PPS: Planning for a Natural and Healthy Environment (Consultation, 2010), PPS5: Planning for the Historic Environment (2010), and PPG17: Planning for Open Space, Sport and Recreation (2002).

⁶ It should be noted that the National Planning Policy Framework (NPPF) was published on 27 March 2012. The NPPF replaces Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). A key element of the NPPF are its 'presumption in favour or sustainable development', where sustainable development is defined by the five principles as set out in the UK Sustainable Development Strategy (2005): living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

- The reduction and mitigation of the environmental impacts of new and existing developments forms the focus of a number of messages in the review. Generally, the review highlights the need to respect ‘environmental limits’. This is one of the five guiding principles listed in the UK Sustainable Development Strategy (2005).
- A more specific concern is the incorporation waste strategies into new developments, and the encouragement of reuse, recycling and recovery. Appropriate management of waste is called for at multiple levels, including the East Sussex and Brighton & Hove Waste Local Plan (2006), PPS10 and the EU Waste Directive.
- Reductions in water, air, noise, and soil pollution are also a concern of the review. Efforts to reduce pollution are encouraged at the national and international levels, for instance through PPS23 and the EU Air Quality Framework Directive.
- The need to take steps to tackle the issue of climate change is highlighted as a crosscutting issue. Broadly, the PPS1: Planning and Climate Change Supplement (2007) calls for climate change measures to be integral to the overall aims and policies of a plan. In terms of the mitigation, the review points out the need to reduce emissions, and to promote renewable energy and high levels of energy efficiency in buildings. *Mitigation* measures are encouraged at the international level through the Kyoto Protocol, and nationally through the Climate Change Act and the Government’s ‘Beyond Copenhagen’ action plan (2009). *Adaptation* is called for in a range of policy including The UK Low Carbon Transition Plan (2009) and Defra’s Climate Resilient Infrastructure vision (2011).

The economy

- There is a need to develop and sustain a vibrant economy. More specifically, there is a need to economic policy including that set out in PPS4 (2009), with its overall aim of achieving sustainable economic growth, and the Local Growth White Paper (BIS, 2010).
- The review highlights the importance of land being made available for employment needs. The provision of land for business uses is a concern of the local Retail Capacity Study (2006 & 2010 update) and the Hastings & Rother Employment Strategy and Land Review (2008).
- There is a need for policies that assist in education and skill development. Improvement in skill levels in order to obtain economic growth is an objective of Skills for Growth – The National Skills Strategy (BIS, 2009).
- As well as a general requirement to support economic growth, the context review identified the need to invest in the regeneration of deprived areas and to reduce deprivation gaps. This message draws upon policy such as PPS4: Planning for Sustainable Economic Growth (2009) and the Hastings & St Leonards Sustainable Community Strategy (2009-2026). A specific message of the review is the need for a revival in tourism through enhanced facilities, greater diversity and reduced seasonality. The Hastings, Bexhill & 1066 Country Hotel and Guest Accommodation Futures (2007) report examines the suitability of current tourist facilities and looks for growth opportunities in this area.

6.3 Key messages from the National Planning Policy Framework (NPPF)⁷

- 6.3.1 In March 2012 the National Planning Policy Framework (NPPF) was published. The NPPF, read as a whole, constitutes ‘the Government’s view of what sustainable development in England means in practice for the planning system. The NPPF supersedes most PPSs and PPGs. The following is a summary of the new guidance included in the NPPF that is of relevance to this SA.

⁷ CLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

Biodiversity and open space

- 6.3.2 Impacts on biodiversity should be minimised, with net gains in biodiversity to be provided wherever possible. To contribute to national and local targets on biodiversity, planning should promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

Landscape

- 6.3.3 The planning system should protect and enhance valued landscapes. In designated areas, planning permission should be refused for major development, unless it can be demonstrated to be 'in the public interest'. 'Great weight' should be given to the conservation of the landscape and scenic beauty of Areas of Outstanding Natural Beauty, which have the 'highest level of protection' in this regard.
- 6.3.4 Planning policies and decisions should 'encourage effective use of land' through the reuse of land which is previously developed, 'provided that this is not of high environmental value'. The value of best and most versatile agricultural land should also be taken into account.
- 6.3.5 In relation to the undeveloped coast, local planning authorities should maintain the character of such areas by 'protecting and enhancing its distinctive landscapes', particularly in those areas that have been defined as Heritage Coast.

Cultural heritage

- 6.3.6 Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Air quality

- 6.3.7 New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account the presence of Air Quality Management Areas and cumulative impacts on air quality.

Soil and contamination

- 6.3.8 The planning system prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land' wherever appropriate.

Climate change mitigation

- 6.3.9 Supporting the 'transition to a low carbon future in a changing climate' is regarded as a 'core planning principle'. A key role for planning in securing reduced GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008⁸. Specifically, planning policy should support the move to a low carbon future through:
- planning for new development in locations and ways which reduce GHG emissions;
 - positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and

⁸ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

Climate change adaptation

- 6.3.10 Planning authorities should take account of the long term effects of climate and 'adopt proactive strategies' to adaptation, with new developments planned to avoid increased vulnerability to climate change impacts.
- 6.3.11 In terms of flooding, development should be directed away from areas highest at risk and should not be allocated if there are 'reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. The NPPF states that local planning authorities should avoid 'inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast' in order to reduce the risk posed from coastal change.

Economy & Employment

- 6.3.12 The contribution the planning system can make to building a strong, responsive economy is highlighted. This should include 'identifying and coordinating development requirements, including the provision of infrastructure'. There is a need to support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'. In addition, local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas.

Housing

- 6.3.13 Local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. To create 'sustainable, inclusive and mixed communities' authorities should ensure affordable housing is provided. Whilst there is no longer a national requirement to build at a minimum density, there is a need to ensure that effective and efficient use of available land is made when permitting residential development.

Education

- 6.3.14 Ensuring that there is a 'sufficient choice of school places' is of 'great importance'. Local planning authorities must 'work with other authorities and providers' in order to access the current 'quality and capacity' of infrastructure for education, plus its capability of meeting 'forecast demand'.

Community: Population, Health, Crime and Social Equity

- 6.3.15 The social role of the planning system is defined as 'supporting vibrant and healthy communities', with a 'core planning principle' being to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.

Transport and Accessibility

- 6.3.16 Planning for transport and travel will have an important role in 'contributing to wider sustainability and health objectives'. To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for 'a balance of land uses'. Wherever practical, key facilities should be located within walking distance of most properties.

7 WHAT'S THE SUSTAINABILITY 'BASELINE' AT THE CURRENT TIME?

The SA Report must include...

- The relevant aspects of the current state of the environment
- The environmental characteristics of areas likely to be significantly affected

7.1 Introduction

7.1.1 Another important step when seeking to establish the appropriate 'scope' of an SA involves reviewing the situation now for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects.

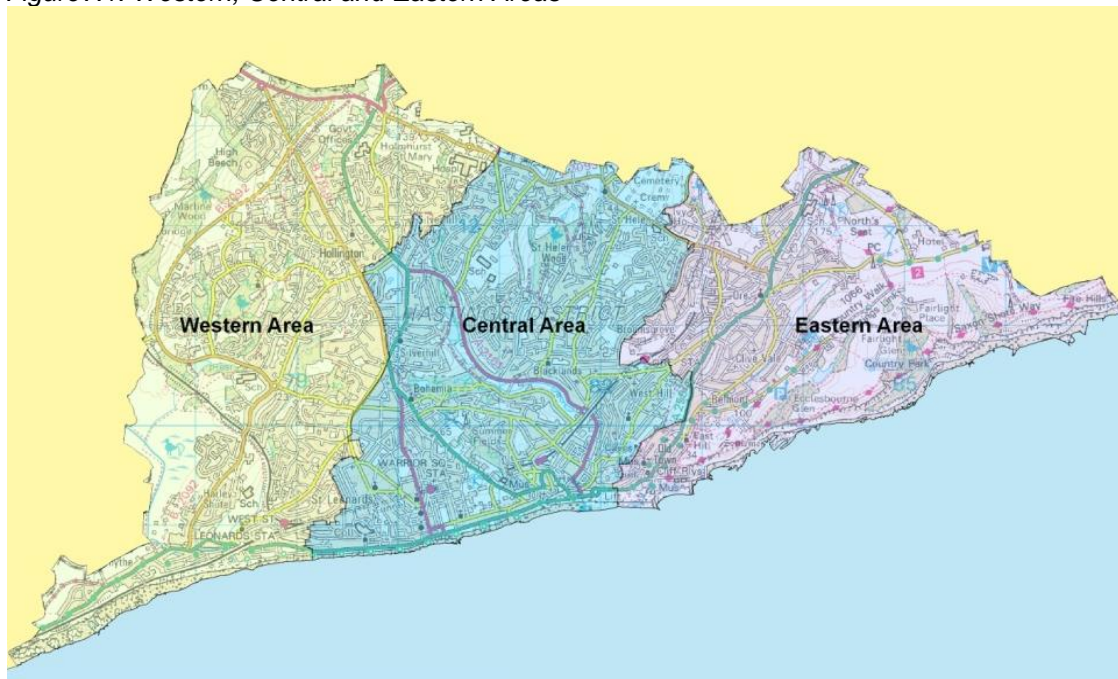
7.1.2 The updated SA Scoping Report (2011) sets out a clear picture of baseline conditions in the Borough of Hastings for a range of sustainability issues. This Chapter presents a summary, updated to reflect current conditions where relevant.

7.2 Hastings Borough - a spatial overview

7.2.1 Hastings is an urban borough located in the County of East Sussex in the South East region of England. It covers an area of approximately 30 square kilometres, with a population of approximately 90,000 people (2011). Combined with Bexhill and nearby settlements the population of the area is around 140,000. Hastings itself has a tightly contained urban centre, situated to the west of a series of sandstone headlands and mostly surrounded by the High Weald Area of Outstanding Natural Beauty and the English Channel to the south.

7.2.2 The preferred scale for considering strategic planning issues and desired outcomes is at the level of the following identifiable spatial areas: Western Area, Central Area, Eastern Area, and the seafront'.

Figure 7.1: Western, Central and Eastern Areas



Western Area

- 7.2.3 The Western Area comprises the areas of Little Ridge and Ashdown, Greater Hollington and Filsham Valley, and Bulverhythe. It includes a mix of employment areas, housing and green spaces, with residential neighbourhoods and some established communities. The area benefits from 3 major employment areas, with a focus on manufacturing and engineering. Large supermarkets, the Conquest Hospital and Ashdown House also provide significant sources of employment in the area.

Central Area

- 7.2.4 The Central Area comprises the areas of St Helens, Silverhill and Alexandra Park, Maze Hill and Burtons' St Leonards, Central St Leonards and Bohemia, Hastings Town Centre, and West Hill. Each area benefits from a unique identity. The town centre boasts over 500 retail units and mainly private or private rented accommodation, as well as 15 out of the 18 conservation areas in the town; Alexandra Park enjoys large Victorian properties, while Silverhill provides a range of popular local shops and small businesses. St Helens Wood is a mainly residential area with a high proportion of privately owned properties

Eastern Area

- 7.2.5 The Eastern Area includes the Old Town, Hillcrest and Ore Valley, Clive Vale and Ore Village and Hastings Country Park. The Eastern Area is one of the most diverse areas in Hastings, containing a number of residential areas – Halton, Clive Vale, West Hill and the Pilot Road area – as well as the Ivyhouse Lane employment area and the attractions of Hastings Country Park Nature Reserve and the Old Town and the Stade. It also includes Hastings Cliffs Special Area of Conservation and the Old Town and Tillington Terrace Conservation areas

Seafront

- 7.2.6 The seafront is one of Hastings' best assets and is the public face of the town. It provides a variety of economic, leisure and health opportunities supporting the town's tourism economy.

7.3 Hastings Borough - a thematic overview

Population

- 7.3.1 Hastings' population is approximately 90,000 (2011) with a demographic profile similar to the national average, but younger than the rest of East Sussex. Hastings' population is expected to increase by 1.6% by 2028 (based on housing growth), or by around 9% based on ONS population projections. Although population growth is expected across all age groups the proportion of working age population is forecast to decline to 39,000 by 2028, representing a decrease of 5.5%. Correspondingly there will be an increase in the proportion of retired people and the elderly.

Access to services

- 7.3.2 71% of households are within 300m of accessible green space, which is an increase from 60% in 2005/06. Hastings has a target of 82% of households to be within 300m of accessible green space by 2012/2013. In 2007 over 30% of people were within 20 minutes walking time of different sports facilities, which is less than the County (34.6) and English (38.2) averages. Although underperforming this is an increase from only 8% in 2006.
- 7.3.3 No information is available on access to community facilities / voluntary and community section activity. 83.7% of people in Hastings have access to employment by public transport,

walking and cycling (2010)⁹, rising from 82% in 2007. In 2010 63.5% of adults had a home internet connection, compared to 68.5% in East Sussex.

Community strength

- 7.3.4 In 2008/09 75% of surveyed residents said they were satisfied with their local area, an increase from 70% in 2006/07. Only 55% of young people thought Hastings was a good place to live in 2007/08, which was a marginal increase on the previous year. In terms of community cohesion 70% agreed that people from different backgrounds get on together in 2008/09. This is compared to 80% for East Sussex

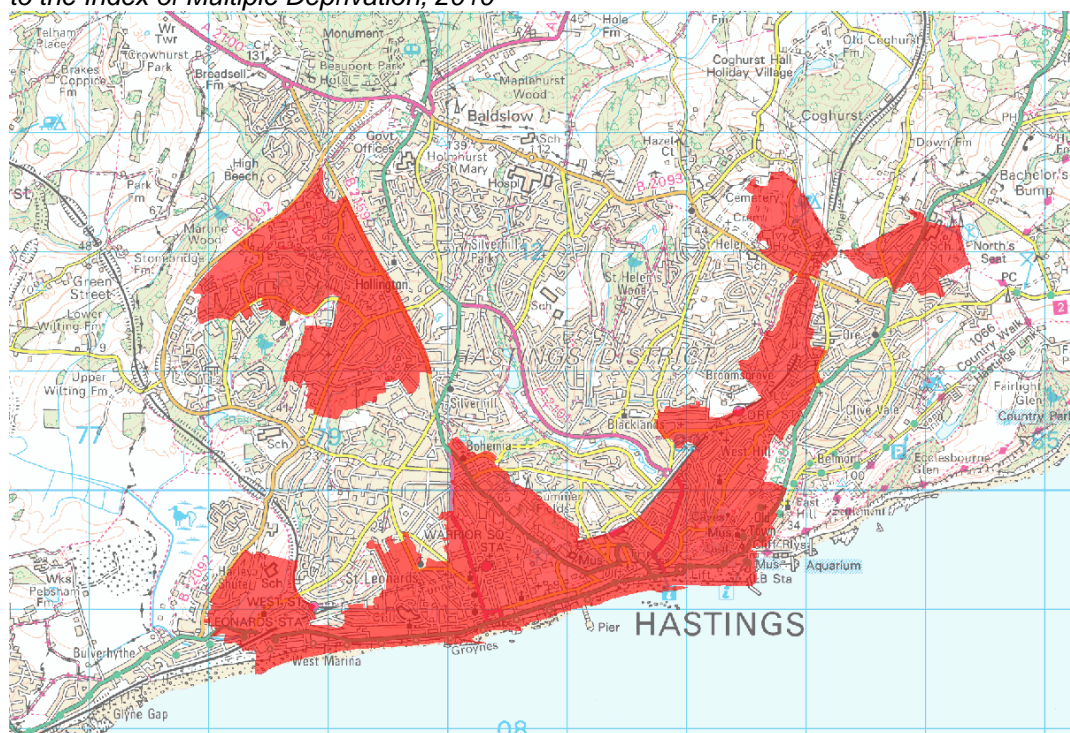
Community safety

- 7.3.5 Hastings has seen a significant fall in overall crime rates, from 142 incidents per 1000 people in 2005/06 to 95.3 /1000 in 2009/10 and 83.3/1000 in 2010/11. 85% of people felt safe outside in their local area in 2008/09, compared to 91% in East Sussex. After dark this dropped to 39%, considerably below East Sussex, 57%. This is also a significant drop from previous years; when over 50% of people felt safe outside after dark.

Deprivation

- 7.3.6 Hastings is one of the most deprived local authorities in England (19th out of a total of 326). 15 of Hastings 53 Super Output Areas are within the most deprived 10% and nine are within the most deprived 20% in England (Figure 7.2).
- 7.3.7 Deprivation is widespread throughout the town. Twelve of the towns 16 wards contain one or more neighbourhoods that fall within the worst 10% or 20% most deprived nationally. Hastings also has high levels of child poverty. In 2008 30% of children under 16 were living in poverty, compared to 18.5% in East Sussex as a whole. There has been no improvement in this figure since 2006.

Figure 7.2: Areas in the Borough that are amongst the 20% most deprived nationally according to the Index of Multiple Deprivation, 2010



⁹ East Sussex in Figures; the central statistical database for East Sussex, managed by the County Council

Economy, jobs and prosperity

- 7.3.8 Compared to the South East average, Hastings has a weak economy and wages are accordingly low. Figures from NOMIS for April 2011 - March 2012 show that Hastings has an economically active rate of 72.8% compared to the South East average of 79.4%. Hastings' unemployment rate in 2010 was 8.8%, compared to the County average of 6.8% and the national average of 7.7%. This was an increase of nearly 1% on the previous year. In February 2012 23.1% of the working age population were claiming key benefits, as compared to 14.3% in East Sussex, 10.9% in South East Sussex and 15% in England. This figure has increased over recent years. Hastings also has a higher rate of Job Seekers Allowance (JSA) claimants, 5.7%, compared to the County (3.1%) and South East (2.6%) averages (March 2011). Notably this is a decrease from 6.7% in March 2010.
- 7.3.9 Average household income (mean) in 2012 was £31,128, considerably below the average for East Sussex (£34,817) and the South East (£40,226). Around 9.6% of the Hastings population is employed in manufacturing, which is higher than the County (7.1%) and South East (6.9%) averages; whereas employment in financial, insurance and real estate; and professional, scientific and technical sectors is significantly below the County and South East averages.

Education, learning and skills

- 7.3.10 In 2008/09, 26.4% of GCSE students achieved grades A*-C falling from 33% in 2007/08. 7.5% of the working age population had no qualifications in 2009 which is below the County (7.9%) and South East (9.1%) averages.

Health and wellbeing

Life expectancy at birth (2007-2009) for both men and women in Hastings is markedly below the county and regional average at 76.6 and 80.8 respectively. (East Sussex 79.5 and 83.5; South East 79.4 and 83.3). Since 2003 Hastings has benefited from reduction in deaths from circulatory disease and cancer; however general levels of health are below the county and regional average.

Transport

- 7.3.11 Hastings has a high proportion of residents that live and work in the borough and correspondingly a high proportion of people (57.5%) travel less than 5km to work compared to 39.1% for East Sussex. Although there have been improvements to the Hastings-Ashford rail link with the provision of new trains, rail links are still considered poor. Hastings saw a 26% increase in bus passenger journeys from 2002/03 to 2008/09.

Housing

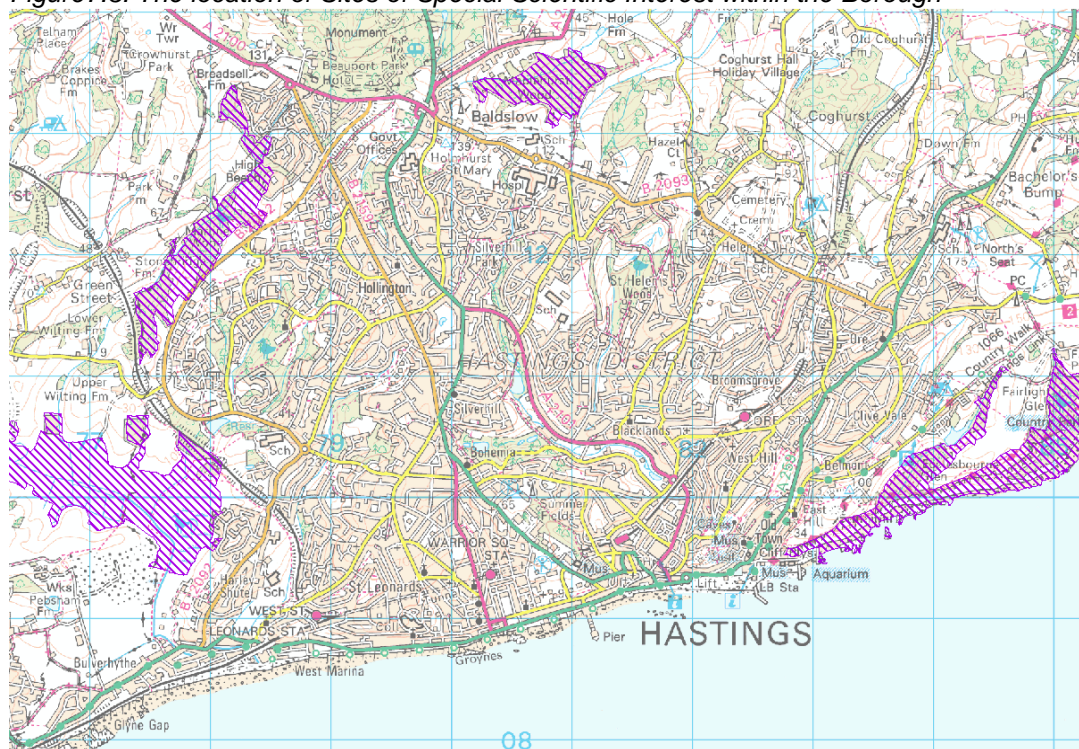
- 7.3.12 The average property value in Hastings is £171,585; over £20,000 lower than the County average and £40,000 less than the South East average. However, the affordability of housing in Hastings is still an issue due to low average incomes. The house price / earnings affordability ratio in 2009/2010 was 6.49, which was slightly lower than the County (6.78), but higher than the South East (6.18) averages. In 2007 the ratio was 8.34; however the current demand for affordable housing far exceeds supply. It is understood a significant number of people who want a home are unable to either buy or rent one without assistance and rely on private renting with top-up support from local housing assistance.
- 7.3.13 A 'house price/affordability ratio update 2011' showed a figure of 5.45 for Hastings, as compared to 7.69 for East Sussex, and 6.54 for the South East. In 2010, the figure for Hastings was 6.5, as compared to East Sussex 7.37, and 6.55 for the South East.

- 7.3.14 2001 ONS data indicates that Hastings has a disproportionately high number of flats/maisonettes (34.7%) and low number of detached and semi-detached homes (37.9%) compared to the South East (18.1% and 57.7% respectively). This is, in part, in response to the demand for low-cost rental accommodation and indicates the significant role the private rented sector plays in meeting housing needs in Hastings.
- 7.3.15 It is understood that a high proportion of private rented accommodation, often in multiple occupation (HMO) is below minimum acceptable standards. Evidence shows that 64% of HMOs fail to meet the Government's Decent Homes Standard.
- 7.3.16 In 2011/12, 71 gross new affordable dwellings were completed in Hastings. This compares to 32 in 2010/11 and 44 in 2009/10.

Green space

- 7.3.17 Hastings has three open spaces managed to Green Flag Award standards, including Alexandra Park and Hastings Country Park Nature Reserve and St Leonards Gardens. It also benefits from Hastings Cliffs Special Area of Conservation (SAC), three Sites of Special Scientific Interest (SSSI) (Figure 7.3), eight Local Nature Reserves (LNR) and 32 Sites of Nature Conservation Importance (SNCI). In 2010 84% of Hastings' SSSIs (% of total area) were in favourable condition with 6.1% as unfavourable, declining.

Figure 7.3: The location of Sites of Special Scientific Interest within the Borough



Heritage

- 7.3.18 Hastings has over 900 listed buildings, 18 conservation areas (Figure 7.4), two registered historic parks, 300 archaeological sites/monuments/finds locations, and 17 archaeological notification areas within the town. In 2010, three buildings were 'at risk'. Hastings' architecture and historic areas contribute to its sense of place and local distinctiveness.

Figure 7.4: The location of Conservation Areas within the Borough



Soil and land

- 7.3.19 In 2010/11 90% of gross new dwellings were built on previously developed land, and 100% of new employment floorspace was on PDL. In each year since 2004 the Council has consistently exceeded its target of 60% of new homes to be built on previously developed land.

Waste

- 7.3.20 In 2009/10 23.3% of household waste was recycled and 3.7% composted which is broadly in line with figures for East Sussex. Hastings' has a target for 30% of household waste to be recycled and composted by 2013. Over 27% of household waste goes to landfill in the borough, which is significantly lower than the County average of 36.3%.

Water

- 7.3.21 100% of Hastings' water quality is classed as:

- moderate (ecological)
- good (biological)
- moderate (physio-chemical)

Air and climatic factors

- 7.3.22 Hastings has one air quality management area (AQMA) - Bexhill Road – which is designated for exceeding PM₁₀.
- 7.3.23 In 2009/10 4.26kW of renewable energy was installed in Hastings adding to an existing installed capacity of 62.5kW. Average domestic consumption of electricity and gas in Hastings is below the county and regional average and has decreased year on year since 2006. Average per capita emissions were 4.8 tonnes CO₂ compared to 6.1 tonnes for the County and 7.6 for the South East.

8 WHAT'S THE BASELINE PROJECTION?

The SA Report must include...

- The likely evolution of the current state of the environment without implementation of the plan

8.1.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might 'evolve' in the future under the 'no plan' / 'business as usual' scenario. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects.

2.0 Community and well-being

8.1.2 The population of Hastings is predicted to increase by 9% by 2028 in line with ONS predictions. A shift in the demographic profile towards an increasingly elderly and retired population is also expected. These changes could potentially put pressure on existing services and facilities, such as those providing healthcare. Demand for affordable housing may also rise, out-stripping supply.

8.1.3 Deprivation is likely to continue to be widespread within Hastings. With a rising population the demand for jobs may increase, placing further pressure on those struggling in the labour market. As a result crime levels could rise, or at best remain steady. Community cohesion may decline due to these pressures.

8.1.4 It is probable that educational achievement will rise due to the new facilities already constructed. However, Hastings' regionally low economic performance, and continuing local dissatisfaction amongst the young, would likely lead to an outflow of those with high skill levels. This may further reduce long term community cohesion and contribute to the aging demographic.

3.0 The Environment

8.1.5 Given existing high population densities, a rising population is likely to increase pressure on green spaces and possibly also heritage features. Without protection and enhancement the quality of these assets. Current council targets to build on developed land will likely reduce, but not prevent, the loss of green areas. Biodiversity would likely decline in-line with a loss of greenspace.

8.1.6 It is probable that an increasing population will raise the number of road journeys made in the area. This trend may be reinforced by a lack of targeted investment in new public transport links. Knock-on effects would include increased CO₂ emissions and possibly also a decline in air quality. Per capita CO₂ emissions would also be expected to rise given the absence of focused energy efficiency measures. It is probable that renewable energy will continue to make up a low proportion of the energy mix.

8.1.7 Hastings will continue to raise its recycling rates to 30% in line with its 2013 target. Beyond this period waste facilities may come under pressure due to a rising population, perhaps increasing land fill demand. Water quality will likely remain steady, although consumption will rise without measures to reduce demand. This may lead to increased drought risk and biodiversity loss.

4.0 Economic Trends

- 8.1.8 Without initiatives to encourage indigenous and inward investment, it is probable that the economy of Hastings will continue to perform poorly. As a result, wages and average household income will likely remain low. A lack of economic growth is likely to be felt hardest in the most deprived areas, where new employment opportunities are unlikely to emerge in significant numbers without concentrated regeneration efforts.
- 8.1.9 An increasing population is likely to raise the demand for jobs in the area. Given the Borough's weak economy, such a rise would probably lead to an increase in numbers of unemployed and a degree of migration from the area. An aging population may place extra strain on low household incomes, and as a result spending power could decline. An increase in demand for part time employment from those caring for the elderly may occur.
- 8.1.10 Without measures to diversify the economy, employment is likely to be concentrated in the manufacturing and public sectors. This may maintain the vulnerability of communities to exogenous shocks, such as central government decisions. There will probably be limited growth in higher value sectors, such as the financial, real estate, scientific and technological sectors. This will likely contribute to continuing low average wage levels in the area.

9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

The SA Report must include...

- Any existing environmental problems which are relevant to the plan

9.1 Introduction

- 9.1.1 Drawing on the review of the sustainability context and baseline, the 2011 SA Scoping Report was able to identify a range of sustainability issues that should provide a methodological framework for the appraisal, ensuring it remains focused. These issues were then further refined and a concise list of sustainability 'objectives' identified. Sustainability issues and objectives are summarised below:¹⁰

9.2 Key issues (2011)

Community and well-being

- Increasing population, and planning for increase in older people and student population
- Access to services
- Housing need and affordability
- Unfit dwellings
- Fuel poverty and energy efficiency
- Eradication of deprivation hotspots
- Finding room for growth
- Health inequalities and provision
- Educational achievement
- Fear of crime and community safety

The environment

- Increase in traffic and its impact on the environment
- Protect, conserve and enhance biodiversity
- Growth in waste and recycling
- Protecting our cultural heritage
- Reducing water consumption
- Minimising the risk of flooding and raising water quality
- Improving air quality
- Addressing climate change

The economy

- Unemployment
- Economic output
- Movement and transport

¹⁰ The Scoping Report contains a more detailed discussion of the key issues.

9.3 Sustainability objectives (2011)

9.3.1 The following list of sustainability objectives are written as 'aspirational statements', i.e. they describe a desired situation that we should strive to achieve.

- More opportunities are provided for everyone to live in a decent, sustainably constructed and **affordable home suitable to their need**
- The **health and well-being** of the population is improved and inequalities in health are reduced
- Levels of **poverty and social exclusion** are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town
- Opportunities are available for everyone to acquire new skills, and the **education and skills** of the population improve
- All sectors of the community have improved **accessibility to services, facilities, jobs, and social, cultural and recreational opportunities**, including access to the countryside and the historic environment
- **Safe and secure environments** are created and there is a reduction in crime and the fear of crime
- Vibrant and locally distinctive **communities** are created and sustained
- **Land and buildings** are used more efficiently and the best use is made of previously developed land
- **Biodiversity** is protected, conserved and enhanced
- The risk of **flooding** (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future
- **Parks and gardens, countryside, and the historic environment / townscape and landscape** are protected, enhanced and made more accessible
- **Air pollution** from transport and land use planning is reduced, and air quality continues to improve
- The **causes of climate change** are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)
- The risk of pollution to all **water** resources is reduced, water quality is improved and water consumption is reduced
- The use of **sustainable energy** and renewable energy technologies is maximised in new development, and in existing buildings
- Through **waste** re-use, recycling and minimisation, the amount of waste for disposal is reduced
- **Road congestion** and pollution levels are reduced, and there is less car dependency and greater travel choice
- There are high and stable levels of **employment** and rewarding and satisfying employment opportunities for all
- **Economic revival** in the more deprived areas of the town is stimulated and successfully achieved
- The **sustained economic growth** of the town is achieved and linked closely to social regeneration
- Indigenous and inward **investment** is encouraged and accommodated

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

10 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan

10.1.1 The 'story' of plan-making / SA up to this point is told within this Part of the SA Report. Specifically, this Part of the SA Report describes how, as an interim plan-making / SA step, there was an appraisal of:

- alternative approaches to addressing a range of General Guidance issues; and
- a range of site allocation options...

... and how the Council then took account of the interim SA findings when preparing the Proposed Submission version of the Plan.

11 CONSIDERATION OF GENERAL GUIDANCE ALTERNATIVES

11.1 Alternatives for what?

11.1.1 The Regulations state only that the SA Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*'. In practice, local authorities in England tend to consider **reasonable alternatives for a reasonable range of the issues addressed** though plan-making.

11.1.2 This Chapter presents a consideration of alternatives for the following General Guidance issues:

- | | |
|--|---|
| • Access | • Ground conditions |
| • Amenity | • Hastings Town Centre shopping area |
| • Caravans and camping sites | • Managing certain types of premises outside defined shopping areas |
| • Change of use of a dwelling for a business use | • Non-designated heritage assets |
| • Commercial centres | • Pollution |
| • Community facilities' | • Residential institutions |
| • Conversion of dwellings | • Retention of shops and services outside defined shopping areas |
| • Defining the green infrastructure network' | • Small businesses |
| • Design | • Tourist facilities |
| • Designated heritage assets | • Upper Ore Valley Greenspace |
| • Development Boundary | • Water resources |

11.1.3 For each issue this Chapter summarises SA findings and explains the degree to which these are reflected in the Council's preferred (Proposed Submission) approach. **Appendix II** discusses the methodological approach taken (to the appraisal of General Guidance alternatives) and presents appraisal findings in full.

11.2 Access

- 11.2.1 Table 1 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.
- 11.2.2 The SA concluded that:
- By promoting good accessibility for those with disabilities and those that wish to use non-car based modes of transport, the suggested policy approach (Alternative 1) performs well against the sustainability objectives. A more stringent approach (Alternative 2) may not be necessary due to the extra burden this could place on developers.*
- 11.2.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised (i.e. unchanged).

11.3 Amenity

- 11.3.1 Table 2 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.
- 11.3.2 The SA concluded that:
- Whilst the suggested policy approach (Alternative 1) meets the requirements of a number of the sustainability objectives, some small changes could be made which would enhance its performance. In particular, a more prescriptive policy approach (Alternative 2) may be preferable for the spaces between buildings. Supported by criteria relating to the quality of these spaces and green infrastructure provision, these areas could make a greater contribution to health and wellbeing, biodiversity, and climate adaptation objectives. Alternatively, these issues could be addressed through the 'Design' policy.*
- 11.3.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised, but with policy criterion (c) amended to make clearer requirements for green infrastructure provision.

11.4 Caravans and camping sites

- 11.4.1 Table 3 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.
- 11.4.2 The SA concluded that:
- The suggested policy approach (Alternative 1) should effectively balance the requirement to protect residential amenity and the wider environment from the effects of campsite and caravan site establishment, whilst also not placing an undue burden on such businesses. However, more prescriptive guidance (Alternative 2) could ensure that camping sites are well served by public transport and walking and cycling routes, with multiple benefits. Weaker guidance or a reliance on higher level policy (Alternative 3) is unlikely to obtain the same level of benefit.*
- 11.4.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised, but with policy criterion (c) amended to make clearer requirements in relation to sustainable transport.

11.5 Change of use of a dwelling for a business use

11.5.1 Table 4 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

11.5.2 The SA concluded that:

The suggested policy approach (Alternative 1) looks to protect residential areas in terms of their character, their amenity, and the levels of housing that are available whilst also allowing for some flexibility where appropriate. With this being the case it performs well against those sustainability options relating to the efficient use of buildings and the provision of decent, affordable homes. However, a more relaxed approach to conversion (Alternative 3) could result in increased economic activity, potentially revitalising local economies and providing increased employment opportunities. The extent to which these potential economic benefits could contribute to or work against social regeneration remains uncertain though, and so Alternative 1 could represent the best option in terms of a precautionary approach.

11.5.3 The Council has chosen not to address this issue through a specific policy within the draft plan. This reflects a view that the issues can be sufficiently addressed via application of other General Guidance Policy.

11.6 Commercial centres

11.6.1 Table 5 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent approach to addressing the issue; and one that would involve taking a less stringent approach.

11.6.2 The SA concluded that:

An overemphasis on protecting A1 uses should there be low demand for them could result in empty premises and decline. On the other hand, if there is too little protection and large demand for A1 uses, then too few premises may be available, and these may be scattered in a manner which reduces their economic potential (Alternative 1 or 2). A preferred option may be to have a less prescriptive approach which allows for conversion away from A1 uses over targeted levels after a certain period of vacancy such as proposed by Alternative 3.

11.6.3 The Council **disagrees** with this conclusion on the basis that a less prescriptive approach would be contrary to the wider strategic objectives of the Council and the Local Plan, which seek to stimulate economic growth, particularly in town and commercial centres.

11.7 Community facilities

11.7.1 Table 6 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

11.7.2 The SA concluded that:

By protecting and supporting the creation of community facilities where appropriate, the suggested policy approach (Alternative 1) performs reasonably well in terms of a number of the sustainability objectives. However a more prescriptive approach (Alternative 2) could yield greater benefits in terms of reducing social exclusion and poverty by giving particular weight to the protection of existing community facilities and the provision of new in those areas suffering from high levels of deprivation (for example, by setting out clear criteria for determining viability of community facilities). As such, Alternative 2 is the preferred approach from an SA perspective. Alternative 3 is unlikely to meet the needs of the borough.

- 11.7.3 The Council **disagrees** with this conclusion on the basis that stating the criteria for determining viability is too detailed for this planning policy. Each site will be considered on a case by case basis. This has been clarified in the supporting text.

11.8 Conversion of dwellings

- 11.8.1 Table 7 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

- 11.8.2 The SA concluded that:

The suggested policy approach (Alternative 1) could help to ensure an efficient use of buildings, as it sets out criteria which provide the flexibility to convert dwellings where necessary, whilst also protecting the housing mix where change would not be appropriate. It also looks to ensure that decent living standards are maintained during any conversions. With this being the case, it performs well in terms of sustainability objectives. A more stringent approach (Alternative 2) may therefore not be necessary given the extra burden this may place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.

- 11.8.3 The Council **agrees**, and as such the draft plan presents the policy approach *virtually* as previously appraised. One change has been made, and that is to remove the criterion relating to significant extensions and changes to layout (because this matter is addressed through other policy).

11.9 Defining the green infrastructure network

- 11.9.1 Table 8 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.

- 11.9.2 The SA concluded that:

Whilst the suggested policy approach (Alternative 1) would offer some protection for on-site ecology, but a more prescriptive approach (Alternative 2) could bring further benefits. It could do so by calling for full account to be taken of the multifunctional nature of green spaces and the role that these spaces play within the wider green infrastructure 'network'. This includes enhancing recreational opportunities and access to the countryside. The potential for appropriate management and ecological restoration to enhance 'ecological services' could also be highlighted. As such, Alternative 2 is the preferred approach.

- 11.9.3 The Council **agrees**, and as such the "defining the green infrastructure network" section has now been expanded to take full account of the different types of green spaces and the role they play. The Council will also be undertaking some supporting research in terms of green infrastructure that will support the Development Management Plan at submission. The Green infrastructure policy also makes reference to the appropriate management and ecological restoration of green infrastructure as recommended.

11.10 Design

- 11.10.1 Table 9 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.

- 11.10.2 The SA concluded that:

The potential for good design to contribute towards a range of environmental issues (including water conservation, adaptation to climate change, reduction of flood risk through Sustainable

Urban Drainage Systems, biodiversity and green infrastructure provision) through building features such as green roofs and sustainable transport infrastructure (e.g. cycle parking) could be made far more explicit than is currently the case under the suggested policy approach (Alternative 1). A more stringent approach as suggested (Alternative 2) could set out criteria for each of these issues, making it clearer to applicants the importance of these considerations.

- 11.10.3 The Council **disagrees** on the basis that most of these issues are covered by Planning Strategy Policy SC1: Strategy for Managing Change in a Sustainable Way, and the adopted SPD on Householder Development. The Council will, however, amend the supporting text in the Design section of the Development Management Plan to make clearer reference to overarching sustainability policies in the Planning Strategy, and to signpost the SPD in terms of detailed sustainable design improvements.

11.11 Designated heritage assets

- 11.11.1 Table 10 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.

- 11.11.2 The SA concluded that:

The suggested policy approach (Alternative 1) could help to protect and enhance conservation areas, listed buildings, archaeological sites and ancient monuments. However, a more prescriptive approach (Alternative 2) could give greater consideration to balancing energy efficiency requirements with the protection of historic assets and therefore result in better performance in terms of sustainability objectives.

- 11.11.3 The Council **disagrees** on the basis that the issue of energy efficiency is covered by other General Guidance policies. However, connections between heritage conservation and wider sustainability issues has been made clearer in the supporting text.

11.12 Development Boundary

- 11.12.1 Table 11 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve not addressing this issue explicitly through policy.

- 11.12.2 The SA concluded that:

Alternative 1 is the preferred policy approach and will have significant positive effects on the baseline in relation to the efficient use of land and buildings and previously developed land, and in relation to the protection and enhancement of the unique characteristics of townscape and landscape. Alternative 1 is considered the most appropriate tool for managing impacts on sensitive landscapes which have been identified in the 2008 Landscape Character Assessment. Alternative 1 is also considered to be the most beneficial approach in terms of stimulating development and thus economic growth and regeneration within Hastings town. Alternative 2 is not considered to be sufficiently strong, strategic, coordinated or transparent to achieve the same desired outcomes.

- 11.12.3 The Council **disagrees** and has decided not to include a specific policy relating to a Development Boundary. This reflects the fact that a development boundary should not be necessary provided local, national and international policies for the protection and enhancement of the natural environment are properly applied. This should include recognition of the important local sites within wider ecological networks as well as local character and distinctiveness. Furthermore, the Council now recognise that there could be environmental advantages to not designating a development boundary as this can constrain opportunities to consider sites which have some capacity for development and are outside the development boundary. Development of such sites could potentially ease the pressure on more sensitive sites within the built up area.

11.13 Ground conditions

11.13.1 Table 12 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.

11.13.2 The SA concluded that:

The suggested policy approach (Alternative 1) may contribute to protecting health and wellbeing and could help to ensure that land is used in a manner most fitting to its condition, including reducing risks associated with coastal erosion. With this being the case, a more stringent approach (Alternative 2) may not be necessary. By providing criteria relating to ground conditions such that an investigation of contamination takes place prior to development, the suggested policy approach (Alternative 1) should reduce the risk of pollution of ground water resources in the vicinity of the development. However the policy could be improved by adding the words "or suspected presence of contamination" to clause B, as the history of the use of the site might not always be known. This would represent a more stringent approach (i.e. Alternative 2) and therefore Alternative 2 (revised as per the recommendation) is the favoured alternative.

11.13.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised, but with policy wording added to reflect the SA recommendation.

11.14 Hastings Town Centre shopping area

11.14.1 Table 13 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach (which would involve defining a shopping area boundary but having less stringent policies to manage activities within it).

11.14.2 The SA concluded that:

An overemphasis on protecting A1 uses should there be low demand for them could result in empty premises and decline. On the other hand, if there is too little protection and large demand for A1 uses then too few premises may be available and these may be scattered in a manner which reduces their economic potential (Alternative 1). A preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy such as proposed by Alternative 2.

11.14.3 The Council **disagrees** on the basis that taking a less prescriptive approach would be contrary to the strategic objectives of the Council and the Local Plan, which seek to stimulate economic growth, particularly in town and commercial centres.

11.15 Managing certain types of premises outside defined shopping areas

11.15.1 Table 14 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

11.15.2 The SA concluded that:

The suggested policy approach (Alternative 1) should contribute towards local well-being by protecting local amenity against the potential negative effects of new shops and services outside of commercial areas, whilst at the same time providing the necessary conditions for well managed businesses to locate outside commercial areas. It therefore performs well in terms of sustainability objectives. Whilst the suggested policy approach does place stringent requirements upon business which could discourage some developments, these are selected in manner which means the wider gains for the local economy through a high quality residential environment are likely to outweigh any small losses. A more relaxed approach (Alternative 3) may encourage more development, but could result in an overall decline in the

amenity of an area with wider adverse economic implications. A more stringent approach (Alternative 2) could act as a greater barrier to small business development and economic growth.

- 11.15.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised (i.e. un-changed).

11.16 Non-designated heritage assets

- 11.16.1 Table 15 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.

- 11.16.2 The SA concluded that:

The proportionate approach to the protection of non-designated heritage assets put forward through the suggested policy approach (Alternative 1) could perform well in terms of safeguarding these features. However without more detail as to what “protection” entails, it is difficult to determine whether the stated policy approach (Alternative 1) or a more stringent approach (Alternative 2) would be necessary. A more stringent approach may not be necessary given the extra burden this may place on developers. It would be helpful if the policy provided some indication of how “the significance of the asset” will be measured, and articulated what “protection” could mean, in practical terms.

- 11.16.3 The Council **agrees** and, as such, measuring “significance” is now addressed in the pre-amble to the heritage assets section. The Local List and Historic Environment Record (HER) are tools to measure the significance of a heritage asset. Policy has also been re-drafted so that a “protection” definition no longer necessary.

11.17 Pollution

- 11.17.1 Table 16 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a more stringent/prescriptive approach to addressing the issue.

- 11.17.2 The SA concluded that:

The suggested policy approach (Alternative 1) performs well in terms of keeping air pollution within acceptable limits and protecting the population from the potential negative effects on health and well-being that pollution can cause. It may also contribute indirectly to addressing the clauses of climate change and protecting biodiversity. However, a more prescriptive policy could include criteria relating to water pollution that are otherwise missing. With this being the case, Alternative 2 would be a preferable option in this instance.

- 11.17.3 The Council **agrees** and, as such, a criterion has been added.

11.18 Residential institutions

- 11.18.1 Table 17 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

- 11.18.2 The SA concluded that:

The suggested policy approach (Alternative 1) performs well in terms of setting out criteria for suitable levels of access, space, and amenity in residential institutions. In addition to this, it takes into account the character and amenity of residential areas and levels of housing provision for other sectors of the community. A focus on public transport provision is also potentially of benefit. As such, it performs strongly in terms of sustainability objectives. A

more stringent approach (Alternative 2) may not be necessary given the extra burden it would place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.

- 11.18.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised (i.e. unchanged).

11.19 Retention of shops and services outside defined shopping areas

- 11.19.1 Table 18 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

- 11.19.2 The SA concluded that:

The suggested policy approach (Alternative 1) performs relatively well in terms of sustainability objectives, encouraging the preservation of local shops and services, and reducing unsustainable travel use, whilst also including a test of viability which allows for flexibility. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. A more prescriptive approach (Alternative 2) could perhaps improve on this by providing further details on the nature of this viability test, which could potentially provide additional protection to shops and services in deprived areas of the Borough. Weaker guidance or a reliance on higher level policy (Alternative 3) is the least favoured approach.

- 11.19.3 The Council **disagrees** on the basis that stating the criteria for determining viability is too detailed for this planning policy. Each site will be considered on a case by case basis. This has now been clarified in the supporting text.

11.20 Small businesses

- 11.20.1 Table 19 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

- 11.20.2 The SA concluded that:

The suggested policy approach (Alternative 1) should contribute towards local well-being by protecting local amenity against the potential negative effects of small business development. As such, it performs well in terms of sustainability objectives. Whilst the suggested policy approach (Alternative 1) does place requirements upon businesses that could discourage some small business developments, these are selected in manner which means the wider gains for the local economy (e.g. relating to a high quality local environment) are likely to outweigh any small losses. Alternative 3 may not be able to maintain the amenity of an area, which could have wider adverse economic implications and Alternative 2 could act as a barrier to small business development.

- 11.20.3 The Council has chosen not to address this issue through a specific policy within the draft plan. This reflects a view that the issues can be sufficiently addressed via application of other General Guidance Policy.

11.21 Tourist facilities

- 11.21.1 Table 20 of Appendix II presents an appraisal of a suggested policy approach and an alternative approach, which would involve taking a less stringent/prescriptive approach to addressing the issue.

11.21.2 The SA concluded that:

The suggested policy approach (Alternative 1) could contribute towards local well-being by protecting local amenity and the built, historic and natural environments against the potential negative effects of tourism related development. As such, it performs well in terms of sustainability objectives. Whilst Alternative 1 does set standards for the operators of tourist attractions and amusements that could discourage some developments, the wider gains of these requirements are likely to outweigh any small economic losses. It is considered that weaker guidance or reliance on higher level policy (Alternative 2) is unlikely to obtain the same level of benefit from an economic perspective.

11.21.3 The Council has chosen not to address this issue through a specific policy within the draft plan. This reflects a view that the issues can be sufficiently addressed via application of other General Guidance Policy.

11.22 Upper Ore Valley Greenspace

11.22.1 Table 21 of Appendix II presents an appraisal of three alternative approaches to allocating greenspace in the Upper Ore Valley:

- Option A: Protecting the land in the centre of the existing allocation – leaving the potential for development on the existing allocations
- Option B: Protecting the land in the centre and to the south east, leaving only the land along Church Street allocated for development
- Option C: Protecting all the woodland in the area of the Upper Ore Valley that does not have current consent for development

11.22.2 The SA concluded that:

11.22.3 *Option A would result in the loss of some of the greenspace functions of this land, and so cannot be considered an efficient use of land. However, some of the greenspace functions would remain given that the woodland belt along the stream would be retained. In conclusion, given the assumption that the greenspace functions of a larger site are considerably greater than those of a smaller site, then Option C would appear to be the most favourable approach from an SA perspective.*

11.22.4 The Council is proceeding with a new option, which takes into account the concerns of both landowners and the community. This aims to preserve as much green spaces as possible whilst at the same time freeing up some land for allocation.

11.23 Water resources

11.23.1 Table 22 of Appendix II presents an appraisal of a suggested policy approach and two alternatives: one that would involve taking a more stringent/prescriptive approach to addressing the issue; and one that would involve taking a less stringent/prescriptive approach.

11.23.2 The SA concluded that:

By setting out criteria which look to ensure that abstraction levels are sustainable, prevent the adverse effects of low river flows, and preserve ground water quality, the suggested policy approach (Alternative 1) performs well in terms of sustainability objectives. A more stringent approach (Alternative 2) may therefore be unnecessary given the extra burden this could place on developers, whilst weaker guidance (Alternative 3) would not obtain the same level of benefit and could result in a negative effect.

11.23.3 The Council **agrees**, and as such the draft plan presents the policy approach as previously appraised (i.e. unchanged).

12 CONSIDERATION OF SITE ALLOCATION OPTIONS

12.1 Introduction

12.1.1 139 site allocation options (126 housing and 13 employment) were subjected to SA utilising a strict 'appraisal question' based methodology. Site appraisal questions were developed to reflect the sustainability objectives identified through SA scoping as far as possible. Answers were categorised using a 'red/green/amber' system where: a **red** categorisation equates to the prediction of a 'significant constraint'; an **amber** categorisation equates to the prediction of a 'potentially significant constraint'; and a **green** categorisation equates to the prediction of 'no constraint'.

12.1.2 **Appendix III** introduces the methodological approach in detail and presents appraisal findings in full. The following is a summary of appraisal findings and the degree to which these are reflected in the Council's preferred approach. **Appendix IV** explains in more detail how the Council's preferred approach to site allocations reflects the findings of the interim (options) SA.

12.2 Housing site options

12.2.1 All sites 'flagged' at least one red, with the total number of red flags ranging from one to eight (out of 14 appraisal questions asked). Of the 126 site options, the Council has chosen to allocate 79. As set out in Table 1 of Appendix IV for most allocated sites the Council has developed site specific policy to ensure that development will address the constraints flagged by the SA. However, this is not the case for every allocated site. Rather, in some instances site specific policy has not been developed to reflect SA findings on the basis that:

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

12.3 Employment site options

12.3.1 All sites 'flagged' at least one red, with the total number of red flags ranging from three to six (out of 12 appraisal questions asked). Of the 13 site options, the Council has chosen to allocate 11. As set out in Table 2 of Appendix IV, in most instances the Council has developed site specific policy to ensure that development at allocated sites addresses the constraints flagged by the SA. However, in *one* instance (Land in Whitworth Road, LRA8) site specific policy has not been developed to reflect SA findings. The Council's justification is as follows:

It is acknowledged that part of the site is within flood zones 2 and 3. However, the outcome of 'Sequential Test' work is necessary before an appropriate course of action can be determined. At this stage, the only measure taken is to make reference to flood risk issues associated with the site. It is also acknowledged that this is a greenfield site and so does not perform well in terms of some sustainability objectives; however, the Council's evidence base shows that some greenfield sites are required in order to meet the need for employment floorspace in Hastings.

PART 3: WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?

13 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects on the environment associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

13.1.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the draft (Proposed Submission) plan approach. Part 3 is structured as follows:

- Chapter 14 presents an appraisal of the draft (Proposed Submission) Plan
- Chapter 15 discusses overall conclusions at this current stage
- Chapter 16 summarises outstanding recommendations.

14 APPRAISAL OF THE DRAFT (PROPOSED SUBMISSION) DEVELOPMENT MANAGEMENT PLAN

14.1 Methodology

14.1.1 The appraisal is structured under 21 headings; one for each of the SA objectives identified through scoping. Under each heading there is an appraisal of: 1) the preferred approach to General Guidance policy; and 2) the preferred approach to site allocations.

14.1.2 For (1) and (2) 'significant effects' on the baseline / likely future baseline are identified and evaluated. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained in full.¹¹ In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of the draft plan approach in more general terms. It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs.¹² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

Broad implications of General Guidance policies

14.1.3 The following scoring system is used to indicate the 'implications' of each of the General Guidance policies:

↗	Positive implications.
↔	No implications.
↘	Negative implications.
?	Uncertain implications.

14.1.4 It's important to note that these symbols are not used to indicate significant effects.

¹¹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

¹² Environmental Assessment of Plans and Programmes Regulations 2004

14.2 More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need

General guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↗	↔	↗	↗	↔	↔	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

A number of the policies have positive implications. The design and construction of accessible new homes, built to high standards is supported through **Policies DM1, DM3 and DM4**. The adoption of **Policy HC1** should help to protect the existing stock from inappropriate conversions that would lower living standards. This is important given that a high proportion of private rented accommodation, often in multiple occupation, is thought to be below minimum acceptable standards. **Policy HC2** meanwhile should assist in the provision of high quality residential institutions and student accommodation. It is recognised that whilst these policies could set higher demands for quality and sustainability, this must be balanced against considerations of viability. The Housing Needs Survey indicated a significant shortage of affordable homes in Hastings, estimating that over 596 affordable homes are required per annum, over 14 times the rate of construction. Given this, affordability must be given considerable weight.

Collectively these policies should have a **positive effect** on the baseline in relation to this SA objective.

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects in terms of this objective. Whilst the Planning Strategy, through setting borough-wide housing figures, does have the potential to produce significant effects on the identified issue of borough-wide housing need, the same cannot be said for the choice of sites to allocate within the DMP. In terms of the distribution of the residential allocations, it is notable that six sites are to be brought forward in the Little Ridge and Ashdown focus area, with two of these sites potentially providing over one hundred homes. This could have a localised positive effect, as this focus area has a lower provision of affordable and social housing than other areas of the Borough.

The following recommendation is made at this stage:

- Provide a clear statement regarding the extent to which the site allocations will contribute towards ensuring identified housing needs are met.

14.3 The health and well-being of the population is improved and inequalities in health are reduced

General Guidance

General Guidance Policy	DM1:Design Principles	DM2:Tele-communications	DM3: General Amenity	DM4:General Access	DM5:Ground Conditions	DM6:Pollution and Hazards	DM7:Water Resources	HC1:Dwelling Conversions	HC2:Residential Institutions & Students	HC3:Community Facilities	HN1:Heritage Assets (Setting & Significance)	HN2:Conservation Areas (Doors & Windows)	HN3:Heritage Assets (Demolition)	HN4:Archaeological & Historical Interest	HN5:Non-designated heritage Assets	HN6:Private Open Space	HN7: Allotments	HN8:Local Green Spaces	HN9:Green Infrastructure	SA1:Hastings Town Centre Shopping	SA2:Other Shopping Areas	SA3:Shops & Services outside Shopping Areas	SA4:Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1:Cultural Quarters
Broad Implications	↔	↗	↗	↗	↗	↗	↔	↔	↗	↗	↔	↔	↔	↔	↔	↗	↗	↗	↗	↔	↗	↔	↔	↗	↗

The majority of policies have positive implications. There is an emphasis on protecting local services (**SA2; HC3**), creating new services and developments that provide high living standards, and responding to the health needs of residents, including those with physical or sensory disabilities (**DM3; DM4; HC2**). This is particularly important given the Borough's generally poor levels of health. The well-being of those in the area may be also supported by the encouragement of cultural activities (**CQ1**). Green infrastructure policies such as **HN7**, which will protect local food growing space, and **HN8** which looks to preserve local green spaces, such as playing fields, should also help to support the achievement of health and well-being goals. However, more emphasis could be placed on the creation of such spaces, for instance the provision of new allotments should demand rise. Collectively these policies should have a **significant positive effect** on the baseline in relation to this SA objective.

The following recommendation is made at this stage:

- Seek to encourage the creation of green spaces in areas of identified need.

Site allocations

The majority of housing allocations are within 200m of an area of open space, eight being directly adjacent. This may contribute towards the Borough's target for 82% of households to be within 300m of accessible green space by 2012/2013. However, there is also the potential for some negative effects. Specifically, four of the allocations will result in the loss of over 20% of an area of open space.

A majority of sites are over 200 metres from an amenity footpath or cycle route, which may potentially reduce uptake of cycling and walking; however, this effect is uncertain and there is clear potential for mitigation (e.g. through green infrastructure strategy). Also, of the 68 housing allocations, 21 are over 400 metres from a playground facility.

On a more local level, it is notable that access to open space in the western edge of the Clive Vale & Ore Village focus area is limited. The majority of residential sites proposed here are to be found in this part of the focus area.

14.4 Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↔	↔	↗

A number of the policies have positive implications. Deprivation is spread throughout the town and as such, the protection of shops and services outside of shopping areas (**SA3**) and community facilities (**HC3**) may protect vital local economic and social links. The effectiveness of these policies could potentially be raised by giving particular weight to the protection and creation of services and facilities in those areas that suffer particular deprivation. By encouraging public transport links for residential institutions, Policy **HC2** may help to reduce levels of social exclusion for those who may not be able to travel by other means.

The protection of A1 uses in Hastings Town Centre and in the Borough's other Shopping Areas should help to support economic growth and social regeneration in these areas of deprivation by preventing the loss or scattering of these premises.

The following recommendations are made at this stage:

- Add criteria giving additional weight to the protection and creation of services and facilities in areas of high deprivation

Site allocations

In total, 45 of the 79 allocated sites are in area amongst the 20% most deprived. Of the 11 employment sites, 7 are in areas of high deprivation and so could contribute to lessening poverty where this is related to economic opportunity. The provision of additional housing in deprived areas can also help to support economic activity. Given Hastings status is one of the most deprived local authorities in England, these allocations may result in **significant positive effects** on the baseline in terms of this objective.

14.5 Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CC2: Cultural Quarters
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

None of the policies in the DMP appear likely to have a significant effect upon this objective. The criteria set out in Policy **HC3** relating to the creation and protection of community facilities may positively contribute to increasing opportunities. For instance, facilities such as youth clubs and community halls can provide access to classes teaching new skills. Such opportunities may be crucial for those amongst the local population who currently possess few or no qualifications.

It is not thought that the Plan itself will result in a significant effect on the skills / education baseline. However, it should have the effect of complementing the Planning Strategy, which includes a Policy dedicated to Skills and Access to Jobs (Policy E2).

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects in terms of this objective.

14.6 All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment

General Guidance

General Guidance Policy	DM1:Design Principles	DM2:Tele-communications	DM3: General Amenity	DM4:General Access	DM5:Ground Conditions	DM6:Pollution and Hazards	DM7:Water Resources	HC1:Dwelling Conversions	HC2:Residential Institutions & Students	HC3:Community Facilities	HN1:Heritage Assets (Setting & Significance)	HN2:Conservation Areas (Doors & Windows)	HN3:Heritage Assets (Demolition)	HN4:Archaeological & Historical Interest	HN5:Non-designated heritage Assets	HN6:Private Open Space	HN7: Allotments	HN8:Local Green Spaces	HN9:Green Infrastructure	SA1:Hastings Town Centre Shopping	SA2:Other Shopping Areas	SA3:Shops & Services outside Shopping Areas	SA4:Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1:Cultural Quarters
Broad Implications	↔	↔	↔	↗	↔	↔	↔	↔	↗	↗	↗	↔	↗	↗	↗	↔	↗	↗	↗	↔	↔	↗	↔	↗	↔

Suitable access to and within all new developments is strongly supported through Policy **DM4**. By looking to protect viable shops and services outside of commercial areas, Policy **SA3** may also support access to jobs and services, whilst Policy **HC3** may increase accessibility to the social opportunities offered by community facilities. Identifying and protecting heritage assets (**HN1**; **HN2**; **HN4**) could improve access to the cultural opportunities afforded by the historic environment. The emphasis on green space connectivity in Policy **HN9** should increase access to the countryside, whilst the protection of local green spaces (**HN8**) may support access to recreational opportunities. However, more emphasis could be placed on the creation of new recreational green spaces, particularly given that many in the Borough are over 20 minutes walking time from sports facilities. Collectively these policies should have a **significant positive effect** on the baseline in relation to this SA objective.

- The following recommendation is made at this stage: Seek to encourage the creation of green spaces in areas of identified need.

Site allocations

A majority of sites are over 200 metres from an amenity footpath or cycle route, which may potentially reduce opportunities for recreational cycling, walking and access to the countryside. In addition, over half of the residential sites allocated (37 of 69) are over 400 metres from a District or Local Centre. Of these 16 are located over 1km away. Given the number of jobs, services, facilities, and cultural and recreational opportunities concentrated in such locations, this could result in negative effects in terms of this SA objective. However, it is worth noting that these more distant sites may be well connected to such centres through various transport links and that a large number of the remaining sites are in close proximity to such centres.

On a more local level, allocations in the West Hill focus area may also contribute towards this objective. This is a busy and densely populated area of the town, with services and open spaces concentrated in the south and east. Given this, the allocation of the ten residential sites proposed here primarily in the southern area should result in positive effects in terms of accessibility. It is also noted that the housing sites proposed for the Silverhill and Alexandra Park focus area are likely to have excellent access to the Borough's principal urban park, potentially leading to positive effects in this area.

14.7 Safe and secure environments are created and there is a reduction in crime and the fear of crime

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity/ Services outside Shopping Areas	CC1: Caravan and Camping Sites	CC1: Cultural Quarters
Broad Implications	↔	↔	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

By setting criteria relating to designing out crime, including a public realm that is active and ‘overlooked’, Policy **DM3** should help to ensure that safe and secure environments are provided for those occupying or passing through new developments. This may be particularly important given that a high proportion of the Borough’s residents do not feel safe in their local area after dark. The outcome should be a **significant positive effect** on the baseline in relation to this SA objective.

Criteria relating to the issue of land instability (**DM5**) may also contribute somewhat to this objective by addressing safety issues associated with ground conditions.

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects against this objective.

14.8 Vibrant and locally distinctive communities are created and sustained

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↗	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↗	↗	↗	↗	↔	↗	↗	↗	↔	↔	↗	↔	↔	↗

By protecting and granting permission for suitable community facilities, Policy **HC3** may help to ensure that communities remain 'vibrant' thanks to the services and opportunities that such developments can offer. Such facilities may also help to support community cohesion, which is currently relatively low in the Borough. Policy **HC1** seeks to protect the character of established residential areas by ensuring that an appropriate mix of housing is achieved, whilst Policy **DM1** looks to protect and enhance local character through the design of new developments. The protection of green infrastructure (**HN9**; **HN7**; **HN7**) could also contribute to the vibrancy of community life, although additional emphasis on the creation of new community open spaces such as allotments and sports fields could bring further benefit.

Local distinctiveness is in many cases supported by the heritage assets found in an area. DMP Policies **HN1**; **HN2**; **HN3** and **HN4** should help to support this distinctiveness. The protection of viable local shops and services (**SA3**) and continuance and expansion of cultural activities in the Cultural Quarters (**CQ1**) may also contribute in terms of vibrancy and distinctiveness.

Taken together, these policies may result in **significant positive effects** in terms of this SA objective.

The following recommendation is made at this stage:

- Seek to encourage the creation of green spaces in areas of identified need.

Site allocations

The majority of residential sites are within 200m of an area of open space, eight being directly adjacent; these sites may contribute positively to the vibrancy of communities. However, it is important to note four of the allocations will result in the loss of over 20% of an area of open space. No further evidence is available to suggest whether or not the preferred sites will result in significant effects against this objective and so the overall effect of the allocations is uncertain.

14.9 Land and buildings are used more efficiently and the best use is made of previously developed land

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↗	↔	↔	↔	↗	↔	↔	↗	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↘	↘	↗	↔	↔	↔

A number of the policies included in the DMP offer a degree of flexibility towards changes in use that should contribute positively to the efficient use of land and buildings. For instance, by allowing for the loss of community facilities where they are shown to be unviable, Policy **HC3** allows sufficient flexibility to ensure that buildings are used in an efficient manner. Further flexibility is demonstrated by Policy **HC1**, which allows for the conversion of dwellings under particular circumstances. It is considered possible that setting a target for a proportion of A1 uses to be maintained within Hastings Town Centre (**SA1**) and the Borough's other Shopping Areas (**SA2**) could result in an inefficient use of buildings *should* insufficient demand for this use result in empty shops. A better performing approach (in terms of this objective) could involve being less prescriptive, e.g. allowing for conversion away from A1 use over targeted levels after a certain period of vacancy, when future viability appears unlikely. However, it is noted that the boundaries of the Borough's commercial areas have been refined, resulting in smaller shopping areas, which in turn should reduce the risk that the demand for A1 premises will fall below targeted levels.

Taken together, these policies may result in **significant positive effects** in terms of this SA objective.

The following recommendation is made at this stage:

- Adjust criteria to allow conversion away from A1 use over targeted levels after a certain period of vacancy, where future viability appears unlikely.

Site allocations

Of the allocated sites, 20 out of a total of 79 will result in the loss of a fully greenfield sites. A further four will be brought forward on sites consisting of brownfield and greenfield land. This loss of greenfield land represents an inefficient use of land and therefore is likely to result in **significant negative effects** in terms of this SA objective. It is however noteworthy that the majority of sites do make use of brownfield land, so demonstrating the priority that has been given to such areas. The Borough has also consistently exceeded its target of 60% of new homes to be built on previously developed land since 2004, possibly reducing the availability of viable brownfield sites.

14.10 Biodiversity is protected, conserved and enhanced

General Guidance

General Guidance Policy	DM1:Design Principles	DM2:Tele-communications	DM3: General Amenity	DM4:General Access	DM5:Ground Conditions	DM6:Pollution and Hazards	DM7:Water Resources	HC1:Dwelling Conversions	HC2:Residential Institutions & Students	HC3:Community Facilities	HN1:Heritage Assets (Setting & Significance)	HN2:Conservation Areas (Doors & Windows)	HN3:Heritage Assets (Demolition)	HN4:Archaeological & Historical Interest	HN5:Non-designated heritage Assets	HN6:Private Open Space	HN7: Allotments	HN8:Local Green Spaces	HN9:Green Infrastructure	SA1:Hastings Town Centre Shopping	SA2:Other Shopping Areas	SA3:Shops & Services outside Shopping Areas	SA4:Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1:Cultural Quarters
Broad Implications	↔	↔	↗	↔	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↗	↔	↔	↔	↔	↗	↔

A range of the policies put forward in the DMP consider the issue of biodiversity. Of these, those policies focusing specifically on the Borough's green infrastructure network (**HN6; H7; HN8; HN9**) are likely to contribute significantly towards the aims of this objective. In particular, Policy **HN9** which sets out criteria for the protection, provision and enhancement of green infrastructure in new developments should work to protect and conserve biodiversity. Requirements are set through this policy for the assessment of on-site ecology, the prevention of invasive species, protection and management, and for the provision for ecological improvements, including connectivity both onsite and offsite.

Other policies may also contribute indirectly towards this objective. Policy **DM6** may assist insofar as various habitats or species are sensitive to air, noise or light pollution. The consideration of the potential environmental effects of low river flows (**DM7**) may also help to conserve biodiversity.

Taken together, these policies may result in **significant positive effects** in terms of this SA objective.

Site allocations

Of the allocated sites, two of the sites are on or adjacent to an SSSI. Whilst this is a small number relative to the total allocations (79 sites) there could be serious implications for biodiversity given the national importance of such sites. Seven of the sites are within 200 metres of a SSSI, which could lead to indirect negative effects. In addition, a high number of allocations could impact upon Local Wildlife Sites, with 17 to be found on or adjacent to such an area. Whilst these sites are of a non-statutory designation, they are nonetheless of value for their natural interest and public enjoyment. The cumulative impact of development on such a large number of LWSs; plus the direct impacts of development on a small number of SSSIs, could result in **significant negative effects** against the baseline. It is noted that mitigation measures (e.g. buffer strips) are committed to but yet to be determined in detail.

14.11 The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↔	↔	↔	↔

The role that the design of new developments can play in mitigating flood risk is not explicitly addressed through any of the policies in the DMP. This is of some concern, particularly given the level of flood risk which occurs in the western part of the town. Criteria set out in Policy **DM1** call for new developments to achieve a good performance against nationally recognised best practice guidance on sustainability and urban design. This may contribute towards the aims of this objective, although the extent of any positive effect will be determined by the guidance chosen.

A number of policies relating to green infrastructure (**HN6; HN8; HN9**) could contribute to the aims of this objective given the flood storage potential of green spaces. However, Policy **HN9** could make clearer the need for assessments of existing ecology to take into account the multi-functional nature of green spaces. This could help to ensure that a full range of flood related natural services are protected and enhanced.

Overall, a slight positive effect is predicted against the baseline as a result of these policies.

The following recommendation is made at this stage:

- Amend criteria on the assessment of onsite ecology to ensure that all of the functions of green space are considered.

Site allocations

Of the 79 allocated sites, six are located in an area that intersects with Flood Zone 3. Ten intersect with an area of 'deep' surface water flood risk (1 in 30 year event), with a further eight sites intersecting with an area of 'shallow' surface water flood risk (1 in 30 year event). Given this degree of exposure to flood risk, some negative effects in terms of this objective are possible. However, it should be noted that the majority of sites do avoid areas of high flood risk. Furthermore, allocations in areas of flood risk (e.g. within the low lying Filsham Valley and Bulverhythe focus area where a large amount of housing is proposed) are currently being subjected to Sequential Testing with a view to ensuring suitable mitigation can be put in place. As such the overall effects of the allocations may be mostly positive.

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

General Guidance

General Guidance Policy	DM1:Design Principles	DM2:Tele-communications	DM3: General Amenity	DM4:General Access	DM5:Ground Conditions	DM6:Pollution and Hazards	DM7:Water Resources	HC1:Dwelling Conversions	HC2:Residential Institutions & Students	HC3:Community Facilities	HN1:Heritage Assets (Setting & Significance)	HN2:Conservation Areas (Doors & Windows)	HN3:Heritage Assets (Demolition)	HN4:Archaeological & Historical Interest	HN5:Non-designated heritage Assets	HN6:Private Open Space	HN7: Allotments	HN8:Local Green Spaces	HN9:Green Infrastructure	SA1:Hastings Town Centre Shopping	SA2:Other Shopping Areas	SA3:Shops & Services outside Shopping Areas	SA4:Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CC1:Cultural Quarters
Broad Implications	↗	↔	↔	↗	↔	↔	↔	↔	↗	↔	↗	↗	↗	↗	↗	↔	↔	↗	↗	↔	↔	↔	↔	↗	↔

A number of the policies brought forward have the potential to bring about positive change terms of this objective. The historic environment is given a high degree of focus, with policies setting out criteria to protect and enhance conservation areas, listed buildings, non-designated heritage assets, archaeological sites and ancient monuments. This level of protection is appropriate given the Borough's wide range of heritage assets.

The effect of new developments on the townscape and landscape is addressed through policies relating to design (**DM1**), new caravan and camping sites (**CC1**), and new residential institutions and student accommodation (**HC2**). In addition, the contribution of policy approaches **HN8** and **HN9** to improving the Borough's green infrastructure network may result in improved access to parks, gardens and the countryside.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

Site allocations

The majority of residential sites are within 200m of an area of open space, eight being directly adjacent; these sites may contribute positively in terms of accessibility. However, it is notable that four of the allocations will result in the loss of over 20% of an area of open space. There is also the potential for impacts to heritage assets, with 17 sites at least in part situated within a Conservation Area or directly adjacent to a Historic Park and Garden. It is recognised that there is the potential for positive or negative effects, depending on the type and design of development. On a more local basis, it is important to note that the Maze Hill and Burtons' St Leonards focus area and the Old Town focus areas are both of great architectural and townscape interest. The development of the residential sites proposed for this area must be sensitive to the character of these areas if negative effects are to be avoided.

In terms of landscape capacity, the allocated site perform extremely well. Just one residential site is in an area with 'moderate' capacity to accept residential development, with the rest situated in areas with 'high' capacity. However, of the eleven employment sites brought forward, two are located in areas where there is no capacity for such developments, which may result in negative effects on the landscape.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↗	↔	↗	↔	↔	↗	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↗	↔	↗	↔

Of the policies brought forwards in the DMP, a wide range may help to achieve the aims of this objective. Of particular significance is Policy **DM6** which sets out to ensure that airborne pollutants do not exceed statutory guidelines, unless appropriate mitigation measures are agreed prior to development. Several other policies (**DM4**; **CC1**; **HC2**) have the potential to reduce air pollution by promoting the use of non-car based modes of transport, which may help to reduce of traffic congestion and associated pollution. The protection of existing shops and services outside of shopping areas where there are not alternatives within walking distance through Policy **SA3** may also help to reduce travel by car, so reducing air pollution levels. The provision, protection enhancement of green infrastructure may have a role to play in reducing air pollution, as vegetation can directly remove pollutants from the air.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

Site allocations

A majority of sites are over 200 metres from an amenity footpath or cycle route, which may potentially reduce sustainable transport, so increasing car use and associated air pollution. However, this effect is uncertain. It is also notable that over half of the residential sites allocated (37 of 69) are over 400 metres from a District or Local Centre. Of these 16 are located over 1km away. The location of these sites could encourage the use of the car to access the jobs, services, facilities, and cultural and recreational opportunities that tend to be concentrated in these centres, with corresponding rises in emissions. However, it is worth noting that these more distant sites may be well connected to such centres through various sustainable transport links and that a large number of the remaining sites are in close proximity to such centres. Overall effects are therefore uncertain.

Taking into account local conditions, it is notable that the Little Ridge and Ashdown focus area features several particularly busy roads. There is the potential here for negative cumulative effects given high existing traffic levels, the housing and employment growth proposed here, and the future establishment of the Bexhill-Hastings link road.

14.14 The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)

General Guidance

General Guidance Policy	DM1:Design Principles	DM2:Tele-communications	DM3: General Amenity	DM4:General Access	DM5:Ground Conditions	DM6:Pollution and Hazards	DM7:Water Resources	HC1:Dwelling Conversions	HC2:Residential Institutions & Students	HC3:Community Facilities	HN1:Heritage Assets (Setting & Significance)	HN2:Conservation Areas (Doors & Windows)	HN3:Heritage Assets (Demolition)	HN4:Archaeological & Historical Interest	HN5:Non-designated heritage Assets	HN6:Private Open Space	HN7: Allotments	HN8:Local Green Spaces	HN9:Green Infrastructure	SA1:Hastings Town Centre Shopping	SA2:Other Shopping Areas	SA3:Shops & Services outside Shopping Areas	SA4:Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1:Cultural Quarters
Broad Implications	↗	↔	↗	↗	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↗	↔	↗	↔

A large number of policies could contribute towards achieving the aims of this objective. A direct impact on reducing GHG and preparing developments for the effects of climate change could be made by Policy **DM1**, which calls for new developments to achieve a good performance against nationally recognised best practice guidance on sustainability. However, the extent that this policy contributes towards this objective is highly dependent on the guidance chosen. Other policies may help to reduce GHG emissions through the promotion of non-car based modes of transport (**DM4**; **CC1**; **HC2**). Policy **SA3** may also help to reduce travel by car by protecting existing shops and services outside of shopping areas where there are no alternatives within walking distance.

Green infrastructure may contribute positively towards this objective, for instance through providing shading and flood storage. In terms 'adaptive capacity', Policy **HN9** could make clearer the need for assessments of existing ecology to take into account the multi-functional nature of green spaces. This could help to ensure that a full range of climate related services are provided.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

The following recommendation is made at this stage:

- Amend criteria on the assessment of onsite ecology to ensure that all of the functions of green space are considered.

Site allocations

The effect of the site allocations in relation to climate change mitigation are the same as the effects in relation to air quality. See discussion above under the 'air quality' related objective (Section 14.13).

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

General Guidance

General Guidance Policy	DM1:Design Principles	DM2:Tele-communications	DM3: General Amenity	DM4:General Access	DM5:Ground Conditions	DM6:Pollution and Hazards	DM7:Water Resources	HC1:Dwelling Conversions	HC2:Residential Institutions & Students	HC3:Community Facilities	HN1:Heritage Assets (Setting & Significance)	HN2:Conservation Areas (Doors & Windows)	HN3:Heritage Assets (Demolition)	HN4:Archaeological & Historical Interest	HN5:Non-designated heritage Assets	HN6:Private Open Space	HN7: Allotments	HN8:Local Green Spaces	HN9:Green Infrastructure	SA1:Hastings Town Centre Shopping	SA2:Other Shopping Areas	SA3:Shops & Services outside Shopping Areas	SA4:Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1:Cultural Quarters
Broad Implications	↗	↔	↔	↔	↗	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↔	↔	↔	↔

Two of the policies under appraisal have the potential to contribute significantly to the aims of this objective. The criteria laid out in Policy **DM7** should be sufficient to ensure that water consumption from new developments does not adversely affect supplies through over abstraction. It also calls for a consideration of effects on ground water quality. In addition, Policy **DM6** requires that new developments incorporate appropriate pollution control measures to protect ground and surface waters where necessary. This may be especially important given that the Borough's waterways currently perform only moderately well in terms of their ecological and physio-chemical status.

Design of new developments can potentially play a role in reducing water consumption, for instance through water harvesting and reuse. Water stress is a major issue for this area of the country. Policy **DM1** calls for new developments to achieve a good performance against nationally recognised best practice guidance on sustainability. However, the extent that this policy contributes towards this objective is highly dependent on the guidance chosen.

By providing criteria relating to ground conditions such that an investigation of contamination takes place prior to development, Policy **DM5** should reduce the risk of pollution of ground water. Green infrastructure (**HN6**; **HN8**; **HN9**) may also play a role in improving water quality, for instance through filtering water as it passes through a catchment.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects against this objective.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Whilst Policy **DM1** does not make explicit the need to maximise the use of sustainable energy and renewable energy technologies in new developments and existing buildings, it does call for new developments to achieve a good performance against nationally recognised best practice guidance on sustainability. However, the extent to which this policy contributes to this objective will be determined by the guidance chosen. No other policies set out criteria that may encourage the uptake of renewable energy technologies or the use of sustainable energy.

Overall, the effect of the DMP policies on progress towards this objective is uncertain.

However, it is also important to note that the DMP will act in combination with **the Planning Strategy**, which includes a number of important policies that should contribute positively to the baseline in relation to this objective. Specifically, Policy SC3 (Promoting Sustainable and Green Design), Policy SC4 (Working Towards Zero Carbon Development) and Policy SC5 (District Heating Networks and Combined Heat and Power Systems) will ensure climate change mitigation is a foremost consideration.

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects against this objective.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Adequate space for the storage of waste and for the means of its disposal is to be required in new developments through Policy **DM3**. This includes ensuring provision is made for the general management of recyclable materials. By calling for new developments to achieve a good performance against nationally recognised best practice guidance on sustainability, **DM1** could potentially contribute toward this objective. The extent of this contribution will be determined by the guidance chosen. These policies may help towards Hastings' target for 30% of household waste to be recycled and composted by 2013.

In all, the effect of the policies may be positive.

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects against this objective.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↗	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔

A range of policies have the potential to contribute towards this objective. Reductions in car dependency is particularly encouraged through Policy **DM4**, which calls for the promotion and enhancement of access for sustainable modes of transport, and the consideration of these modes when laying out development. Public transport accessibility is also encouraged for new residential institutions and student accommodation (**HC2**) and for Caravan and Camping Sites (**CC1**). The latter policy also calls for good access to cycle and walking routes where possible. The protection of existing shops and services outside of shopping areas where there are not alternatives within walking distance through Policy **SA3** may also help to reduce travel by car dependency.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

Site allocations

A majority of sites are over 200 metres from an amenity footpath or cycle route. This may potentially reduce uptake of sustainable transport, so increasing car use and associated congestion and pollution, although this effect is uncertain. Over half of the residential sites allocated (37 of 69) are over 400 metres from a District or Local Centre. Of these 16 are located over 1km away. The location of these sites could encourage the use of the car to access the jobs, services, facilities, and cultural and recreational opportunities that tend to be concentrated in these centres, with corresponding rises in pollution. However, it is worth noting that these more distant sites may be well connected to such centres through various sustainable transport links and that a large number of the remaining sites are in close proximity to such centres. Overall effects are therefore uncertain.

On a local level, it is notable that the level of car ownership in the St Helens focus area is particularly high, with jobs and services often found elsewhere in the Borough. The allocation of seven housing sites here, with no additional employment space may worsen this situation unless steps are taken to ensure that sustainable transport modes are available, or opportunities for mixed use development are considered.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↗	↗	↗

By setting of targets for A1 use in Hastings Town Centre (**SA1**) and in other Shopping Areas (**SA2**), the loss or scattering of these premises may be prevented. This could help to support the economic success of these areas, so maintaining or increasing employment opportunities. By protecting existing shops and services outside of shopping areas where there are no alternatives within walking distance, Policy **SA3** may help to maintain local employment. The promotion of cultural activities (**CQ1**) could also create direct employment, along with wider opportunities from increased visitor numbers.

Two of the policies set out in the DMP look to set out stringent standards for new business developments (**CC1**; **SA4**). These could restrict business creation in some instances, although it seems unlikely that these requirements will have serious implications employment. Indeed, it is more likely that in the long term these restrictions will contribute to economic viability by maintaining an attractive environment that encourages visitors. Collectively, the General Guidance policies could have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

Site allocations

Of the 79 allocated sites, 45 are situated in areas amongst the 20% deprived. Of the 11 employment sites, 7 are in areas of high deprivation and so could contribute to economic growth where it is in particular need, so helping to provide employment opportunities for all. The provision of additional housing in deprived areas can also help to support economic and employment activity, and so the 38 residential sites (out of 68) allocated in such areas may also contribute positively. Collectively, these allocations may result in **significant positive effects** particularly given Hastings above average level of unemployment and economic inactivity.

On a more local basis, it is notable that in the Greater Hollington focus area seven housing sites and four employment site are to be brought forward. This focus area is the fourth most deprived in the Borough, with a quarter of the population receiving out of work benefits. As such, it is possible that these allocations could lead to increased associated employment opportunities in this area. A similar effect may be felt in the Hillcrest and Ore Valley focus area, which includes allocations for a total of 8400m² of potential gross floorspace in another area of particularly high deprivation. Central St Leonards & Bohemia is the most densely populated in the Borough and the second most economically deprived. The allocation on a single mixed use site here may help to provide additional opportunities for economic development. However, the provision of a larger quantity of employment space in this area could have led to a greater positive effect.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↔	↗	↗	↗

The protection of A1 uses in Hastings Town Centre and in the Borough's other Shopping Areas should help to support economic revival in these areas of deprivation by preventing the loss or scattering of these premises. The promotion of cultural activities through Policy **CQ1** could help to facilitate economic revival in areas of the Borough currently suffering from high deprivation, along with wider opportunities from increased visitor numbers. It could also assist by diversifying the local economy.

Two of the policies set out in the DMP look to set out stringent standards for new business developments (**CC1**; **SA4**). These could restrict economic revival in some cases. However, in the long term these restrictions may contribute to the economic viability of commercial areas and facilities by maintaining an attractive urban and rural environment that encourages visitors.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

Site allocations

See discussion under 14.19, above. Collectively, these allocations may result in **significant positive effects** particularly given Hastings above average level of unemployment and economic inactivity.

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

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↗	↗	↗

By setting of targets for A1 use in Hastings Town Centre (**SA1**) and in other Shopping Areas (**SA2**), the loss or scattering of these premises may be prevented. This could help to sustained economic growth in these areas and the wider Borough although this effect is somewhat uncertain given that strict targets for A1 use could result in long term empty premises. A somewhat less prescriptive policy could allow for conversion after a certain period of vacancy and where future viability seems unlikely. Having said this, it is noted that the boundaries of the Borough's commercial areas have been refined, resulting in smaller shopping areas and hence less risk that the demand for A1 premises will fall below targeted levels.

By protecting and granting permission for suitable community facilities, Policy **HC3** may help link social regeneration to growth by increasing opportunities for economic participation, through up-skilling for example. This may be particularly important given proportion of Borough residents without qualifications.

Of the policies set out in the DMP, two look to set out stringent standards for new business developments (**CC1**; **SA4**). These could restrict economic growth in some cases. However, these restrictions may contribute to the economic viability of commercial areas and facilities in the long term by maintaining an attractive urban and rural environment that encourages visitors.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

The following recommendation is made at this stage:

- Adjust criteria to allow conversion away from A1 use over targeted levels after a certain period of vacancy, where future viability appears unlikely.

Site allocations

See discussion under 14.19, above. Collectively, these allocations may result in **significant positive effects** particularly given Hastings above average level of unemployment and economic inactivity.

14.22 Indigenous and inward investment is encouraged and accommodated

General Guidance

General Guidance Policy	DM1: Design Principles	DM2: Tele-communications	DM3: General Amenity	DM4: General Access	DM5: Ground Conditions	DM6: Pollution and Hazards	DM7: Water Resources	HC1: Dwelling Conversions	HC2: Residential Institutions & Students	HC3: Community Facilities	HN1: Heritage Assets (Setting & Significance)	HN2: Conservation Areas (Doors & Windows)	HN3: Heritage Assets (Demolition)	HN4: Archaeological & Historical Interest	HN5: Non-designated heritage Assets	HN6: Private Open Space	HN7: Allotments	HN8: Local Green Spaces	HN9: Green Infrastructure	SA1: Hastings Town Centre Shopping	SA2: Other Shopping Areas	SA3: Shops & Services outside Shopping Areas	SA4: Amenity Services outside Shopping Areas	CC1: Caravan and Camping Sites	CQ1: Cultural Quarters
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↔	↗	↗

The protection of A1 uses in Hastings Town Centre and in the Borough's other Shopping Areas may help to encourage inward and indigenous investment by preventing the loss or scattering of these premises. Nevertheless, the strict targets for A1 use could result in long term empty premises. A somewhat less prescriptive policy could allow for conversion after a certain period of vacancy and where future viability seems unlikely.

The promotion of cultural activities through Policy **CQ1** could encourage investment in this sector and others as a result of increased visitor numbers.

Whilst Policies **CC1** and **SA4** set out stringent standards which could discourage some developments, it seems unlikely that they will have a serious adverse impact on levels of investment in these businesses. A more relaxed approach may encourage more development and associated investment, but could result in an overall decline in the amenity of an area with wider adverse economic implications.

These policies collectively have the potential to bring about **significant positive effects** on the baseline in terms of this SA objective.

The following recommendation is made at this stage:

- Adjust criteria to allow conversion away from A1 use over targeted levels after a certain period of vacancy, where future viability appears unlikely.

Site allocations

There is no evidence available to suggest whether or not the preferred sites will result in significant effects in terms of this objective.

15 CONCLUSIONS AT THIS CURRENT STAGE

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

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

15.1.3 The following is a summary of key effects in terms of sustainability objectives / aspects of the sustainability baseline:

Environment

15.1.4 The plan is strong on green infrastructure and biodiversity from a policy perspective. A range of policies call for the protection of a variety of spaces and for detailed appraisal of green infrastructure as part of new development proposals, although more could be done to emphasise the need for green space creation in areas of particular need. The site allocations perform less well, potentially negatively affecting a small number of SSSI sites, plus several locally important non-designated sites. Several greenfield sites across the Borough will be developed, with uncertain cumulative effects on biodiversity. It is possible that the stringent policy approach set out in the plan can mitigate against any negative effects associated with allocations.

15.1.5 The need to reduce GHG emissions and to prepare the area for the future effects of climate change is given little direct consideration in the plan. Whilst a number of the policies may result in a reduction in transport emissions, the plan as a whole is otherwise not explicit about the role design, green infrastructure, and sustainable energy can play in terms of mitigation and adaptation. In addition, over half of the allocated residential sites allocated are some distance from a District or Local Centre. It may nonetheless be the case that the plans effects are positive, for instance thanks to the use of best practice sustainable construction guidance as a result of the design policy. However, without clear guidance, effects are uncertain. It is also noted that issues relating to climate change are given more explicit consideration in the Hastings Planning Strategy (the overarching Local Plan).

Communities

15.1.6 A range of policies focus on improving community life, health, and living standards through local services, cultural opportunities, access to green space and the protection of the Borough's landscape, townscape and heritage assets. These policies in conjunction with site allocations which are mostly in close proximity to open space and which on the whole avoid areas of high landscape sensitivity, should ensure the plan performs positively in this respect. This performance is, however, somewhat limited by losses of green space as a result of the allocations, plus the distance of a number of housing sites from sustainable transport links and play facilities.

The economy

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

Overall

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

16 RECOMMENDATIONS AT THIS CURRENT STAGE

- 16.1.1 The following is a summary of the recommendations presented within Chapter 14, above. These recommendations will be taken into account when finalising the plan (alongside appraisal findings more generally, and consultation responses received as part of the current consultation).

Recommendation	To ensure performance of the plan is maximised in terms of
Provide a clear statement regarding the extent to which the site allocations will contribute towards ensuring identified housing needs are met.	The sustainability objective to ensure more opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need
Seek to encourage the creation of green spaces in areas of identified need.	Several sustainability objectives, including relating to health and well-being and ensuring vibrant and locally distinctive communities.
Add criteria giving additional weight to the protection and creation of services and facilities in areas of high deprivation	The sustainability objective to ensure levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town
Adjust criteria to allow conversion away from A1 use over targeted levels after a certain period of vacancy, where future viability appears unlikely.	Several sustainability objectives, including relating to efficient use of land and building, and sustained economic growth.
Amend criteria on the assessment of onsite ecology to ensure that all of the functions of green space are considered.	The sustainability objective to ensure the risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future; also the sustainability objective relating to climate change adaptation; as well as the objective to ensure the town is prepared for the impacts of climate change.

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

17 INTRODUCTION (TO PART 4)

The SA Report must include...

- A description of the measures envisaged concerning monitoring

17.1.1 As such, this Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

18 PLAN FINALISATION, ADOPTION AND MONITORING

18.1.1 Following consultation under Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012, the Council will prepare a schedule of modifications to the Development Management Plan and submit this, along with all the representations received, to the Secretary of State for Independent Examination. It is the Council's intention to have an adopted Development Management Plan by April 2014, although this is dependent on the Inspector's findings at Examination, and any additional work needed to ensure the Soundness of the Plan.

18.1.2 At the time of Adoption a 'Statement' must published that sets out (amongst other things):

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

18.1.3 At the current stage (i.e. within the SA Report), there is a need to present 'measures envisaged concerning monitoring' only. As such, Table 18.1 suggests measures that might be taken to monitor the effects (in particular the negative effects) highlighted by the appraisal of the draft plan (see Part 3 of this SA Report).

Table 18.1: Measures envisaged concerning monitoring.

Sustainability objective	Significant effect?	Established indicators ¹³	Gaps in coverage / suggested further indicators
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	Positive (General Guidance)	<ul style="list-style-type: none"> - Housing completions - Affordable housing completions - Empty homes brought back into use - Property affordability – house price/earnings ratio - Housing stock - Households on housing register 	Indicators could also include: <ul style="list-style-type: none"> - Quality of new housing developments (e.g. against best practice guidance) - Satisfaction of people over 65 with both home and neighbourhood - Percentage of overall housing stock not meeting 'Decent Homes Standard'
The health and well-being of the population is improved and inequalities in health are reduced	Positive (General Guidance)	<ul style="list-style-type: none"> - Life expectancy - General level of health 	Indicators could also include: <ul style="list-style-type: none"> - Accessibility of leisure and recreation facilities - Amount of new residential development within 30 minutes public transport journey time of key services - Percentage of residents with a limiting long-term illness
Levels of poverty and social exclusion are reduced and the deprivation gap is	No	<ul style="list-style-type: none"> - Indices of Multiple Deprivation - Child poverty - Households in fuel poverty 	Indicators could also include: <ul style="list-style-type: none"> - Percentage of working age population receiving Employment Support Allowance and incapacity benefits

¹³ These indicators are proposed within the Hastings SA Scoping Report

closed between the more deprived areas in Hastings and the rest of the town			The Council might wish to identify particular social groups that should be the focus of monitoring.
Opportunities are available for everyone to acquire new skills , and the education and skills of the population improve	No	<ul style="list-style-type: none"> - GCSE qualifications - Working age population with no qualifications - Working age population with NVQ qualifications 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - 16 to 18 year olds who are not in education, employment or training <p>Provision of education and skills training will be primarily the responsibility of the County Council and other delivery partners. The Council might wish to work with these organisations to ensure effective strategy is developed on the basis of on-going monitoring and evaluation.</p>
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	Positive (General Guidance)	<ul style="list-style-type: none"> - Average distance travelled to work - Access to open space - Internet connection (adults) - Population within 20mins travel time of sports facilities 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Accessibility of leisure and recreation facilities - Amount of new residential development within 30 minutes public transport journey time of key services - Percentage of local residents having visited local cultural or historic sites of interest
Safe and secure environments are created and there is a reduction in crime and the fear of crime	Positive (General Guidance)	<ul style="list-style-type: none"> - Satisfaction with local area - Overall crime rates - Fear of crime 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Percentage of residents feeling safe after dark
Vibrant and locally distinctive communities are created and sustained	Positive (General Guidance)	<ul style="list-style-type: none"> - Young people (demographics) - Levels of Community Cohesion (surveys of opinion) 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Loss of community facilities; except where adequate replacement has been made - Percentage of residents 'very satisfied' or 'fairly satisfied' with their local area as a place to live <p>It is recommended that the Council explore the development of further indicators around gauging peoples' opinions of their local area.</p>
Land and buildings are used more efficiently and the best use is made of previously developed land	Positive (General Guidance); Negative (Sites)	<ul style="list-style-type: none"> - Homes built on previously developed land - Employment floorspace on previously developed land 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Previously Developed Land that has been vacant or derelict for more than five years - Loss of agricultural land which is identified as being within the best and most versatile
Biodiversity is protected, conserved and enhanced	Positive (General Guidance); Negative (Sites)	<ul style="list-style-type: none"> - Nature conservation designations and extent of coverage - Condition of SSSIs - Change in areas of biodiversity importance 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Net change in Borough Wildlife Sites in "Positive Conservation Management" - Area of Local Wildlife Sites - Progress in achieving priority BAP targets <p>It is recommend that the Council explore development of further biodiversity indicators – perhaps related to the extent of biodiversity enhancements in new development.</p>
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	No	<ul style="list-style-type: none"> - Planning applications granted permission contrary to advice from EA on flooding grounds 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Applications for development in flood zone - Incidents of flooding as a result of surface water run-off - Percentage of new development with SuDS installed

			The council may wish to consider more closely (e.g. through a Supplementary Planning Document) the scope of what can and should be achieved in terms of high quality SuDS, which would then also enable the success of policy to be monitored going forward.
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	Positive (General Guidance)	<ul style="list-style-type: none"> - Open spaces managed to Green Flag Award standards - Condition of SSSIs 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Loss/gain of open space with recreational value - Loss/gain of non-listed / listed buildings - Implementation of landscaping schemes in new developments - Local assets on the Buildings at Risk Register <p>It is suggested that the Council may wish to work with English Heritage to identify priority indicators.</p>
Air pollution from transport and land use planning is reduced, and air quality continues to improve	Positive (General Guidance)	<ul style="list-style-type: none"> - Air Quality Management Zones - Car ownership 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Improvements to the transport network which contribute to sustainable transport - Provision of new cycle ways/footpaths
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	Positive (General Guidance)	<ul style="list-style-type: none"> - Carbon Dioxide emissions (reduction in emissions per person) - Total emissions per sector (per capita) 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Decentralised and renewable or low carbon energy sources permitted in developments - KWh of gas and electricity consumed per consumer per year
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	Positive (General Guidance)	<ul style="list-style-type: none"> - Water quality (ecological) - Water quality (biological) - Water quality (physio-chemical) - Planning applications granted permission contrary to advice from EA on water quality grounds 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Changes in the quality of bathing water <p>Water consumption per head per day</p> <p>Depleted groundwater can manifest itself in poor water quality and the poor quality of aquatic ecosystems. It is suggested that the Council may wish to work with the Environment Agency to ensure monitoring effort is directed towards those watercourses that have the greatest potential to be impacted as a result of future growth.</p>
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	No	<ul style="list-style-type: none"> - Renewable energy schemes installed - Average consumption of electricity (domestic and industrial/commercial) - Average consumption of gas (domestic and industrial/commercial) 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Decentralised and renewable or low carbon energy sources permitted in developments - KWh of gas and electricity consumed per consumer per year
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	No	<ul style="list-style-type: none"> - Total tonnage of household waste - Household waste recycled and composted - Household waste going to landfill 	No additional indicators are suggested.

Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	Positive (General Guidance)	<ul style="list-style-type: none"> - Traffic flows for all motor vehicles - Car ownership - Bus passenger journeys 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Hastings specific data (currently county wide) - Method of travelling to work (modal share) - Improvements to the transport network which contribute to sustainable transport - Provision of new cycle ways/footpaths
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	Positive (General Guidance & Sites)	<ul style="list-style-type: none"> - Employment floorspace development - Economically active working age population - Unemployment rate 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Percentage of workforce employed in higher skilled and managerial occupations - New business registration rate per 10,000 population
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	Positive (General Guidance & Sites)	<ul style="list-style-type: none"> - Average earnings - Vacant commercial floorspace 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Changes in the vitality and viability of Commercials Centres as measured by a Town Centre Health Check or equivalent - Changes to the level of retail and office space in commercial centres - Gain/loss in shops outside of commercial centres - New business registration rate per 10,000 population <p>If the Council were to define 'categories of success' for the commercial centres, then it may be easier to monitor progress going forward.</p>
The sustained economic growth of the town is achieved and linked closely to social regeneration	Positive (General Guidance & Sites)	<ul style="list-style-type: none"> - Employment land available - Mean household income - Vacant commercial floorspace 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Changes in the vitality and viability of Commercials Centres as measured by a Town Centre Health Check or equivalent - Changes to the level of retail and office space in commercial centres - Gain/loss in shops outside of commercial centres - New business registration rate per 10,000 population
Indigenous and inward investment is encouraged and accommodated	Positive (General Guidance)	<ul style="list-style-type: none"> - Employment floorspace development - Employment land available 	<p>Indicators could also include:</p> <ul style="list-style-type: none"> - Changes in the vitality and viability of Commercials Centres as measured by a Town Centre Health Check or equivalent - Changes to the level of retail and office space in commercial centres - New business registration rate per 10,000 population

APPENDIX I: REGULATORY REQUIREMENTS

The Introduction to this SA Report explains that, in order to demonstrate compliance with the requirements of the Environmental Assessment Regulations 2004, SA Reports must answer four questions. Table 1.1 of the Introduction then ‘makes the links’ between requirements of the Regs and these four questions. Table 1.1 is reproduced below (as Table 1). The right-hand column of Table 1 does not quote directly from the Regs, but rather reflects a degree of interpretation. As such, Table 2 explains this interpretation. The following points supplement Table 2.

- References to ‘plan or programme’ have been shortened to ‘plan’.
- Reference to *‘the environmental protection objectives, established at international, Community or Member State level...’* is shortened to *‘the environmental protection objectives, established at international or national level...’*
- The requirement to provide 1) *‘an outline of the ... relationship [of the plan] with other relevant plans and programmes’* and 2) *‘the environmental protection objectives...’* is taken to mean that a review of the relevant context should be provided.
- The requirement to provide an explanation of *‘the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation’* is taken as indicating that the SA Report must explain how SA has influenced development of the draft plan.
- The reference to issues that might be a focus of SEA is not given prominence. This reflects the fact that these issues are merely suggested; and that a foremost consideration when undertaking SEA should be the fact that the Regulations are of a procedural nature, i.e. do not seek to prescribe substantive issues that should be a focus. These issues are a material consideration nonetheless.
- The need to provide *‘an outline of the reasons for selecting the alternatives dealt with’* is taken to have a dual meaning:
 - 1) There is a need to justify the range of alternatives considered (and indeed, the range of issues for which alternatives were considered)
 - 2) There is a need to explain the reasons for selecting preferred alternatives / the preferred approach to addressing each of the key issues in question. This requirement tallies with the requirement to explain *‘the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation’*
- The requirement to explain *‘the likely significant effects...’* is assumed to relate to both the draft plan and alternatives.
- The reference to providing *‘a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information’* is not given prominence. This is purely for reasons of brevity. Methodology is explained where relevant in the report.
- Reference to ‘in accordance with Article 10’ is removed for brevity.
- Finally, it will be noted that references to ‘the environment’ have been retained, despite the fact that the starting assumption that there is a need to give particular attention to environmental issues does not apply to SA.

Table 1: Questions that must be answered within the SA Report

SA REPORT QUESTION	SUB-QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The relevant environmental protection objectives, established at international or national level
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
	What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable') The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next (including monitoring)?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

Table 2: Interpreting regulatory requirements

<u>Interpretation of the requirements (as presented in Table 1, above)</u>	<u>Requirements of Schedule 2 of the Regs (the report must include...)</u>
An outline of the contents, main objectives of the plan	(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
The relationship of the plan with other relevant plans and programmes	
The environmental protection objectives, established at international or national level, relevant to the plan	(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
The relevant aspects of the current state of the environment	(c) the environmental characteristics of areas likely to be significantly affected;
The environmental characteristics of areas likely to be significantly affected	(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
The likely evolution [of the baseline] without implementation of the plan	(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
An outline of the reasons for selecting the alternatives dealt with	(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
The likely significant effects on the environment' associated with alternatives / An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.	(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
The likely significant effects on the environment associated with the draft plan	
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
A description of the measures envisaged concerning monitoring	(i) a description of the measures envisaged concerning monitoring.

APPENDIX II: GENERAL GUIDANCE ALTERNATIVES APPRAISAL

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising alternative approaches to addressing the following range of General Guidance issues:

- | | | |
|--|---|--|
| • Access | • Design | • Pollution |
| • Amenity | • Designated heritage assets | • Residential institutions |
| • Caravans and camping sites | • Development Boundary | • Retention of shops and services outside defined shopping areas |
| • Change of use of a dwelling for a business use | • Ground conditions | • Small businesses |
| • Commercial centres | • Hastings Town Centre shopping area | • Tourist facilities |
| • Community facilities' | • Managing certain types of premises outside defined shopping areas | • Upper Ore Valley Greenspace |
| • Conversion of dwellings | • Non-designated heritage assets | • Water resources |
| • Defining green infrastructure | | |

The interim appraisal findings are presented in full within this Appendix. Each of the appraisal tables should be read alongside the corresponding section of Part 2 of the main report, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission version of the Plan.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'significant effects' on the baseline / likely future baseline, drawing on the sustainability objectives identified through scoping (see Part 1 of the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained in full.¹⁴

In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of alternatives in more general terms. This is helpful, as it enables a distinction to be made between alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs.¹⁵ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

Alternatives considered

Not all of the alternatives presented in the consultation documents 'Hastings Local Plan Development Management Plan Consultation Document (February 2012) and the Hastings Local Plan Development Management Plan Focused Consultation Document (July 2012) have been subjected to SA. Where options presented within the consultation documents have been omitted from SA, this is clearly indicated in the tables below. The important thing is that SA has been undertaken on a 'reasonable' range of options for the issues presented within the consultation documents.

¹⁴ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

¹⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Access

Table 1: Appraisal of alternative policy approaches to addressing the issue of 'Access'



February 2012 Consultation Option 1: Attention must be paid, not only to the access onto the site, but also access into, and within all parts of any resultant development. This includes: a) When considering the layout of a site, priority is to be given to non-car based modes; b) The enhancement and promotion of pedestrian and cycle access; c) Good accessibility for all, especially for people with a physical or sensory impairment; d) Good performance against nationally recognised best practice guidance on internal building design and layout; e) Planning permission will only be granted for development which would generate additional traffic on an un-metalled carriageway, if an agreement is made that the road in question remains private; f) For any new buildings (except a single dwelling house) of three stories or more, we would expect to see the installation of a powered lift system to all floors.¹⁶

February 2012 Consultation Option 3: More stringent / prescriptive policy



The following options, although presented within consultation documents, have not been given standalone consideration in the table below:




February Consultation Option 2: Split the guidance into separate policies


February Consultation Option 4: Not to have a specific policy for this issue and rely upon guidance from the County Council and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although adherence to accessible design principles should help to ensure new homes meet the needs of their occupants, including the needs of less able bodied occupants (Alternative 1). Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: The criteria in the suggested policy approach (Alternative 1) ensuring good accessibility for all, especially those with physical and sensory impairment, and the installation of lift systems into appropriate buildings, should contribute to health and wellbeing. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2

¹⁶¹⁶ Additional policy issue suggested through the Hastings Local Plan Development Management Plan Focused Consultation Document

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although they may both indirectly assist to reduce social exclusion through design. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	 1	2
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that both of these policy approaches would lead to significant positive effects on the baseline. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	 1	2
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although they may both contribute indirectly to meeting this objective.	-	-
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although they may both indirectly assist to improve accessibility to these features for both able and less able members of the community. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	 1	2
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: By enhancing and promoting pedestrian access and ensuring that non-car based modes of transport are given priority in development layout consideration, the suggested policy approach (Alternative 1) could contribute to the reduction of traffic congestion and associated air pollution. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	 1	2
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline although both options may contribute indirectly to achieving this objective, In terms of the relative merits of the alternatives the following is noted: Through its focus on promoting non-car based forms of transport through development layout and access criteria, the suggested policy approach (Alternative 1) may help to reduce transport emissions and so reduce GHG emission levels. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	 1	2
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The use of sustainable energy and renewable energy technologies is maximised	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that both of these policy approaches would lead to significant positive effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By calling for the promotion and enhancement of access for non-car modes of transport, and the consideration of these modes when laying out development, the suggested policy approach (Alternative 1) may contribute positively to this objective. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion By promoting good accessibility for those with disabilities and those that wish to use non-car based modes of transport, the suggested policy approach (Alternative 1) performs well against the sustainability objectives. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.			

Amenity

Table 2: Appraisal of alternative policy approaches to addressing the issue of 'Amenity'

February 2012 Consultation Option 1: In order to achieve a good living standard for future users of proposed development and its neighbours, permission will be given where it can be proven that the following have been carefully considered and can be demonstrated: a) Careful use of the scale, form, height, mass, and density of any building and buildings; b) Dwellings must be designed to allow residents to live comfortably and conveniently with sufficient internal space. The guidelines for minimum internal floor areas are: 1 bedroom/2 person 51m²; 2 bedroom/3 person 86m²; 3 bedroom/5 person 93m²; 4 bedroom/6 person 106m²; c) There is adequate storage for waste, and means of its removal (including recyclable materials) has been given careful attention; d) Means of landscaping and how this contributes to crime prevention; a permeable and legible network of routes and spaces to create a public realm that is attractive, overlooked and safe; e) Arrangements being in place for the future maintenance of any public areas; f) Considerate design solutions for the spaces between and around buildings, as well as respect to the character of the surroundings; a well-designed scheme in terms of private, semi-private and public open space; g) Appropriate levels of private external space, especially for larger homes designed to be marketed for family use. In terms of proposed family dwellings the council would expect to see the provision of private garden space of at least 30m²; Development will not be accepted where there is: h) Insufficient scope to accommodate necessary servicing areas, ancillary structures and landscaping i) Significant impact upon the area's character or the amenity of neighbouring properties.

February 2012 Consultation Option 3: More stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:


February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The approach laid out in Alternative 1 should ensure that homes are of a high standard and suit the needs of their occupants in terms of floorspace, privacy and landscaping. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	★ 1	2
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline although the indirect linkages between health and wellbeing and the design of new development should be recognised. In terms of the relative merits of the alternatives the following is noted: Whilst appropriate levels of private external space are called for in Alternative 1, there is no mention of the	2	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	quality of these spaces. This may be an important factor in determined the extent to which health and wellbeing is promoted in new developments. As such, a more prescriptive approach is called for and Alternative 2 is therefore the preferred approach in terms of meeting this objective.		
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline although both approaches should contribute to meeting this objective. In terms of the relative merits of the alternatives the following is noted: By setting criteria relating to designing out crime, the suggested policy approach (Alternative 1) should ensure that safe and secure environments are provided for residents. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Land and buildings are used more efficiently and the best use is made of	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
previously developed land			
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The potential for management of spaces between buildings to provide green infrastructure and so contribute to safeguarding biodiversity is not highlighted by the suggested policy approach (Alternative 1). A more prescriptive policy approach would better meet the requirements of this objective and Alternative 2 is therefore the preferred approach. Alternatively, this issue could be addressed under the Design policy, as previously recommended.	2	★1
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. N.B. the issue of flood prevention through development design is addressed through the policy approaches suggested for the issue of 'Design'.		
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: A more prescriptive policy (Alternative 2) could place greater emphasis on the need for the spaces between and around buildings to contribute to climate adaptation through green infrastructure, for example by using green spaces to help control local temperature. Alternatively, this issue could be addressed under the 'Design' policy, as previously recommended.	2	★1
The risk of pollution to all water resources is reduced, water quality is	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
improved and water consumption is reduced			
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: By calling for waste storage (including recyclables) to be provided the approach suggested in the suggested policy approach (Alternative 1) should be sufficient to meet this aims of this objective. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

Conclusion

Whilst the suggested policy approach (Alternative 1) meets the requirements of a number of the sustainability objectives, some small changes could be made which would enhance its performance. In particular, a more prescriptive policy approach (Alternative 2) may be preferable for the spaces between buildings. Supported by criteria relating to the quality of these spaces and green infrastructure provision, these areas could make a greater contribution to health and wellbeing, biodiversity, and climate adaptation objectives. Alternatively, these issues could be addressed through the 'Design' policy.

Caravans and camping sites

Table 3: Appraisal of alternative policy approaches to addressing the issue of 'Caravans and camping sites'

February 2012 Consultation Option 1: Planning permission will only be granted for additional caravan and camping sites or the expansion of existing sites provided: a) Safe and convenient access to and from the public highway can be provided; b) The proposal would not have an adverse impact on surrounding residential areas or the wider environment, and an assessment of potential the ecological and landscape impact is provided; c) The use of the site is restricted to a seasonal basis (between the 28th February in any one year and the 14th January in the following year); and d) A minimum of one third of the total number of pitches on new or extended static caravan sites is reserved for touring caravans or campers. Planning permission will be granted for development designed to enhance facilities within existing caravan sites, including accommodation and the replacement of static caravans by chalets, provided that the above criteria is adhered to and: a) It would not be visually intrusive; and b) It would not unacceptably affect the living conditions of nearby residents.

February 2012 Consultation Option 4: More stringent / prescriptive policy



February 2012 Consultation Option 4: Less stringent / prescriptive policy




The following options, although presented within consultation documents, have not been given standalone consideration in the table below:




February 2012 Consultation Option 2: Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) could contribute towards local well-being by ensuring that development on camping or caravan sites does not adversely affect the amenity of surrounding residential areas. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	 1	2	3
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does refer to convenient access to the highway network, a more prescriptive policy approach (Alternative 2) could set out measures to ensure that camping sites include good access to public transport and cycle and walking routes where possible, so increasing sustainable transport options for accessing recreational and cultural opportunities. Weaker guidance or reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	2	 1	3
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) performs well against this objective as developments which impact negatively on the wider environment would not be granted permission, with an assessment of ecological impact to be provided. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	 1	2	3
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) performs well against this objective as developments which impact negatively on the environment would not be granted permission, with an assessment of landscape impact to be provided. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	 1	2	3
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does refer to convenient access to the highway network, a more prescriptive policy approach (Alternative 2) could set out measures to ensure that camping sites include good access to public transport and cycle and walking routes where possible, so potentially reducing car journeys and related air pollution. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	2	 1	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does refer to convenient access to the highway network, a more prescriptive policy approach (Alternative 2) could set out measures to ensure that camping sites include good access to public transport and cycle and walking routes where possible, so potentially reducing car journeys and associated GHG emissions. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	2		3
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does refer to convenient access to the highway network, a more prescriptive policy approach (Alternative 2) could set out measures to ensure that camping sites include good access to public transport and cycle and walking routes where possible, so potentially reducing car journeys and associated congestion. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	2		3
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) could set standards which could discourage the development of some camping and caravan developments, it seems unlikely that they will have a		2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	serious adverse impact on levels of tourism and related employment. However, a more stringent approach (Alternative 2) may place an undue burden on such businesses. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.			
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) could set standards which could discourage the development of some camping and caravan developments, it seems unlikely that they will have a serious adverse impact on levels of tourism and associated economic revival. However, a more stringent approach (Alternative 2) may place an undue burden on such businesses. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.		2	3
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) could set standards which could discourage the development of some camping and caravan developments, it seems unlikely that they will have a serious adverse impact on levels of tourism and the economic benefits it can provide. However, a more stringent approach (Alternative 2) may place an undue burden on such businesses. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.		2	3
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) could set standards which could discourage the development of some camping and caravan developments, it seems unlikely that they will have a serious adverse impact on levels of investment in these businesses and tourism more widely. However, a more stringent approach (Alternative 2) may place an undue burden on such businesses. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.		2	3
Conclusion The suggested policy approach (Alternative 1) should effectively balance the requirement to protect residential amenity and the wider environment from the effects of campsite and caravan site establishment, whilst also not placing an undue burden on such businesses. However, through Alternative 2, more prescriptive guidance could ensure that camping sites are well served by public transport and walking and cycling routes, with multiple benefits. Weaker guidance or a reliance on higher level policy (Alternative 3) is unlikely to obtain the same level of benefit.				

Change of use of a dwelling for a business use

Table 4: Appraisal of alternative policy approaches to addressing the issue of 'Change of use of a dwelling for a business use'

February 2012 Consultation Option 1: Permissions to allow a change of use to part of a dwelling or permission to erect a new building related to the dwelling in order to operate a business or work from home, will be granted provided the following criteria are met: a) No significant detriment to the character of the building and surroundings would result, either from the activity on the site or collection/delivery of materials; b) The business will employ no more than one person in addition to the owner. The business use must be ancillary to the overall use of the site for residential purposes; c) Business activities will be contained within the non-residential part of the dwelling; d) Adequate access and parking is available within the site to cater for both domestic and business needs; e) Any sales (retail or wholesale) shall be ancillary or incidental to the employment activity on the site. No sales shall take place of goods which are not manufactured or processed on the site; f) The curtilage is adequate to site any proposed building without significant detriment to surrounding residential area.


February 2012 Consultation Option 4: More stringent / prescriptive policy

February 2012 Consultation Option 4: Less stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: By restricting the extent to which residential developments can be converted to a business use, the Alternative 1 may help to keep house prices in the area affordable by protecting the size of the housing stock. At the same time, it allows flexibility to ensure that housing meets occupant's needs, i.e. by providing for small business activity. The criteria in this policy preventing significant detriment to surrounding residential areas should help to ensure that a decent standard of living is also secured. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.		2	3
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	terms.			
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives it is noted that : Alternative 1 or 3 may contribute indirectly to improving accessibility to jobs (home working); whilst Alternative 2 would be unlikely to create the conditions to facilitate home working.	★1	3	2
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By allowing business use to occur in residential areas under certain circumstances, the suggested policy approach (Alternative 1) may help to ensure that buildings are used in a more efficient manner, making maximum use of the space available. A more relaxed approach under Alternative 3 could result in a loss of housing in a manner which does not represent an efficient use of available buildings, whilst a more stringent approach (Alternative 2) may place unnecessary burdens on developers.	★1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Parks / gardens, countryside, historic environment & townscape / landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A more relaxed approach to the conversion of dwelling for business use, as suggested under Alternative 3, may allow for an increase in employment opportunities by providing local businesses with greater flexibility when it comes to choosing where to locate their premises. It also provides flexibility for home working.	2	3	★1
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By allowing businesses to position themselves with greater flexibility, a more relaxed approach as advocated through Alternative 3 could provide more opportunities for economic growth in areas where this has not been possible before, including within deprived areas.	2	3	★1
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A greater degree of flexibility in allowing business use conversions under Alternative 3 may help to deliver sustained economic growth by increasing the opportunities for businesses to select a variety of premises and to develop in one location. This may have the effect of social regeneration by providing local employment opportunities or home working where they may not otherwise occur. Conversely, changes to the character and amenity of residential areas and availability of housing as a result of increased business uses may have a negative social effect. With this being the case, the effects of these alternative policy approaches on this sustainability objective are uncertain.	?	?	?
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A greater degree of flexibility in allowing business use conversions under Alternative 3 may help to encourage indigenous and inward investment by increasing the opportunities for businesses to select a variety of premises and to develop in one location.	2	3	★1

Conclusion

The suggested policy approach (Alternative 1) looks to protect residential areas in terms of their character, their amenity, and the levels of housing that are available whilst also allowing for some flexibility where appropriate. With this being the case it performs well against those sustainability options relating to the efficient use of buildings and the provision of decent, affordable homes. However, a more relaxed approach to conversion, as suggested under Alternative 3 could result in increased economic activity, potentially revitalising local economies and providing increased employment opportunities. The extent to which these potential economic benefits could contribute to or work against social regeneration remains uncertain though, and so Alt 1 could represent the best option in terms of a precautionary approach.

Commercial centres

Table 5: Appraisal of alternative policy approaches to addressing the issue of 'Commercial centres'

July 2012 Consultation Option 1: Within district, local and neighbourhood Primary Shopping Areas, as defined on the Proposals Map, at ground floor level, proposals for Class A1, A2, A3, A4, A5 and other uses appropriate to the character of the shopping area will be permitted provided both of the following criteria are satisfied: a) The proposal would not result in non-A1 uses exceeding the stated proportion for each of these shopping areas, as defined on the Proposals Map: St Leonards centre: Primary area 40%;Secondary area 60%; The Old Town: 45%; Ore village: 45%; Silverhill: 45%; Bohemia: 50%; West St Leonards (Bexhill Road): 40%; Battle Road: 50%; Mount Pleasant: 40%; Mount Road: 40%; Marine Court: 35%; b) The proposal would not result in the excessive concentration of non-A1 uses which would cause a significant interruption in the shopping frontage, reducing its attractiveness and thus harming the vitality and viability of the centre as a whole.

July 2012 Consultation Option 2 and February Consultation Option 1 and 2: Define commercial centre boundaries but make the policy more stringent


July 2012 Consultation Option 2 and February Consultation Option 1 and 2: Define commercial centre boundaries but make the policy less stringent

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

July 2012 Consultation Option 3 and February Consultation Option 3: To define commercial centre boundaries but not have a specific policy for this issue and add detail to the suggested policies of the General Guidance section

July 2012 Consultation Option 4 and February Consultation Option 4: : Not to define commercial area boundaries for this issue

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that all of these policy approaches could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By setting a target for a proportion of A1 uses to be maintained within a commercial area boundary, the suggested policy approach (Alternative 1 or 2) could result in an inefficient use of buildings should insufficient demand for this use result in empty shops. A preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain	2	3	

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	period of vacancy (Alternative 3).			
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible identify the relative merits of the alternatives in more general terms.	-	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that Alternative 1 or 2 could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in these commercial areas (Alternative 1 or 2) should help to support the economic success and so employment potential of these areas by preventing the loss or scattering of these premises. However, fixed targets for A1 use could result in vacant premises and missed economic opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 3).	2	3	★1
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that Alternative 1 and 2 could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in these commercial areas (Alternative 1 or 2) should help to support economic revival by preventing the loss or scattering of these premises. However, fixed targets for A1 use could result in vacant premises and missed economic opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 3).	2	3	★1
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that Alternative 1 and 2 could lead to significant positive effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in these commercial areas (Alternative 1 or 2) should help to support economic growth and social regeneration by preventing the loss or scattering of these premises. However, fixed targets for A1 use could result in vacant premises and missed economic opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 3).	2	3	★1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Indigenous and inward investment is encouraged and accommodated	<p>It is considered that Alternative 1 and 2 could lead to significant positive effects on the baseline In terms of the relative merits of the alternatives the following is noted:</p> <p>The setting of targets for A1 use in commercial areas (Alternative 1 or 2) should help to encourage inward and indigenous investment by preventing the loss or scattering of these premises. However, fixed targets for A1 use could result in vacant premises and missed investment opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 3).</p>	2	3	1
<p>Conclusion</p> <p>An overemphasis on protecting A1 uses should there be low demand for them could result in empty premises and decline. On the other hand, if there is too little protection and large demand for A1 uses, then too few premises may be available, and these may be scattered in a manner which reduces there economic potential (Alternative 1 or 2). A preferred option may be to have less prescriptive approach which allows for conversion away from A1 uses over targeted levels after a certain period of vacancy such as proposed by Alternative 3.</p>				

Community facilities

Table 6: Appraisal of alternative policy approaches to addressing the issue of 'Community facilities'


July 2012 Consultation Option 1: In general, the provision of community services and utilities will be permitted, though the development must be acceptable in terms of location, design, access and impact on the locality, and be in general conformity with other guidance. Proposals involving the loss of a community facility will only be permitted where the existing community use is shown to not be viable, or plans for its replacement are included.




July 2012 Consultation Option 3: More stringent / prescriptive policy


July 2012 Consultation Option 3: Less stringent / prescriptive policy


The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

July 2012 Consultation Option 2: Not to have a specific policy for this issue and rely upon national policy and guidance, the Planning Strategy and other General Guidance from the eventual Development Management Plan

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, although the provision of adequate community facilities may indirectly contribute to improving the well-being of the population, especially where these facilities have a health related function. In terms of the relative merits of the alternatives the following is noted: By setting out criteria for the protecting and granting permission for suitable community facilities, the suggested policy approach (Alternative 1) could help to promote the health and wellbeing of the population, although at present, the criteria for determining whether a community facility is viable or not have not been identified, which weakens the protection element of the policy. With this being the case, a more stringent approach (Alternative 2) is likely to offer greater certainty to developers and users of community facilities. Weaker guidance or a reliance on higher level policy (Alternative 3) is unlikely to obtain the same level of benefit.	2		3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	<p>It is considered that all of these policy approaches could potentially lead to significant effects on the baseline, with positive significant effects likely to arise from Alternative 1 or 2. In terms of the relative merits of the alternatives the following is noted:</p> <p>Community facilities can provide services for those who might not otherwise be able to receive them, so combating the effects of poverty and high levels of social exclusion in the town. A more prescriptive approach through Alternative 2 could give particular weight to the protection of existing community facilities and the provision of new facilities in those areas that are suffering from high levels of deprivation. It could also specify what evidence will be required to demonstrate that an existing facility is not viable. For this reason, Alternative 2 is preferred. Alternative 3 is not considered appropriate, given the high level of social deprivation recorded in the town.</p>	2		3
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, although the provision of community facilities can indirectly contribute to meeting the objective of improving the education and skills of the local population.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	<p>It is considered that all of these policy approaches could potentially lead to significant effects on the baseline, with positive significant effects likely to arise from Alternative 1 or 2. In terms of the relative merits of the alternatives the following is noted:</p> <p>The suggested policy approach (Alternative 1) could help to improve accessibility to services, facilities, and social, cultural and recreational opportunities by setting out criteria for the protection and the creation of community facilities although at present, the criteria for determining whether a community facility is viable or not have not been identified, which weakens the protection element of the policy. With this being the case, a more stringent approach (Alternative 2) is likely to offer greater certainty to developers and users of community facilities. Weaker guidance or a reliance on higher level policy (Alternative 3) is unlikely to obtain the same level of benefit.</p>	2		3
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that all of these policy approaches could potentially lead to significant effects on the baseline, with positive significant effects likely to arise from Alternative 1 or 2. In terms of the relative merits of the alternatives the following is noted:	2		3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	By protecting and granting permission for suitable community facilities, the approach set out in the suggested policy approach (Alternative 1) may help to ensure that communities remain vibrant thanks to the services and opportunities that such developments can offer to local people. However the current policy wording is weak in relation to the protection element of the policy, and Alternative 2, which could specify the criteria by which viability will be determined, is the preferred alternative. Weaker guidance or a reliance on higher level policy is unlikely to meet this objective (Alternative 3).			
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By allowing for the loss of community facilities where they are shown to be unviable, the suggested policy approach (Alternative 1) allows sufficient flexibility to ensure that buildings are used in an efficient manner. However the policy should specify what criteria will be used to determine viability. Therefore a more stringent approach (Alternative 2) is likely to offer greater certainty and would be the preferred approach. Weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	2		3
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)				
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline, although community facilities and the third sector do provide jobs and training which is linked to social regeneration. By protecting and granting permission for suitable community facilities, the approach set out in the suggested policy approach (Alternative 1) may help to provide for the needs of the community	2		3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
	in terms of helping them to participate in the local economy, through up-skilling for example. However the current policy wording is weak in relation to the protection element of the policy, and Alternative 2, which could specify the criteria by which viability will be determined, is the preferred alternative. Weaker guidance or a reliance on higher level policy is unlikely to meet this objective (Alternative 3).			
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

Conclusion

By protecting and supporting the creation of community facilities where appropriate, the suggested policy approach (Alternative 1) performs reasonably well in terms of a number of the sustainability objectives. However a more prescriptive approach (Alternative 2) could yield greater benefits in terms of reducing social exclusion and poverty by giving particular weight to the protection of existing community facilities and the provision of new in those areas suffering from high levels of deprivation (for example, by setting out clear criteria for determining viability of community facilities). As such, Alternative 2 is the preferred approach from an SA perspective. Alternative 3 is unlikely to meet the needs of the borough.

Conversion of dwellings

Table 7: Appraisal of alternative policy approaches to addressing the issue of 'Conversion of dwellings'

February 2012 Consultation Option 1: To protect the character of established residential areas and to retain existing housing stock, converting all or part of a dwelling to flats or maisonettes will only be permitted provided that: The building can no longer be retained in its entirety for single family housing occupancy in accordance with modern standards; The proposals are in general conformity with other policies in this plan; It would not include significant extension(s) or significant changes to room layouts to achieve an adequate standard of accommodation; It would not involve the self-containment of basement areas or other parts of any property having inadequate light or low ceilings or which would result in a poor outlook from main windows; and It would make adequate provision for refuse storage.

February 2012 Consultation Option 4: More stringent / prescriptive policy



February 2012 Consultation Option 4: Less stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches could lead to significant effects on the baseline, although they may all contribute to a varying extent to meeting this objective, in terms of providing a decent home which meets occupant's needs. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) should help to ensure that the existing housing stock is only altered under appropriate conditions and where decent living standards are obtained. With this being the case it performs well in relation to this objective. As such, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★ 1	2	3
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, although they may all contribute to a varying extent to meeting this objective indirectly, given the indirect links between health and housing provision. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) performs well in relation to this objective. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on	★ 1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.			
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, although they may all contribute to a varying extent to meeting this objective indirectly, given the indirect links between social exclusion and housing provision. The suggested policy approach (Alternative 1) performs well in relation to this objective. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.		2	3
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches could lead to significant effects on the baseline, although they may all contribute to a varying extent to meeting this objective through providing for the most efficient use of previously developed land/buildings. In terms of the relative merits of the alternatives the following is noted: By setting out criteria that will allow the conversion of dwellings under particular circumstances, the suggested policy approach (Alternative 1) allows for some flexibility in the housing mix, whilst ensuring		2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	that this mix remains appropriate to an areas needs. This may help to ensure that buildings are used efficiently relative to their type. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 2) might not obtain the same level of benefit.			
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Conclusion The suggested policy approach (Alternative 1) could help to ensure an efficient use of buildings, as it sets out criteria which provide the flexibility to convert dwellings where necessary, whilst also protecting the housing mix where change would not be appropriate. It also looks to ensure that decent living standards are maintained during any conversions. With this being the case, it performs well in terms of sustainability objectives. A more stringent approach (Alternative 2) may therefore not be necessary given the extra burden this may place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.				

Defining the green infrastructure network


Table 8: Appraisal of alternative policy approaches to addressing the issue of 'Defining the green infrastructure network'

February 2012 Consultation Option 1: The Council expects that proposals, where appropriate, include assessments of existing ecology. These assessments should be of habitats, including trees, hedges, shrubs and ponds. The specific species of new planting should be given particularly careful consideration to avoid 'invasive species' and the loss of neighbouring amenity. Measures for protection and management of the ecology will also be required where appropriate.

February 2012 Consultation Option 2: More stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A more stringent policy approach under Alternative 2 could make clearer the need for assessments of existing ecology to take into account the multi-functionality of green spaces, such as providing health and well-being benefits through recreation, and the importance of such spaces as part of a green infrastructure 'network'. It could also make explicit the potential for management to enhance services such as these. As such, Alternative 2 is the preferred approach.	2	
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The policy as currently worded does not take advantage of the opportunity to improve access to recreational opportunities or to the countryside, which could be provided by a linked up green infrastructure network. The emphasis is on on-site ecology, rather than the potential for an approach to green spaces which extends this to include consideration of how on-site habitats might link into a wider network. This could be addressed through a more wide-ranging/stringent approach (Alternative 2) and as such, Alternative 2 is the preferred approach.	2	★1
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although the indirect linkages between green infrastructure and a vibrant and locally distinctive community should be recognised.	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Biodiversity is protected, conserved and enhanced	It is considered that both of these policy approaches could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1), with its emphasis on assessing on-site ecology, preventing the establishment of invasive species and the putting in place protection and management where necessary, should work to protect and conserve biodiversity. However, a more stringent approach through Alternative 2 could add criteria calling for the enhancement of ecological assets where they are currently degraded and is thus identified as the preferred approach.	2	★1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A more prescriptive policy approach under Alternative 2 could make clearer the need for assessments of existing ecology to take into account the multi-functionality of green spaces, such as their flood water storage potential, and the importance of such spaces as part of a green infrastructure 'network'. It could also make explicit the potential for management to enhance services such as these. As such, Alternative 2 is the preferred approach.	2	★1
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although both policy approaches could potentially contribute to the provision and improved functionality of a green infrastructure network, which could mean improved access to parks, gardens and the countryside.	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A more stringent policy approach under Alternative 2 could make clearer the need for assessments of existing ecology to take into account the multi-functionality of green spaces, such as the potential for vegetation to reduce air pollution through filtration, and the importance of such spaces as part of a green infrastructure 'network'. It could also make explicit the potential for management to enhance services such as these, and as such, is the preferred approach.	2	★1
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: A more prescriptive policy approach under Alternative 2 could make clearer the need for assessments of existing ecology to take into account the multi-functionality of green spaces, such as their flood water storage potential, and the importance of such spaces as part of a green infrastructure 'network'. It could also make explicit the potential for management to enhance services such as these and as such, is the preferred approach.	2	★1
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted:	2	★1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
reduced	A more stringent policy approach under Alternative 2 could make clearer the need for assessments of existing ecology to take into account the multi-functionality of green spaces, such as the potential for them to improve water quality through filtration, and the importance of such spaces as part of a green infrastructure 'network'. It could also make explicit the potential for management to enhance services such as these and as such, is the preferred approach.		
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

Conclusion

Whilst the suggested policy approach (Alternative 1) would offer some protection for on-site ecology, but a more prescriptive approach (Alternative 2) could bring further benefits. It could do so by calling for full account to be taken of the multifunctional nature of green spaces and the role that these spaces play within the wider green infrastructure 'network'. This includes enhancing recreational opportunities and access to the countryside. The potential for appropriate management and ecological restoration to enhance 'ecological services' could also be highlighted. As such, Alternative 2 is the preferred approach.

Design

Table 9: Appraisal of alternative policy approaches to addressing the issue of 'Design'


February 2012 Consultation Option 1: All proposals must reach a good standard of design, which includes efficient use of resources, and takes into account: a) Protecting and enhancing local character and showing appreciation of the surrounding neighbourhood's historic context, street patterns, plot boundaries, block sizes, height and materials; b) The layout and siting of buildings making efficient use of land, the orientation of frontages to achieve attractive streetscapes and the maximisation of solar gain; c) Assessment of visual impact, including the height, scale, and form of development that should be appropriate to the location, especially given the complex topography of the Borough and the need, in some instances, to consider the visual effect from key viewpoints; d) The density of the development is compatible with the area's existing character; e) Good performance against nationally recognised best practice guidance on sustainability, urban design and place-making, architectural quality and distinctiveness. In the case of telecommunications prior approval for the siting and appearance of antennae will be given and full planning permission granted for telecommunications installations provided that the appropriate matters from the list above have been adequately considered in order to minimise the effect upon the character and appearance of the locality and taking account of technical constraints, there is no realistic prospect of a visually less intrusive site or mast, a building or other structure, being available.

February 2012 Consultation Option 3: More stringent / prescriptive policy.






The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: No specific policy for this issue / rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their	It is considered that neither of these policy approaches would lead to significant effects on the baseline although both approaches should contribute to some extent to this objective. In terms of the relative merits of the alternatives, the following differences between them are noted: A more stringent policy on design as suggested through policy (Alternative 2) could result in higher quality		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
need	homes which are more sustainability constructed. For instance, homes can be designed to reduce their energy consumptions through making maximum use of solar gain. However this may have an impact on affordability. The Housing Needs Survey indicated a significant shortage of affordable homes in Hastings, estimating that over 596 affordable homes are required per annum, over 14 times the rate of construction. If policy approach 2 is adopted it should be tested for its impact on housing delivery viability.		
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although there are indirect links between health and well-being and well-designed environments which should be recognised. As such, a more stringent design policy (Alternative 2) may have greater benefits in this respect.	2	★1
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline. Appropriate layout and siting to achieve efficient use of land (Alternative 1) may indirectly assist to improve accessibility. However the need to ensure buildings and spaces are able to be used by less mobile and able bodied people (i.e. accessible design principles) should be given more emphasis in the policy (although it is recognised that this is addressed separately by Policy 3, it should also be covered by this principle design policy). The possibility of improving accessibility through design could therefore be made more explicit through Alternative 2.	2	★1
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, N.B. the issue of designing out crime is addressed through the policy approaches suggested for the issue of 'Amenity'.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 should perform well in protecting vibrancy and local distinctiveness of communities. Given the large range of communities in the Borough and their varying settings, a policy setting out in greater detail what constitutes good design in each could potentially be overly prescriptive and may stifle innovative approaches (Alternative 2).		2
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The criteria set out in the suggested policy approach (Alternative 1) on the appropriate layout and siting of buildings should be sufficient to ensure that land is used in an efficient manner. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The potential for new developments to contribute to the conservation of biodiversity and the provision of green infrastructure through their design (e.g. through green roofs) could be given greater weight in a more prescriptive policy (Alternative 2).	2	
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: There is the potential for design to contribute to reduced flood risk, for instance through the inclusion of Sustainable Urban Drainage systems in new development. The possibility of reducing flood risk through design could therefore be made more explicit through Alternative 2. This is particularly pertinent given the level of flood risk which occurs in the western part of the town.	2	
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) to protect local character and the visual appeal of new developments should be sufficient to protect and enhance the historic environment, townscape and landscape. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of <u>preference</u>	
		Alt 1	Alt 2
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The importance of addressing the causes of climate change through good design could be made clearer through explicit mention of this issues, for example in terms of achieving low / zero carbon developments and high energy efficiency. The potential for developments to be better designed in terms of adaptation could also be clearer, with temperature control in buildings representing one such potential issue. With this being the case, a (Alternative 2) is the preferred approach in terms of meeting this objective.	2	★1
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Reduction in water consumption is an area where the design of new developments can potentially play a major role, for instance through water harvesting and reuse. Water stress is a major issue for this area of the country. This potential could be made more explicit and so Alternative 2 is the preferred approach in terms of meeting this objective.	2	★1
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 does make reference to solar gain. However a more stringent approach under Alternative 2 could make explicit the need to maximise the use of sustainable energy and renewable energy technologies in new developments and existing buildings. As such, Alternative 2 is the preferred approach for meeting this objective.	2	★1
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. N.B. the issue of waste management in new developments is addressed through the policy approaches suggested for the issue of 'Amenity'.	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policies approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 2 could make more explicit mention of the need to design in sustainable travel facilities, such as	2	★1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	cycle parking and is therefore preferred.		
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion The potential for good design to contribute towards a range of environmental issues (including water conservation, adaptation to climate change, reduction of flood risk through Sustainable Urban Drainage Systems, biodiversity and green infrastructure provision) through building features such as green roofs and sustainable transport infrastructure (e.g. cycle parking) could be made far more explicit than is currently the case under the suggested policy approach (Alternative 1). A more stringent approach as suggested (Alternative 2) could set out criteria for each of these issues, making it clearer to applicants the importance of these considerations.			

Designated heritage assets

Table 10: Appraisal of alternative policy approaches to addressing the issue of 'Designated heritage assets'

February 2012 Consultation Option 1: This option would allow an applicant to view a potentially more user friendly single piece of guidance around proposals specifically involving planning permission for designated heritage assets. To achieve this particular approach the existing policies would need to be reviewed and potentially grouped together and the likely changes in national guidance would also need careful consideration. There could be some issues that are not covered by the existing policies that also need to be included in the eventual Development Management Plan policy.



February 2012 Consultation Option 3: More stringent / prescriptive policy



The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy, and other General Guidance

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
improve			
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment.	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Existing local plan policies, if reviewed and grouped as suggested under Alternative 1 would help to protect and enhance conservation areas, listed buildings, archaeological sites and ancient monuments. This could help to safeguard local distinctiveness. With this being the case, a more stringent approach (Alternative 2) may not be necessary and could place an extra burden on developers (although this would have to be confirmed once further detail had been provided).		2
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: Alternative 1 may assist indirectly in terms of the most efficient use of land and buildings, by providing the necessary conditions for heritage assets to be sensitively brought back into active use. A more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that both of these policy approaches could lead to significant effects on the baseline in terms of the historic environment. In terms of the relative merits of the alternatives the following is noted: The policy approach (Alternative 1) could help to protect and enhance conservation areas, listed buildings, archaeological sites and ancient monuments, so helping to preserve the historic environment and townscape of the Borough. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The need to balance energy efficiency requirements with the preservation of historic and architecturally important features is not highlighted in the local plan policies that would form the basis for the suggested policy approach (Alternative 1). As such, a more prescriptive approach under Alternative 2 may be required in order to ensure that there is guidance to inform such decisions.	2	
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-


SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion The suggested policy approach (Alternative 1) could help to protect and enhance conservation areas, listed buildings, archaeological sites and ancient monuments. However, a more prescriptive approach (Alternative 2) could give greater consideration to balancing energy efficiency requirements with the protection of historic assets and therefore result in better performance in terms of sustainability objectives.			

Development Boundary

Table 11: Appraisal of alternative policy approaches to addressing the issue of 'Development Boundary'



February 2012 Consultation Option 1: New development will be accommodated within the development boundary for Hastings as defined on the Proposals Map.

February 2012 Option 2: Not having a development boundary

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 seeks to control the outward expansion of the town and protect open land on the fringes and provides clarity for all as to how this will be managed. This will assist in improving accessibility to the countryside, by protecting open land on the fringes of the town. It will also facilitate a denser urban form, which may improve accessibility to services, facilities, jobs and social and cultural facilities. As such,		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	Alternative 1 is preferred to Alternative 2, which would not provide a coordinated or transparent approach.		
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 seeks to control the outward expansion of the town and protect open land on the fringes and provides clarity for all as to how this will be managed. This will assist in sustaining a vibrant and locally distinctive community, which is clearly delineated from the surrounding countryside. As such, Alternative 1 is preferred to Alternative 2, which would be unlikely to provide the same level of positive effect.	★1	2
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that Alternative 1 would have a significant positive effect on the baseline in relation to this objective. Alternative 1 will provide a coordinated and transparent management tool to ensure that land within the development boundary is used more efficiently, and that best use is made of previously developed land within this boundary. Alternative 2 is not considered sufficiently strong or strategic enough to achieve the same desired outcome.	★1	2
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 seeks to control the outward expansion of the town and protect open land on the fringes and provides clarity for all as to how this will be managed. This will assist in protecting and conserving biodiversity that may be present in the open land on the fringes of the town. As such, this is the preferred approach. Alternative 2 is not considered sufficiently strong or strategic enough to achieve the same desired outcome.	★1	2
The risk of floodings (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are	Alternative 1 seeks to control the outward expansion of the town and protect open land on the fringes and provides clarity for all as to how this will be managed. This will assist in protecting and enhancing the distinction and unique qualities of townscape and landscape. The Landscape Assessment undertaken for	★1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
protected, enhanced and made more accessible	the Hastings Core Strategy in August 2008 confirmed the sensitive and high quality nature of some of landscapes on the fringes of the town, and the need for these to be appropriately managed. As such, Alternative 1 is preferred to Alternative 2, which would not provide a strong or strategic enough approach to achieve the same desired outcome.		
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	2	★1
There are high and stable levels of employment and rewarding and	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
satisfying employment opportunities for all			
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 will provide a coordinated and transparent management tool to ensure that land within the development boundary is used more efficiently, and that best use is made of previously developed land within this boundary. This should assist indirectly to stimulate development within the town boundary, rather than allowing for Greenfield development on the fringes of the town, which is likely to be more attractive to the development market. Alternative 2 is not considered sufficiently strong or strategic enough to achieve the same desired outcome.		2
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 will provide a coordinated and transparent management tool to ensure that land within the development boundary is used more efficiently, and that best use is made of previously developed land within this boundary. This should assist indirectly to stimulate development within the town boundary, and thus provide opportunities for regeneration. Alternative 2 is not considered sufficiently strong or strategic enough to achieve the same desired outcome.		2
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion Alternative 1 is the preferred policy approach and will have significant positive effects on the baseline in relation to the efficient use of land and buildings and previously developed land, and in relation to the protection and enhancement of the unique characteristics of townscape and landscape. Alternative 1 is considered the most appropriate tool for managing impacts on sensitive landscapes which have been identified in the 2008 Landscape Character Assessment. Alternative 1 is also considered to be the most beneficial approach in terms of stimulating development and thus economic growth and regeneration within Hastings town. Alternative 2 is not considered to be sufficiently strong, strategic, coordinated or transparent to achieve the same desired outcomes.			

Ground conditions

Table 12: Appraisal of alternative policy approaches to addressing the issue of 'Ground conditions'


February 2012 Consultation Option 1: Assessments of existing ground conditions should be undertaken, and details submitted to the Local Planning Authority before any development takes place. Planning permission will only be granted for development providing: a) On land potentially subject to instability (such as steeply sloping sites or in areas with a history of land instability), the applicant supplies convincing supporting evidence that any actual or potential instability can be overcome through appropriate remedial, preventative or precautionary measures; b) An assessment of ground conditions, particularly where there is presence of contaminative substances on the site, or surrounding area has been fully undertaken. It is the responsibility of the landowner and/or developer to provide this assessment. Applications for development within 250 metres of a landfill site or land suspected of contamination require investigation and demonstration that development is acceptable.



February 2012 Consultation Option 3: More stringent / prescriptive policy


The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By setting out criteria relating to ground contamination, the suggested policy (Alternative 1) should ensure that health is not adversely affected by pollution. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
the rest of the town			
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although both policy approaches may contribute indirectly to this objective by addressing safety issues associated with ground conditions.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that both of these policy approaches would lead to significant positive effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By providing criteria relating to land instability and contamination, the suggested policy approach (Alternative 1) may help to ensure that land is used appropriately relative to its condition. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that both of these policy approaches would lead to significant positive effects on the baseline, insofar as it relates to the issue of coastal erosion. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that both of these policy approaches would lead to significant positive effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By providing criteria relating to ground conditions such that an investigation of contamination takes place prior to development, the suggested policy approach (Alternative 1) should reduce the risk of pollution of ground water resources in the vicinity of the development. However the policy could be improved by adding the words "or suspected presence of contamination" to clause B, as the history of the use of the site might not always be known. This would represent a more stringent approach (i.e. Alternative 2) and therefore Alternative 2 is favoured.	2	
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion The suggested policy approach (Alternative 1) may contribute to protecting health and wellbeing and could help to ensure that land is used in a manner most fitting to its condition, including reducing risks associated with coastal erosion. With this being the case, a more stringent approach (Alternative 2) may not be necessary. By providing criteria relating to ground conditions such that an investigation of contamination takes place prior to development, the suggested policy approach (Alternative 1) should reduce the risk of pollution of ground water resources in the vicinity of the development. However the policy could be improved by adding the words “or suspected presence of contamination” to clause B, as the history of the use of the site might not always be known. This would represent a more stringent approach (i.e. Alternative 2) and therefore Alternative 2 (revised as per the recommendation) is the favoured alternative.			

Hastings Town Centre shopping area

Table 13: Appraisal of alternative policy approaches to addressing the issue of 'Hastings Town Centre shopping area'


July 2012 Consultation Option 1: Within Hastings Town Centre Shopping Area, as defined on the Proposals Map, at ground floor level, proposals for planning use-class A1, A2, A3, A4 and other uses appropriate to the character of the shopping area will be permitted provided both of the following criteria are satisfied: a) The proposal would not result in non-A1 uses exceeding 5% of the total floorspace of Priory Meadow and not more than 45% of the remaining shopping area, as defined on the Proposals Map; b) The proposal would not result in such a concentration as to lead to a significant interruption in the shopping frontage, thus harming the vitality and viability of the town centre shopping area as a whole.


July 2012 Consultation Option 2: To create a shopping area boundary but have less stringent policies to manage activities within it

The following option, although presented within consultation documents, has not been given standalone consideration in the table below:

July 2012 Consultation Option 3: Not to have a shopping area boundary.

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: By setting a target for a proportion of A1 uses to be maintained within a shopping area boundary, the suggested policy approach (Alternative 1) could result in an inefficient use of buildings should insufficient demand for this use result in empty shops. A preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 2).	2	
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in shopping areas should help to support the economic success and so employment potential of these areas, by preventing the loss or scattering of these premises (Alternative 1). However, fixed targets for A1 use could result in vacant premises and missed economic opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which	2	

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 2).		
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that both of these policy approaches could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in shopping areas should help to support economic revival by preventing the loss or scattering of these premises (Alternative 1). However, fixed targets for A1 use could result in vacant premises and missed economic opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 2).	2	★1
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that both of these policy approaches could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in shopping areas should help to support economic growth and social regeneration by preventing the loss or scattering of these premises (Alternative 1). However, fixed targets for A1 use could result in vacant premises and missed economic opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 2).	2	★1
Indigenous and inward investment is encouraged and accommodated	It is considered that both of these policy approaches could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The setting of targets for A1 use in shopping areas should help to encourage inward and indigenous investment by preventing the loss or scattering of these premises (Alternative 1). However, fixed targets for A1 use could result in vacant premises and missed investment opportunities should demand for these premises fall. As such, a preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy (Alternative 2).	2	★1
Conclusion An overemphasis on protecting A1 uses should there be low demand for them could result in empty premises and decline. On the other hand, if there is too little protection and large demand for A1 uses then too few premises may be available and these may be scattered in a manner which reduces their economic potential (Alternative 1). A preferred option may be to have less prescriptive approach which allows for conversion away from A1 use over targeted levels after a certain period of vacancy such as proposed by Alternative 2.			

Managing certain types of premises outside defined shopping areas

Table 14: Appraisal of alternative policy approaches to addressing the issue of 'Managing certain types of premises outside defined shopping areas'

February 2012 Consultation Option 1: Planning permission for new shops and services outside the commercial area will be granted provided that: a) The precise nature of the use proposed (which should be specified in the planning application) including opening hours is given; b) The proposal would not adversely affect neighbours, for example, causing excess noise or smell; c) The proposal would not, on its own, or cumulatively with other such uses in the area, be likely to result in problems of disturbance or public disorder; d) Suitable off-street parking can be provided, or there is sufficient on-street parking; and e) It would not cause inconvenience or danger on the public highway as a result of the additional stopping and manoeuvring of vehicles.


February 2012 Consultation Option 4: More stringent / prescriptive policy


February 2012 Consultation Option 4: Less stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:





February 2012 Consultation Option 2: Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By looking to ensure that permission is granted for new shops and services outside of commercial areas only after a consideration of the effect these premises may have on local amenity, the suggested policy approach (Alternative 1) should contribute towards local well-being. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	 1	2	3
Levels of poverty and social exclusion are reduced and the	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
deprivation gap is closed between the more deprived areas in Hastings and the rest of the town				
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline, In terms of the relative merits of the alternatives the following is noted: By looking to provide for permission to be granted for new shops and services outside of commercial areas (subject to amenity considerations), the suggested policy approach (Alternative 1) should contribute towards improving accessibility to services and jobs. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	 1	2	3
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon business which could discourage some developments, it seems unlikely that they will have a serious adverse impact on employment. A more relaxed approach under Alternative 3 may encourage more development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to small business development (Alternative 2).		3	2
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon business which could discourage some developments, it seems unlikely that they will have a serious adverse impact on the potential for economic revival. A more relaxed approach under Alternative 3 may encourage more development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to small business development and thus economic revival (Alternative 2).		3	2
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon business which could discourage some developments, it seems unlikely that they will have a serious adverse impact on the objective of sustained economic growth. A more relaxed approach under Alternative 3 may encourage more development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to small business development and sustained economic growth (Alternative 2).		3	2
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon business which could discourage some developments, it seems unlikely that they would have a serious adverse impact on the attracting indigenous and inward investment. A more relaxed approach under Alternative 3 may encourage more development, but could result in an overall decline in the amenity of an area with		3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
	wider adverse economic implications. A more stringent approach could act as a greater barrier to indigenous and inward investment (Alternative 2).			

Conclusion

The suggested policy approach (Alternative 1) should contribute towards local well-being by protecting local amenity against the potential negative effects of new shops and services outside of commercial areas, whilst at the same time providing the necessary conditions for well managed businesses to locate outside commercial areas. It therefore performs well in terms of sustainability objectives. Whilst the suggested policy approach does place stringent requirements upon business which could discourage some developments, these are selected in manner which means the wider gains for the local economy through a high quality residential environment are likely to outweigh any small losses. A more relaxed approach (Alternative 3) may encourage more development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach (Alternative 2) could act as a greater barrier to small business development and economic growth.

Non-designated heritage assets

Table 15: Appraisal of alternative policy approaches to addressing the issue of 'Non-designated heritage assets'



February 2012 Consultation Option 1: Non-designated heritage assets and their setting will be afforded protection that is proportionate to the scale of any harm or loss proposed and the significance of the asset in question.


February 2012 Consultation Option 2: More stringent / prescriptive policy

The following option, although presented within consultation documents, has not been given standalone consideration in the table below:

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
need			
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Identifying non-designated heritage assets and providing for some level of protection for these assets may help to improve access to social and cultural opportunities and the historic environment (Alternative 1). Without more detail as to what “protection” entails, it is difficult to determine whether a more stringent approach (Alternative 2) would be necessary. A more stringent approach may not be necessary and would place an extra burden on developers. It would be helpful if the policy provided some indication of how “the significance of the asset” will be measured.		2
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 could help to protect and enhance non-designated heritage assets and this could help to safeguard local distinctiveness. With this being the case, a more stringent approach (Alternative 2) may not		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	be necessary and would place an extra burden on developers.		
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that both of these policy approaches could lead to significant effects on the baseline in terms of the historic environment. In terms of the relative merits of the alternatives the following is noted: The proportionate protection of non-heritage assets and their setting as proposed under the suggested policy approach (Alternative 1) may be sufficient to ensure that the Borough's heritage assets are appropriately safeguarded. Without more detail as to what "protection" entails however, it is difficult to determine whether a more stringent approach (Alternative 2) would be necessary. A more stringent approach may not be necessary and would place an extra burden on developers. It would be helpful if the policy provided some indication of how "the significance of the asset" will be measured.		2
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of pollution to all water resources is reduced, water quality is	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
improved and water consumption is reduced			
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion			
The proportionate approach to the protection of non-designated heritage assets put forward through the suggested policy approach (Alternative 1) could perform well in terms of safeguarding these features. However without more detail as to what “protection” entails, it is difficult to determine whether the stated policy approach (Alternative 1) or a more stringent approach (Alternative 2) would be necessary. A more stringent approach may not be necessary given the extra burden this may			

place on developers. It would be helpful if the policy provided some indication of how “the significance of the asset” will be measured, and articulated what “protection” could mean, in practical terms.

Pollution

Table 16: Appraisal of alternative policy approaches to addressing the issue of ‘Pollution’


February 2012 Consultation Option 1: Planning permission will only be granted for development providing: a) External lighting proposals avoid unnecessary light pollution beyond the specific area intended to be lit; b) A level of air borne pollutants does not exceed statutory guidelines, unless appropriate mitigation measures are agreed; c) Noise creation that is detrimental to neighbouring and/or local amenity is kept to a practical minimum; appropriate means of assessment may be required. Where prudent, the Local Planning Authority will consult with the Health and Safety Executive on applications near 'notifiable installations' (examples include high pressure gas mains and overhead power cables). Determining factors are the distance, risks and nature of the proposals.

February 2012 Consultation Option 3: More stringent / prescriptive policy



The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that both of these policy approaches would lead to significant positive effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By setting criteria relating to levels of light, air and noise pollution, the suggested policy approach (Alternative 1) should help to protect the health and wellbeing of the population. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.	 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although both policy approaches may contribute indirectly to meeting this objective, insofar as various habitats or species may be sensitive to air, noise or light pollution.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
reduced, now and in the future			
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that both of these policy approaches would lead to significant positive effects on the baseline. In terms of the relative merits of the alternatives the following is noted: The criteria set out in relation to air pollution in the suggested policy approach (Alternative 1) should be sufficient to keep air pollution within statutory limits and so meet the requirements of this objective. Given this, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers.		2
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline, although both policy approaches may contribute indirectly to meeting this objective, by addressing air pollution, which can be a contributor to climate change.	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that both of these policy approaches could lead to significant positive effects on the baseline (if amended as recommended). In terms of the relative merits of the alternatives the following is noted: The policy approach set out in the suggested policy approach (Alternative 1) does not address the issue of water pollution. A more prescriptive policy (Alternative 2) could include criteria relating to the prevention of unacceptable levels of water pollution from development and so would be preferred in terms of this objective.	2	
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for	It is considered that neither of these policy approaches would lead to significant effects on the baseline,	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
disposal is reduced	neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.		
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Conclusion The suggested policy approach (Alternative 1) performs well in terms of keeping air pollution within acceptable limits and protecting the population from the potential negative effects on health and well-being that pollution can cause. It may also contribute indirectly to addressing the clauses of climate change and protecting biodiversity. However, a more prescriptive policy could include criteria relating to water pollution that are otherwise missing. With this being the case, Alternative 2 would be a preferable option in this instance.			

Residential institutions

Table 17: Appraisal of alternative policy approaches to addressing the issue of 'Residential institutions'

February 2012 Consultation Option 1: Planning applications for residential institutions, and housing including for the elderly, infirm and physically and sensory impaired should comply with the following criteria :a) The site is accessible by public transport, particularly at off-peak times when visitor trips are likely to be at their highest; b) The site should be reasonably level and large enough to accommodate adequate parking, room for delivery vehicles and amenity space; c) Changing the use of an existing building should not detrimentally affect its character or setting; d) Account will be taken of existing accommodation in the locality to ensure an adequate stock of general housing remains for all sectors of the community; e) Access and parking arrangements should take account of people with physical and sensory disabilities.

February 2012 Consultation Option 4: More stringent / prescriptive policy

February 2012 Consultation Option 4: Less stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it

February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that all of these policy approaches could lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By looking to ensure that residential institutions have sufficient levels of amenity space, and that the character, setting, and housing stock of current residential areas are not adversely affected, the suggested policy approach (Alternative 1) performs well against this sustainability option. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★ 1	2	3
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline although all the options may contribute to some extent to meeting this objective. In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) looks to encourage sensitive care home development which has suitable access for those with physical or sensory disabilities and which has sufficient amenity space. As such, it performs well in terms of health and wellbeing. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on	★ 1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.			
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging public transport links for residential institutions, the suggested policy approach (Alternative 1) may help to reduce levels of social exclusion for those who may not be able to travel by other means. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★1	2	3
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By looking to ensure that sites are accessible by public transport, the suggested policy approach (Alternative 1) performs well in relation to access to services, facilities, jobs, and social, cultural and recreational opportunities. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★1	2	3
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By taking account of the existing accommodation in the area and the level of housing that remains for other sectors of the community, the suggested policy approach (Alternative 1) could help to ensure that	★1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	existing buildings are used in an efficient manner as part of an appropriate mix of housing types. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.			
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By considering the character and setting of the area where a residential institution might be developed, the suggested policy approach (Alternative 1) may help to protect and enhance the quality of the townscape. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★1	2	3
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline In terms of the relative merits of the alternatives the following is noted: The suggested policy approach (Alternative 1) performs well in relation to this objective, as its focus on public transport access may help to reduce travel by car, so cutting air pollution levels. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★1	2	3
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts	It is considered that none of these policy approaches would lead to significant effects on the baseline In terms of the relative merits of the alternatives the following is noted: By encouraging the use of public transport, the suggested policy approach (Alternative 1) may help to cut GHG emissions by the reducing number of car journeys taken. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
(adaptation)				
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Road congestion arising from such developments may be reduced through the suggested policy approach (Alternative 1), which encourages public transport accessibility. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.	★ 1	2	3
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-

Conclusion

The suggested policy approach (Alternative 1) performs well in terms of setting out criteria for suitable levels of access, space, and amenity in residential institutions. In addition to this, it takes into account the character and amenity of residential areas and levels of housing provision for other sectors of the community. A focus on public transport provision is also potentially of benefit. As such, it performs strongly in terms of sustainability objectives. A more stringent approach (Alternative 2) may not be necessary given the extra burden it would place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit.

Retention of shops and services outside defined shopping areas

Table 18: Appraisal of alternative policy approaches to addressing the issue of 'Retention of shops and services outside defined shopping areas'

[February 2012 Consultation Option 1](#): Proposals for the change of use or redevelopment that would result in the loss of a shop or service outside the defined commercial areas will only be permitted when: a) There is an alternative within reasonable walking distance; or b) It is demonstrated that the existing use is no longer viable.

[February 2012 Consultation Option 4](#): More stringent / prescriptive policy

[February 2012 Consultation Option 4](#): Less stringent / prescriptive policy



The following options, although presented within consultation documents, have not been given standalone consideration in the table below:



[February 2012 Consultation Option 2](#): Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it

[February 2012 Consultation Option 3](#): Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
need				
The health and well-being of the population is improved and inequalities in health are reduced	<p>It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted:</p> <p>By protecting existing shops and services, such as Doctors surgeries, outside of shopping areas where there are not alternatives within walking distance, the suggested policy approach (Alternative 1) should help to support health and wellbeing. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).</p>	2	★ 1	3
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	<p>It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted:</p> <p>By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance, the suggested policy approach (Alternative 1) may help to tackle poverty and social exclusion. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).</p>	2	★ 1	3
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	<p>It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted:</p> <p>By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance, the suggested policy approach (Alternative 1) should help to support accessibility to services, facilities, jobs, and social, cultural and recreational opportunities. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to</p>	2	★ 1	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	those shops and services that are found in deprived areas and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).			
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance, the suggested policy approach (Alternative 1) should help to maintain the vibrancy of local communities due the role these services can play in community life. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).	2		3
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By allowing shops and services outside of shopping areas to be converted to other uses where they are shown to not be viable, the suggested policy approach (Alternative 1) should help to ensure that buildings are used in an efficient manner. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).	2		3
Biodiversity is protected, conserved and enhanced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance, the suggested policy approach (Alternative 1) may reduce travel by car, so reducing air pollution levels. . However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).	2		3
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance, the suggested policy approach (Alternative 1) may reduce travel by car, so reducing GHG emissions. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas where people are likely to have less access to a car and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).	2		3
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
in existing buildings				
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance the suggested policy approach (Alternative 1) may reduce travel by car, so reducing congestion. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas where people are likely to have less access to a car and is thus the preferred approach. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).	2	★1	3
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance the suggested policy approach (Alternative 1) could help in maintaining sources of local employment. In addition, the test of viability should help to ensure that other economic opportunities are not missed. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas, potentially increasing employment opportunities for all. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).	2	★1	3
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance the suggested policy approach (Alternative 1) could help in producing economic revival in deprived areas. In addition, the test of viability should help to ensure that other economic opportunities are not missed. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability	2	★1	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	that gives additional protection to those shops and services that are found in deprived areas. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).			
The sustained economic growth of the town is achieved and linked closely to social regeneration	<p>It is considered that neither of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted:</p> <p>By protecting existing shops and services outside of shopping areas where there are not alternatives within walking distance the suggested policy approach (Alternative 1) could help in sustaining economic growth. In addition, the test of viability should help to ensure that other economic opportunities are not missed. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. Alternative 2 could set out criteria on viability that gives additional protection to those shops and services that are found in deprived areas, thereby supporting social regeneration. Weaker guidance or a reliance on higher level policy is unlikely to obtain the same level of benefit (Alternative 3).</p>	2	1	3
Indigenous and inward investment is encouraged and accommodated	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Conclusion <p>The suggested policy approach (Alternative 1) performs relatively well in terms of sustainability objectives, encouraging the preservation of local shops and services, and reducing unsustainable travel use, whilst also including a test of viability which allows for flexibility. However as currently worded, the protection element of the policy is weak, as it does not set out the criteria for determining viability. A more prescriptive approach (Alternative 2) could perhaps improve on this by providing further details on the nature of this viability test, which could potentially provide additional protection to shops and services in deprived areas of the Borough. Weaker guidance or a reliance on higher level policy (Alternative 3) is the least favoured approach.</p>				

Small businesses

Table 19: Appraisal of alternative policy approaches to addressing the issue of 'Small businesses'

February 2012 Consultation Option 1: The intensification or replacement of existing employment uses and for the development of land for small workshops will be permitted where: a) The proposals are in scale and character with the existing premises; b) It can be demonstrated that there is reasonable access to the public transport network and an investigation into green travel options (cycling and walking to work) has been made; c) any increase in traffic would not cause serious inconvenience and/or danger on the public highway; and d) The development would not cause serious harm to the amenities of local residents as a result of, for example, noise or other disturbance. Consideration will also be given to the length of time the business has been established on the site, the investment already made, and the contribution to employment in the locality.


February 2012 Consultation Option 4: More stringent / prescriptive policy

February 2012 Consultation Option 4: Less stringent / prescriptive policy



The following options, although presented within consultation documents, have not been given standalone consideration in the table below:





February 2012 Consultation Option 2: Not to have a specific policy for this issue and add detail to the suggested policies of the General Guidance section to deal with it


February 2012 Consultation Option 3: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By looking to ensure that permission is granted for small business development only after a consideration of the adverse effects these premises may have on local amenity, the suggested policy approach (Alternative 1) should contribute towards maintaining local well-being. Its focus on green transport options may also assist health objectives by encouraging walking and cycling. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	 1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging reasonable access to the public transport network and investigation into green travel options, the suggested policy approach (Alternative 1) may help to improve accessibility to the jobs and services that small businesses can provide. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	★ 1	2	3
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging reasonable access to the public transport network and investigation into green travel options, the suggested policy approach (Alternative 1) may reduce travel by private vehicle, so contributing to a reduction in air pollution. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	 1	2	3
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging reasonable access to the public transport network and investigation into green travel options, the suggested policy approach (Alternative 1) may reduce travel by private vehicle, so reducing GHG emissions. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.	 1	2	3
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging reasonable access to the public transport network and investigation into green travel options, the suggested policy approach (Alternative 1) may reduce travel by car travel, so reducing road congestion. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or a reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.		2	3
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon small businesses which could discourage some business development, it seems unlikely that they will have a serious adverse impact on employment. A more relaxed approach under Alternative 3 may encourage more small business development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to small business development (Alternative 2).		3	2
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon small businesses which could discourage some business development, it seems unlikely that they will have a serious adverse impact on the possibility for economic revival. A more relaxed approach under Alternative 3 may encourage more small business development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to small business development and thus economic revival (Alternative 2).		3	2
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon small		3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	businesses which could discourage some business development, it seems unlikely that they will have a serious adverse impact on sustaining economic growth. A more relaxed approach under Alternative 3 may encourage more small business development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to small business development and thus sustained economic growth (Alternative 2).			
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst the suggested policy approach (Alternative 1) does place stringent requirements upon small business which could discourage some business development, it seems unlikely that they will have a serious adverse impact on attracting indigenous and inward investment. A more relaxed approach under Alternative 3 may encourage more small business development, but could result in an overall decline in the amenity of an area with wider adverse economic implications. A more stringent approach could act as a greater barrier to indigenous and inward investment (Alternative 2).		3	2

Conclusion

The suggested policy approach (Alternative 1) should contribute towards local well-being by protecting local amenity against the potential negative effects of small business development. As such, it performs well in terms of sustainability objectives. Whilst the suggested policy approach (Alternative 1) does place requirements upon businesses that could discourage some small business developments, these are selected in manner which means the wider gains for the local economy (e.g. relating to a high quality local environment) are likely to outweigh any small losses. Alternative 3 may not be able to maintain the amenity of an area, which could have wider adverse economic implications and Alternative 2 could act as a barrier to small business development.

Tourist facilities

Table 20: Appraisal of alternative policy approaches to addressing the issue of 'Tourist facilities'


February 2012 Consultation Option 1: This option would allow an applicant to view a potentially more user friendly single piece of guidance around proposals specifically involving planning permission for tourist facilities. To achieve this particular approach the existing policies would need to be reviewed and potentially grouped together and the likely changes in national guidance would also need careful consideration. There could be some issues that are not covered by the existing policies that also need to be included in the eventual Development Management Plan policy.


February 2012 Consultation Option 3: Less stringent / prescriptive policy



The following options, although presented within consultation documents, have not been given standalone consideration in the table below:






February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy and the General Guidance from this consultation

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of <u>preference</u>	
		Alt 1	Alt 2
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 could contribute towards local well-being by ensuring that tourist attractions and amusements do not harm local amenity and open spaces. The placement of attractions on cycling and pedestrian routes might also provide health benefits by encouraging active travel. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers.		2
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
the rest of the town			
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging the placement of tourist attractions and amusements in areas with frequent public transport and cycling and pedestrian routes, Alternative 1 could help to ensure that the jobs and recreational opportunities they can offer are accessible. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers.		2
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Parks and gardens, countryside, and the historic environment / townscape and landscape are	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Alternative 1 could help to protect the townscape, landscape and historic environment of the town by	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
protected, enhanced and made more accessible	ensuring that tourist attractions and amusements complement the existing built and natural environment. With this being the case, a more stringent approach (Alternative 2) may not be necessary and would place an extra burden on developers; whilst weaker guidance or reliance on higher level policy (Alternative 3) might not obtain the same level of benefit.		
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging the placement of tourist attractions and amusements in areas with frequent public transport and cycling and pedestrian routes, Alternative 1 could reduce the number of journeys taken by car, so reducing air pollution. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers.		2
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging the placement of tourist attractions and amusements in areas with frequent public transport and cycling and pedestrian routes, Alternative 1 could reduce the number of journeys taken by car, so reducing GHG emissions and their contribution to climate change. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers.		2
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: By encouraging the placement of tourist attractions and amusements in areas with frequent public transport and cycling and pedestrian routes, Alternative 1 could reduce the number of journeys taken by car, so reducing road congestion. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers.		2
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst Alternative 1 could set standards which could discourage the development of some tourist attractions and amusements, it seems unlikely that they will have a serious adverse impact on employment opportunities. However, a more stringent approach (Alternative 2) may place an undue burden on tourism related businesses.		2
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst Alternative 1 could set standards which could discourage the development of some tourist attractions and amusements, it seems unlikely that they will have a serious adverse impact on economic revival. However, a more stringent approach (Alternative 2) may place an undue burden on tourism related businesses.		2
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst Alternative 1 could set standards which could discourage the development of some tourist attractions and amusements, it seems unlikely that they will have a serious adverse impact on sustaining economic growth.		2
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline. In terms of the relative merits of the alternatives the following is noted: Whilst Alternative 1 could involve requirements which could discourage the development of some tourist attractions and amusements, it seems unlikely that they will have a serious adverse impact on levels of indigenous and inward investment. However, a more stringent approach (Alternative 2) may place an undue		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	burden on tourism related businesses whilst weaker guidance or reliance on higher level policy (Alternative 3) might not obtain the same level of employment benefit.		

Overall conclusion

The suggested policy approach (Alternative 1) could contribute towards local well-being by protecting local amenity and the built, historic and natural environments against the potential negative effects of tourism related development. As such, it performs well in terms of sustainability objectives. Whilst Alternative 1 does set standards for the operators of tourist attractions and amusements that could discourage some developments, the wider gains of these requirements are likely to outweigh any small economic losses. It is considered that weaker guidance or reliance on higher level policy (Alternative 2) is unlikely to obtain the same level of benefit from an economic perspective.

Upper Ore Valley Greenspace

Table 21: Appraisal of alternative policy approaches to addressing the issue of 'Upper Ore Valley Greenspace'

July 2012 Consultation Option A: Protecting the land in the centre of the existing allocation – leaving the potential for development on the existing allocations

July 2012 Consultation Option B: Protecting the land in the centre and to the south east, leaving only the land along Church Street allocated for development

July 2012 Consultation Option C: Protecting all the woodland in the area of the Upper Ore Valley that does not have current consent for development

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt A	Alt B	Alt C
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	The allocation of greenspace does preclude the opportunity to build homes that would contribute to addressing housing need. However, given the quantities of land in question it is not thought that there is the likelihood of a significant negative effect.	★ 1	2	3
The health and well-being of the population is improved and inequalities in health are reduced	Urban greenspace is important in terms of health and well-being. It is noted that these greenspace options are located in close proximity to (although not within) parts of the borough that are more deprived. As such, it is suggested that Option C would lead to significant positive effects . Given that	3	2	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt A	Alt B	Alt C
	the central woodland belt would remain under Option A, it is not clear that this approach would lead to significant negative effects.			
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is unclear whether this greenspace has the potential to offer recreational opportunity.	-	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	Local greenspace (and in particular woodland) can be important from a perspective of community identity; however, the degree to which this is the case in this instance is not clear.	3	2	★1
Land and buildings are used more efficiently and the best use is made of previously developed land	The development of land that can serve greenspace functions cannot be considered an efficient use of land. It is suggested that Options A and B would lead to significant negative effects .	3	2	★1
Biodiversity is protected, conserved and enhanced	Patches of urban greenspace can function as 'stepping stones' in an ecological network, and so the loss of a 'patch' can have impacts that go beyond simply the loss of the species populations found at that site. It is noted that Option A would not result in the loss of the main woodland belt, but would result in new development abutting the woodland where currently there is greenspace. It may be that the effect	3	2	★1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt A	Alt B	Alt C
	of this is to reduce the potential for this 'patch' to function as a stepping stone / part of the wider ecological network; however, this is uncertain.			
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	The land under consideration will currently act to slow the flow of rainwater to the stream that runs through the centre of the woodland belt, and hence act to reduce the risk of downstream flooding. It could be that development, and in particular development either side, has the effect of increasing the flow of rainwater into the stream, and so increasing downstream flood risk. However, this effect is uncertain, particularly given that development can be designed with Sustainable Drainage in mind.	3	2	★ 1
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	Assuming that development is designed with sustainable drainage in mind, it is unlikely that housing development in close proximity to the stream will lead to problems of water pollution.	-	-	-
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt A	Alt B	Alt C
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	Housing in Hastings is an important part of the strategy for economic revival. Equally, the image of the town is also important, and a network of greenspace is an important part of that image.	?	?	?
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Indigenous and inward investment is encouraged and accommodated	Housing in Hastings is an important part of the strategy for economic revival. Equally, the image of the town is also important, and a network of greenspace is an important part of that image.	?	?	?
Overall conclusion Option A would result in the loss of some of the greenspace functions of this land, and so cannot be considered an efficient use of land. However, some of the greenspace functions would remain given that the woodland belt along the stream would be retained. In conclusion, given the assumption that the greenspace functions of a larger site are considerably greater than those of a smaller site, then Option C would appear to be the most favourable approach from an SA perspective.				

Water resources

Table 22: Appraisal of alternative policy approaches to addressing the issue of 'Water resources'

February 2012 Consultation Option 1: Development will not be permitted within areas where there is significant risk to ground water resources. Development may have impact upon water resources locally. As well as overall availability, considerations will also be given to possible environmental effects such as unacceptable low river flows or drying of wetlands; on site, immediately offsite and further away from the development. Where appropriate advice will be sought from the relevant body; the Environment Agency or Southern Water. The protection of ground water sources and reserves is also of importance. Therefore development that would threaten the quality of ground water will be prevented, in accordance with advice from the Environment Agency.

February 2012 Option 3: More stringent / prescriptive policy

February 2012 Option 3: Less stringent / prescriptive policy

The following options, although presented within consultation documents, have not been given standalone consideration in the table below:

February 2012 Consultation Option 2: Split the guidance into separate policies

February 2012 Consultation Option 4: Not to have a specific policy for this issue and rely upon national guidance and the Planning Strategy

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The health and well-being of the population is improved and inequalities in health are reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities , including access to the countryside and the historic environment	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Safe and secure environments are created and there is a reduction in crime and the fear of crime	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Vibrant and locally distinctive communities are created and sustained	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Land and buildings are used more efficiently and the best use is made of previously developed land	It is considered that neither of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Biodiversity is protected, conserved and enhanced	It is considered that none of these policy approaches would lead to significant effects on the baseline, although Alternatives 1 and 2 may indirectly contribute to meeting this objective. In terms of the relative merits of the alternatives the following is noted: By including criteria which calls for the potential environmental effects of low river flows to be considered, the suggested policy approach (Alternative 1) should contribute to the conservation of biodiversity. Given this, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit and may result in a negative effect in terms of this objective.	★ 1	2	3
The risk of flooding (fluvial and tidal) and coastal erosion is managed and	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
reduced, now and in the future	terms.			
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
Air pollution from transport and land use planning is reduced, and air quality continues to improve	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	It is considered that all of these policy approaches would lead to significant effects on the baseline, with positive effects expected from Alternative 1 and 2, and potentially negative effects from Alternative 3. In terms of the relative merits of the alternatives the following is noted: The criteria set out in the suggested policy approach (Alternative 1) should be sufficient to ensure that water consumption from new developments does not adversely affect supplies through over abstraction. It also calls for a consideration of the effect that new development could have on the quality of ground water. With this being the case, a more stringent approach (Alternative 2) may not be necessary given the extra burden this may place on developers, whilst weaker guidance (Alternative 3) might not obtain the same level of benefit and may result in a negative effect in terms of this objective.	1	2	3
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
The sustained economic growth of the town is achieved and linked closely to social regeneration	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Indigenous and inward investment is encouraged and accommodated	It is considered that none of these policy approaches would lead to significant effects on the baseline, neither is it possible to identify the relative merits of the alternatives in more general terms.	-	-	-
Conclusion By setting out criteria which look to ensure that abstraction levels are sustainable, prevent the adverse effects of low river flows, and preserve ground water quality, the suggested policy approach (Alternative 1) performs well in terms of sustainability objectives. A more stringent approach (Alternative 2) may therefore be unnecessary given the extra burden this could place on developers, whilst weaker guidance (Alternative 3) would not obtain the same level of benefit and could result in a negative effect.				

APPENDIX III: SITE OPTIONS APPRAISAL

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising a list of 126 housing site options and 13 employment site options. The interim appraisal findings are presented in full within this Appendix.

Site options appraisal methodology

Site options were subjected to SA utilising a strict ‘appraisal question’ based methodology. Site appraisal questions were developed to reflect the sustainability objectives identified through SA scoping as far as possible – see Table 1; however, given data availability¹⁷ the site appraisal questions that it has been possible to ask/answer are limited in scope.

Table 1: Scope of the site appraisal methodology

SA objective	Appraisal questions that have been answered	Other appraisal questions that might ideally have been answered were data available
More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Proximity of housing sites to a part of the Borough where there is particular housing need?
The health and well-being of the population is improved and inequalities in health are reduced	<ul style="list-style-type: none"> Proximity of housing sites to the nearest playground? Proximity of housing sites to the nearest district or local centre? Proximity of housing sites to the nearest open space? 	<ul style="list-style-type: none"> Proximity of housing sites to the nearest outdoor sports facility? Proximity of housing sites to the nearest allotment space? Would allocation of the site lead to the loss of a significant outdoor sports facility, children's play space, green space or allotment?
Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	<ul style="list-style-type: none"> Is the site within an area that suffers from problems of overall deprivation? 	<ul style="list-style-type: none"> Is the site in a deprived area where development is required in order to support regeneration?
Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	<ul style="list-style-type: none"> Previous work undertaken by the Council has established that nowhere in the Borough is constrained in terms of proximity to educational facilities. 	

¹⁷ Given the imperative of achieving consistency and transparency it is only possible to draw on data-sets for which data is available for each and every site option.

SA objective	Appraisal questions that have been answered	Other appraisal questions that might ideally have been answered were data available
All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	<ul style="list-style-type: none"> Proximity of housing sites to the nearest district or local centre? 	<ul style="list-style-type: none"> Proximity of housing sites to the nearest health centre or GP service? Would allocation lead to the loss of a significant recreational resource?
Safe and secure environments are created and there is a reduction in crime and the fear of crime	<ul style="list-style-type: none"> This SA objective is not relevant to the appraisal of site allocation options. 	
Vibrant and locally distinctive communities are created and sustained	<ul style="list-style-type: none"> Would allocation impact on a heritage feature? 	<ul style="list-style-type: none"> Is the site located in an area where there is a need for new development to improve the image of the built environment?
Land and buildings are used more efficiently and the best use is made of previously developed land	<ul style="list-style-type: none"> Does the site include previously developed (brownfield) land? 	<ul style="list-style-type: none"> Does the site include contaminated land?
Biodiversity is protected, conserved and enhanced	<ul style="list-style-type: none"> Proximity to the nearest Site of Special Scientific Interest? Proximity to the nearest Local Wildlife Site? 	<ul style="list-style-type: none"> Would allocation impact on an ecological corridor? Does the site contain any BAP priority species or habitats?
The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	<ul style="list-style-type: none"> Is the site within a flood risk area? Is the site at risk of surface water flooding? Does the site have a history of surface water flooding? 	<ul style="list-style-type: none"> None
Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible	<ul style="list-style-type: none"> Proximity to is the nearest Scheduled Monument or Archaeological Notification Area? Proximity to the nearest Conservation Area or Historic Park or Garden? Is the site within an area that has been identified as sensitive from a perspective of maintaining the landscape setting of Hastings?¹⁸ 	<ul style="list-style-type: none"> Proximity to the nearest listed building? Is the site within an area that contributes to the setting of a heritage asset / area of heritage importance?

¹⁸ A 2008 Landscape Assessment Study examined the sensitivity of a number of urban edge sites to housing and employment development from a perspective of maintaining the landscape setting of Hastings.

SA objective	Appraisal questions that have been answered	Other appraisal questions that might ideally have been answered were data available
Air pollution from transport and land use planning is reduced, and air quality continues to improve	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Will development of the site lead to increased traffic movements within an Air Quality Management Area (AQMA)?
The causes of climate change are addressed through reducing emissions of greenhouse gases through zero / low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	<ul style="list-style-type: none"> Proximity to the nearest cycle route? Proximity to the nearest amenity footpath? 	<ul style="list-style-type: none"> Would development of this site contribute to the potential to develop community heating networks? N.B. In terms of access to public transport, work undertaken by the Council has identified that nowhere within the Borough is constrained.
The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Is this site located in an area where development / re-development might result in problems of water pollution?
The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Would development of this site contribute to the potential to develop community heating networks?
Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	<ul style="list-style-type: none"> This SA objective is not relevant to the appraisal of site allocation options. 	
Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	<ul style="list-style-type: none"> Proximity to the nearest cycle route? Proximity to the nearest amenity footpath? 	<ul style="list-style-type: none"> Would traffic generated as a result of development of this site result in increased congestion on the local road network? N.B. In terms of access to public transport, work undertaken by the Council has identified that nowhere within the Borough is constrained.
There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Would employment allocation at this location help to meet particular employment needs? Will the allocation result in loss of employment or employment land?
Economic revival in the more deprived areas of the town is stimulated and successfully achieved	<ul style="list-style-type: none"> Is the site within an area that suffers from problems of overall deprivation? 	<ul style="list-style-type: none"> Is the site in a deprived area where development is required in order to support regeneration?
The sustained economic growth of the town is achieved and linked closely to social regeneration	<ul style="list-style-type: none"> Is the site within an area that suffers from problems of overall deprivation? 	<ul style="list-style-type: none"> Is the site in a deprived area where development is required in order to support regeneration?

SA objective	Appraisal questions that have been answered	Other appraisal questions that might ideally have been answered were data available
Indigenous and inward investment is encouraged and accommodated	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Is the site in an area where development / re-development would contribute to the image of Hastings?

Tables 2 and 3 present a concise list of the appraisal questions answered for housing site options (Table 2) and employment site options (Table 3), along with the 'decision rules' used to categorise performance. A **red** categorisation equates to the prediction of a 'significant constraint', an **amber** categorisation equates to the prediction of a 'potentially significant constraint', and a **green** categorisation equates to the prediction of 'no constraint'.

The decision rules are quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software. No qualitative information / professional judgement has been drawn on when categorising sites as **red**, **green** or **amber**.

Most of the rules are distance related. It is important to note that all distances are 'as the crow flies' as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre). Most distance rules have been developed internally by the plan-making / SA team, following a review of thresholds applied as part of Site Allocation / SA processes elsewhere in England. A number of thresholds reflect the assumption that 400m is a distance that is easily walked by those with young children and the elderly.

Table 2: Site appraisal questions and decision rules (Housing)

Proximity to a district or local centre	
Appraisal question	Decision rules
Proximity to a district or local centre? ¹⁹	R = >400m A = 200-400m G = <200m
Proximity to outdoor facilities and open space	
Appraisal question	Decision rules
Proximity to a playground?	R = >400m A = 200 - 400m G = <200m
Proximity to an area of open space?	R = >400m or results in the loss of over 20% of the total area of an open space patch A = 200 - 400m G = <200m

¹⁹ As defined by Policy S2 of the Hastings Local Plan 2004

Supporting regeneration	
Appraisal question	Decision rules
Encouraging development in deprived areas?	A = Not within the 0-20% most deprived Super Output Areas according to the Index of Multiple Deprivation, 2010. G = Within the 0-20% most deprived Super Output Areas
Supporting a shift to more sustainable modes of travel	
Appraisal question	Decision rules
Proximity to a cycle route?	R = >200m A = 100 - 200m G = <100m
Proximity to an amenity footpath? ²⁰	R = >200m A = 100 - 200m G = <100m
Protecting the historic environment	
Appraisal question	Decision rules
Proximity to a Scheduled Ancient Monument or Archaeological Notification Area?	R = On or adjacent to a SAM A = Within or adjacent to an ANA G = Not within or adjacent to an ANA ²¹
Proximity to a Conservation Area or Registered Park and Garden?	R = Within A = Adjacent G = Not within or adjacent to a Conservation Area or Registered Park and Garden
Protecting the natural environment	
Appraisal question	Decision rules
Proximity to a Site of Special Scientific Interest (SSSI)?	R = <200m A = 200 - 400m G = >400m
Proximity to a Local Wildlife Site? ²²	R = Contains or is adjacent to a site A = <20m G = >20m

²⁰ As defined by Policy OS5 of the Hastings Local Plan 2004

²¹ N.B. All SAMs are within ANAs

²² N.B. All Ancient Woodlands and Local Nature Reserves are also designated as Local Wildlife Sites

Landscape setting of Hastings?

R = Within a landscape character area on the Hastings fringes identified as having nil or low capacity to accept housing development
A = Within a landscape character area on the Hastings fringes identified as having moderate capacity to accept housing development
G = Within a landscape character area on the Hastings fringes identified as having high capacity to accept housing development; or not located on the fringes of Hastings.

Making best use of natural resources

Appraisal question

Decision rules

Use of previously developed (brownfield) land?

R = Greenfield
A = Partially greenfield / partially previously developed
G = Previously developed

Avoiding flood risk

Appraisal question

Decision rules

Flood risk (fluvial and tidal)?

R = Within flood risk zone 3
A = Within flood risk zone 2
G = None of the above

Flood risk (surface water)?

R = Within an area of 'deep' surface water flood risk (1 in 30 year event)
A = Within an area of 'shallow' surface water flood risk (1 in 30 year event) or within a 'Flood Hotspot'
G = None of the above

Table 3: Site appraisal questions and decision rules (Employment)

Proximity to a district or local centre

Appraisal question

Decision rules

Proximity to a district or local centre?²³

R = >400m
A = 200-400m
G = <200m

²³ As defined by Policy S2 of the Hastings Local Plan 2004

Supporting regeneration	
Appraisal question	Decision rules
Encouraging development in deprived areas?	A = Not within the 0-20% most deprived Super Output Areas according to the Index of Multiple Deprivation, 2010. G = Within the 0-20% most deprived Super Output Areas
Supporting a shift to more sustainable modes of travel	
Appraisal question	Decision rules
Proximity to a cycle route?	R = >200m A = 100 - 200m G = <100m
Proximity to an amenity footpath? ²⁴	R = >200m A = 100 - 200m G = <100m
Protecting the historic environment	
Appraisal question	Decision rules
Proximity to a Scheduled Ancient Monument or Archaeological Notification Area?	R = On or adjacent to a SAM A = Within or adjacent to an ANA G = Not within or adjacent to an ANA ²⁵
Proximity to a Conservation Area or Registered Park and Garden?	R = Within A = Adjacent G = Not within or adjacent to a Conservation Area or Registered Park and Garden
Protecting the natural environment	
Appraisal question	Decision rules
Proximity to a Site of Special Scientific Interest (SSSI)?	R = <200m A = 200 - 400m G = >400m
Proximity to a Local Wildlife Site? ²⁶	R = Contains or is adjacent to a site A = <20m G = >20m

²⁴ As defined by Policy OS5 of the Hastings Local Plan 2004

²⁵ N.B. All SAMs are within ANAs

²⁶ N.B. All Ancient Woodlands and Local Nature Reserves are also designated as Local Wildlife Sites

Would development of the site negatively affect the landscape setting of Hastings?

R = Within a landscape character area on the Hastings fringes identified as having nil or low capacity to accept business development
A = Within a landscape character area on the Hastings fringes identified as having moderate capacity to accept business development
G = Within a landscape character area on the Hastings fringes identified as having high capacity to accept business development; or not located on the fringes of Hastings.

Making best use of natural resources

Appraisal question

Decision rules

Use of previously developed (brownfield) land?

R = Greenfield
A = Partially greenfield / partially previously developed
G = Previously developed

Avoiding flood risk

Appraisal question

Decision rules

Flood risk (fluvial and tidal)?

R = Within flood risk zone 3
A = Within flood risk zone 2
G = None of the above

Flood risk (surface water)?

R = Within an area of 'deep' surface water flood risk (1 in 30 year event)
A = Within an area of 'shallow' surface water flood risk (1 in 30 year event) or within a 'Flood Hotspot'²⁷
G = None of the above

Appraisal findings

Appraisal findings in relation to the housing (Table 4) and employment (Table 5) site allocation options are presented below. The tables also indicates which site options the Council subsequently determined should be 'preferred', i.e. presented as allocations in the Proposed Submission Plan. **Appendix IV** provides further details regarding how the Council came to the decision to select some sites for allocation, and not others.

²⁷ Flood hotspots are areas that have experienced surface water flooding in the past.

Table 4: Housing site allocations options: appraisal findings

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
A01	Upper Ore Valley	Yes	Green	Yellow	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	This site is relatively free of constraints. It is within 50 metres of a District or Local Centre and a cycle route, and has an open space adjacent. However, it scores poorly for proximity to an amenity footpath. It makes use of both brownfield and greenfield land.
A02	Mount Pleasant Hospital, Frederick Road (Former Ore Valley Millennium Communities)	Yes	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	This brownfield site has a large number of positive aspects. It is situated within the 20% most deprived areas nationally, adjacent to an open space and within 25m of a cycle route and 50m of a playground. However, it is distant from an amenity footpath.
A04	Mayfield E, Bodiam Drive	Yes	Red	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	This site has a range of positive features, including being within 25 metres of a cycle route. However, it is over 1.5km distant from a Local or District centre. It also does not make best use of previously developed land.
A05	Malmesbury House, West Hill Road	Yes	Green	Green	Yellow	Green	Yellow	Green	Yellow	Red	Green	Red	Green	Green	Green	Green	This is a brownfield site with a number of positive aspects, including being situated within one of the nations 20% most deprived areas. It is constrained by its location within a Conservation Area or Historic Park and Garden, and a Local Wildlife Site.
A11	Land at Redgeland Rise (Wishing Tree Nursery)	Yes	Red	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Whilst this site scores poorly in terms of proximity to a District or Local centre, it is otherwise relatively unconstrained. Located within one of the nations 20% most deprived areas, it makes use of previously developed land.
A14	Hastings Station Yard (Part)	Yes	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	There are a number of positives to this brownfield site. It is situated within one of the nations 20% most deprived area and is only 25m from a cycle route. However, it scores poorly for proximity to

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	playground facilities and an amenity footpath.
A15	The Observer Building (part)	Yes															This site has several positive aspects, including its location within 50m of a district or Local centre and its use of previously developed land. Its location within a Conservation Area or Historic Park and Garden is a notable negative, whilst it is also distant from an amenity footpath.
A16	Seaside Road, West St Leonards	Yes															This site has a number of positive features. It is within 50 metres of a District or Local Centre, and 25 metres of a playground and cycle route. It makes use of brownfield land and is in one of the nations 20% most deprived areas. The site intersects with Flood Zone 3 and would result in the loss of over 20% of an area of open space which are key constraints.
A18	Ore Valley	Yes															Situated on brownfield land, in an area in the 20% most deprived nationally, and within 25 metres of cycle route, this site has a range of positive aspects. However, it has some notable constraints, including being within or adjacent to a Local Wildlife Site and intersecting with an area of 'deep' surface water flood risk.
A19	12-19 Braybrooke Terrace	Yes															This site performs well against several criteria, including its use of previously developed land and its location adjacent to an area of open space. It is however, constrained in a number of ways, including intersecting with an area of 'deep' surface water flood risk.
A20	Taxi Office/B.R. Social Club, St John's Road	Yes															Whilst this site is within the nations 20% most deprived areas, consists of brownfield land, and is within 50 metres of both a playground and a District or Local Centre, it does suffer from some

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	constraints, notably its location within a Conservation Area or Historic Park and Garden.
A21	Hurst Court, The Ridge	Yes															This site features a number of positive aspects, including making use of brownfield land. However, it also suffers from a range of constraints, particularly its location 1km from the nearest playground and the nearest cycle route, and 1.5km from District and Local Centres.
A22	Mayfield Farm	Yes															This site has a number of positive features, including being within 25 metres of a cycle route. It does however have some negative aspects, including failing to make use of brownfield land, and its location over 1.5km from a District or Local centre.
A23	Former Stills Factory Ore Valley	Yes															A brownfield site with a number of positive features, including being in an area amongst the 20% most deprived nationwide. Its distance from a District or Local Centre and a Cycle Route could present some issues in terms of accessibility.
A24	Land west of Frederick Road	Yes															This site makes use of previously developed land and is in an area amongst the 20% most deprived nationwide. Distance to a District or Local Centre and an Amenity footpath could result in some accessibility issues.
A26	Mayfield J, Mayfield Lane	Yes															This site features a range of positive features, particularly its location within 25m of a cycle route. It is highly constrained in some respects, such as its distance to a District or Local Centre, which is over 1.5km away, and its use of greenfield land.
A27	Robsack A, Churchwood Drive	Yes															Whilst this site does have some positive aspects, including an amenity footpath within 25 metres and an adjacent open

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	space, it is constrained in many respects. Of particular note is the sites greenfield nature and its location on or adjacent to a Local Wildlife Site.
A28	Land at Osborne House, The Ridge	Yes															This is a brownfield site with several positive features. However it also features a number of negatives, including its distance from a cycle route, an amenity footpath, a playground and a District or Local Centre.
A29	West St. Leonards Primary School	Yes															The brownfield site has several positive aspects; including its location within the 20% most deprived areas nationally and adjacent to an area of open space. It features some notable constraints, being situated on or adjacent to a Local Wildlife site and in an area which intersects with Flood Zone 3.
A30	Rear of Old London Road	Yes															This site makes use of previously developed land and scores well against a large number of the appraisal criteria. Distance to an amenity footpath represents the main constraint.
A31	Holmhurst St Mary	Yes															Whilst this site does have a number of positive features, it also suffers from a wide range of constraints. Notably, it is a greenfield site, which intersects with an area of 'deep' surface water flood risk, and which is on or adjacent to a Local Wildlife Site.
A32	Gambier House, West Hill Road	Yes															This brownfield site performs well against a number of criteria, including its location in an area amongst the 20% most deprived nationally. However, it has a number of constraints, particularly its location on or adjacent to a Local Wildlife Site and within a Conservation Area or Historic Park and Garden.
A33	Hollingsworth Garage, Braybrooke Road	Yes															This is a site which makes use of previously developed land, is 25 metres

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	from a cycle route, and is relatively unconstrained across the criteria. Distance to an amenity footpath is the main constraint this site faces.
A34	12 Stanley Road	No															This is a brownfield site which has a range of positive aspects. Constraints include its distance to playground facilities, an amenity footpath, and a cycle route.
A35	17 Bulverhythe Road	No															Whilst this site performs well against a number of the criteria, including making use of previously developed land, it does face some constraints. In particular, the site intersects with Flood Zone 3.
A36	BT Centre, Sedlescombe Road North	No															This site is on brownfield land and has a range of positive features. It does suffer from several constraints, notably its location in an area of 'deep' surface water flood risk.
A37	Blacklands Garage, Fearon Road	No															This is a site situated on previously developed land which has a number of positive aspects. Distance from open space and from playground facilities are the sites main constraints.
A38	20-22 Albany Road	No															This brownfield site is situated in one of the 20% most deprived areas nationwide and performs well against a number of criteria. The sites distance from a playground, cycle route and a District or Local Centre represent constraints.
A39	Land rear of 35-39 St Helens Park Road	No															This brownfield site has several positive features, including an adjacent area of open space. The site has several constraints, including distance from a playground, a cycle route, an amenity footpath and a District or Local Centre.
A40	Land East of Hillside Road	No															Whilst this site does perform well against some criteria, including an adjacent area of open space, it suffers from a range of constraints. Notably the site is of a

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	greenfield nature and is located on or adjacent to a Local Wildlife Site.
A41	Land West of Hillside Road	No															This is a site that has a number of positive aspects, but which does suffer from a number of constraints, including a failure to make use of previously developed land.
A42	Ore Place	No															This is a brownfield site, with some positive features, including an area of adjacent open space. However, it features a range of constraints, notably its location on or adjacent to a Scheduled Ancient Monument, within a Conservation Area or Historic Park and Garden, 1km distant from a playground and 1.5km distant from a District or Local Centre.
A43	Cornwallis Street Car Park	Yes															This site has a wide range of positive aspects, including its use of brownfield land, and its location within 50 metres of a District or Local Centre and in one of the 20% most deprived areas nationwide. Constraints include distance from a playground and from an amenity footpath.
A44	Silverhill Bus Depot	No															This site performs well against a large number of the criteria, including making use of previously developed land. Distance to an amenity footpath is the sites main constraint.
A45	York Road Business Park	No															This is a brownfield site which has a high number of positive aspects. The main constraint facing the site is its distance to an amenity footpath.
A46	Land at Middle Street	No															This is a site which has several positive features, including its brownfield nature, and its location within 50 metres of a District or Local Centre and in one of the 20% most deprived areas nationwide. It has some constraints, notably its location within a Conservation Area or Historic Park and Garden.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
A47	Rear of Linley Drive	Yes															This site has a number of positive aspects, including making use of brownfield land and being within 50m of a playground. Constraints include distance to a District or Local Centre, and to a cycle route and amenity footpath.
B01	Bulverhythe Development Area	No															This site performs well against a large number of the criteria, including making use of previously developed land and its location within 25 metres of a cycle route. It has some constraints, notably its intersection with Flood Zone 3.
B02	Former Hastings College Archery Road	Yes															This is a brownfield site which is in one of the 20% most deprived areas nationwide and which has a number of positive features. It is constrained in some respects, notably through its location within 20% most deprived Within Conservation Area or Historic park and Garden
B03	Former Westerleigh School Playing fields	Yes															This site makes use of brownfield land and performs well against several criteria. However, it is constrained in a number of respects, including distance to a District or Local Centre, a playground, cycle route and an amenity footpath.
B04	Former Westerleigh School	Yes															This brownfield site has a number of positive aspects, but also suffers from several constraints. These include its distance to a District or Local Centre, a playground, cycle route and an amenity footpath.
B06	Crystal Square	No															This site performs well against a range of the criteria, including use of brownfield land, its location in one of the 20% most deprived areas nationwide and its position within or adjacent to a District or Local Centre. However, it does feature some notable constraints, being located in a Conservation Area or Historic Park

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	and Garden and over 1km from an Amenity Footpath.
B08	The Cheviots/Cotswold Close	Yes															This brownfield site has a number of positive features, including its location in one of the 20% most deprived areas nationwide and within 25m of a cycle route. The sites distance to a District or Local Centre and an amenity footpath are constraints.
B09	87-221 (Odds) Farley Bank	Yes															This brownfield site performs well against a large number of the criteria, including its location in one of the 20% most deprived areas nationwide and adjacent to an area of open space. A notable constraint is its distance from an amenity footpath, which is over 1km away.
B11	Summerfields Business Centre	No															This site has some positive aspects, including making use of brownfield site, an adjacent area of open space, and being located in one of the 20% most deprived areas nationwide. However, it does also feature several constraints, notably its position on or adjacent to a Local Wildlife Site.
B12	1-3 Chapel Park Road	Yes															This brownfield site performs well against a wide range of the criteria, including being within 50m of a playground and being located within the 20% most deprived areas nationwide. Distance from a cycle route and an amenity footpath are constraints.
B13	Cinque Ports Way former Stamco Timber Yard and TA Centre	Yes															This site has a number of positive aspects, including its location within the 20% most deprived areas nationwide and within 25 metres of a cycle route, plus its use of brownfield land. The site does however feature several constraints, notably its position on or adjacent to a Local Wildlife Site and its intersection with Flood Zone 3.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
B14	Former HCAT St Saviours Rd	Yes															This is a site which makes use of previously developed land and which performs well against a number of criteria, including being located within the 20% most deprived areas nationwide. It has some constraints, notably its location on or adjacent to a Local Wildlife Site.
B15	Spyways School, Gillsmans Hill	Yes															Whilst this site does have some positive aspects, including making use of previously developed land, it features a range of constraints. The most notable of these is the sites location on or adjacent to a Local Wildlife Site.
B16	Land at Breadsell Lane	No															This site does have some positive features; including being within 25 metres of an amenity footpath and having an adjacent area of open space, but suffers from a large number of constraints. These include its greenfield nature, its position on or adjacent to an SSSI and a Local Wildlife Site, plus over 1.5km from a District or Local Centre. It is also located in a landscape character area with no capacity to accept housing development.
B20	Summerfields Sports Centre, Bohemia Road	No															This brownfield site has several positive aspects, including its location within the 20% most deprived areas nationwide. It features some constraints, notably being positioned on or adjacent to a Local Wildlife Site and resulting in the loss of over 20% of an area of green space.
B21	Glenmore, Old Road Road	No															This site performs well against a range of the criteria, including being within 25 metres of an amenity footpath and making use of brownfield land. Constraints include the sites distance from a District or Local Centre and from a cycle route.
B22	Land Between 177-185 (odds) London Road	No															This site has a number of positive features, including its location within the

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	20% most deprived areas nationwide. However, there are a range of constraints, notably the sites greenfield nature and its location in an area of 'deep' surface water flood risk.
B23	45-53 (odd) Hollington Old Lane	No															This brownfield site performs well against a large number of criteria, including its location within the 20% most deprived areas nationwide, within 50 metres of a District or Local Centre and within 25 metres of an amenity footpath. Distance to a cycle route is a constraint.
B24	West Hill Road Reservoir	Yes															This site has several positive aspects, including its brownfield nature and its location within the 20% most deprived areas nationwide. It does however feature several constraints, notably its location within a Conservation Area or Historic Park and Garden.
B25	Allotments, Beaufort Road	No															This site performs well against many of the criteria, including being within 25 metres of a cycle route and having an area of adjacent open space. It does feature some constraints, notably its failure to make use of previously developed land.
B26	Land adjacent to Vale Road Allotments	No															This site is relatively unconstrained and has a range of positive aspects, including a cycle route and an amenity footpath within 25 metres, plus having an adjacent area of open space. A failure to make use of previously developed land is the primary constraint.
B27	Land at Filsham Road	No															This site has a number of positive features, including its location within the 20% most deprived areas nationwide. It is however constrained by its distance from a cycle route and its greenfield nature.
B28	Land at Springfield Valley	No															This site features some positive aspects, such as its use of previously developed

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	land, but is in several ways constrained. A key constraint is the sites location in an area of 'deep' surface water flood risk.
B29	Land at Queens Road	No															This brownfield site performs well against a large number of the criteria, including its location within the 20% most deprived areas nationwide and within 50 metres of District or Local Centre. The site intersects with Flood Zone 3, which is a notable constraint
B30	Jackson Hall, Portland Place	No															This site has a large number of positive features, including the use of brownfield land, its location within the 20% most deprived areas nationwide and within 50 metres of District or Local Centre. Distance to an amenity footpath s a constraint.
B31	College of Holy Child Jesus, Magdalen Rd	Yes															Whilst this brownfield site has a number of positive aspects, including being located within the 20% most deprived areas nationwide, it also has some notable constraints. These are the sites location within a Conservation Area or Historic Park and Garden and in an area of 'deep' surface water flood risk
B32	The Malvern and adjacent shops, Malvern Way	No															This brownfield site is relatively unconstrained and has a range of positive aspects; including being located within the 20% most deprived areas nationwide and having a playground within 50 metres. The sites location over 1km from an amenity footpath is a notable constraint.
B33	Pilot Field, Elphinstone Road	No															This site has some positive features, but also features a range of constraints. These notably include the sites location on or adjacent to a Local Wildlife Site and in an area of 'deep' surface water flood risk. It makes use of both green and brownfield land.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
B34	Hastings Cottage	No															This is a brownfield site which has a number of positive aspects. However, the site also suffers from a number of constraints, notably its location over 1km from a playground and a cycle route, plus over 1.5km from a District or Local Centre.
B35	Lower Cornwallis Allotments, Lower Park Road	No															This site has a number of positive aspects, but it is in some ways constrained. Notably it fails to make use of previously developed land and its development would result in the complete loss of an area of greenspace.
B36	Land west of Grove College	No															This site has some positive aspects, including its proximity to an amenity footpath, which is within 25 metres. However, it is in several ways constrained, including its use of greenfield land, its proximity to an SSSI which is 25 metres away, and its location on or adjacent to a Local Wildlife Site.
B38	Land west of Winchelsea Lane	No															This site has a number of positive aspects, including an amenity footpath within 25 metres and its location within the 20% most deprived areas nationwide. However, the site is also constrained in several ways, such as its greenfield nature.
B39	Land at Spindlewood Caravan Park, Rock Lane	No															Whilst this site has a number of positive aspects, including being located within the 20% most deprived areas nationwide and within 50 metres of a playground, it also has some notable constraints. These include its greenfield nature, and its location in a landscape character area with no capacity to accept housing development, and an area of 'deep' surface water flood risk.
B41	Tilekiln Farm, Fairlight Avenue	No															This site has some positive features, but is also constrained in several ways.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	These constraints include a failure to make use of previously developed land.
B43	Sandhurst Playing Fields, the Ridge	No															This site has a number of positive aspects, but it is in several ways constrained. Notable constraints include its greenfield nature, plus its distance over 1km from a playground and over 1.5km from a District or Local Centre. Development here would also result in the complete loss of an area of greenspace.
B45	Land South East of Bembrook Road	No															This site has a number of positive aspects, including a playground within 50 metres and its location within the 20% most deprived areas nationwide. It does however feature several constraints, notably its greenfield nature and the loss of over 20% of open space that would occur should this site be developed.
B46	Football Pitches, Barley Lane	No															This site has several positive features, including close proximity to a cycle route which is 25 metres away. It is in other ways constrained, notably its failure to make use of previously developed land and the loss of over 20% of open space that would occur should this site be developed.
B47	Land at Mill Lane	No															This site performs well against a number of the criteria, including its location within 25 metres of an amenity footpath and with an adjacent area of open space. In other ways the site is notably constrained, including its greenfield nature, plus its position on or adjacent to a Local Wildlife Site and in a landscape area with no capacity to accept housing development.
B49	Upper Broomgrove Road	Yes															This brownfield site performs well against several of the criteria, including its location within the 20% most deprived areas nationwide. It has some

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	constraints, notable its distance from an amenity footpath, which is over 1km away.
C02	Mount Denys, Pinehill & Ridgeway	Yes															This site has a number of positive aspects, including its use of previously developed land. Constraints include distance from a cycle route, amenity footpath, and a District or Local Centre.
C03	Old Roar house, Old Roar Road	Yes															This site has several positive features, including an amenity footpath within 25 metres. There are also some constraints, notably the sites location on or adjacent to a Local Wildlife Site.
C04	Hornbye Park	Yes															This is a brownfield site which performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide. A notable constraint is the loss of over 20% of open space that would occur.
C05	2-20(evens) Fellows Road	Yes															This site performs well against a number of the criteria, including being located within the 20% most deprived areas nationwide. The sites constraints include distance from a cycle route, amenity footpath, and a District or Local Centre. It makes use of both green and brownfield land.
C06	Braybrooke House, Holmesdale Gardens	No															This is a site which performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide and its use of brownfield land. It has some constraints, notably its location within a Conservation Area or Historic Park and Garden.
C07	Westwood house, Holmesdale Gardens	No															This is a site on previously developed land which performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide. It features some constraints, notably its location within a

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	Conservation Area or Historic Park and Garden.
C08	land adj to 777 The Ridge	Yes															This site has some positive features, such as an adjacent area of greenspace, but is also constrained in several ways. These constraints include a failure to make use of previously developed land.
C09	Land at William Parker Sports College	No															This site performs well against a number of the criteria, but is also constrained in several ways. These constraints include a failure to make use of previously developed land.
C10	Nursery Building adjacent to Ashdown House	No															This site has a number of positive aspects, including making use of brownfield land. A notable constraint is the sites distance from a cycle route, which is over 1km away.
C11	Land at Thorpe's Wood	No															This site performs well against a range of criteria, but it is also in some ways constrained. These constraints include a failure to make use of previously developed land.
C12	Land at Church Wood Drive	No															Whilst this site has a number of positive aspects, including a playground within 50 metres, it also features some notable constraints. These include the greenfield nature of the site and its position on or adjacent to a Local Wildlife Site.
C13	Land at Whatlington Way	No															This site performs well against a range of the criteria, including its use of previously developed land. It features some constraints, notably its location 1.5km from a District or Local Centre.
C14	Land at Winchelsea Lane and Rye Road	No															This site performs well against several of the criteria, but it is also in some ways constrained. These constraints include its distance from a District or Local Centre and from a Cycle Route. It makes use of both brownfield and greenfield land.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
C15	Land East of Holmhurst St Mary	No															This site has some positive features, including playground facilities within 50 metres. It is however constrained in several ways, notably by its location on or adjacent to a Local Wildlife Site.
C16	Linton Gardens, Braybrooke Terrace	No															Whilst this site has a number of positive aspects, it features several constraints. Most notable of these are the sites greenfield nature, its location within a Conservation Area or Historic Park and Garden, and that development here would result in the complete loss of an area of open space.
C17	Unit E, Roebuck Centre, Roebuck Street	No															This brownfield site performs well against a range of the criteria, including its location within the 20% most deprived areas nationwide and less than 50 metres from a District or Local Centre. It has some constraints, notably its location within a Conservation Area or Historic Park and Garden.
C19	Land Rear of 16-56 (Evens) Ironlatch Avenue and Gillsmans Drive	No															This site performs well against several of the criteria, including having an amenity footpath within 25 metres, and its location within the 20% most deprived areas nationwide. However, there are some constraints, notably the sites greenfield nature, its position on or adjacent to a Local Wildlife Site, and the loss of over 20% of an area of open space that would occur should development take place here.
C20	Land at Jenners Lane, Rye Road	No															This site performs well against a range of criteria, but it is also in some ways constrained. These constraints include a failure to make use of previously developed land.
C23	Lidham Barn, Rye Road	No															This site performs well against a number of the criteria, but it is also in a number of

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	ways constrained. These constraints include a failure to make use of previously developed land.
C24	Land at Barley Lane	No															This site has some positive aspects, including being adjacent to an area of open space and less than 25 metres from a cycle route. However, it suffers from a number of constraints, notably its position 1km from an amenity footpath, on or adjacent to a Scheduled Ancient Monument, within a Conservation Area or Historic park and Garden, and within or adjacent to a Local Wildlife Site.
C25	My Way Lodge, The Ridge West	No															This site has some positive aspects, but also a large range of constraints. Notable constraints include the greenfield nature of the site, plus its location over 1km from a cycle route and amenity footpath, and over 1.5km from a District or Local Centre.
C26	5-15 (odds) Fellows Road	Yes															This brownfield site has a number of positive features, including being located within the 20% most deprived areas nationwide. Constraints include distance to a cycle route and an amenity footpath.
D08	Sorting Office Site, Kings Road	Yes															This site has a range of positive features, including the use of previously developed land, its location within the 20% most deprived areas nationwide and within or adjacent to a District or Local Centre. It is in some ways constrained, notably from its location within a Conservation Area or Historic Park and Garden
D14	4-5 Stockleigh Road	Yes															This brownfield site performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide and the proximity of a District or Local Centre, which is less than 50 metres away. The site has some constraints, notably its location within a

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	Conservation Area or Historic Park and Garden.
D18	49-52 Caves Road	Yes															This site has a number of positive aspects, including its location within the 20% most deprived areas nationwide. However, the site does feature a number of constraints, including its greenfield nature, its location within a Conservation Area or Historic Park and Garden, and on or adjacent to a Local Wildlife Site.
D20	The Langham Hotel, 16 Elphinstone Road	Yes															This site performs well against a range of criteria, including its use of previously developed land and its proximity of a District or Local Centre, which is less than 50 metres away. The site has some constraints, notably its location within a Conservation Area or Historic Park and Garden.
D21	27 Dane Road	Yes															This site performs well against a number of the criteria, but it is also in a number of ways constrained. A notable constraint is the sites location within a Conservation Area or Historic Park and Garden. The site makes use of both green and brownfield land.
D26	Hare & Hounds, 391 Old London Road	Yes															This site performs well against a number of the criteria, being on brownfield land and within or adjacent to a District or Local Centre. Constraints include distance from a playground and from an amenity footpath.
D28	107 The Ridge (Simes & Sons)	Yes															This brownfield site has a number of positive aspects, including its location within the 20% most deprived areas nationwide and the proximity of a cycle route, which is less than 25 metres away. The site does feature some constraints, notably its location over 400 metres from an area of open space.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
D30	Silver Springs Medical Practice Beaufort Road	Yes															This brownfield site scores well against a large number of the criteria, including proximity to a District or Local Centre, which is within 50 metres, and a cycle route within 25 metres. The distance of the site to an amenity footpath is a constraint.
D32	347-349 London Road	Yes															This site has a number of positive features, including its use of previously developed land. The distance of the site to an amenity footpath is a constraint.
D34	190 Bexhill Road	Yes															This site performs well against a number of the criteria, including its use of previously developed land. The site has some constraints, including its distance from an amenity footpath, playground, and District or Local Centre.
D35	309-311 Harold Road	Yes															This site has a number of positive features, including its use of previously developed land. The distance of the site to an amenity footpath and a cycle route are constraints.
D40	191 The Ridge	Yes															This site has some positive aspects, including its location within the 20% most deprived areas nationwide. The sites constraints include its distance from an amenity footpath, cycle route, playground, and District or Local Centre.
D41	195 The Ridge	Yes															This site performs well against a number of the criteria, including its use of previously developed land. The site has some constraints, including its distance from an amenity footpath, cycle route, playground, and District or Local Centre.
D43	St Ethelburga's Church Hall	Yes															This brownfield site has a number of positive aspects, including its location within the 20% most deprived areas nationwide. Constraints include distance from a cycle route and from an amenity footpath.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
D49	Former Workplace Health & Fitness Centre, The Ridge West	Yes															This site performs well against some criteria, including making use of previously developed land. However the site is affected by a number of constraints, including its location over 400 metres from an area of open Space, over 1km from a cycle route and an amenity footpath and over 1.5km from a District or Local Centre.
D50	40 & 41 Wellington Square	Yes															This brownfield site has a number of positive features, including its location within the 20% most deprived areas nationwide and within 50 metres of a District or Local Centre. The site has some constraints, notably its location within a Conservation Area or Historic Park and Garden.
D51	36-40 Caves Road	Yes															This site performs well against some of the criteria including making use of previously developed land and being located within the 20% most deprived areas nationwide. The site has some constraints, notably its location within a Conservation Area or Historic Park and Garden.
D52	36 & 37 Wellington Square	Yes															This brownfield site has a number of positive features, being located within 50 metres of a District or Local Centre and within the 20% most deprived areas nationwide. A notable constraint is the site's location within a Conservation Area or Historic Park and Garden.
D53	37 Charles Road West, Filsham Nurseries	Yes															This site has a number of positive features, including its use of previously developed land. Constraints include the distance of the site from a cycle route, playground and a District or Local Centre.
D56	Land south of 12-17 Catsfield Close	Yes															This site performs well against some of the criteria, including having an adjacent area of open space. It does however

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	have some constraints, notably its greenfield nature, its location 1.5km from a District or Local Centre, and its position in an area of 'deep' surface water flood risk.
D57	Ore Business Park, Farley Bank	Yes															This brownfield site performs positively against a wide range of the criteria, including its location within the 20% most deprived areas nationwide and within 25 metres of a cycle route. The location of the site over 1km from an amenity footpath is a notable constraint.
N01	Harrow Lane Playing Fields	Yes															This site has some positive features, but also features a number of constraints these include the greenfield nature of the site and the loss of over 20% of open space that would occur should development take place here.
N02	Land South of Crowhurst Road	Yes															This site performs well in terms of a number of the criteria, including having an amenity footpath within 25 metres. However, it is also constrained in a range of ways, notably through the sites greenfield nature, its location 1.5km from a District or Local Centre, and its position on or adjacent to a Local Wildlife Site.
N03	The Grove School	Yes															This brownfield site has some positive aspects, including having an amenity footpath within 25 metres. The site is also constrained in a number of ways, notably its location on or adjacent to a Local Wildlife Site and in an area of 'deep' surface water flood risk.
N04	Land adjacent to Sandrock Park	Yes															Whilst this site does perform well against some of the criteria, it is otherwise constrained in a number of ways. Notable constraints include the sites greenfield nature, its location 1km from a playground, 1.5km from a District or Local Centre and within a Conservation Area or

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance from Playground	Distance from Open Space	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
																	Historic Park and Garden. Development of this site could also result in the loss of over 20% of an area of open space.
N05	Land to the North West of Winchelsea Lane	No															This site has some positive aspects, including its location within the 20% most deprived areas nationwide. It is also constrained in several ways, including its use of greenfield land.
N06	Hastings Garden Centre, Bexhill Road	No															This brownfield site has a number of positive features, including an amenity footpath within 25 metres. It is however constrained in a number of ways, notably is location over 1km from a playground, over 1.5km from a District or Local Centre, and in an area which intersects with Flood Zone 3.
N07	Land at Barley Avenue	No															This site features a number of positive aspects, including being within 25 metres of a cycle route. However, it also has a number of constraints, including its greenfield nature, and its location over 1km from an amenity footpath and on or adjacent to a Local Wildlife Site.
N08	Wychnour, Battle Road	No															This site has some positive aspects, including its location adjacent to an area of open space. The site does have some constraints, notably its location over 1.5km from a District or Local Centre and over 1km from a Cycle Route.

Table 4: Employment site allocations options: appraisal findings

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
E01	Land in Whitworth Road	Yes													Whilst this site has some positive features, it is constrained in a number of ways. Notable constraints include the sites greenfield nature, and its location over 1km from a cycle route and an amenity footpath, on or adjacent to a Local Wildlife Site and intersecting with Flood Zone 3.
E02	Queensway North, Queensway	Yes													This site performs well against a number of the criteria, but also features a range of constraints. The sites notable constraints include its greenfield nature, its location on or adjacent to a Local Wildlife Site and a SSSI, and in an area of 'deep' surface water flood risk.
E03	Marline Fields, Enviro21 Business Park, Land West of Queensway	Yes													Whilst this site has some positive features, this site also suffers from several constraints. Notable constraints include the sites greenfield nature and its location on or adjacent to a Local Wildlife Site and a SSSI.
E04	Plot M Gresley Road	No													This site has a range of positive aspects, including its location within the 20% most deprived areas nationwide and its use of brownfield land. Constraints include the sites distance form a cycle route, amenity footpath, and District or Local Centre.
E05	Site RX2, Sydney Little Road, Churchfields	Yes													Whilst this site performs well against several of the criteria, including its location within the 20% most deprived areas nationwide, it does suffer from some constraints. Notable constraints include the sites greenfield nature and its location over 1.5km from a District or Local Centre.

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
E06	Sites PX and QX Churchfields	Yes													This site has a range of positive aspects, including its location within the 20% most deprived areas nationwide. It does however feature some constraints, notably its greenfield nature and its location over 1.5km from a District or Local Centre.
E07	NX3 Sydney Little Road, Churchfields	Yes													This site performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide. However, the site does have some constraints, notably its greenfield nature and its location over 1.5km from a District or Local Centre.
E08	NX2 Sydney Little Road, Churchfields	Yes													This site has a number of positive features, including its location within the 20% most deprived areas nationwide. It does however feature some constraints, notably its greenfield nature and its location over 1.5km from a District or Local Centre.
E09	Land at the rear of Drury Lane, Ponswood	No													This site performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide. Notable constraints include the sites greenfield nature and its location on or adjacent to a Local Wildlife Site.
E10	Ivyhouse Lane, Norther Extension	Yes													Whilst this site performs well against a range of criteria, including its location within the 20% most deprived areas nationwide, it also suffers from several constraints. Notable constraints include the sites greenfield nature and its location in a landscape character area with no capacity to accept business development.
E11	Land East of Burgess Road, Ivyhouse	Yes													This site performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide. It does feature a

Site	Location	Preferred (i.e. allocated)?	Distance to District or Local Centre	Development in deprived areas	Distance to Cycle Route	Distance to Amenity Footpath	Proximity to Scheduled Ancient Monument or Archaeological Notification Area	Proximity to Conservation Area or Registered Park and Garden	Proximity to a Site of Special Scientific Interest	Proximity to a Local Wildlife Site	Landscape setting	Use of previously developed land	Flood risk (fluvial and tidal)	Flood risk (surface water)	Commentary
		Yes													number of constraints, notably the sites greenfield nature and its location in a landscape character area with no capacity to accept business development.
E12	Priory Quarter														This brownfield site performs well against a number of the criteria, including its location within the 20% most deprived areas nationwide, within or adjacent to a District or Local Centre and within 25 metres of a cycle route. However, the site also has some constraints, notably its location within a Conservation Area or Historic park and Garden and in an area of 'deep' surface water flood risk.
NE01	Land at junction of The Ridge West and Queensway	Yes													Whilst this site has some positive features, this site has a number of constraints. Notable constraints include the sites greenfield nature, and its location over 1km from a cycle route and on or adjacent to a Local Wildlife Site.

APPENDIX IV: TAKING ON-BOARD THE FINDINGS OF SITES OPTIONS APPRAISAL

Introduction

As described within Part 2 of the main SA Report document, and in Appendix III above, an interim stage of plan-making / SA involved appraising a list of 126 housing site options and 13 employment site options. This Appendix describes in detail how the Council has chosen to reflect SA findings (or not, as the case may be) in the preferred approach as set out in the Proposed Submission document.

Table 1 considers housing site options, whilst Table 2 considers employment site options. The cells within the right hand column of each table are shaded according to whether the Council's preferred approach has been modified to reflect the constraints and other issues flagged by the interim SA (**green**) or not (**red** or **amber**).

Table 1: Housing site options

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
A01	Upper Ore Valley	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from playground Not within the most deprived SOAs Partially Greenfield/partially previously developed 	Yes (split into CV01, CV03 & CV04)	<p>Not directly comparable as the site appraised as part of the interim SA has now been allocated as three separate sites.</p> <p>The decision to split the site reflects the local opposition to the development of the site as presented during the earlier consultation.</p> <p>One of the sites already has planning permission for 51 units, with the remaining 2 sites being allocated for a total of just 16 houses. Both of these additional allocations will take into account boundary landscaping as identified on the design brief to accompany the allocation.</p>
A02	Mount Pleasant Hospital, Frederick Road (Former Ore Valley Millennium Communities)	<ul style="list-style-type: none"> Distance to amenity footpath 		Yes (HOV3)	<p>This is a brownfield site identified as being free of any significant constraints.</p> <p>Distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>
A04	Mayfield E, Bodiam Drive	<ul style="list-style-type: none"> Distance to district/local centre Proximity to SSSI 	<ul style="list-style-type: none"> Distance from playground Not within the most 	Yes (GH2)	<p>It has not been considered necessary to amend the allocation as a result of the SA findings.</p> <p>Its proximity to the SSSI is not significant due to the main</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Use of PDL – Greenfield site 	deprived SOAs		<p>road – Queensway separating the site.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first, however, is a priority.</p> <p>The site is served by shops close by that were built as part of the wider estate.</p>
A05	Malmesbury House, West Hill Road	<ul style="list-style-type: none"> Within conservation area or registered park or garden Within or adjacent to Local Wildlife Site 	<ul style="list-style-type: none"> Distance from playground Distance from cycle route Within or adjacent to ANA 	Yes (FB8)	<p>The allocation details now take full account of the heritage and ecology issues associated with the site.</p> <p>This is proposed as a flatted development, based on an earlier permission. As such, the provision of a play area is not necessary for this site.</p> <p>The Architectural Notification Area only covers a small area in the corner of the site, and as such does not need to be mitigated against.</p>
A11	Land at Redgeland Rise (Wishing Tree Nursery)	<ul style="list-style-type: none"> Distance to district/local centre 	<ul style="list-style-type: none"> Distance from playground Distance from amenity footpath 	Yes (GH5)	<p>The site already has planning permission for development, subject to a legal agreement</p>
A14	Hastings Station Yard (Part)	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from open space Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (HTC1)	<p>The site already has planning permission for development.</p>
A15	The Observer Building (part)	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance from playground Within or adjacent an ANA 	Yes (HTC3)	<p>The allocation details now take full account the building's location within a conservation area and the ANA which covers the site.</p> <p>Play facilities are not considered appropriate for this site.</p> <p>The distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>
A16	Seaside Road, West St Leonards	<ul style="list-style-type: none"> Distance from open space Distance to amenity 	<ul style="list-style-type: none"> Within or adjacent an ANA Within an area of shallow 	Yes (FB3)	<p>Awaiting outcome of sequential test study (Flood Risk Zone 3 covers the north west corner of the site).</p> <p>Whilst the SA of this site flags up the distance from open</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> footpath Within flood risk zone 3 	<ul style="list-style-type: none"> surface water flood risk, or within Flood Hotspot 		<p>space, the beach is close by, so is not considered a significant issue.</p> <p>Both the ANA and the Surface Water flood risk area data only clip outer edge of site boundary, so do not require amendments to the allocation details.</p> <p>Distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>
A18	Ore Valley	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath Within or adjacent to Local Wildlife Site Within area of deep surface water flood risk 		Yes (HOV2)	<p>Although it is not directly affected by the Local Wildlife Site that adjoins the site, any development would need to take account of potential impact on ecology issues, which is now referenced in the allocation details.</p> <p>Deep surface water flood risk also affects the south west corner of the site, again, considered in the allocation details.</p> <p>The site is served by services in the wider Ore Valley area, which has been newly developed.</p>
A19	12-19 Braybrooke Terrace	<ul style="list-style-type: none"> Distance to amenity footpath Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Distance to district or local centre Not within the most deprived SOAs Distance from playground Distance from cycle route Adjacent to conservation area or registered park or garden 	Yes (SAP3)	<p>No change necessary.</p> <p>Deep surface water flood risk only affects a minor part of the southern boundary, and not within the site.</p> <p>It is not considered necessary to make provision for additional services and shops in this location just outside of the town centre, and the site is not large enough to warrant play areas.</p> <p>Heritage policies will not be directly relevant given site location outside of conservation area, not within.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network</p>
A20	Taxi Office/B.R. Social Club, St John's Road	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (CLB2)	<p>Allocation details now reflect the site's location within a Conservation Area, as well as potential for flood risk mitigation measures in response to the site being within a flood hotspot.</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Within conservation area or registered park or garden 			Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network
A21	Hurst Court, The Ridge	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA 	Yes (SH3)	<p>Informal play and recreation is now required as part of the development and set out in the site design brief. Allocation details also amended to take account of the ANA that covers the site.</p> <p>The proposed allocation is for 30 dwellings so it is not considered justified to require shops or services as part of the development. The site is however on a main bus route and is served by a nearby Garage with supermarket attached.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>
A22	Mayfield Farm	<ul style="list-style-type: none"> Distance to district/local centre Proximity to SSSI Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground 	Yes (GH6)	<p>Impact on SSSI now taken into account in the allocation details.</p> <p>Site size means access to district/local centres and playgrounds not relevant here.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
A23	Former Stills Factory Ore Valley	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from playground Proximity to Local Wildlife Site 	Yes (HOV1)	<p>No amendments needed.</p> <p>The site is served by shops in the wider Ore Valley area, which has been newly developed, and there are play facilities in the neighbouring development.</p> <p>Although development is unlikely to affect by the Local Wildlife Site that adjoins the site, any development would need to take account of potential impacts, in-line with other policies in the Plan.</p> <p>Distance to amenity footpath will be considered as part of</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
					the wider green infrastructure network.
A24	Land west of Frederick Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from open space 	Yes (CVO2)	The site already has planning permission for development.
A26	Mayfield J, Mayfield Lane	<ul style="list-style-type: none"> Distance to district/local centre Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Distance from open space Proximity to SSSI 	Yes (GH4)	The site already has planning permission for development, subject to a legal agreement
A27	Robsack A, Churchwood Drive	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within flood risk zone 3 Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA 	Yes (GH1)	<p>The Local Wildlife site abuts the site boundary only, although allocations details do take full account of the ecology issues that may arise.</p> <p>The flood zone and area of surface water flood risk clip the southern part of the site, but would not deter development outside of that area. Potential risk is however, mentioned in the allocation details to take the precautionary approach.</p> <p>The ANA covers a minute part of the site directly on the edge, so does not represent a significant constraint.</p> <p>Distance to cycle routes will be considered as part of the wider green infrastructure network.</p>
A28	Land at Osborne House, The Ridge	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA 	Yes (SH2)	The site already has planning permission for development, subject to legal agreement.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
A29	West St. Leonards Primary School	<ul style="list-style-type: none"> Distance to amenity footpath Within or adjacent to Local Wildlife Site Within flood risk zone 3 	<ul style="list-style-type: none"> Distance to district or local centre Distance from playground Distance from cycle route Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (FB2)	<p>Will need to reference sequential test outcome – southern a part of site is covered by flood zone 3.</p> <p>Text amended to reference need to address surface water flood risk, although this only affects a small area by the community centre just north of Bexhill Road.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p> <p>The site is adjacent to local wildlife site, and the allocation details include reference to the ecology issues that will need to be addressed.</p> <p>Green space will also now be required as part of the design brief for informal recreation to address the play requirements.</p>
A30	Rear of Old London Road	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Distance from cycle route 	Yes (CV03)	<p>Site size means access to playgrounds not relevant here.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>
A31	Holmhurst St Mary	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Proximity to SSSI 	Yes (LRA1)	<p>Walking and cycling connectivity and opportunities for enhancing the green infrastructure network specifically identified in allocations details.</p> <p>Local Wildlife Site covers a section to the east of the site and as such, ecology issues are now mentioned in allocations details as are surface water flood risk although this only affects the south eastern corner of the site by the pond, which is outside the site boundary.</p> <p>It is not considered necessary to require additional shops as part of this development as it is served by nearby shops at Harrow Lane, Little Ridge Avenue, and the Sainsbury's supermarket a bit further away.</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
A32	Gambier House, West Hill Road	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath Within conservation area or registered park or garden Within or adjacent to Local Wildlife Site 	<ul style="list-style-type: none"> Distance to district or local centre Distance from cycle route 	Yes (MBL3)	<p>Heritage policies are now considered within allocation details.</p> <p>The proposed site is adjacent to a Local Wildlife Site, not within. For this reason no specific reference to ecology policies is mentioned, although will be considered as part of the planning application process in accordance with other policies in the Plan.</p> <p>The site capacity is also too small to require play facilities to be provided on site.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>
A33	Hollingsworth Garage, Braybrooke Road	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs Distance from playground 	Yes (SAP2)	No amendments required. This site lies just outside the town centre so is adequately served by shops and other services. Alexandra Park is also within walking distance so no play facilities are considered to be required onsite.
A34	12 Stanley Road	<ul style="list-style-type: none"> Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A35	17 Bulverhythe Road	<ul style="list-style-type: none"> Distance to amenity footpath Within flood risk zone 3 	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A36	BT Centre, Sedlescombe Road North	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

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		<ul style="list-style-type: none"> footpath Within area of deep surface water flood risk 			
A37	Blacklands Garage, Fearon Road	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A38	20-22 Albany Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route 	<ul style="list-style-type: none"> Distance to amenity footpath Adjacent to conservation area or registered park or garden 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A39	Land rear of 35-39 St Helens Park Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A40	Land East of Hillside Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

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		<ul style="list-style-type: none"> Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 			
A41	Land West of Hillside Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to amenity footpath Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from cycle route 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A42	Ore Place	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route On or adjacent to a SAM Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to amenity footpath Proximity to Local Wildlife Site 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A43	Cornwallis Street Car Park	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from open space Within flood risk zone 2 Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (HTC2)	Allocation details amended to include the requirement to address potential flood risk issues in new development. Flood risk zone 2 affects only a small proportion of the site, but will not preclude residential development. Site capacity is too small to require additional open space or play facilities. Distance to amenity footpath will be considered as part of the wider green infrastructure network.
A44	Silverhill Bus Depot	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> 			SHLAA.
A45	York Road Business Park	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from cycle route Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A46	Land at Middle Street	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Within or adjacent an ANA Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
A47	Rear of Linley Drive	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (SH5)	The site already has planning permission for development, subject to a legal agreement.
B01	Bulverhythe Development Area	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Within flood risk zone 3 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA Proximity to Local Wildlife Site Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B02	Former Hastings College Archery	<ul style="list-style-type: none"> Distance from playground Distance to amenity 	<ul style="list-style-type: none"> Distance to cycle route 	Yes (MBL1)	Allocation details now set requirements for accordance with heritage policies.

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	Road	<ul style="list-style-type: none"> footpath Within conservation area or registered park or garden 			<p>Site in close proximity to St Leonards Gardens, which provides opportunities for informal play and recreation. Cycle routes will be considered as part of the wider green infrastructure network.</p>
B03	Former Westerleigh School Playing fields	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space 	Yes (FB9)	<p>The site already has planning permission for development, subject to a legal agreement.</p>
B04	Former Westerleigh School	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (FB4)	<p>Allocation details amended to require SUDs to address shallow surface flood water risk in the site, and green space for informal play as part of the design brief. Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network. Shopping facilities are already provided in the nearby Fernside Avenue parade.</p>
B06	Crystal Square	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance from playground Distance to cycle route Within or adjacent an ANA Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	<p>This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.</p>
B08	The Cheviots/Cotswold Close	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath 		Yes (HOV4)	<p>The site already has planning permission for development.</p>

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B09	87-221 (Odds) Farley Bank	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre 	Yes (HOV5)	The site already has planning permission for development.
B11	Summerfields Business Centre	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Within or adjacent to Local Wildlife Site Distance to amenity footpath 		No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B12	1-3 Chapel Park Road	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Adjacent to conservation area or registered park or garden 	Yes (CLB1)	Allocation details amended to refer to heritage policies. Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.
B13	Cinque Ports Way former Stamco Timber Yard and TA Centre	<ul style="list-style-type: none"> Distance to amenity footpath Within or adjacent to Local Wildlife Site Within flood risk zone 3 Within area of deep surface water flood risk 		Yes (FB6)	Flood zone level 3 covers the northern half of the site, the outcome of the sequential test report is awaited. The Local Wildlife site covers only a small portion of the site on the western border, although a potential landscape buffer is provided for in the design brief to cover this area. The distance to amenity footpath will be considered as part of the wider green infrastructure network. Deep surface water flood risk only affects land just on the northern border of the site, and will be considered as part of the wider flood risk issues.
B14	Former HCAT St Saviours Road	<ul style="list-style-type: none"> Distance to cycle route Within or adjacent to Local Wildlife Site 	<ul style="list-style-type: none"> Distance from playground 	Yes (FB5)	The site already has planning permission for development.
B15	Spyways School, Gillsmans Hill	<ul style="list-style-type: none"> Distance to district/local centre 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	Yes (GH3)	The site already has planning permission for development, subject to a legal agreement.

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		<ul style="list-style-type: none"> Distance from playground Distance to cycle route Distance to amenity footpath Within or adjacent to Local Wildlife Site 			
B16	Land at Breadsell Lane	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Proximity to SSSI Within or adjacent to Local Wildlife Site Within a landscape character area on Hastings fringes Use of PDL – Greenfield site Within flood risk zone 3 Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.. Full details of the consideration of this site are set out in our background paper “Explanation of Housing Evidence” (August 2012)
B20	Summerfields Sports Centre, Bohemia Road	<ul style="list-style-type: none"> Distance to cycle route Distance from open space Distance to amenity footpath Within or adjacent to Local Wildlife Site 	<ul style="list-style-type: none"> Distance to district/local centre Within or adjacent an ANA 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B21	Glenmore, Old	<ul style="list-style-type: none"> Distance to district/local 	<ul style="list-style-type: none"> Not within the most 	No	This site is no longer being proposed for development as

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
	Road Road	<ul style="list-style-type: none"> centre Distance to cycle route 	<ul style="list-style-type: none"> deprived SOAs Within an area of shallow surface water flood risk, or within Flood Hotspot 		a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B22	Land Between 177-185 (odds) London Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Use of PDL – Greenfield site Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Distance from playground 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B23	45-53 (odd) Hollington Old Lane	<ul style="list-style-type: none"> Distance to cycle route 	<ul style="list-style-type: none"> Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B24	West Hill Road Reservoir	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance to cycle route 	Yes (MBL4)	The site already has planning permission for development.
B25	Allotments, Beaufort Road	<ul style="list-style-type: none"> Distance to amenity footpath Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

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			<ul style="list-style-type: none"> Within or adjacent an ANA Adjacent to conservation area or registered park or garden 		
B26	Land adjacent to Vale Road Allotments	<ul style="list-style-type: none"> Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs Within or adjacent an ANA Adjacent to conservation area or registered park or garden 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B27	Land at Filsham Road	<ul style="list-style-type: none"> Distance to cycle route Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to amenity footpath Proximity to Local Wildlife Site 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B28	Land at Springfield Valley	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space Adjacent to conservation area or registered park or garden 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
B29	Land at Queens Road	<ul style="list-style-type: none"> Within flood risk zone 3 	<ul style="list-style-type: none"> Distance from playground Distance to cycle route Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B30	Jackson Hall, Portland Place	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from playground Distance to cycle route 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B31	College of Holy Child Jesus, Magdalen Rd	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Within or adjacent an ANA 	Yes (CLB6)	In part. This site has its own policy which relates to “enabling development”. Heritage issues are however considered as a priority in any development of the site. Surface water flood risk affects only a very small part of the site on the southern boundary, and is not so significant to warrant changes to the policy text. Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.
B32	The Malvern and adjacent shops, Malvern Way	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath 		No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B33	Pilot Field, Elphinstone Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Within or adjacent to Local Wildlife Site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground PDL - mixed 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Within area of deep surface water flood risk 			
B34	Hastings Cottage	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B35	Lower Cornwallis Allotments, Lower Park Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from open space Distance to amenity footpath Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Adjacent to conservation area or registered park or garden 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B36	Land west of Grove College	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Proximity to SSSI Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space Within a landscape character area on Hastings fringes 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B38	Land west of Winchelsea Lane	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground 		No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Distance to cycle route Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 			SHLAA.
B39	Land at Spindlewood Caravan Park, Rock Lane	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath Within a landscape character area on Hastings fringes Use of PDL – Greenfield site Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Distance to cycle route 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B41	Tilekiln Farm, Fairlight Avenue	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath Use of PDL – Greenfield site Within flood risk zone 3 Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Distance from open space Within or adjacent an ANA Proximity to SSSI Proximity to Local Wildlife Site 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B43	Sandhurst Playing Fields, the Ridge	<ul style="list-style-type: none"> Distance to district/local centre 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Distance from playground Distance from open space Distance to cycle route Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to amenity footpath Within or adjacent an ANA Within a landscape character area on Hastings fringes 		SHLAA.
B45	Land South East of Bembrook Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from open space Distance to cycle route Distance to amenity footpath Within conservation area or registered park or garden Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Within or adjacent an ANA 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B46	Football Pitches, Barley Lane	<ul style="list-style-type: none"> Distance to district/local centre Distance from open space Distance to amenity footpath Proximity to SSSI Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Proximity to Local Wildlife Site 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
B47	Land at Mill Lane	<ul style="list-style-type: none"> Distance to district/local centre Within or adjacent to Local Wildlife Site Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
B49	Upper Broomgrove Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath 	<ul style="list-style-type: none"> Proximity to Local Wildlife Site 	Yes (HOV7)	The site already has planning permission for development.
C02	Mount Denys, Pinehill & Ridgeway	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Distance from open space Within or adjacent an ANA 	Yes (SH4)	Allocation details now require retention of green spaces that could be used additional for informal recreation. In addition, reference to potential archaeological remains is included, in response to the ANA that covers a significant part of the site.
C03	Old Roar House, Old Roar Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Within or adjacent to Local Wildlife Site 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	Yes (LRA4)	Site text amended to make clear the site is adjacent to Alexandra Park, which would need to be considered in any future development proposals. The site is not large enough to require any additional shops to be provided given its location away from a district or local centre. Cycle routes will be considered as part of the wider green infrastructure network.
C04	Hornty Park	<ul style="list-style-type: none"> Distance to district/local centre 	<ul style="list-style-type: none"> Within an area of shallow surface water flood risk, or 	Yes (SAP1)	The site already has planning permission for development, subject to a legal agreement.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Distance from open space Distance from playground Distance to cycle route Distance to amenity footpath 	within Flood Hotspot		
C05	2-20(evens) Fellows Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from playground Use of PDL - mixed 	Yes (HOV8)	The site already has planning permission for development, subject to a legal agreement
C06	Braybrooke House, Holmesdale Gardens	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Within or adjacent an ANA 	No	This site is no longer being proposed for development as planning permission has been granted for an alternative use.
C07	Westwood house, Holmesdale Gardens	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance to cycle route Within or adjacent an ANA 	No	This site is no longer being proposed for development as planning permission has been granted for an alternative use.
C08	Land adj to 777 The Ridge	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Within or adjacent an ANA Proximity to SSSI Within a landscape character area on Hastings fringes 	Yes (LRA3)	<p>Allocation details amended to reference potential archaeological remains, in response to the ANA that covers most of the site. Landscape and ecology issues are also referenced here.</p> <p>Whilst the site is not of a significant enough size to warrant the provision of shops or playgrounds, it will provide some open space to be used for informal play.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
					network.
C09	Land at William Parker Sports College	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Proximity to Local Wildlife Site 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C10	Nursery Building adjacent to Ashdown House	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C11	Land at Thorpe's Wood	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA Adjacent to conservation area or registered park or garden 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C12	Land at Church Wood Drive	<ul style="list-style-type: none"> Distance to district/local centre Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within flood risk zone 3 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to cycle route Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> 			
C13	Land at Whatlington Way	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Distance to cycle route Proximity to SSSI 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C14	Land at Winchelsea Lane and Rye Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space Distance to amenity footpath Use of PDL - mixed 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C15	Land East of Holmhurst St Mary	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within flood risk zone 3 Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to amenity footpath 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C16	Linton Gardens, Braybrooke Terrace	<ul style="list-style-type: none"> Distance to amenity footpath Distance from open space Within conservation area or 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> registered park or garden Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance from playground Distance to cycle route Within an area of shallow surface water flood risk, or within Flood Hotspot 		
C17	Unit E, Roebuck Centre, Roebuck Street	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance from playground Within or adjacent an ANA Proximity to SSSI Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C19	Land Rear of 16-56 (Evens) Ironlatch Avenue and Gillsmans Drive	<ul style="list-style-type: none"> Distance to district/local centre Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within flood risk zone 3 Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Distance from playground Distance to cycle route Within or adjacent an ANA 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C20	Land at Jenners Lane, Rye Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Within a landscape character area on Hastings fringes 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Use of PDL – Greenfield site 			
C23	Lidham Barn, Rye Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space Distance to amenity footpath 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C24	Land at Barley Lane	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath On or adjacent to a SAM Within conservation area or registered park or garden Proximity to SSSI Within or adjacent to Local Wildlife Site Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
C25	My Way Lodge, The Ridge West	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		<ul style="list-style-type: none"> Distance to amenity footpath Use of PDL – Greenfield site 			
C26	5-15 (odds) Fellows Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from playground 	Yes (HOV12)	The site already has planning permission for development, subject to a legal agreement
D08	Sorting Office Site, Kings Road	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (CLB4)	The site already has planning permission for development.
D14	4-5 Stockleigh Road	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance from playground Distance from open space Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (CLB5)	The site already has planning permission for development.
D18	49-52 Caves Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to amenity footpath Within conservation area or registered park or garden Within or adjacent to Local 		Yes (MBL6)	Allocation details amended to include reference to heritage and ecology requirements. Access to services and playground provision not relevant due to site size. Distance to amenity footpath will be considered as part of the wider green infrastructure network.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		Wildlife Site			
D20	The Langham Hotel, 16 Elphinstone Road	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance from playground Distance to cycle route 	Yes (SAP6)	The site already has planning permission for development.
D21	27 Dane Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Use of PDL - mixed 	Yes (MBL5)	The site already has planning permission for development.
D26	Hare & Hounds, 391 Old London Road	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to cycle route 	Yes (CVO6)	No changes necessary. Playground provision in not necessary due to site size. Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.
D28	107 The Ridge (Simes & Sons)	<ul style="list-style-type: none"> Distance to district/local centre Distance from open space Distance to amenity footpath 	<ul style="list-style-type: none"> Distance from playground Within or adjacent an ANA 	Yes (HOV9)	The site already has planning permission for development.
D30	Silver Springs Medical Practice Beaufort Road	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground 	Yes (SAP5)	The site already has planning permission for development.
D32	347-349 London Road	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	Yes (SAP4)	This site is subject to a lapsed planning permission in a residential area. It does not provide for enough dwellings to warrant its own

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
			<ul style="list-style-type: none"> Distance from playground 		separate play facilities in addition to the garden space available.
D34	190 Bexhill Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to amenity footpath Within flood risk zone 3 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to cycle route 	Yes (FB10)	The site already has planning permission for development, subject to a legal agreement
D35	309-311 Harold Road	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre Not within the most deprived SOAs Distance from playground Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (CV05)	The site already has planning permission for development, subject to a legal agreement
D40	191 The Ridge	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space Within or adjacent an ANA Use of PDL - mixed 	Yes (SH7)	The site already has planning permission for development, subject to a legal agreement
D41	195 The Ridge	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Distance to amenity 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space Within or adjacent an ANA 	Yes (SH6)	The site already has planning permission for development.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
		footpath			
D43	St Ethelburga's Church Hall	<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground 	Yes (FB12)	The site already has planning permission for development.
D49	Former Workplace Health & Fitness Centre, The Ridge West	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance from open space Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA 	Yes (LRA5)	The site already has planning permission for development.
D50	40 & 41 Wellington Square	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Within or adjacent an ANA 	Yes (HTC4)	The site already has planning permission for development.
D51	36-40 Caves Road	<ul style="list-style-type: none"> Distance from playground Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance to district/local centre Proximity to Local Wildlife Site 	Yes (MBL7)	The site already has planning permission for development.
D52	36 & 37 Wellington Square	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden 	<ul style="list-style-type: none"> Distance from playground Within or adjacent an ANA 	Yes (HTC5)	The site already has planning permission for development.
D53	37 Charles Road West, Filsham	<ul style="list-style-type: none"> Distance to district/local 	<ul style="list-style-type: none"> Not within the most 	Yes	The site already has planning permission for development, subject to a legal agreement

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
	Nurseries	<ul style="list-style-type: none"> centre Distance from playground Distance to cycle route 	<ul style="list-style-type: none"> deprived SOAs Distance from open space 	(MBL2)	<p>The site already has planning permission for development, subject to a legal agreement</p> <p>The site already has planning permission for development, subject to a legal agreement</p> <p>Walking and cycling connectivity and opportunities for enhancing the green infrastructure network specifically identified in allocations details. Green space is also identified which can be used for informal recreation and play. It is not considered necessary to require additional shops as part of this development as it is served by nearby shops at Harrow Lane, Little Ridge Avenue, and the Sainsbury's supermarket a bit further away. In developing the Local Plan it has been necessary to allocate both brownfield and greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
D56	Land south of 12-17 Catsfield Close	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Use of PDL – Greenfield site Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Proximity to SSSI 	Yes (GH7)	
D57	Ore Business Park, Farley Bank	<ul style="list-style-type: none"> Distance to amenity footpath 	<ul style="list-style-type: none"> Distance to district/local centre Proximity to Local Wildlife Site 	Yes (HOV6)	
N01	Harrow Lane Playing Fields	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground 	Yes (LRA2)	

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
N02	Land South of Crowhurst Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Proximity to SSSI Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from open space 	Yes (FB11)	<p>Allocation details amended to require consideration of ecology issues, particularly in terms of its proximity to the SSSI and the nearby Local Wildlife Site.</p> <p>The levels of development will not be enough to warrant any formal open space to be laid out; the site is large enough to retain enough recreational space.</p> <p>Whilst it is acknowledged that this is a greenfield site, the process for identifying a permanent gypsy and traveller site has shown that this is the most suitable.</p>
N03	The Grove School	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Within or adjacent to Local Wildlife Site Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance from playground Proximity to SSSI 	Yes (FB1)	<p>Allocation details amended to require provision of SUDs to address deep surface water flood risk towards the south west corner of the site, play provision and the provision of small convenience shops given its location away from a district/local centre. The Local Wildlife Site sits outside the site boundary, although reference is made to greenspace policy HN9, and boundary landscaping identified in the design brief. Cycle routes will be considered as part of the wider green infrastructure network.</p>
N04	Land adjacent to Sandrock Park	<ul style="list-style-type: none"> Distance to district/local centre Distance from open space Distance from playground Distance to cycle route Within conservation area or registered park or garden Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA Proximity to Local Wildlife Site 	Yes (SH1)	<p>Informal play and recreation is now required as part of the development.</p> <p>Allocation details also amended to take account of the ANA that covers the site.</p> <p>The site is served by a nearby Garage with supermarket attached, and as such it is not considered necessary to provide additional shopping facilities on site.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF. Cycle routes will be considered as part of the wider green infrastructure network.</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
N05	Land to the North West of Winchelsea Lane	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Distance to cycle route Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to amenity footpath 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
N06	Hastings Garden Centre, Bexhill Road	<ul style="list-style-type: none"> Distance to district/local centre Distance from playground Within flood risk zone 3 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to cycle route Within or adjacent an ANA Proximity to Local Wildlife Site Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.
N07	Land at Barley Avenue	<ul style="list-style-type: none"> Distance to district/local centre Distance to amenity footpath Proximity to SSSI Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	Have constraints and other issues flagged by SA been reflected in the Plan? How?
N08	Wychnour, Battle Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Proximity to SSSI Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	<p>This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites in the SHLAA.</p>

Table 2: Employment Site Allocation Options

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	How has SA influenced this decision? What has changed in the Plan?
E01	Land in Whitworth Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within flood risk zone 3 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA Within an area of shallow surface water flood risk, or within Flood Hotspot 	YES (LRA8)	<p>It is acknowledged that part of the site is within flood zones 2 and 3. However, the outcome of ‘Sequential Test’ work is necessary before an appropriate course of action can be determined. At this stage, the only measure taken is to make reference to flood risk issues associated with the site.</p> <p>It is also acknowledged that this is a greenfield site and so not ideal in terms of some sustainability objectives; however, the Council’s evidence base shows that some greenfield sites are required in order to meet the need for employment floorspace in Hastings.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p> <p>Allocation details amended to refer to ecology and surface water flood risk issues associated with the site, as well as the potential for archaeological remains that need to be considered with new build.</p>
E02	Queensway North, Queensway	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Proximity to SSSI Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Not within the most deprived SOAs 	Yes (LRA6)	<p>Allocation details amended to refer to ecology and surface water flood risk issues associated with the site (although surface water flood risk covers only a very small area). Cycle routes will be considered as part of the wider green infrastructure network.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
E03	Marline Fields, Enviro21 Business Park, Land West of Queensway	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Proximity to SSSI 	<ul style="list-style-type: none"> Not within the most deprived SOAs Distance to amenity footpath 	Yes (LRA9)	<p>Allocations details amended to include reference to ecology policies in respect of the sites proximity to the SSSI and Local Wildlife Site.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	How has SA influenced this decision? What has changed in the Plan?
		<ul style="list-style-type: none"> Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 			In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.
E04	Plot M Gresley Road	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath 	<ul style="list-style-type: none"> Within an area of shallow surface water flood risk, or within Flood Hotspot 	No	This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites for employment purposes.
E05	Site RX2, Sydney Little Road, Churchfields	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Proximity to SSSI Use of PDL – Greenfield site 		Yes (GH10)	<p>No amendments required.</p> <p>Impacts to the SSSI are unlikely and so this issue does not warrant additional details within the allocation text.</p> <p>Cycle routes will be considered as part of the wider green infrastructure network.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
E06	Sites PX and QX Churchfields	<ul style="list-style-type: none"> Distance to district/local centre Proximity to SSSI Use of PDL – Greenfield site 		Yes (GH8)	<p>Allocation details amended to include reference to ecology issues and tree protection in respect of ancient woodland adjacent to the site. Specific reference to the SSSI not required due to the distance away from the site.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
E07	NX3 Sydney Little Road, Churchfields	<ul style="list-style-type: none"> Distance to district/local centre Proximity to SSSI Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to amenity footpath 	Yes (GH11)	<p>No amendments necessary.</p> <p>Impacts to the SSSI are unlikely and so this issue does not warrant additional details within the allocation text.</p> <p>The distance to amenity footpath will be considered as part of the wider green infrastructure network.</p> <p>In developing the Local Plan it has been necessary to allocate</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	How has SA influenced this decision? What has changed in the Plan?
					both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.
E08	NX2 Sydney Little Road, Churchfields	<ul style="list-style-type: none"> Distance to district/local centre Proximity to SSSI Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Distance to amenity footpath 	Yes (GH9)	<p>Allocation details amended to include reference to ecology issues and tree protection in respect of ancient woodland adjacent to the site. Specific reference to the SSSI not required due to the distance away from the site.</p> <p>The distance to amenity footpath will be considered as part of the wider green infrastructure network.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
E09	Land at the rear of Drury Lane, Ponswood	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Within or adjacent an ANA 	No	<p>This site is no longer being proposed for development as a result of both the Sustainability Appraisal process, and the assessment of deliverable and developable sites for employment purposes.</p>
E10	Ivyhouse Lane, Northern Extension	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Proximity to Local Wildlife Site Within an area of shallow surface water flood risk, or within Flood Hotspot 	Yes (HOV11)	<p>Allocation details amended to take full account of landscape and ecology issues, and need to provide SUDs to address shallow surface water flood risk.</p> <p>Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network.</p> <p>In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.</p>
E11	Land East of Burgess Road, Ivyhouse	<ul style="list-style-type: none"> Distance to district/local centre 		Yes (HOV12)	<p>Allocation details amended to take full account of landscape and ecology issues.</p> <p>Cycle routes and the distance to amenity footpath will be</p>

Site Ref	Site name	Significant constraints highlighted by SA	Potential issues highlighted by SA	Will the site be allocated?	How has SA influenced this decision? What has changed in the Plan?
		<ul style="list-style-type: none"> Distance to cycle route Distance to amenity footpath Within a landscape character area on Hastings fringes Use of PDL – Greenfield site 			considered as part of the wider green infrastructure network. In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.
E12	Priory Quarter	<ul style="list-style-type: none"> Distance to amenity footpath Within conservation area or registered park or garden Within area of deep surface water flood risk 	<ul style="list-style-type: none"> Within or adjacent an ANA 	Yes (HTC6)	Allocation details amended to take account of heritage and surface water flood risk issues. Half of the site is also covered by an ANA, which needs to be considered as part of new development. The distance to amenity footpath will be considered as part of the wider green infrastructure network.
NE01	Land at junction of The Ridge West and Queensway	<ul style="list-style-type: none"> Distance to district/local centre Distance to cycle route Distance to amenity footpath Within or adjacent to Local Wildlife Site Use of PDL – Greenfield site 	<ul style="list-style-type: none"> Not within the most deprived SOAs Within or adjacent an ANA 	Yes (LRA7)	Allocation details amended to take full account of ecology issues. ANA covers part of the site, and as a result, the potential for archaeological remains are noted in the allocation details. Cycle routes and the distance to amenity footpath will be considered as part of the wider green infrastructure network. In developing the Local Plan it has been necessary to allocate both brownfield and Greenfield sites. Bringing forward brownfield sites first however, is a priority, in line with national guidance in the NPPF.