

**URS**

# The Hastings Planning Strategy

Sustainability Appraisal  
(SA) Report

May 2012

UNITED  
KINGDOM &  
IRELAND



REVISION SCHEDULE					
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## **NON-TECHNICAL SUMMARY**

### **Overview**

Sustainability Appraisal (SA) is undertaken in order to consider the impacts of a draft plan approach, and alternatives to that approach, in terms of key sustainability issues. This is with a view to avoiding and mitigating adverse impacts and maximising the positives.

This SA report is published for consultation alongside the 'Proposed Submission' version of the Hastings Planning Strategy, which once adopted will be the key component of the Hastings Local Plan. The Local Plan will set out how Hastings is expected to change over the time period up to 2028.

Subsequent to consultation the Council will take on-board responses received, as well as the SA findings and recommendations set out within this report, before finalising the Planning Strategy for 'Submission' to the Secretary of State.

### **Scope of the appraisal**

This report begins by presenting the 'scope' of the appraisal, i.e. the issues that have been a focus. It does this by answering the following question in turn:

- What is the plan seeking to achieve?
- What's the sustainability 'context'?
- What's the situation now?
- What would the situation be without the plan?
- What are the key issues that should be a focus of the appraisal?

Under the final scoping heading is presented a list of sustainability 'issues' and also 'objectives' that have been used as a methodological 'framework' for structuring the appraisal of the Planning Strategy.

### **How has the plan developed up to this point?**

The aim of this SA Report is to present not only the appraisal of the Council's 'preferred plan approach', as set out within the Proposed Submission Planning Strategy, but also to provide the reader with a better understanding why the preferred approach has been selected given the existence of alternative approaches. By providing stakeholders with this information it is the intention that this SA Report should facilitate an effective consultation on the Proposed Submission Plan. As such, this report describes how a range of alternative approaches to addressing key plan issues have been given formal consideration at various stages of the plan-making process, and the outcomes of this have fed into the Proposed Submission Plan.

### **Current findings and recommendations**

For each of the identified sustainability objectives, the likely significant effects of implementing the plan set out within the Hastings Planning Strategy have been described and evaluated. This evaluation takes into account the sustainability context, baseline and key issues established through scoping. Where the potential for a significant effect has been identified, recommendations have been made for modifying the plan.

The following is a summary of the current findings and recommendations:

#### **Community and well-being**

The SA found that the Planning Strategy will have mixed effects. The situation of Hastings, bordered as it is by nature conservation areas, constrains the amount of land suitable for housing and employment. As such,

while the numbers of houses will increase, they are not likely to meet predicted future demand. Furthermore, the level of affordable housing likely to be brought forward by the Planning Strategy is unlikely to meet the existing need. A number of other significant issues, such as the number of houses in disrepair and the provision of accommodation for the homeless population have also been identified as issues that might not be addressed in full through the plan. However, it is understood that these issues will be addressed through other mechanisms and corporate strategies in addition to planning policy. In terms of positive social effects likely to result from the Planning Strategy:

- Policies relating to housing density and housing mix are suitable and are likely to ensure a greater mix of tenure types, house sizes and population, which in turn will encourage a reduction in social exclusion and will have a other positive 'knock-on' effects;
- Policies relating to transport will have a beneficial *effect* through increasing accessibility to health and other social services.

### The economy

In terms of the economy and particularly levels of employment land in Hastings, the Planning Strategy is likely to have mainly beneficial effects. The significant levels of employment land that are set out in the Strategy, the expansion of retail employment land, the safeguarding of existing employment land and the policy around increasing access to these employment opportunities are all positive, and seek to reverse the trend in unemployment. The mix of skilled and unskilled employment that will be created through the development of employment land should mean that a range of jobs is available – even if some of these, such as tourism-based jobs, are seasonal by nature. This should mean that the gap between the least and the most deprived areas is not widened. The development of employment land will be predominantly in the Western and Central areas. This may result in less accessible employment opportunities being provided for those in the Eastern area. It is **recommended** that the improvement of public transport and cycling/walking infrastructure should be a focus in order to mitigate this risk. Beneficial effects relate to the fact that the development of employment land is supported by investment in improving local education and training.

### The environment

The effects of the Planning Strategy have been found to be mainly positive. In terms of land use, the policies on housing density and on the protection of a network of open spaces are likely to be effective in ensuring development makes efficient use of land. Furthermore, the policy which targets the return of long term unoccupied houses to use will reduce the amount of derelict and underused land. In terms of flood risk, the Strategy was deemed sufficient, although the need to be aware of the potential impacts of climate change on flood risk needs to be better integrated throughout. In terms of protecting and enhancing open space, and existing nature conservation areas on the outskirts of Hastings, the Strategy was deemed appropriate. It was found that the Strategy will have a mixed impact on climate change. While a range of policies are beneficial in mitigating climate change, such as the promotion of high density housing and the promotion of sustainable transport, it is **recommended** that policies aimed at increasing the contribution of renewable energy could be made more ambitious.

### Next steps (including monitoring)

This appraisal has highlighted the potential for a range of significant negative effects and also highlighted a number of uncertain effects. Recommendations have been made to ensure that negative effects are avoided or mitigated as far as possible, through changes made to the plan before Adoption.

At the time of plan adoption, an 'SA Statement' will be published that summarises the 'residual' effects of the plan in terms of the SA framework, i.e. those effects that the Council has not been able to avoid or mitigate. Within the SA Statement measures will be proposed for monitoring these and other significant effects.

Given that, at this stage, it is not possible to be certain of residual effects there is only a need to set out 'a description of the measures envisaged concerning monitoring'. For example, it will be important to monitor affordable housing completions (by size and type) and the % of households within 300m of a multifunctional green space or a play area.

# 1 INTRODUCTION

## 1.1 Background

- 1.1.1 URS is commissioned to undertake the Sustainability Appraisal (SA) in support of the emerging Hastings Planning Strategy. SA is a mechanism for considering the impacts of a draft plan approach, and alternatives to that approach, in terms of key sustainability issues, with a view to avoiding and mitigating adverse impacts and maximising the positives.

## 1.2 Aim of this SA Report

- 1.2.1 It is a legal requirement that SA is undertaken in-line with the procedures prescribed by the EU Strategic Environmental Assessment (SEA) Directive\*. Publication of this SA Report for consultation alongside the 'proposed submission' version of the Planning Strategy meets the following requirement of the SEA Directive:

*"Where an assessment is required by this Directive, [a]... report should be prepared... identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives"*

- 1.2.2 As such, the aim of this SA Report is to 1) present the appraisal of the Council's 'preferred plan approach', as set out within the Proposed Submission Planning Strategy; and 2) provide the reader with a better understanding why the preferred approach has been selected given the existence of alternative approaches. By providing stakeholders with this information it is the intention that this SA Report should facilitate an effective consultation on the Proposed Submission Plan.†

## 1.3 Structure of this SA Report

- 1.3.1 Annex 1 of the Directive prescribes the information that must be contained within this SA Report. Providing this information involves answering a logical sequence of nine 'appraisal questions' - see **Table 1-1**. This SA Report answers each of the appraisal questions in turn.

\* Directive 2001/42/EC

† In-line with the spirit of the SEA Directive (2001), which aims to support 'early and effective' consultation; and the UNECE Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (1998)



Table 1-1: Questions that must be answered (sequentially) within the SA Report

	APPRAISAL QUESTION	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE (THE REPORT MUST INCLUDE...)
What is the scope of the appraisal?	What is the Plan seeking to achieve?	<b>“an outline of the contents, main objectives of the plan</b> and relationship with other relevant plans and programmes” (Annex I(a))
	What’s the sustainability ‘context’?	“an outline of the contents, main objectives of the plan and <b>relationship with other relevant plans and programmes</b> ” (Annex I(a)) <b>“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan</b> and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))
	What’s the situation now?	<b>“the relevant aspects of the current state of the environment</b> and the likely evolution thereof without implementation of the plan” (Annex I(b)) <b>“the environmental characteristics of areas likely to be significantly affected”</b> (Annex I(c))
	What would the situation be without the Plan?	“the relevant aspects of the current state of the environment and <b>the likely evolution thereof without implementation of the plan</b> ” (Annex I(b))
	What are the key issues that should be a particular focus of the appraisal?	<b>“any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance,</b> such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I(d))
	What has the Plan-making process involved up to this point?	<b>“an outline of the reasons for selecting the alternatives dealt with,</b> 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” (Annex I(h)) “the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan <b>and the way those objectives and any environmental considerations have been taken into account during its preparation</b> ” (Annex I(e))
	How has the appraisal at this current stage been undertaken?	<b>“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</b> in compiling the required information” (Annex I(h))
	What are the appraisal findings and recommendations at this current stage?	<b>“the likely significant effects on the environment,</b> 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” (Annex I(f)) <b>“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects</b> on the environment of implementing the plan” (Annex I(g))
	What are the next steps (including monitoring)?	<b>“a description of the measures envisaged concerning monitoring...”</b> (Annex I(i))



## 2 WHAT IS THE PLAN SEEKING TO ACHIEVE?

**“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (SEA Directive, Annex I(a))**

### 2.1 Introduction

- 2.1.1 The Hastings Planning Strategy will be the key component of the Hastings Local Plan, which when complete will be a set of planning documents, maps and written policies to show where, in what form and in what quantities development can take place. The Local Plan will set out how Hastings is expected to change over the time period up to 2028, and will reflect other strategies and policies in the area, including matters such as education, health and economic development priorities.
- 2.1.2 The Planning Strategy will inform other Local Plan documents as they're written over the next few years. The Planning Strategy must provide a long-term plan to deliver regeneration and sustainable growth in the town and. More specifically, it will:
- Set out the vision for Hastings;
  - Set out generally how the Council intends to deliver new housing, jobs and infrastructure; and
  - Set guidelines for the pattern of land use around the town and policies for protecting the most important green spaces and historic townscapes.

### 2.2 Objectives of the Hastings Planning Strategy

- 2.2.1 The scope of the Planning Strategy is reflected in its Strategic Objectives, which are summarised below:
- 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

### 2.3 What's the plan not trying to achieve?

- 2.3.1 It is important to emphasise that the Planning Strategy is not concerned with individual development sites or specific details. The strategic nature of the plan is reflected in this SA (see further discussion under the heading *'How has the appraisal at this current stage been undertaken'*).

### 3 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

"an outline of the contents, main objectives of the plan or programme and **relationship with other relevant plans and programmes**" (SEA Directive, Annex I(a))

**"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme** and the way those objectives and any environmental considerations have been taken into account during its preparation" (SEA Directive, Annex I(e))

#### 3.1 Introduction

3.1.1 At the outset of the sustainability appraisal there was a need to establish more precisely what sustainable development might mean in practice for Hastings and for the Hastings Planning Strategy. This initial step was undertaken in 2005, with the findings consulted upon and subsequently published in the SA Scoping Report. A revised version was published in 2008 and then there was a comprehensive update in 2011. The revised Scoping Report is available at [http://www.hastings.gov.uk/environment\\_planning/planning/local\\_development\\_framework/ldf\\_documents/](http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/ldf_documents/)

3.1.2 An important step of the scoping process was to complete a review of sustainability context messages (e.g. objectives or issues) 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.

#### 3.2 Key messages from the 2011 context review

##### 3.2.1 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)<sup>3</sup> 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.

<sup>3</sup> 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 is its 'presumption in favour of 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 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).
- 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.

## 4 WHAT'S THE SITUATION NOW?

**“the relevant aspects of the current state of the environment** and the likely evolution thereof without implementation of the plan or programme” (SEA Directive, Annex I(b))

**“the environmental characteristics of areas likely to be significantly affected”** (SEA Directive, Annex I(c))

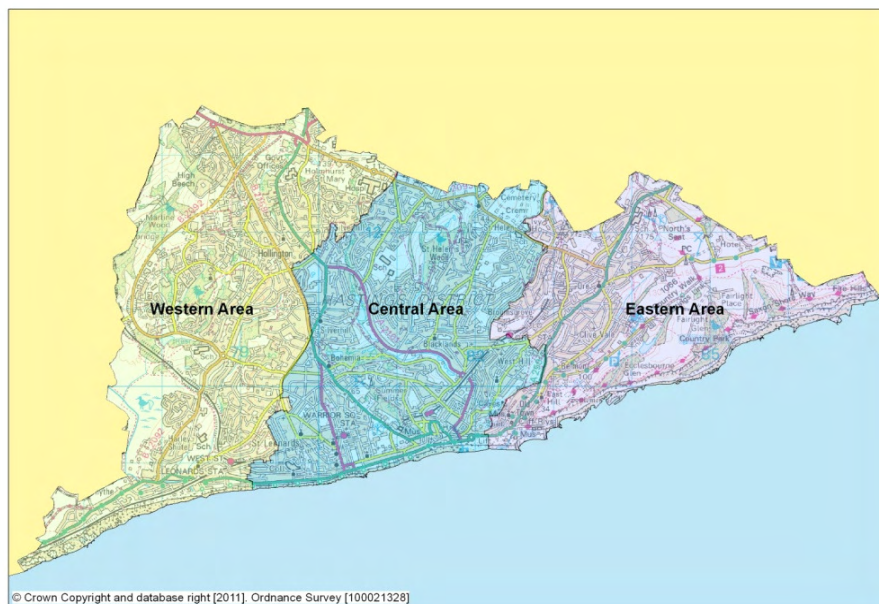
### 4.1 Introduction

- 4.1.1 An understanding of baseline conditions for a range of sustainability issues is important. It 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. The updated SA Scoping Report (2011) sets out a clear picture of baseline conditions in Hastings for a range of sustainability issues. This Chapter presents a summary.

### 4.2 Hastings Borough - a spatial overview

- 4.2.1 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 88,000 people. 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.
- 4.2.2 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 4-1: Western, Central and Eastern Areas**



### Western Area

- 4.2.3 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

- 4.2.4 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

- 4.2.5 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

- 4.2.6 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.

## 4.3 Hastings Borough - a thematic overview

### Population

- 4.3.1 Hastings' population is approximately 88,000<sup>4</sup> 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

- 4.3.2 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.

<sup>4</sup> Proposed Submission Version Planning Strategy

- 4.3.3 No information is available on access to community facilities / voluntary and community section activity. Information on the % of working age people with access to employment by public transport, cycling or walking is from 2001, and so may be out of date. In 2010 63.5% of adults had a home internet connection, compared to 68.5% in East Sussex.

#### Community strength and leadership

- 4.3.4 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

- 4.3.5 Hastings has seen a significant and continued fall in overall crime rates between 2005/06 (142/1000) and 2009/10 (57/1000). 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

- 4.3.6 Hastings is one of the most deprived local authorities in England (19<sup>th</sup> 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. 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. 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.

#### Economy, jobs and prosperity

- 4.3.7 Compared to the South East average, Hastings has a weak economy and wages are accordingly low. Figure from NOMIS for 2010 to 2011 show that Hastings has an economically active rate of 74.9% compared to the South East average of 79.3%. 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 May 2010, 22.6% of the working age population were claiming key benefits; much higher than neighbouring authorities of Eastbourne (15.8%), Lewes (11.8%), Rother (13.7%) and Wealden (8.6%). Furthermore this was an increase of 2.8% over previous 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.
- 4.3.8 Average household incomes (mean) in 2010 were £30,290, around 86% of the national average, and considerably below the East Sussex (£34,569) and South East (£40,239) averages. This also represents a drop in income of £504 from 2009.
- 4.3.9 Around 10% of Hastings' population is employed in manufacturing, which is higher than the County (7.9%) and South East (7.5%) averages, whereas employment in financial, insurance and real estate; and professional, scientific and technical sectors is significantly below the County and South East averages.



### Housing

- 4.3.10 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.
- 4.3.11 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.
- 4.3.12 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.
- 4.3.13 In 2010/11, 32 gross new affordable dwellings were completed in Hastings. This is below the previous year's gross figure of 44 new dwellings, but makes up a higher percentage of total net new dwellings (41.5%) than in 2009/10 (28.4%).

### Education, learning and skills

- 4.3.14 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.

### Transport

- 4.3.15 Hastings has a high proportion of residents that live and work in the district 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.

### Green space

- 4.3.16 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), 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.

### Soil and land

- 4.3.17 In 2009/2010 100% of all new homes were built on previously developed land. In each year since 2004 the Council has consistently exceeded its target of 60% of new homes to be built on previously developed land. Similarly 100% of new employment floorspace (567m2) was built on previously developed land.



### Waste

- 4.3.18 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

- 4.3.19 100% of Hastings' water quality is classed as:

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

### Air and climatic factors

- 4.3.20 Hastings has one air quality management area (AQMA) - Bexhill Road – which is designated for exceeding PM<sub>10</sub>.
- 4.3.21 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 CO<sub>2</sub> compared to 6.1 tonnes for the County and 7.6 for the South East.

### Heritage

- 4.3.22 Hastings has over 900 listed buildings, 18 conservation areas, 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.

### Health and wellbeing

- 4.3.23 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.

### Data gaps

- 4.3.24 A number of limitations and data gaps were identified in the baseline data and are identified in the Scoping Report. For example:
- Percentage of population in 20 minutes travel time (walking) of different sports facilities – Data is 4 years old (Sport England)
  - Employment by type – data pre 2007 not available
  - Renewable energy schemes – some schemes do not require planning permission presenting difficulties in accurate monitoring
  - Traffic flows – no district level data was available

## 5 WHAT WOULD THE SITUATION BE WITHOUT THE PLAN?

“the relevant aspects of the current state of the environment and **the likely evolution thereof without implementation of the plan** or programme” (SEA Directive, Annex I(b))

### 5.1 Introduction

- 5.1.1 Just as its important to undertake appraisal with an understanding of current baseline conditions, its 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. This chapter presents a summary for a for a range of sustainability considerations.

### 2.0 Community and well-being

- 5.1.2 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.
- 5.1.3 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.
- 5.1.4 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

- 5.1.5 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.
- 5.1.6 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 CO<sub>2</sub> emissions and possibly also a decline in air quality. Per capita CO<sub>2</sub> 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.
- 5.1.7 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

- 5.1.8 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.
- 5.1.9 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.
- 5.1.10 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.

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

**“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 [Special Protection Areas under the Birds Directive] and 92/43/EEC” (SEA Directive, Annex I(d))**  
(Note impacts on European sites will be specifically addressed through Habitats Regulations Assessment)

### 6.1 Introduction

6.1.1 Drawing on the review of the sustainability context and baseline, the 2011 SA Scoping Report was able to identify a range of sustainability issues and objectives. The objectives have been drawn-on and used as a methodological ‘framework’ for structuring this appraisal presented within the subsequent chapter *‘What are the appraisal findings and recommendations at this current stage?’*.

### 6.2 Key issues (2011)

6.2.1 A range of social, environmental and economic sustainability ‘issues’ were identified within the 2011 SA Scoping Report. These issues are summarised below:<sup>5</sup>

#### 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

<sup>5</sup> Refer to the 2011 Scoping Report for a more detailed discussion of the key issues.

- Addressing climate change

#### The economy

- Unemployment
- Economic output
- Movement and transport

### 6.3 Sustainability objectives (2011)

6.3.1 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

## 7 HOW HAS THE PLAN DEVELOPED UP TO THIS POINT?

“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” (SEA Directive, Annex I(h))

“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (SEA Directive, Annex I(e))

### 7.1 Introduction

7.1.1 An important part of plan-making is the consideration of alternative approaches to addressing key issues. This chapter sets out the reasonable alternatives considered by Hastings Borough Council in developing the plan for several key issues:

- Housing growth – the number of new homes that should be built in the Borough
- Housing distribution – where new housing in the Borough should be located
- Employment growth – the number of new jobs that should be planned for
- Retail provision – how adequate shopping facilities should be provided
- Sustainable design and renewable energy

7.1.2 The need to consider alternatives reflects legislation which requires local authorities to consider ‘reasonable alternatives’ as part of plan-making. In addition, at the examination into the plan, the Planning Inspector will be seeking assurances that the plan is the most appropriate strategy, when considered against reasonable alternatives. Note alternatives are also referred to as scenarios or options and these terms are used interchangeably throughout this chapter.

7.1.3 Finally, this chapter discusses how ‘other issues’ have been addressed with less formal consideration having been given to alternative approaches; and also explains that, even where this is the case, SA has still had an influence on the ‘evolution’ of preferred policy approach.

### 7.2 Housing growth

7.2.1 Previously the South East Plan dictated that 4,200 new homes should be built in Hastings between 2006 and 2026. However, in line with the Government’s localism agenda, local authorities are increasingly working with the local community to determine how many new homes should be built in their area, having first assessed the level of housing need.

7.2.2 In light of this, in summer 2011 the Council asked the local community which of three alternatives approaches to housing growth they preferred:

- High growth – 7,840 new houses by 2028 (461 per year)
- Low growth – 2,470 new houses by 2028 (146 per year)
- Medium growth – 3,418 new houses by 2028 (201 per year)

7.2.3 The rationale for each of these three scenarios is set out in **Table 7-1**.

**Table 7-1: Rationale for the three scenarios considered**

<ul style="list-style-type: none"> <li>• The higher level growth figure (7,840 new homes by 2028 or 461 per year) reflects the trend-based population projection and so it can be argued that it is necessary to meet the needs of local communities.</li> <li>• The lower level growth figure (2,470 new houses by 2028 or 146 per year) was considered given the expectation that it would result in less pressure on the local environment of Hastings and the local character that makes the town distinctive.</li> <li>• The medium level growth figure (3,418 net new homes or 201 dwellings per year) is broadly in line with the South East Plan figure. The Council considers that although the Government plans to abolish the South East Plan, there is still a significant body of evidence underpinning the housing numbers within it.</li> </ul>
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7.2.4 At the time, the Council undertook a Sustainability Appraisal of these three alternatives the findings of which are summarised in **Table 7-2** and presented in full within **Appendix I**.

**Table 7-2: Findings of SA in relation to the three housing growth scenarios**

<ul style="list-style-type: none"> <li>• Analysis of these scenarios has shown that higher housing growth figure (7,840 new homes by 2028 or 461 per year) whilst providing the most new homes scores poorly in meeting environmental objectives. In particular, building at this level would require more high density development, and there would be far more pressure to build on undeveloped (Greenfield) land and in environmentally sensitive areas.</li> <li>• The medium and low growth scenarios have broadly similar impacts – the main difference being that low growth will not provide as many opportunities for everyone to have access to a decent home. As well as reducing the ability to address some of the demand for general market housing, it would also mean fewer affordable homes for people to live in, since the delivery of both are closely linked. More specifically, reduced housing choice would effect the potential to encourage younger people to remain in the town and attract more skilled workers to Hastings (who would require family sized and larger homes).</li> <li>• In comparison to low growth, the medium growth scenario would achieve slightly more in terms of stimulating economic revival in the more deprived parts on the town; and will go further in meeting housing need.</li> </ul>
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7.2.5 In the consultation, the Council stated its preference for the medium scale growth scenario, which is broadly in line with the South East Plan figure. The Council's rationale for the choice of the middle scale alternative is set out in **Table 7-3**.

**Table 7-3: Rationale for the Council's choice of the middle scale growth scenario**

<ul style="list-style-type: none"> <li>• Given the regeneration vision of the Plan, medium growth is the preferred way forward. This target would help support regeneration efforts, whilst respecting the town's environmental assets – which includes areas of wildlife, landscape, and recreation importance.</li> <li>• The approach is deliverable given the amount of development that is already in the pipeline (that is, sites already under construction, with planning permission, or already allocated for development), the development sites identified through the Strategic Housing Land Availability Assessment (SHLAA) and the expectation that windfall development will occur.</li> <li>• Delivering this level of development would not be without its challenges, but mitigation measures will be achieved through policies in the Core Strategy that aim to protect the environment, ensure good design and provide the necessary infrastructure to support development.</li> </ul>
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7.2.6 Following the summer 2011 consultation, various issues arose with a bearing on the level of housing growth to plan for. Most significant here was the publication of the draft National Planning Policy Framework in July 2011 and the requirement for a 20% contingency on top of the 5-year supply requirement. This applies to those authorities, including Hastings, with a poor record on past delivery. However, ultimately, the level of housing growth arrived at is 200 dpa, which is almost exactly that under the medium scale growth scenario.



### 7.3 Housing distribution

- 7.3.1 Alongside establishing an appropriate level of housing growth, the Council considered where within Hastings Borough new housing might be best located. The possibilities for expanding Hastings are limited because the town is obviously surrounded by the sea on one side and valuable countryside to the north, east and west, much of it designated nationally in recognition of its value.
- 7.3.2 In line with Government guidance, the Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA). The areas of housing site search have extended beyond the existing built-up area boundary of Hastings to sites on the urban fringe and beyond potentially encroaching into the High Weald Area of Outstanding Natural Beauty (ANOB). Only a few exceptions to the areas of search have been made. These include Hastings Cliff Special Area of Conservation (SAC), which is an internationally important area of conservation; Sites of Special Scientific Interest (SSSIs); designated Local Nature Reserves (LNRs) and areas of Ancient Woodland. The area of search also considered a major greenfield site outside of the existing urban area – land at Breadsell. The Council investigated the possibility of accommodating around 1,000 new homes at this site to the north west of Hastings. This is the only major remaining area of the Borough which is free from nationally important landscape and wildlife designations.
- 7.3.3 In light of this, four alternatives were considered:
- Option 1: development wholly within the built-up area
  - Option 2: Accommodating new housing within the existing Hastings urban area plus a limited number of small greenfield sites
  - Option 3: Option 1 plus an urban extension of around 1,000 new homes at Breadsell
  - Option 4: Development within the built up area boundary plus greenfield sites on the periphery, plus release of one major greenfield site (Breadsell)
- 7.3.4 The rationale for each of these options is set out in **Table 7-4**.

**Table 7-4: Rationale for the four options considered**

- Option 1 - In determining the geographical extent of the SHLAA study area, the Council had regard to the relationship of potential new housing and access to jobs, shopping, leisure facilities and services. Since option 1 would promote the location of new housing close to existing services it was considered that this option might be in-line with the need to create sustainable communities.
- Option 2 - had the potential to allow the identification of sufficient sites to deliver on the draft South East Plan target figure without relying on windfall development.
- Option 3 - had the potential to allow the identification of sufficient sites to deliver over and above the draft South East Plan (SEP) target, providing more flexibility if the SEP target were to be increased before being finalised. It was also felt that the development of a larger scale strategic greenfield site offered better potential for the creation for a single stand alone sustainable development incorporating employment uses, public transport, the potential for on-site renewable energy generation and homes designed to high environmental standards than could effectively be imposed on smaller scale urban edge greenfield sites.
- Option 4 - provided the most flexibility in meeting the SEP target, and represented the maximum amount of development that could potentially take place

- 7.3.5 In 2008, the Council undertook a Sustainability Appraisal of these four alternatives, the findings of which are summarised in **Table 7-5** and presented in full within **Appendix II**.

**Table 7-5: Findings of SA in relation to the four housing distribution options**

<ul style="list-style-type: none"> <li>Option 1 - has the potential for significant positive effects in terms of making the best use of land, assuming that brownfield sites are developed first. However this option did not provide sufficient potential to meet the South East plan housing target figure without relying on windfall, at this stage in the plan-making process Government guidance indicated that continuing with this option could result in the Plan being found unsound. Reliance on windfall development could also be seen to create risk in terms of meeting the needs of individuals (in housing need), communities and businesses.</li> <li>Option 2 - only just meets the South East Plan target for housing provision, allowing no flexibility should the target be increased. Landscape, nature conservation and accessibility impacts of identifying additional greenfield sites outside the built up area makes this option undesirable.</li> <li>Bringing forward a major greenfield site (Option 3) could negatively impact on most environmental objectives, but impact could be reduced through masterplanning and design. Another important consideration is that one major site releases more potential to provide higher levels of sustainable design and construction, and provide more opportunities to support accessibility and sustainable transport initiatives.</li> <li>Option 4 - The release of a major greenfield site, plus numerous smaller ones, would cause more harm in terms of environmental objectives than a single strategic greenfield site alone.</li> </ul>
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7.3.6 Subsequent investigations of the feasibility of development at Breadsell indicated that the nature conservation concerns expressed by Natural England could not be overcome. For this reason, Option 1 – concentrating new housing development within the existing Hastings urban area – was selected as the Council's preferred option and this underpins the Planning Strategy as a whole.

7.3.7 The Council will also rely to some extent on the delivery of new housing through 'windfall' developments. Investigation into the potential development at Breadsell provides robust evidence of the genuine local circumstances preventing the identification of specific developable sites and necessity of relying on a windfall projection. Investigation of past completion rates for windfall development also lends support to the realism of the allowance that has been made. In addition to a windfall allowance, the Council is also including an allowance for the return of long term empty homes back into use.

7.3.8 For completeness, the Council's rationale for the choice of Option 1 is set out in **Table 7-6**.

**Table 7-6: Rationale for the Council's choice of Option 1 to concentrate new housing in the Hastings urban area**

<ul style="list-style-type: none"> <li>This option makes the best use of urban and brownfield land and will assist the Council in promoting sustainable development.</li> <li>The Council has robust evidence of the genuine local circumstances which prevent specific sites being identified outside of the urban area.</li> <li>Past rates of delivery from windfall development have been strong, and, based on research the Council expects it to remain so. However in line with earlier guidance, no allowance for windfall development has been included in the first 10 years of the Plan period.</li> <li>Empty homes are a wasted resource and number of long term empty homes (vacant for 2 or more years) is recognised as an issue by the Council. In a town where development opportunities are limited, the Council is committed to making the best use of resources and so tackling empty homes forms an important part of the Council's strategic approach to housing in order to help meet local housing need.</li> </ul>
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7.3.9 Having established that new housing would need to be accommodated solely within the existing Hastings urban area, the Council considered where within the urban area housing should be best located. In order to best determine this, the Council sub-divided Hastings urban area into three discrete sub-areas (Western Area, Central Area and Eastern Area) and considered how much housing each area could reasonably accommodate based on the evidence. The evidence in question was SHLAA which, in line with Government advice,

identifies all the sites where housing could conceivably be delivered. However, it does not allocate sites for development; it merely indicates to the Council where development could potentially go. The Council used the SHLAA findings to estimate how much housing each of the three sub-areas could accommodate and these figures are set out in Spatial Area policies FA1, FA2 and FA5 of the Planning Strategy. The figure for each area has been determined on the basis of the evidence available; as such, there are no alternatives to the figures proposed. Each site included in the SHLAA was subject to an assessment which included consideration of sustainability issues. Selected sites from the SHLAA will be formally allocated in the forthcoming Development Management Plan, which includes site allocations, and each site will also be subject at that point to a detailed Sustainability Appraisal. Through the consultation, local residents and other interested stakeholders will have the opportunity to register any concerns regarding individual sites.

## **7.4 Employment growth**

- 7.4.1 The South East Plan did not stipulate a particular level of job growth to be provided for in Hastings. In order to determine the appropriate number of new jobs to plan for the Council has taken into regeneration priorities and evidence base studies and identified an appropriate amount of floorspace. The evidence indicates that in order to provide for the appropriate number of jobs all existing employment sites must be retained. The alternative approach - whereby some of these sites might be developed for other uses - is therefore not reasonable in the Hastings context. In addition to retaining existing sites, there will be a need to provide for some additional floorspace. The sites at which this will be delivered will be determined through the Development Management Plan.

## **7.5 Retail provision**

- 7.5.1 Although the evidence base indicates that the need for new retail space in Hastings has reduced from 30,000 to 20,500 square metres, a substantial new area for comparison goods floorspace needs to be identified. In March 2010 as part of early engagement on the Development Management Plan, the community were asked whether this would be best located on a single, large town centre site, or on a combination of smaller sites.
- 7.5.2 There are strong economic arguments for seeking to locate the bulk of this floorspace in one location, as an extension to the existing core. However, to allocate new space on the most obvious location abutting the existing town centre it would be necessary to demolish existing housing in over 200 separate ownerships including a significant number of leasehold flats. It is doubtful in the present economic climate whether land acquisition on this scale would be viable, even if developer interest was secured. Loss of housing on this scale would also be likely to be quite controversial, and for these reasons, this is not considered a reasonable alternative. A further alternative is to develop new shopping facilities on an edge of centre site to the east, currently occupied by Morrisons. However, this would involve identifying an alternative site for Morrisons and no sites are immediately suitable. For this reason, expanding the retail offering at the Morrisons site is not considered a reasonable alternative at this stage. There is also concern that the distance from the core shopping area might deter shoppers or affect existing, more marginal parts of the town centre.
- 7.5.3 Several smaller sites within the town centre boundary were also looked at, which taken together, could make some contribution to the overall floorspace requirement. However, further analysis revealed that some of them were not suitable for retail development and in some cases, no net gain in retail floorspace would be realised due to the existing retail use.
- 7.5.4 Overall, the Council is aware that there is an unmet need for new retail space but is not in a position to identify particular sites at present. However, this issue will be readdressed through the site allocations component of the Local Plan, in the Development Management Plan.

## 7.6 Sustainable design and renewable energy

- 7.6.1 Consideration of alternatives has informed the development of the policy approach to addressing sustainable design and renewable energy, which is set out within the following policies of the Proposed Submission Planning Strategy:
- Policy SC3 – Promoting Sustainable and Green Design
  - Policy SC4 – Working Towards Zero Carbon Development
  - Policy SC5 – District Heating Networks and Combined Heat and Power systems
  - Policy SC6 – Renewable Energy Developments
- 7.6.2 Specifically, within the development of these policies has been informed by the appraisal of the following alternative approaches to addressing the ‘sustainable design and renewable energy’ issue:
- Adopt a minimum requirement for sustainable building based on BREEAM and Eco-homes<sup>6</sup> standards;
  - Require that at least 10% of a development’s energy demand is supplied by onsite renewable energy;
  - ‘Encourage’ rather than ‘require’;
  - Policy should this relate to schemes of 10 or more dwellings, or all development
  - Identify individual sites for renewable energy generation.
- 7.6.3 The appraisal found that:
- Adopting a minimum requirement performs very well in sustainability terms, although given ‘viability’ considerations there is a need for a strong evidence base to support higher standards than currently required by the Building Regulations.
  - Setting ‘requirements’ rather than simply ‘encouraging’ performs better than option 3 and has significant positive effects over both the short and long term.
  - Setting requirements that apply to all developments regardless of their size performs better in terms of a range of sustainability objectives. However, there are economic implications with this, and national planning guidance advises against placing undue burden on developers.
  - Identifying specific sites for renewable energy schemes presents significant positive environmental and social effects, and will also have a positive economic impact over the medium to long term. However this is subject to the availability and suitability of sites.
- 7.6.4 Further to additional evidence base work being undertaken and a changing focus on national guidance, it was decided that the most efficient way to meet the Governments targets for energy efficiency was to focus on a hierarchical approach, focusing on energy efficiency first, before relying on renewable energy installations. This approach is reflected in the proposed submission policies, although the alternatives considered have also influenced Council thinking.

<sup>6</sup> The Eco-homes standard has since been re-worked and superseded by the Code for Sustainable Homes.

## 7.7 Other issues

- 7.7.1 For a range of other issues, alternatives were considered and subjected to SA early in 2007, with findings subsequently presented within the 2008 Interim SA Report. In some instances, this consideration of alternatives led to the identification of a preferred approach that has been translated into policy within the Proposed Submission Planning Strategy. However, in the majority of cases the Proposed Submission policy approach to addressing issues is more indirectly linked to the earlier consideration of alternatives, i.e. other sources of evidence have also fed in and had an influence.
- 7.7.2 Where other issues have been addressed with less formal consideration having been given to alternative approaches, this is not to say that SA has not had an important influence on the development of Proposed Submission approach. In particular, it is important to note that most of the Proposed Submission policies are 'evolutions' of policy approaches that were consulted upon and subjected to SA at the time of the 2008 'Preferred Approaches' consultation. SA findings and recommendations from this stage have had a clear influence on the development of the Proposed Submission Planning Strategy.
- 7.7.3 Taking just one (important) issue - affordable housing<sup>7</sup> - it can be seen that the SA of the 2008 'preferred approach' has had an influence on the development of the Proposed Submission approach. Specifically, in 2008 a preferred approaches in relation to:
- Overall target for affordable housing;
  - Types of affordable housing needed; and
  - Specifying the size and form of affordable housing.
- 7.7.4 The appraisal concluded that:
- The proposed targets are higher than those set in the previous local plan and contribute significantly to the social sustainability objectives, providing more opportunity for the community to access affordable housing and increasing the potential to tackle social exclusion (by helping to remove barriers to housing), which in turn will have knock-on benefits in terms of health and well being.
  - The preferred approach to 'types' of affordable housing provides flexibility in terms of providing different forms of affordable housing where appropriate, which will ensure there is a greater range of affordable housing types available to serve more members of the community. The provision of affordable housing in this manner will also help social inclusion and make the best use of available land. This appraisal did not note any links with the environmental or economic sustainability objectives.
  - Integrating affordable homes within a wider development as proposed in the preferred approach to 'specifying the size and form of affordable housing' performs well against the social sustainability objectives. As well as providing opportunities for housing for more people, it also promotes social inclusion.
- 7.7.5 Subsequent to the Preferred Approaches consultation the Council was in a position to develop their Proposed Submission approach, which takes the form of a sliding scale.

<sup>7</sup> i.e. the need to determine an appropriate requirement on developers to deliver affordable housing alongside market-housing.

## 8 HOW HAS THE APPRAISAL AT THIS CURRENT STAGE BEEN UNDERTAKEN?

“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” (SEA Directive, Annex I(h))

### 8.1 Approach to appraisal

- 8.1.1 The appraisal is presented under 21 headings - one for each of the sustainability objectives identified through scoping (see Chapter 6). For each objective, the likely significant effects of implementing the plan - as set out within the Proposed Submission Planning Strategy document<sup>8</sup> - are described and evaluated. Where the potential for a significant effect is highlighted, recommendations are made for modifying the preferred approach (or making more wholesale change, i.e. selecting an alternative approach).
- 8.1.2 Although it is important that this appraisal focuses on ‘the plan’ as a whole (in-line with the requirement of the SEA Directive), for some objectives there is the potential for the narrative appraisal to become long and unwieldy. As such, the appraisal is structured under sub-headings as necessary, with each sub-heading referring to a particular component of the plan.
- 8.1.3 Under the objective headings / sub-headings, effects associated with the Proposed Submission approach are described and evaluated taking account of the sustainability context / baseline and key issues established through scoping. As part of this, consideration has been given to the potential for effects that are direct / indirect, the potential for the significance of effects to vary according to timescale, duration and reversibility and also the potential for effects to be significant because they will impact cumulatively with the effects of other planned activities.

### 8.2 Difficulties encountered

- 8.2.1 The key difficulty is that associated with establishing a causal link between a policy approach and effects to the sustainability baseline. Often, there is considerable uncertainty, given that the precise way in which the policy approach will be implemented ‘on the ground’ is unknown. Where this uncertainty exists, it is helpful to discuss effects in more general terms - i.e. in terms of particular sustainability issues or broad sustainability themes / the sustainability context. In other instances, it may be appropriate to highlight the potential for a significant impact to the sustainability baseline, along with the uncertainties involved.
- 8.2.2 When considering which potential effects to highlight (along with a discussion of uncertainty) / not highlight, a foremost consideration is that the aim of SA is to have a focused discussion regarding those effects that are most likely and significant (and how they should be avoided or mitigated), rather than a potentially endless discussion relating to all of possible plan effects. Ultimately, it is a matter of professional judgement as to those effects that are highlighted and those that are not. This approach is justified by the SEA Directive (i.e. through its reference to ‘technical deficiencies or lack of know-how’) as well as Government Guidance, which states that: *‘You are only required to assess the likely significant effects of the plan, not all possible effects... ‘Ultimately, the significance of an effect is a matter of judgment...’*<sup>9</sup>

<sup>8</sup> The Version of the document appraised was that dated January 6<sup>th</sup>.

<sup>9</sup> The Plan-making Manual

## 9 WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?

**“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” (SEA Directive, Annex I(f))

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

### 9.1 Introduction

- 9.1.1 Appraisal findings relating to the Proposed Submission Planning Strategy are set out below within 21 appraisal tables. **Each table relates to one of the sustainability objectives identified through scoping.**



## 9.2 Appraisal findings and recommendations

**Table 9-1: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b> POLICY DS1: New Housing Development</p> <p><b>Planning Strategy</b> POLICY FA1: Strategy for Western Area POLICY FA2: Strategic Policy for Central Area POLICY FA3: Strategy for Hastings Town Centre POLICY FA4: Strategy for Central St Leonards POLICY FA5: Strategic Policy for Eastern Area POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way POLICY SC2: Design and Access Statements POLICY SC3: Promoting Sustainable and Green Design POLICY SC4: Working Towards Zero Carbon Development POLICY SC5: District Heating Networks and Combined Heat and Power Systems" POLICY EN2: Green Infrastructure Network POLICY EN3: Nature Conservation and Improvement of Biodiversity POLICY EN4: Conservation and Enhancement of Landscape POLICY EN5: Open Spaces – Enhancement, Provision and Protection POLICY H1: Housing Density</p>
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	<p>POLICY H2: Housing Mix</p> <p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p>
<b>Appraisal Findings</b>	<p><b>Housing targets</b></p> <p>Policy DS1 (New Housing Development) states that between 2011 and 2028 the net new homes target will be for 3,400 dwellings. There will be a broad distribution of housing types within this target and it will include returning 255 long term empty homes to use over the planning period.</p> <p>This policy is likely to have a beneficial impact on this sustainability objective as it will provide a greater number of houses to try and address the demands of the growing population. However, the extent to which it will fully meet this growing demand is less clear. Key issues in this respect include the affordability of the housing, the number of affordable houses, and the need to provide for the elderly and student population, which is expected to grow. Trend based population growth suggest that there is a need to build considerably more houses than those proposed in the Planning Policy (some 7,840 new homes by 2028 or 461 per annum). There was also an identified need for 596 additional affordable homes per annum in the Housing Needs Survey. The levels of development proposed here are not sufficient to meet this identified need. A further issue is that while family sized homes are mentioned explicitly in the policy text, the provision of appropriate levels of student accommodation and houses suitable for the elderly is not mentioned.</p> <p>The difficulty found in meeting the identified need relates to the constrained setting of Hastings, which is surrounded by protected areas, such as the High Weald Area of Natural Beauty (AONB).</p> <p><b>Houses that are ‘unfit for habitation’</b></p> <p>A related issue is the number of dwellings in Hastings, which are deemed ‘unfit for human habitation’<sup>10</sup>. 10.5% of houses in Hastings are deemed ‘unfit for human habitation’, a figure which has remained relatively constant since 2004. This is significantly higher than the 7.5% of houses, which are deemed unfit for habitation nationally. 4.2% of houses are also deemed in a state of</p>

<sup>10</sup> The definition of unfitness is taken from the Housing Act 1985, which states that : “*In determining for any of the purposes of this Act whether premises are unfit for human habitation, regard shall be had to their condition in respect of the following matters : repair, stability, freedom from damp, internal arrangement, natural lighting, ventilation, water supply drainage and sanitary conveniences, facilities for the preparation and cooking of food and for the disposal of waste water; and these premises shall be deemed unfit if, and only if, they are so far defective in one or more of those matters that they are not reasonably suitable for occupation in that condition*”.

	<p>substantial disrepair. These figures are in part due to the large number of dwellings (38%), which were constructed pre 1919.</p> <p>Policy DS1 (New Housing Development) states that <i>“In order to maintain and make effective use of the existing housing stock, the Council will bring back into residential use empty housing in line with its Empty Homes Strategy”</i> And Policy FA4 (Strategy for Central St Leonards) states that planning permission will be granted to proposals that tackle buildings in a state of disrepair.</p> <p>Given the number of negative implications, including health and social implications, for people living in houses in a state of disrepair, it is important that this issue is addressed. However, it might be that this issue is better addressed through other mechanisms and corporate strategies.</p> <p><b>Sustainable Design</b></p> <p>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 have a positive impact on this sustainability objective. They will ensure climate change mitigation and adaptation is incorporated into the design of the houses and that the buildings are energy efficient. This will have a positive impact on the environment and the building occupants, who will require less energy to heat their home.</p> <p><b>Green Infrastructure</b></p> <p>Policy EN2 (Green Infrastructure Networks), Policy EN3 (Nature Conservation and Improvement of Biodiversity), Policy EN4 (Conservation and Enhancement of Landscape), and Policy EN5 (Open Spaces – Enhancement, Provision and Protection) all prevent development which will harm or remove areas that are important for biodiversity, recreation and amenity. These policies have an adverse impact on this sustainability objective, since they prevent further development to meet the needs of the growing population.</p> <p><b>Housing Policy</b></p> <p>Policy H1 (Housing Density) states that creating dense urban environments is an appropriate means of balancing the growing need for housing in Hastings with the need to protect open spaces and biodiversity. The policy states that housing densities of 40 dwellings per hectare should be met in sustainable locations close to a good range of existing or potential services and facilities, and where there is, or there is the potential for good public transport. Where the location is not deemed suitable a target housing density of 30 dwellings per hectare is recommended. This policy will have positive impacts on this objective, as it will enable more houses to be provided.</p>
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Policy H2 (Housing mix) is well suited to diversify both tenure types and the sizes of residential housing. At present, Hastings has a significantly higher proportion of smaller dwellings and flats/maisonettes when compared to the profile of the stock in the South East as a whole. There are also pockets of similar tenure types in Hastings, which is seen as one of the reasons for continued deprivation. Central St Leonards for example, has a concentration of poor quality, privately rented accommodation. This has encouraged a transient population. This policy recognises the importance of addressing imbalances in the housing stock in order to address levels of deprivation. As such, it promotes the development of larger homes (3 or more bedrooms) to address the bias in the existing stock towards smaller dwellings and flats. Overall this will have a positive impact. However, there is the potential issue that the housing mix that is encouraged will not be suitable to the needs of those two segments of the population predicted to grow most rapidly; the student and elderly population.

Policy H3 (Provision of Affordable Housing) sets out the number of affordable houses that developers must provide as part of new developments. This is in response to the recognised short supply of affordable accommodation in Hastings. The most recent research shows that there is a shortfall of 596 affordable homes per annum. As a result, many people are living in unsuitable accommodation, such as properties which are overcrowded or in a state of disrepair. This policy will improve access to affordable housing in Hastings. However, there will continue to be significant over demand for these types of housing in the short and medium term.

In 2010/11, 32 gross new affordable dwellings were completed in Hastings. This was below the previous year's gross figure of 44 new dwellings, but made up a higher percentage of total net new dwellings (41.5%) than in 2009/10 (28.4%). The policy will help to improve upon these trends, but will not provide sufficient affordable homes to meet demand.

Policy H4 (Houses in Multiple Occupation) limits the conversion of dwellings (Class C3) to Houses in Multiple Occupation (Class C4). Permission for conversion will not be permitted where more than 10% of the total numbers of properties within a 100m radius are already in use as either Class C4, or other types of HMO in a sui generis use. This policy will have both a positive and negative impact. On the positive side it will encourage mixed use houses and a range of housing tenures, which are deemed important for reducing levels of deprivation. However, it is likely that it will have an adverse impact on low income individuals and those starting out their careers as these are the groups which tend to live in HMOs.

Policy H5 (Accommodation for Travelling Communities) takes account of the need of traveller and gypsy communities and supports the provision of adequate areas for their needs. This will have a positive impact on this objective, as it recognises the needs of traveller and gypsy communities and seeks to ensure they are sited in appropriate locations.

	<p><b>Spatial Policies</b></p> <p>The spatial policies (Policies FA1 to FA6) set out the number of houses to be provided in each of the areas within Hastings. Between 1080 and 1270 houses will be developed in the Western Area, between 1240 and 1500 in the Central Area, and between 730 and 910 in the Eastern Area.</p> <p>The Index of Multiple Deprivation (IMD) shows that access to housing and services is constrained throughout Hastings. However, it is particularly constrained in the Northern and Western areas, where other levels of deprivation are comparatively lower. The provision of the majority of houses in the Western Area is therefore appropriate.</p> <p>Other spatial issues include the concentration of houses in 'disrepair' in Central St Leonards and Bohemia and the high level of fuel poverty (17.6% in Central St Leonards and Bohemia). There is a policy in Central St Leonards to: <i>"continue to concentrate resources on improving housing conditions and reducing the number of empty dwellings in the area"</i>, which should improve the number of buildings deemed 'unfit for habitation'. However, the policy should be strengthened to drive substantial change and should be included in all spatial policies, where there are houses deemed 'unfit for habitation'.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• While overall levels of housing will increase, this will not provide sufficient accommodation in line with the predicted increase in population;</li> <li>• The policy relating to affordable housing will have a positive impact on the number of affordable houses available. However, it will be insufficient to meet existing demand, which will, as a result, remain high in the medium and long term;</li> <li>• The number of houses deemed 'unfit for habitation' and in a state of 'substantial disrepair' has been identified as a significant issue for Hastings. However, it is understood that these issues will be addressed through other mechanisms and corporate strategies rather than through planning policy.</li> <li>• It is important for the Council to consider the need to provide accommodation for homeless people. However, there is limited potential for the planning policy to address this. As such, it is understood that this will be addressed by other corporate strategies.</li> <li>• The planning policies relating to the protection of biodiversity, landscape and open space, prevent further housing development. While this has a negative impact on this objective, these planning policies have a range of positive impacts on the environmental objectives.</li> </ul>

	<ul style="list-style-type: none"> <li>The policy on housing density and housing mix will have a beneficial impact;</li> <li>The policies relating to sustainable design and zero carbon homes will ensure that new developments are cheaper to run and of high quality;</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>In conjunction with the drive to provide more family sized houses, there is a need to ensure sufficient accommodation for the elderly and student population is provided.</li> </ul>
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**Table 9-2: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - The health and well-being of the population is improved and inequalities in health are reduced**

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY SC3: Promoting Sustainable and Green Design</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN4: Conservation and Enhancement of Landscape</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H1: Housing Density</p> <p>POLICY H2: Housing Mix</p>
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	<p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY CI1: Infrastructure and Development Contributions</p> <p>POLICY CI2: Sports and Leisure Facilities</p> <p>POLICY CI3: Children's Play Provision</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p> <p>POLICY T3: Sustainable Transport</p>
<b>Appraisal Findings</b>	<p>There are three groups of policies which are likely to impact on this sustainability objective. These are the policies that relate to green infrastructure and conservation, those that relate to access and public transport, and those that relate to community infrastructure and recreation.</p> <p><b>Green Infrastructure and conservation</b></p> <p>Policies EN2 – EN5 all look to preserve open space for both the protection of biodiversity and for use by the population of Hastings. For example, Policy EN2 (Green Infrastructure Network) states that 'the green network will ensure that everyone has access to natural open space, and will maximise opportunity to conserve and enhance biodiversity. New development will contribute to this network'. The provision of access to quality green space for all the population is likely to have a beneficial impact on the health and well being of the population.</p> <p><b>Community infrastructure and recreation</b></p> <p>Policies CI1, CI2 and CI3 are also likely to have a beneficial impact on this objective.</p> <p>Policy CI1 (Infrastructure and Development Contributions) looks to ensure that the right infrastructure is in place at the right time to provide the additional capacity required to support new development. Contributions from developers are also required, to meet the communities' needs. However, due to the low land values in Hastings, economic contributions to improve community health facilities are not expected to be high.</p>



	<p>Policy CI2 (Sports and Leisure Facilities) protects existing sports and recreation facilities and states that new recreational spaces will be identified as part of the green infrastructure network. Centrally located areas, which are accessible to all, will be preferred. This policy is likely to have a positive impact on this objective and will encourage healthy, active lifestyles and provide opportunities for sport and recreation (formal and informal). The percentage of the population within 20 minutes travel time (walking) of different sports facilities has increased from 8% in 2006 to 29.7% in 2007. This is a significant improvement and this policy will support this trend and the overall aim to increase the health of the population.</p> <p>Policy CI3 (Children's Play Provision) require developers to design housing environments in which children have space to play informally and safely, where they have priority over vehicles, and where such spaces contribute to the provision of open space. This policy recognises the importance of play for the healthy development of children. It will have a positive impact on this objective.</p> <p><b>Transport and access</b></p> <p>The policies, which relate to transport (T1, T3 and T4), have the potential to improve accessibility across the population to health facilities and services. Limited public transport can contribute to increasing the isolation of communities and individuals. Policy on transport is important to correct this. Policy T1 (Strategic Road and Rail Schemes) sets out the priorities for improving access to Bexhill, London, Ashford and Tonbridge. However, the Council has limited powers to bring about these schemes. Policy T3 (Sustainable Transport) sets out a range of priorities, which include improving bus routes, supporting the provision of new and enhanced cycle routes in the town, improving walking routes for pedestrians, ensuring that new development where possible are located close to existing public transport provision, and improving local air quality. These policies will all have a positive impact on this sustainability objective. Policy T4 (Travel Plans) state that 'developments will be required to produce a travel plan, which provide a framework for the development and delivery of targeted travel information and initiatives'. This will ensure that new development does not contribute to a significant increase in car travel. It will ensure that accessibility is a serious consideration, which will have a positive impact.</p> <p>Other policies are likely to have an indirect impact on this objective. For example, Policy T1 (Strategic Road and Rail Schemes) supports the construction of a link road which will reduce congestion on the A259. This would improve the health and quality of life of people living in the vicinity of the A259.</p> <p><b>Houses 'unfit for habitation'</b></p> <p>10.5% of houses in Hastings are deemed 'unfit for human habitation', a figure which has remained relatively constant since 2004. This is significantly higher than the 7.5% of houses, which are deemed unfit for habitation nationally. 4.2% of houses are also deemed in a state of substantial disrepair. These figures are in part due to the large number of dwellings (38%), which were constructed pre 1919. It is likely that this contributes to health inequalities within Hastings since the number of unfit dwellings is</p>
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	<p>concentrated in Central St Leonards and Bohemia. It is understood that these issues will be addressed through other mechanisms and corporate strategies rather than through planning policy.</p> <p><b>Spatial Policies</b></p> <p>The Index of Multiple Deprivation illustrates that the majority of Super Output Areas within Hastings are either in the 20% most deprived or the 20-40% most deprived areas in England. Only 5 of the 53 Super Output Areas were outside these bands (and these were in the 60-60% most deprived). There is therefore a need to improve access to health services and recreation throughout Hastings.</p> <p>There is a diverse mix of people in the Western Area (Policy FA1), with some well established communities and residential neighbourhoods. It contains a mix of uses, but is primarily focussed on employment. The strategy includes provision to improve access to open space for those living in the Western Area. This will primarily be achieved through the development of Combe Valley Countryside Park. The countryside park will help to meet a county-wide open space deficiency within the locality, as identified within the East Sussex Open Spaces Strategy. Other policies which are relevant include the commitment to: <i>“support the implementation of the strategic network of cycle routes to link communities and facilities, particularly from the Conquest Hospital down towards Hastings Town Centre and out to Pebsham<sup>11</sup> Countryside Park”</i>. These two measures have the potential to encourage healthy lifestyles among those living in the western area.</p> <p>The Central Area (Policy FA2) is the most densely populated area. Central St Leonards (Policy FA4) and Bohemia and Hastings Town Centre (Policy FA3) are the most deprived planning focus areas in Central Area, ranking 2nd and 3rd in Hastings as a whole. There are also significant levels of fuel poverty in this area. Within Policy FA4 there is a proposal to: <i>“continue to concentrate resources on improving housing conditions and reducing the number of empty dwellings in the area”</i>, which should improve the number of buildings deemed ‘unfit for habitation’. However, the policy should be strengthened to drive substantial change to ensure that the negative health implications of living in these types of houses are mitigated. The support for the cycle network and the protection of open space in the central area will have a beneficial impact on this objective.</p> <p>The Eastern Area (Policy FA5) has the highest proportion of young people and is one of the most diverse areas, with significant areas of deprivation. The support for the cycle network and the protection of open space in the eastern area will have a beneficial impact on this objective. The policy to <i>“encourage local communities to access areas of green space”</i> should also be beneficial.</p>
<b>Recommendations</b>	In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:

<sup>11</sup> Now known as Combe Valley Countryside Park

	<ul style="list-style-type: none"> <li>On the whole the planning strategy will have a positive impact on this sustainability objective. Open space, recreation and child play area requirements will all boost healthy lifestyles and provide good opportunities for sport and recreation.</li> <li>Access to services is likely to remain an issue in Hastings. However, the requirements to provide access to sustainable modes of transport will improve this</li> <li>The introductory text to Policy CI1 (Infrastructure and Development Contributions) does not state that developer contributions will be used to fund improvements to health facilities. It is understood that the priorities for developer contributions are being considered at a broader level and are part of the wider development of the Community Infrastructure Levy (CIL). As part of this process there is an opportunity for the Council to reconsider how developer contributions are spent and to consider using them to improve health facilities.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>No recommendations are made</li> </ul>
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**Table 9-3: Appraisal of the Proposed Submission Planning Strategy in relation to the 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***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b>  POLICY DS2: Employment Growth  POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b>  POLICY FA1: Strategy for Western Area  POLICY FA2: Strategic Policy for Central Area  POLICY FA3: Strategy for Hastings Town Centre  POLICY FA4: Strategy for Central St Leonards  POLICY FA5: Strategic Policy for Eastern Area  POLICY FA6: The Seafront</p>
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	<p><b>Theme Based Policies</b></p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H1: Housing Density</p> <p>POLICY H2: Housing Mix</p> <p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p> <p>POLICY E4: Tourism and Visitors</p> <p>POLICY CI1: Infrastructure and Development Contributions</p> <p>POLICY CI2: Sports and Leisure Facilities</p> <p>POLICY CI3: Children's Play Provision</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p> <p>POLICY T3: Sustainable Transport</p>
<b>Appraisal Findings</b>	<p>This objective recognises the fact that deprivation is widespread. This is reflected in the fact that of the 53 Super Output Areas in Hastings, 15 of these neighbourhoods fall within the worst 10% in England and a further 9 rank in the worst 20% (Index of Multiple Deprivation, 2010). Furthermore, 12 of the town's 16 wards contain one or more of these neighbourhoods. The localities which are in particular need include Central St Leonards, Castle, Gensing and Hollington.</p> <p>A large range of policies are likely to impact on this objective. The three clusters of policies, which are likely to have the greatest impact, are those relating to employment (DS2 and DS3), access to jobs (E1, E2, E3 and E4) and provision of suitable housing (H1 – H5).</p>

### Reducing poverty and social exclusion

Policy DS2 (Employment Growth) sets out the scale of employment land development within Hastings. It states that *“to support the town’s role as a major employment centre and as the focus for economic regeneration, local economic growth and diversification will be met through the development of up to 70,000m<sup>2</sup> of employment floor space between 2008 and 2028”*. This is likely to significantly increase the number of available jobs over the medium to long term within Hastings, which is likely to have a positive impact on the community. This policy is an attempt to reverse the current negative trend of a contracting workforce.

Policy DS3 (Location of Retail Development) sets out the strategy to provide an additional 20,500m<sup>2</sup> of comparison goods floor space in the period 2014 to 2028. This is in order to ensure that other shopping centres such as Eastbourne and Tunbridge Wells do not divert an even greater proportion of the retail spending away from Hastings. This policy is likely to complement Policy DS2, which provides high skilled employment opportunities, with a number of lower skilled employment opportunities.

Policy E1 (Existing Employment Land and Premises) states that wherever possible existing employment land will be retained rather than converted for other uses. Where this is shown not to be viable, mixed use developments, which include employment areas will be preferred. This is likely to have a beneficial impact, as it will ensure that existing jobs are safeguarded wherever possible.

Policy E2 (Skills and Access to Jobs) supports proposals that relate to higher or further education in Hastings and encourages major employment generating developments to promote access to the jobs they create amongst local people. This policy will have a beneficial impact on the levels of poverty and deprivation in Hastings through improving levels of education and access to employment.

Policy E3 (Town, District and Local Centres) seeks to safeguard and enhance the functions of different centres within Hastings. Hastings Town Centre is seen as the most important and accessible and so has been the subject of regeneration. Local centres, such as Ore Village, will also be protected and enhanced. This will have a positive impact in that it will ensure adequate local services, and opportunities for employment, are provided to residents. There is the potential for it to have a negative impact however, if money for regeneration is focussed on these areas to the exclusion of other areas of Hastings.

Policy E4 (Tourism and Visitors) seeks to lengthen the tourism season, increase the number of visitors, provide job opportunities and sustain the tourism economy. This will be facilitated through encouraging development of tourist attractions, supporting the development of tourist accommodation along the seafront and improving language schools. This policy is likely to have both

	<p>negative and positive impacts on this objective. While it will provide employment opportunities, these are likely to be low-skilled and some degree of seasonality should be expected, regardless of attempts to attract visitors throughout the year.</p> <p><b>Deprivation</b></p> <p>Policy H1 – H5 will all impact on this sustainability objective. This is because levels of deprivation are concentrated in particular areas of Hastings, such as Central St Leonards. Policies which improve the housing stock reduce the number of long term empty houses, ensure that rented properties in multiple ownership are not concentrated in one particular area, will all help to ensure that the disparity between the least and most deprived areas in Hastings is not perpetuated. Policy H5 (Accommodation for Travelling Communities) will also work to reduce deprivation and social exclusion by ensuring sites are established with suitable access to local shops, services, schools and healthcare facilities.</p> <p>The issue that there will be a continuing shortfall in the number of affordable houses and there will continue to be houses deemed ‘unfit for habitation’ will have negative impacts on this objective and are likely to perpetuate the deprivation gap. However, other mechanisms and corporate policies may be the most appropriate way of handling issues relating to those properties currently ‘unfit for habitation’.</p> <p><b>Spatial considerations</b></p> <p>The IMD demonstrates that levels of income and employment deprivation are particularly concentrated around Hastings Town Centre and along the Seafront. However, there are also significant pockets of deprivation in the Eastern and Western part of Hastings.</p> <p>The development of employment land is predominantly focussed in the Western Area of Hastings. This is complemented with policies to safeguard employment land across Hastings, particularly in the town and local centres. Given the improvements to access which are encouraged through the transport and accessibility planning policies (T1-T4), it is likely that the provision of employment land in the western part of Hastings will not lead to a widening in deprivation gaps.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• Policies DS2 and DS3 set aside a significant area of floor space for retail and employment land. Policies E1, E3 and E4 safeguard existing employment areas and services within town centres and also support the tourism industry. These policies are likely to lead to a greater number of jobs and a greater diversity of jobs, from the relatively entry level jobs generated by the</li> </ul>

	<p>tourism sector, through to the highly skilled jobs that will be encouraged through the Environ21 Innovation Park.</p> <ul style="list-style-type: none"> <li>• In conjunction with Policy E2, which states that access for the jobs generated through these developments should be promoted locally, these policies are likely to have a beneficial impact on levels of employment and therefore poverty and social exclusion within Hastings.</li> <li>• As part of the strategy to increase the number of employment opportunities, there is a drive to secure and increase the value of the tourism sector to the local economy. The fact that tourism tends to provide unskilled and seasonal employment is a potential issue. However, tourism is important for the local economy and as part of a wider strategy to diversify employment, and given the plans to attempt lengthen the visitor season; the support for tourism is deemed appropriate.</li> <li>• The policies relating to housing mix and affordable houses are likely to lead to greater population diversity within all areas of Hastings, which is likely to lead to a reduction in social exclusion</li> <li>• No recommendations are made</li> </ul>
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**Table 9-4: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b>  POLICY DS2: Employment Growth  POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b>  POLICY FA1: Strategy for Western Area  POLICY FA2: Strategic Policy for Central Area  POLICY FA3: Strategy for Hastings Town Centre  POLICY FA4: Strategy for Central St Leonards  POLICY FA5: Strategic Policy for Eastern Area  POLICY FA6: The Seafront</p>
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	<p><b>Theme Based Policies</b></p> <p>POLICY SC1: Overall Strategy for Managing change in a Sustainable Way</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p> <p>POLICY E4: Tourism and Visitors</p> <p>Policy CI1: Infrastructure and Development Contributions</p>
<p><b>Appraisal Findings</b></p>	<p>This objective recognises the poor levels of education within Hastings. GCSE pass rates for 15 year olds have reduced from 33% in 2007/08 to 26.4% in 2008/08, and 7.5% of the working age population also have no formal qualification. 43.5% have a NVQ Level 3 or above, compared to 52.6% across the region. It is therefore important to improve the number of qualifications achieved by all age groups. Efforts to improve these statistics have been made recently with the development of the new Sussex Coast College over 2 sites and the development of University Centre Hastings in the Town centre. Significant levels of investment have been made to improve education across Hastings, it is considered likely that this investment will lead to a significant reduction in education, skills and training deprivation.</p> <p><b>Education and skills</b></p> <p>The policies which are most likely to have a beneficial impact on this sustainability objective are those that encourage greater access to education for all ages of the population.</p> <p>Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) contains an overall objective to provide “<i>access to education, training and jobs and supporting the creation of new enterprises to bring economic prosperity and greater self-sufficiency</i>”.</p> <p>Policy E2 (Skills and Access to Jobs) supports proposals that relate to higher or further education in Hastings and encourages major employment generating development to promote access to the jobs amongst local people. This policy will improve access to high quality education and improve the qualification and skills of adults and young people.</p> <p>Potential negative impacts are likely to result from the continued focus on generating jobs that have a low skilled base. Policies that encourage low-skilled jobs include Policy E4 (Tourism and visitors) and Policy DS3 (Location of retail development). This is unlikely</p>

	<p>to lead to 'skills progressions' or to ensure that those that do achieve a good education want to stay and work in Hastings. This is offset to some extent by Policy DS2 (Employment Growth), which supports the development of more high-skilled employment opportunities.</p> <p>The context surrounding Policy CI1 (Infrastructure and Development Contributions) states that education is one of the priority areas that funding from developer contributions will be used to fund.</p> <p><b>Spatial Policies</b></p> <p>The IMD demonstrates that there are particular levels of 'education skills and training' deprivation in western and eastern Hastings and along the seafront. The improvements to Sussex Coast College and University Centre Hastings should have a positive impact on these levels of deprivation.</p> <p>Improved levels of access within Hastings should mean that everyone is able to access higher and further education facilities.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• Significant investment has been made in education facilities, which is appropriate and expected to produce a beneficial upward trend in education, skills and training in Hastings. In addition, the planning policy supports the generation of a diverse range of employment opportunities.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• No recommendations are made</li> </ul>

**Table 9-5: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *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***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b></p> <p>POLICY DS1: New Housing Development</p> <p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN4: Conservation and Enhancement of Landscape</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H2: Housing Mix</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p>
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	<p>POLICY E4: Tourism and Visitors</p> <p>POLICY CI1: Infrastructure and Development Contributions</p> <p>POLICY CI2: Sports and Leisure Facilities</p> <p>POLICY CI3: Children's Play Provision</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p> <p>POLICY T3: Sustainable Transport</p> <p>POLICY T4: Travel Plans</p>
<b>Appraisal Findings</b>	<p>This sustainability objective recognises the fact that access to services such as health care, education, shops, GPs, public transport, employment, training, parks and open spaces is a major issue for Hastings. A lack of mobility can cause real hardship, reducing opportunities for employment and education as well as access to leisure and cultural activities. Limited public transport can contribute to increasing the isolation of communities and individuals.</p> <p>A large number of planning policies will impact on this sustainability objective both directly and indirectly.</p> <p>Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way), has a number of broad objectives that relate to this sustainability objective. These include:</p> <ul style="list-style-type: none"> <li><i>providing access to education, training and jobs and supporting the creation of new enterprises to bring economic prosperity and greater self-sufficiency</i></li> <li><i>enhancing the cohesion and vitality of communities, providing neighbourhoods with a vibrant and accessible mix of flexible and compatible uses, services and community facilities</i></li> <li><i>providing accessible forms of development that reduce the need to travel by car and are integrated with public transport and other sustainable modes of travel, allow for ease of movement and provide safe environments</i></li> </ul> <p>These broad objectives are developed further in the more detailed policy context.</p> <p><b>Transport</b></p> <p>The transport and accessibility policies (T1 – T4) all seek to improve accessibility both within Hastings and between Hastings and</p>

	<p>other regional and national cities. In general this will have a beneficial impact on this objective.</p> <p>There has been a significant increase in the number of trips made by bus; to 4.42 million journeys in 2008/09 (+26.2% from 2002/03 figures). There is also a much higher percentage of households in Hastings that do not own a car (34%), compared to the South East (19%). As such, it is likely that there is a dependency on public transport to access key services and facilities.</p> <p>Policy T1 (Strategic Road and Rail Schemes) and T2 (Local Road Improvements) encourage the provision of an enhanced road and rail network, both within Hastings and between Hastings and other cities. This is complemented by Policy T3 (Sustainable Transport) which seeks to improve the provision of sustainable transport within Hastings. A Quality Bus Partnership has been set up which aims to improve bus services in the town and improve punctuality on key corridors, such as those that provide access to the Conquest Hospital and Sussex Coast College. However, given the dependence on public transport, these proposed improvements are not deemed sufficient.</p> <p>Policy T3 also supports the creation of a strategic network of cycle routes that will link local communities with key services in the town, including employment, healthcare, education and green spaces. This policy will have a beneficial impact on this objective for a large part of the population. However, it is unlikely to benefit the elderly population to the same extent.</p> <p><b>Employment opportunities</b></p> <p>The provision of enhanced employment opportunities is discussed in table 9-4 above. The policy context is deemed appropriate for generating a range of employment opportunities.</p> <p><b>Community facilities and services</b></p> <p>Policy CI1 (Infrastructure and development contributions) looks to ensure that the right infrastructure is in place at the right time to provide the additional capacity required to support new development. Contributions from developers are also required, to meet the communities' needs. As such, it is deemed that this policy will ensure that new developments have adequate access to services.</p> <p><b>Cultural opportunities</b></p> <p>Policy EN1 (Built and Historic Environment) seeks to protect the cultural heritage of Hastings. Those heritage assets that are at risk through neglect, decay or other threats will be identified for conservation. Importance will be placed on new development making a positive contribution to the quality, character, local distinctiveness and sense of place of historic buildings and areas. Listed</p>
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	<p>buildings, conservation areas, locally listed heritage assets, historic parks and gardens, scheduled monument sites; and areas of archaeological potential and known archaeological find sites, will be preserved. There is a presumption in favour of the conservation of heritage assets and their settings.</p> <p>This policy should lead to the successful protection of the heritage assets, which are culturally important to Hastings.</p> <p><b>Recreational opportunities</b></p> <p>There has been a steady increase in access to open space between 2005 and 2008, from 60% to 71%, and a corresponding increase in access to recreational opportunities, from 8% to 29.7% between 2006 and 2007. This positive trend will be supported by Policy Cl2 (Sports and Leisure Facilities), which protects existing sports and leisure facilities and Policy EN2 (Green Infrastructure Network) which states that <i>“the green network will ensure that everyone has access to natural open space”</i>. These policies are likely to ensure Hastings meets the target of ensuring that 82% of inhabitants are within 300metres of an open space by 2013.</p> <p>Development along the seafront, which improves recreational opportunities, will be supported. However, access to other recreational opportunities are not expressly mentioned in the plan.</p> <p><b>Spatial strategies</b></p> <p>The spatial strategies suggest that there is significant potential for building on existing cultural offerings. The Hastings Cultural Regeneration Strategy specifically looks to develop cultural quarters in Central St Leonards, built around studio and workshop space for the creative industries, and in Hastings Town Centre from the White Rock Theatre to the Station Plaza.</p> <p>Access to other jobs and services will be improved through the enhancement of public transport and the development of the strategic cycle and pedestrian network.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• There is high dependency on public transport in Hastings due to the relatively low car ownership and the large elderly population. There has also been a significant increase in the number of people travelling by bus over recent years. There is therefore a need to continue improving the provision of public transport across Hastings. However, this is addressed through the East Sussex Local transport Plan (LTP3) 2011-2026 and it is acknowledged that there is limited potential to influence this</li> </ul>

	<p>through this plan.</p> <ul style="list-style-type: none"> <li>The policy to promote pedestrian and cycle access across Hastings is deemed sufficient</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>No recommendations are made</li> </ul>
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**Table 9-6: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *Safe and secure environments are created and there is a reduction in crime and the fear of crime***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b> POLICY DS1: New Housing Development</p> <p><b>Planning Strategy</b> POLICY FA1: Strategy for Western Area POLICY FA2: Strategic Policy for Central Area POLICY FA3: Strategy for Hastings Town Centre POLICY FA4: Strategy for Central St Leonards POLICY FA5: Strategic Policy for Eastern Area POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b> POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way POLICY EN1: Built and Historic Environment POLICY EN2: Green Infrastructure Network POLICY EN3: Nature Conservation and Improvement of Biodiversity POLICY EN4: Conservation and Enhancement of Landscape POLICY EN5: Open Spaces – Enhancement, Provision and Protection POLICY H1: Housing Density</p>
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	<p>POLICY H2: Housing Mix</p> <p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p> <p>POLICY CI2: Sports and Leisure Facilities</p> <p>POLICY CI3: Children's Play Provision</p>
<b>Appraisal Findings</b>	<p>This objective recognises the importance of reducing levels of crime and the fear of crime in Hastings. Crime rates in Hastings continue to fall, dropping to 57.1 recorded crimes per 1,000 population in 2009/10, from 103 per 1,000 in 2008/09. However, just 85% of population have stated that they feel safe outside their local area during the day, compared to 91% for East Sussex as a whole. Furthermore, only 39% of Hastings residents feel safe outside at night time, compared to 57% for East Sussex. Reducing the fear of crime is therefore particularly important.</p> <p><b>Crime and the fear of crime</b></p> <p>Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) contains the overall goal of: “<i>reducing opportunities for crime and disorder through innovative design and the clear distinction of public and private space</i>”. As an overarching objective, this is likely to have a beneficial impact on this objective.</p> <p>Policy DS1 (New Housing Development) contains an ambition to return 255 long term unoccupied buildings to the housing stock. This is likely to have a beneficial impact on efforts to reduce crime and the fear of crime. However, the large number of buildings which are deemed ‘unfit for human habitation’ and those in a substantial state of disrepair may contribute to the levels of crime and the fear of crime. The weak policy context surrounding these issues may therefore have an adverse impact on levels of crime and the fear of crime. Issues surrounding the fitness of buildings for human habitation may be more appropriately addressed through other measures and corporate strategies.</p> <p>Policy H2 (Housing Mix) and Policy H4 (Houses in Multiple Occupation) seek to ensure that a range of tenure types and house sizes are incorporated into any particular area in Hastings. These policies will ensure that deprivation does not become concentrated in one particular area, which is then more likely to experience greater levels of crime. Promoting diversity is therefore seen as having a beneficial impact.</p>

	<p>Less directly a range of other policies are likely to have a beneficial impact on the levels of crime and the fear of crime. These include policies which focus on protecting the environment (EN2- EN5), which promote green infrastructure, open space and recreation and sporting opportunities. Other policies, such as E2, which seeks to improve access to skills and jobs, are also likely to have a beneficial impact.</p> <p><b>Spatial policies</b> The IMD shows that crime is particularly concentrated in the Central Area, around Hastings Town Centre, St Leonards and Bohemia, and along the Seafront.</p> <p>The relevant spatial policies are therefore FA3, FA4 and FA6, which provides the overall strategy for these areas. Within these policies there is support for improving the public realm, increasing the provision of cultural and social opportunities, providing a greater mix of houses and reducing the number of long term unoccupied houses. It is likely that all these initiatives will support the reduction in crime which has occurred between 2008 and 2009. These initiatives should also reduce the fear of crime in these neighbourhoods.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• Policies, which promote the improvement of the public realm, the redevelopment of unoccupied houses to use, and encourage diverse communities are all likely to have beneficial impacts on this objective.</li> <li>• A range of policies are likely to have an indirect impact on this objective, such as the protection of open space and recreation facilities, and greater access to employment.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• There is an opportunity for the council to promote the use of 'secure by design' principles in the design and construction of new buildings.</li> </ul>

**Table 9-7: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *Vibrant and locally distinctive communities are created and sustained***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b></p> <p>POLICY DS1: New Housing Development</p> <p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY SC3: Promoting Sustainable and Green Design</p> <p>POLICY EN1: Built and Historic Environment</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN4: Conservation and Enhancement of Landscape</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H1: Housing Density</p> <p>POLICY H2: Housing Mix</p> <p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p>
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	<p>POLICY E3: Town, District and Local Centres</p> <p>POLICY E4: Tourism and Visitors</p>
<b>Appraisal Findings</b>	<p><b>Vibrant and locally distinctive communities</b></p> <p>Policy E3 (Town, District and Local Centres) seeks to safeguard and enhance the functions of different centres within Hastings. Hastings Town Centre is seen as the most important and accessible of these centres, and so has been the subject of regeneration. Local centres, such as Ore Village, will also be protected and enhanced. This will have a positive impact, in that it will ensure adequate local services are provided to residents. There is the potential for it to have a negative impact however, if money for regeneration is focussed on these areas to the exclusion of other areas of Hastings. Other policies that support the creation of employment land and opportunities in and around Hastings (e.g. DS2 and DS3), are also likely to improve the local economy and therefore the vibrancy of Hastings as a whole.</p> <p>Policy EN1 (Built and Historic Environment) seeks to protect the cultural heritage within Hastings. Those heritage assets that are at risk through neglect, decay or other threats will be identified for conservation. Importance will be placed on new development making a positive contribution to the quality, character, local distinctiveness and sense of place of historic buildings and areas. This policy will ensure that the history of an area is revealed and contributes to the local identity of Hastings.</p> <p>Policy E4 (Tourism and Visitors) is also likely to have an impact on this objective, through encouraging the development of tourist attractions, particularly along the seafront area between Rock-a-Nore and the pier. This will enable development, which might increase the vibrancy of the seafront. However, it might also lead to a loss of local distinctiveness if tourist attractions are not sensitive to their surroundings.</p> <p>The group of policies that deal with green infrastructure, open space and recreation (EN2 – EN5) are likely to supplement the local urban environment and enhance the setting of the town in general.</p> <p>Policy H2 (Housing mix) supports the creation of diverse communities throughout Hastings through promoting a range of tenure types and house sizes. This is likely to lead to a more vibrant community.</p> <p><b>Neighbourhood planning</b></p> <p>One of the best ways to create and maintain locally distinctive communities is through enabling the local community to establish the</p>

	development needs of their area. Explicit support for neighbourhood plans is given in the overall Planning Strategy Visions, which states: <i>"We will...support neighbourhood planning across the Plan period."</i> This is likely to have a beneficial impact on this objective.
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• Vibrant communities will be encouraged through the planning process by ensuring town and local centres are maintained and enhanced, heritage assets are preserved, a network of green infrastructure is developed and communities are diversified.</li> <li>• The development of tourist attractions may impact on the objective by providing greater services and facilities for the local population. However, there is the potential for it to have a negative impact if new developments are not sensitive to their surroundings.</li> <li>• The development of tourist accommodation may have a negative impact, as it is likely to be empty outside the tourist season. It is acknowledged that the strategy for Hastings is to extend the tourist season and to increase 'business tourism', which, if successful, would result in less empty accommodation.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• The development of tourist attractions and accommodation should be supported providing it does not detract from the local distinctiveness of the site.</li> </ul>

**Table 9-8: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *Land and buildings are used more efficiently and the best use is made of previously developed land***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b></p> <p>POLICY DS1: New Housing Development</p> <p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p>
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	<p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC7: Flood Risk</p> <p>POLICY EN1: Built and Historic Environment</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN4: Conservation and Enhancement of Landscape</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H1: Housing Density</p> <p>POLICY H2: Housing Mix</p> <p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p>
<b>Appraisal Findings</b>	<p>This sustainability objective recognises the fact that Hastings is a tightly contained urban centre that is mostly surrounded by areas of environmental and landscape importance, such as the High Weald Area of Outstanding Natural Beauty. In recognition of this, the Council has stated its commitment “<i>to making best use of Brownfield land in the urban area and to the re-use of empty homes</i>”.</p> <p><b>Land Use</b></p> <p>Policy DS1 (New Housing Development) and DS2 (Employment Growth) make provision for new houses and employment land.</p>

	<p>However, the housing target had been derived from an estimation of the potential to develop on previously developed land and within the town itself. This is also the focus for employment land. There is a provision for developing windfall sites and these may include the development of Greenfield land.</p> <p>Policy DS3 (Location of Retail Development) supports development of 20,500m<sup>2</sup> of net comparison floor space. The preferred location for this development is within Hastings Town Centre. However, the council states that: <i>"If for any reason this retail need cannot be accommodated in the town centre, then the Council will pursue a sequential approach to site selection, looking first for potential sites on the edge of the town centre or at the district centres, including St Leonards, and then at out-of-centre sites that are in accessible locations"</i>. The application of this sequential approach should be sufficient to ensure that the development is located on brownfield land, which is in line with this objective.</p> <p>Policy H1 (Housing Density) states that creating dense urban environments is an appropriate means of balancing the growing need for housing in Hastings with the need to protect open spaces and biodiversity. The policy states that housing densities of 40 dwellings per hectare should be met in sustainable locations close to a good range of existing or potential services and facilities; and where there is, or there is potential for good public transport. Where the location is not deemed suitable, a target housing density of 30 dwellings per hectare is mandated. This policy will have positive impacts on this objective, as it will ensure that land is used efficiently.</p> <p>Policies focused on protecting the environment (EN2-EN5) will ensure that open spaces and areas of importance to biodiversity are protected. EN2 protects a network of green spaces, both for the benefits of biodiversity and humans; and also to provide some protection from the impacts of climate change. These policies therefore ensure that development does not spill over into these areas.</p> <p>However, no explicit protection to Greenfield sites is given in the policy, and the potential to develop the Greenfield land to the northwest of the town has been investigated. At present, however, a strategic allocation of land has not been made due to the uncertain impacts such development would have on the Marline Valley SSSI, which is adjacent to the Greenfield land.</p> <p>It is stated that the Council will look to develop <i>"Brownfield housing sites first, wherever possible, although a mix of both Brownfield and Greenfield may be needed to meet the 5 year supply"</i>. It is likely therefore that a degree of development will occur on Greenfield land.</p> <p><b>Derelict and unused buildings</b></p> <p>Policy DS1 (New Housing Development) states that <i>"in order to maintain and make effective use of the existing housing stock, the</i></p>
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	<p><i>Council will bring back into residential use empty housing in line with its Empty Homes Strategy". This policy is likely to have a positive impact on this sustainability objective.</i></p> <p>A related issue is that Hastings has a high percentage of houses deemed unfit for habitation. While the policy context suggests resources will be targeted at improving these areas, the opportunity to redevelop these areas to provide new residential accommodation is not taken. However, this issue may be best tackled through other measures and corporate strategies.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• The policies on housing density and the protection of a network of open spaces are likely to be effective in ensuring development makes efficient use of land;</li> <li>• The policy which targets the return of long term unoccupied houses to use will reduce the amount of derelict and underused land;</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• The stated preference for development to be sited on previously developed land should be incorporated into the policy text</li> </ul>

**Table 9-9: Appraisal for Objective - Biodiversity is protected, conserved and enhanced**

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b></p> <p>POLICY DS1: New Housing Development</p> <p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p>
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	<p>POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC3: Promoting Sustainable and Green Design</p> <p>POLICY SC4: Working Towards Zero Carbon Development</p> <p>POLICY SC5: District Heating Networks and Combined Heat and Power Systems</p> <p>POLICY SC6: Renewable Energy Developments</p> <p>POLICY SC7: Flood Risk</p> <p>POLICY EN1: Built and Historic Environment</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN4: Conservation and Enhancement of Landscape</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY CI2: Sports and Leisure Facilities</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p>
<b>Appraisal Findings</b>	<p><b>Development Strategy</b></p> <p>The Development Strategy Policies, DS1, DS2, and DS3, focus on the provision of new housing employment and retail provision respectively. DS1 (New Housing Development) makes provision for the delivery of 3,400 new homes by 2028, or 200 per year. Windfall sites (40 dwellings per year) are likely to be required between 2022 and 2028. The areas of housing site search used for the SHLAA<sup>12</sup> extend beyond the existing built-up area boundary of Hastings to sites on the urban fringe and potentially encroaching into the High Weald area of Outstanding Natural Beauty (AONB) and the Greenfield site of Breadsell. The SAC, SSSIs and LNRs</p>

<sup>12</sup> Hastings Borough Council (2010) Strategic Housing Land Availability Assessment [online] at: [http://www.hastings.gov.uk/environment\\_planning/planning/local\\_development\\_framework/strategic\\_housing/#shlaa2011](http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/strategic_housing/#shlaa2011) (Accessed February 2012)

were excluded.

DS2 (Employment Growth) supports the development of up to 70,000m<sup>2</sup> (7ha) of employment floorspace between 2008 and 2028 largely focussed on two main sites, with further employment provided through renewal of existing stock and encouragement of live/work units embedded within housing developments.

To 2028 there is an estimated need for 20,500m<sup>2</sup> of new retail development primarily delivered within the Town Centre and 2,800m<sup>2</sup> or retail warehousing to be met on edge-of- or out-of-centre sites.

Land take as a result of development, both Brownfield and Greenfield can lead to a loss of and increased pressure on biodiversity. Large development sites can provide opportunities to mitigate impacts on biodiversity by designing in green infrastructure to support habitats and increase local biodiversity. Smaller sites often present fewer opportunities to deliver a coordinated and integrated approach and can lead to fragmented habitats. Focussing on maximising the use of existing sites and encouraging development on previously developed land should help mitigate potential impacts on biodiversity; however, where development is proposed on sites outside the urban boundary and Greenfield sites, measures should be made to ensure ecological networks are maintained and enhanced, either through coordinated delivery of smaller development footprints or well designed larger schemes.

### Planning Strategy

Each of the Planning Strategy policies present position of growth encompassing a range of proposals for housing, employment and retail provision. Western Area and Central Area (including Central St Leonards and Hastings town centre) are expected to see the greatest growth in housing and employment provision; however Eastern Area is also expected to accommodate 910 new homes and 11,400m<sup>2</sup> of employment areas. Eastern Area benefits from a variety of green space including Hastings Country Park Nature Reserve and the Hastings Cliffs SAC. Each area benefits from a variety of green space, local parks and nature conservation areas which could be impacted by development. In mitigation, the Western Area, Central Area and Eastern Area make explicit reference to the protection, management and enhancement of green spaces which should ensure development doesn't adversely impact biodiversity in these areas.

### Developing Sustainable Communities

Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) and Policy SC3 (Promoting Sustainable and Green Design) should both help to support this sustainability objective through their specific aim to provide *'an accessible greenspace network and protection and enhancement of biodiversity'* and incorporate *'measures such as ... multifunctional green space [and] protecting and enhancing biodiversity'*.

	<p>Although an indirect effect, Policies SC4 (Working Towards Zero Carbon Development), SC5 (District Heating Networks and Combined Heat and Power) and SC6 (Renewable Energy Developments) should ideally help to mitigate impacts of climate change on biodiversity; however, given these policies relatively weak approach, for example, relying on only meeting minimum standards for building standards and placing restrictive measures on renewable energy development the potential benefits may be limited.</p> <p>Policy SC7 (Flood Risk) is likely to have a positive impact on this objective to protect, conserve and enhance biodiversity by positive management of flood risk through, for example, the use of Sustainable Drainage Systems and other green infrastructure measures.</p> <p><b>Protecting our environment</b></p> <p>The presumption in favour of the conservation of heritage assets (Policy EN1: Built and Historic Environment) and their settings should positively contribute to this sustainability objective, in particular through the Policy's protection of historic parks and gardens. Policies EN2, EN3, EN4 and EN5 should all have significant positive impacts on the protection, conservation and enhancement of biodiversity in Hastings. Measures for private open spaces and allotments to be protected from development should help to maintain green corridors and reduce the risk of fragmentation of habitats.</p> <p><b>Housing</b></p> <p>It is unclear as to how Policy H5 (Accommodation for Travelling Communities) would impact this sustainability objective. However it is likely that the requirement that sites should respect areas of high conservation or ecological value will ensure the conservation and protection of local biodiversity.</p> <p><b>Community Infrastructure</b></p> <p>Recognition of the role that sports and leisure facilities (Policy C12) as part of the green infrastructure should help to ensure that facilities contribute positively to the protection, conservation and enhancement of biodiversity.</p> <p><b>Transport and accessibility</b></p> <p>Policies T1 (Strategic Road and Rail Schemes) and T2 (Local Road Improvements) are likely to result in the loss habitat that support biodiversity.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>No recommendations made.</li> </ul>

**Table 9-10: Appraisal for Objective - The risk of flooding (fluvial & tidal) and coastal erosion is managed and reduced now and in the future**

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b></p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC3: Promoting Sustainable and Green Design</p> <p>POLICY SC7: Flood Risk</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H5: Accommodation for Travelling Communities</p>
<b>Appraisal Findings</b>	<p><b>Planning Strategy</b></p> <p>Policies to increase housing, employment and retail provision within Hastings (Policies FA1 to FA6) will lead to an increase in development and potentially an increased likelihood of flood risk, if not fully assessed, evaluated and managed. Notwithstanding this, there may also be opportunities to improve flood risk management through new development that leading to an overall net improvement both locally and for Hastings as a whole.</p> <p>Flooding is a key issue in parts of Western Area; although the area does benefit from sea defences to protect from tidal flooding. Specific requirements in Policies FA1 to direct development to areas at the lowest risk of flooding and required specific flood risk assessments should help mitigate these concerns.</p>

	<p>It is unclear the extent to which Policy FA2 (Strategic Policy for Central Area) will help to manage flood risk now and in the future due to its relatively limited requirements for development to simply assess and propose measures to manage flooding. This is an issues in central parts of the town which are at risk from groundwater flooding. It is unlikely that simply taking account of past flooding with an 'aim' to reduce the overall level of flood risk is likely to contribute to the positive outcome for this objective. Similarly, the extent to which Policy FA3 will contribute positively to this objective is unclear. The provision of over 40,000m<sup>2</sup> of employment and retail floorspace could have a significant impact on local drainage infrastructure unless measures to reduce flood risk are effectively implemented.</p> <p>Hastings benefits from a number of flood defences including seawalls, groynes and shingle banks and the long term policy is to "hold the line" (The South Foreland to Beachy Head Shoreline Management Plan) which should see the coastal defences in the town being maintained for the foreseeable future. New infrastructure in the form of a rock groyne to protect Carlise Parade provide further protection, however there is recognition that further investment will be required to maintain the same level of defence and compensate for the impacts of climate change. However, the identified need for new infrastructure to ensure adequate protection against tidal flooding and coastal erosion is not clearly identified in Policy FA6 (The Seafront) and it is unlikely whether this policy will contribute positively towards this objective.</p> <p><b>Developing Sustainable Communities</b></p> <p>Both Policies SC1 (Overall Strategy for Managing Change in a Sustainable Way) and SC3 (Promoting Sustainable and Green Design) should contribute positively to this sustainability objective. Acknowledgement of the need to manage flood risk and the impacts of climate change - anticipated wetter warmer winters and rising sea levels, as well as, more frequent and intense weather events - should help mitigate likely increased flood risk as a result of development. Promotion of green infrastructure and sustainable drainage systems will also help meet the positive outcome for this objective. The extent to which these policies will protect current residents as well as future residents is unclear as Policy SC1(g) does not afford this protection.</p> <p><b>Protecting our environment</b></p> <p>Policy SC7 (Flood Risk) sets out the requirements for development proposals. It identifies the need to apply a risk based sequential approach to determine land for development and identifies areas known to be at risk of flooding and the need to manage surface water appropriately. It also specifies the need for positive adaptation, which should, although this is not entirely clear, require developers to build resilience within developments to manage anticipated future flood risk.</p> <p>Policy EN2 (Green Infrastructure Network) and EN3 (Nature Conservation and Improvement of Biodiversity) should positively</p>
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	<p>contribute to minimising the risk of flooding. Policy EN2's strong support for the value of nature and green networks, and the requirements that developments should contribute to these networks is likely to ensure an integrated and effective system to mitigate against flood risk. Furthermore, Policy EN3, in ensuring protection of biodiversity and the requirement for development to contribute positively to the natural environment, should also contribute to minimising flood risk and contributing to the positive outcome for this objective. Policy EN5's protection and enhancement of existing open spaces that of town wide significance will also help mitigate flood risk though maintaining Hastings' green infrastructure network and the benefits this brings in attenuation rates and reducing pressure on the towns drainage infrastructure.</p> <p>Policy H5 (Accommodation for Travelling Communities) which specifies that sites are not to be located on locations where there is a risk of flooding should ensure these communities are not at risk of flooding.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• Policy FA2 (j) should also require development to take account of anticipated future climate change and its impact on flooding</li> <li>• Policy FA2 (j) should refer to sustainable drainage 'systems' not 'techniques' to avoid any ambiguity</li> <li>• Policy SC1 (g) should be re-worded to "managing flood risk and reducing the potential effects of climate change on <i>existing and</i> future communities"</li> <li>• Policy SC7 should clarify exactly what is meant by "positive adaptation"</li> </ul>

**Table 9-11: Appraisal for Objective - Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible**

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b>  POLICY DS1: New Housing Development  POLICY DS2: Employment Growth  POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b>  POLICY FA1: Strategy for Western Area  POLICY FA2: Strategic Policy for Central Area</p>
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	<p>POLICY FA3: Strategy for Hastings Town Centre  POLICY FA4: Strategy for Central St Leonards  POLICY FA5: Strategic Policy for Eastern Area  POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b>  POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way  POLICY SC6: Renewable Energy Developments  POLICY EN1: Built and Historic Environment  POLICY EN2: Green Infrastructure Network  POLICY EN3: Nature Conservation and Improvement of Biodiversity  POLICY EN4: Conservation and Enhancement of Landscape  POLICY EN5: Open Spaces – Enhancement, Provision and Protection  POLICY E3: Town, District and Local Centres  POLICY CI2: Sports and Leisure Facilities</p>
<b>Appraisal Findings</b>	<p><b>Development Strategy</b></p> <p>While it is possible that Policies DS1 – DS3 could provide opportunities for the protection and enhancement of greenspace, the countryside and the built environment, it is also possible that pressures for development, particularly for housing could lead to a net loss of parks, gardens and countryside as the council struggles to bring forward sufficient sites to meet housing need. The focus for employment land (Policy DS2) to be largely located on existing employment areas of Churchfields, Castleham, Ponswood, West Ridge and Ivyhouse Lane; and a focus on encouraging the renewable of existing stock should mitigate the main impacts of this Policy on the protection of the natural and built environment. Similarly, the focus for retail development to be within the town centre or well related to established retail areas should minimising the potential impact of this Policy on this sustainability objective.</p> <p><b>Planning Strategy</b>  Hastings benefits from a variety of natural and built cultural heritage. Including over 900 listed buildings, 18 conservation areas, 2 registered historic parks and hundreds of archaeological locations. As a result there are few locations in Hastings where significant</p>

development would not have an impact on the Towns natural or historic environment. Strong references to the value of Hastings parks within the supporting text for the planning strategy affirms the value that is placed on these assets for the town and will provide the context for any planning decisions. In particular Policy FA1 (Strategy for Western Area), although setting out a strong growth agenda, also aims to capitalise on its surrounding countryside and to work with neighbouring districts to promote the best use of its parks and green spaces, including Combe Valley Country Park. Similarly, Policy FA5 (Strategic Policy for Eastern Area) also aims to provide protection to the natural and historic environment, in particular the unique townscape of Old Town and the Hastings Country Park Nature Reserve.

Although not enjoying the same extent of open space as Western Area, Central Area still has access to good open space and also benefits from 15 out of the 18 conservation areas in the Town. Recognising this Policy FA2 (Strategic Policy for Central Area), Policy FA3 (Strategy for Hastings Town Centre), FA4 (Strategy for Central St Leonards), and Policy FA6 (The Seafront) seek to protect, manage and enhance their green spaces network and its conservation areas, as well as, other areas including key landmarks. As a consequence these policies are likely to contribute positively to this sustainability objective.

Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) should contribute positively to supporting this objective. Its focus on ensuring high quality design which adds to local character and providing an accessible greenspace network should help protect and enhance the towns cultural and heritage assets helping make Hastings a more attractive destination and also help open up the town to the wider countryside and coast. Its aim to strengthen connections between people and nature and provide everyone with access to a good quality natural environment should also help meet the aims of this objective.

Policy SC6 (Renewable Energy Developments) should help contribute to protecting the appearance of the historic environment and townscape.

### **Protecting our environment**

Each policy EN1 – EN5 should all contribute positively to this sustainability objective. Policy EN1 should provide good protection to the built and historic environment, in particular with regards to the significance and setting of a number of classified heritage assets. Furthermore this policy sets out a *'presumption in favour of the conservation of heritage assets and their settings'* with the development of a historic environment strategy during the course of the plan period. Policies EN2 – EN5 afford protection to Hastings natural environment and focus on the protection, conservation and enhancement of the green infrastructure network (Policy EN2), nature conservation and improvement of biodiversity (Policy EN3), conservation and enhancement of landscapes (Policy EN4), and open spaces – enhancement, provision and protection (Policy EN5). In doing so they provide the framework to

	<p>enhance and improve provision both within Hastings and the wider area and provide increased opportunities to access good quality natural environment, parks, open spaces and the coast.</p> <p>Policy E3 (Town, District and Local Centres) should contribute positively to this sustainability objective by ensuring development will reflect the centre's existing and proposed functions and specifying measures to enhance the appearance, safety and environmental quality of the centre. Promoting the reuse of vacant buildings should help ensure Hastings' townscape is protected. Sports and leisure facilities contribute to the town's open spaces and green infrastructure network. Policy CI2 (Sports and Leisure Facilities) affords protection to these areas and will help to maintain access to parks and open spaces within and around Hastings. This Policy should help maintain access to these facilities, particularly those located within and close by local communities.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>No recommendations are made</li> </ul>

**Table 9-12: Appraisal for Objective - Air pollution from transport and land use planning is reduced, and air quality continues to improve**

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Planning strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p><b>Theme based policies</b></p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY CI1: Infrastructure and Development Contributions</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p> <p>POLICY T3: Sustainable Transport</p> <p>POLICY T4: Travel Plans</p>
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<p><b>Appraisal Findings</b></p>	<p><b>Development Strategy</b></p> <p>Policy FA1 (Strategy for Western Area) supports the proposed Bexhill-Hastings Link Road and A21 Baldslow Link. Based on the available information it is difficult to determine whether this would lead to a greater personal car use or improved public transport would encourage people out of their cars on to more sustainable forms of transport. The provision of the link road may lead to reduced congestion on the existing Bexhill Road and improvement of local air quality including the lifting of the designated AQMA here. The Policy's support of a strategic network of cycle routes (as does Policy FA5 (Strategic Policy for Eastern Area)) should help increase the attractiveness of cycling and help reduce local air pollution within these areas. Policy FA2 (Strategic Policy for Central Area) seeks to support the wider cycle network including provision extending out of the town centre to the wider countryside. In doing so this Policy should help provide the necessary infrastructure to both access the town centre and the wider countryside by bike thus helping to improve local air quality and correspondingly promote more sustainable travel patterns.</p> <p>Capitalising on the compact nature of the town centre Policy FA3 (Strategy for Hastings Town Centre) seeks to promote accessibility by local public transport, walking and cycling which should help improve local air pollution.</p> <p>Unlike policies FA1 - FA3 and FA5 (above), Policy FA4 (Strategy for Central St Leonards) makes no explicit mention to encourage more sustainable forms of transport such as walking and cycling; in spite of the area suffering high levels of deprivation and corresponding health related issues. It is unlikely that this policy will have any effect on this strategic objective in promoting more sustainable travel patterns. Policies FA1 – FA5 are likely, on the whole, to lead to a reduction in air pollution as a result of transport related emissions.</p> <p>At this stage there is not enough information to determine the extent to which land use planning would impact on local air pollution.</p> <p>Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) should contribute positively to improved air quality through the provision of accessible forms of development that reduce the need to travel by car and are integrated with public transport and other infrastructure to facilitate cycling and walking.</p> <p>Policy EN2 (Green Infrastructure Network) should help provide greater access to the wider countryside and provide improved opportunities for walking and cycling both within and around Hastings.</p> <p>Policy CI1 (Infrastructure and Development Contributions) should help ensure development is brought forward in such a way to</p>
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	<p>reduce reliance on the private car and enable greater access to public transport and opportunities for cycling and walking. Sustainable transport infrastructure is specifically highlighted as a priority for developer contributions thus ensuring that air pollution as a result of transport emissions should be reduced.</p> <p>Transport Policies T1-T4 all have an influence on this sustainability objective. T1 (Strategic Road and Rail Schemes) seeks the earliest possible implementation of four road and rail schemes to improve road infrastructure (including a link road) and to address capacity and journey time issues on the Ashford to Hastings and Hastings to Tonbridge lines.</p> <p>The Bexhill to Hastings Link road should help achieve local regeneration and growth and reduce congestion on the existing network. Although it is likely to lead to increased road transport in the medium to longer term it may help to mitigate existing air quality issues on this route. Improved access may enable a more efficient bus system and encourage people from their private car to public transport. It is not clear whether the improved rail network would lead to a shift in modal transport from the car to the train for these routes. On balance this Policy is likely to result in a net increase in emissions to air but could deliver localised benefits.</p> <p>Policy T2 (Local Road Improvements) in particular the plan for a quality bus corridor along the A259 between Glyne Gap and Filsham Road should result in an improved services and make public transport along this route more accessible and attractive; as well as, result in an improvement in local air quality. The effectiveness of this measure in reducing air pollution is likely to be largely dependent on the implementation of bus priority lanes and junction approaches; without which it may be difficult to present the bus as a practical alternative to the personal car. Improvements to the Ridge Junction should also make this junction safer for cyclists and pedestrians. It should also help promote greater cycling and walking and with improved traffic flow should help reduce air pollution in this area.</p> <p>Policy T3 (Sustainable Transport) should positively contribute to this sustainability objective. The Policy places particular priority on improved bus routes the service and passenger facilities and provision of real-time information on bus times. It provides a number of measures to make walking and cycling more accessible including the support of a strategic cycle network, a safer highway network, requires developers to consider the needs of cyclists and pedestrians more widely and also supports wider strategies to reduce personal car and adopt 'smarter choices' such as workplace and school travel plans and car clubs for example. Combined with the requirement to improve air quality and the environment more generally this policy should help reduce the need to travel and support modes of travel to reduce air pollution. The requirements of Policy T4 (Travel Plans) for major developments to produce a travel plan should help facilitate the 'designing in' of public transport and pedestrians and cycling infrastructure and help contribute to meeting this sustainability objective.</p>
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<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Policy FA4 (Strategy for Central St Leonards) could include specific reference to promoting more sustainable modes of transport including walking and cycling</li> <li>Policy T3 (Sustainable Transport) could specifically support bus priority lanes and junction approaches as a part of improving bus routes</li> </ul>
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**Table 9-13: Appraisal for Objective - 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)**

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Planning Focus Areas</b></p> <p>POLICY DS1: New Housing Development</p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC3: Promoting Sustainable and Green Design</p> <p>POLICY SC4: Working Towards Zero Carbon Development</p> <p>POLICY SC5: District Heating Networks and Combined Heat and Power Systems</p> <p>POLICY SC6: Renewable Energy Developments</p> <p>POLICY SC7: Flood Risk</p> <p>POLICY H1: Housing Density</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p> <p>POLICY T3: Sustainable Transport</p> <p>POLICY T4: Travel Plans</p>
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<b>Appraisal Findings</b>	<p><b>Development Strategy</b></p> <p>The main sources of CO<sub>2</sub> emissions are buildings, industry and transport and well designed new homes capitalising on modern construction methods, the reuse of building materials and incorporating onsite renewables can contribute significantly to reducing Hastings' impact on the climate.</p> <p>Policy DS1 (New Housing Development) is likely to contribute positively to this objective with its focus on maintaining and making effective use of existing housing stock, however, the extent to which it can minimise its long term impact will be very much dependent on the proposed standards for energy efficiency. Although in the short-medium term the reuse of existing building stock can have net positive benefits in reduced carbon emissions (as a consequence of carbon saved from construction materials) the long term carbon costs as a result of a more inefficient building fabric can sometimes outweigh these.</p> <p><b>Planning Focus Areas</b></p> <p>Policies FA1 – FA6 present a number of specific requirements which should contribute to the positive outcome for this sustainability objective; however in general it is unlikely that these policies go far enough. Policy FA1 (Strategy for Western Area) specifies that only development along the Enviro Enterprise Corridor meets high standards of environmental sustainability but only when it is practical and economically viable. Unless 'economically viable' takes into the consideration of whole life carbon costs and energy costs to the occupier then this policy is unlikely to provide little protection to climate change mitigation. There is also concern that other development not in this area would not even be required to meet this standard. However, reference to exploring opportunities for CHP and renewable energy generation at Combe Valley Countryside Park; and directing development to the areas at the lowest risk of flooding should help both mitigate Hastings' carbon emissions and help it adapt to future climate change. Policy FA2 also supports the use of CHP near the Summerfields Sports Centre. Policy FA2 (Strategic Policy for Central Area) also supports the delivery of mixed use developments that should help promote land use patterns that minimise the need for travel - 'living above the shop'. This policy approach is also proposed by Policy FA3 (Strategy for Hastings Town Centre) and also supported by the intention to promote competitiveness in terms of a range of types of shops.</p> <p>Policy FA5 (Strategic Policy for Eastern Area) supports exploring the potential for renewable energy opportunities in Hastings Country Park which could contributing to reducing the town's carbon emissions.</p> <p>Policies SC1 – SC7 are all likely to contribute positively to this sustainability objective. Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) aim to make provision for home working with fibre-based broadband infrastructure and accessible forms of development that reduce the need to travel by car should help reduce car dependency and transport related emissions in</p>
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	<p>these developments. This policy SC1 also supports the move to a low carbon economy; however it is not clear what this exactly means and whether it would have any direct impact.</p> <p>Policy SC3 (Promoting Sustainable and Green Design) specific focus on both mitigation and adaptation measures for all development will significantly contribute to helping address this sustainability objective. Specifying green roofs and walls, SuDS and green infrastructure will help developments be resilient to the effects of a changing climate and the use of recycled materials in new development should also help mitigate the emissions of new build. Combined with Policy SC4 (Working Towards Zero Carbon Development) which focuses on improved energy efficiency through modern construction methods and provision of onsite low carbon and renewable energy generation should contribute positively to meeting this objective. The requirement for new non-residential development to also follow the same approach is good.</p> <p>It is unclear the extent to which Policy SC6 (Renewable Energy Developments) will contribute to this objective due to the comprehensive limitations prescribed for their deployment. Hastings benefits from a variety of natural and cultural assets which are integral to the character of the town; however, this policy as currently word implies that renewable energy development is incompatible with these and it is difficult to see how their deployment would be promoted given the current wording. To date, less than 70kW of renewable energy has been installed in Hastings.</p> <p>The requirement for development proposals to be flood resistant or incorporate flood resilient design, such as the inclusion of SuDS – Policy SC7 (Flood Risk) - should help ensure the development is prepared for likely future climate change impacts.</p> <p>Housing Policy H1 (Housing Density) is likely to contribute positively to this objective. Specified requirements for high density developments in suitable locations with the potential for good public transport should help reduce emissions of greenhouse gasses by reducing energy consumption and travelling by more sustainable means.</p> <p>It is unclear as to the extent Transport Policy T1 (Strategic Road and Rail Schemes) will contribute to this policy as the development of additional road infrastructure is likely to lead to increase road transport which may or may not be offset by proposed rail improvements. Policy T2 (Local Road Improvements) is more likely to lead to a positive outcome for this objective given the acceptance that the delivery of complementary sustainable transport infrastructure, including improvements to key public transport, walking and cycling routes will also be required.</p> <p>Working with partners on strategic infrastructure can ensure that the benefits of new road, rail, cycling and walking infrastructure</p>
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	can be maximised. Policy T3 (Sustainable Transport) address all these aspects presenting a balanced approach to improved connectivity and sustainable transport provision. Improving bus routes and services, supporting new and enhanced cycle provision and ensuring more accessible public realm for walking should help reduce transport related emissions. Policy T4 (Travel Plans) should also contribute to this objective.
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• Policy FA1 should refer to CCHP/CHP as appropriate in light of anticipated hotter drier summers.</li> <li>• Policy SC3 could promote the use of the waste hierarchy in specifying building materials for new development.</li> <li>• Policy SC4 should refer to CCHP/CHP as appropriate.</li> <li>• Policy SC6 could be re-worded to make distinctions between large scale and small scale renewable technologies reflecting their different level of impacts</li> </ul>

**Table 9-14: The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced**

<b>Policies 'screened-in' to the appraisal</b>	<p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC3: Promoting Sustainable and Green Design</p> <p>POLICY SC7: Flood Risk</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p>
<b>Appraisal Findings</b>	<p><b>Development Strategy</b></p> <p>Policies FA1 – FA6 - Large scale development across Hastings is likely to result in increased water demand; in the area of existing water stress. Although water quality and risk of pollution are addressed in other policies there should be a recognition of the spatial</p>

	<p>approach to development and potential impacts on local water bodies. Policy FA1 (Strategy for Western Area) identifies the proposed development at West Marina which could potentially impact local maintain marine water quality. However, good construction practice should ensure adequate pollution prevention measures are in place. Directing development to areas at lowest risk, as specified by Policy FA1 should ensure potential pollution of local water bodies as a result of flooding and surface water run-off/ground water discharge from development does not occur.</p> <p>Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) aims to improve the quality of the natural environment through supporting environmental regeneration and the protection and enhancement of biodiversity including the protection of water pollution. Consequently this policy should result in reducing the risk of pollution and improving water quality. Policy SC3 (Promoting Sustainable and Green Design) should also help achieve a positive outcome for this objective through incorporating mechanisms to minimise flood risk and transport of pollutants; and through protection and enhancement of the natural environment and biodiversity help increase water attenuation rates and support natural processes for water quality improvement.</p> <p>Policies EN2 (Green Infrastructure Network) and Policy EN3 (Nature Conservation and Improvement of Biodiversity) should both help contribute to improving water quality. The Policies aim to protect and enhance the natural environment and value nature and the benefits that arise from the natural environment including the recognition of ecosystems and coherent ecological networks.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>No recommendations are made.</li> </ul>

**Table 9-15: The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings**

<b>Policies 'screened-in' to the appraisal</b>	<p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC4: Working Towards Zero Carbon Development</p> <p>POLICY SC5: District Heating Networks and Combined Heat and Power Systems</p> <p>POLICY SC6: Renewable Energy Developments</p>
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	POLICY EN1: Built and Historic Environment
<b>Appraisal Findings</b>	<p><b>Planning Strategy</b></p> <p>The planning strategy for the Hastings area contains a number of provisions which should positively promote the uptake of renewable and sustainable energy technologies. A number of avenues will be explored, with the Western Area (Policy FA1) seeking to collaborate with Rother District Council in exploring renewable energy opportunities in Combe Valley Countryside Park. In the Eastern Area (Policy FA5) renewable energy opportunities will also be sought within the Hastings County Park. The opportunity for Combined Heat and Power stations contributing to District Heating systems will be considered in both the Western (FA1) and Central Areas (Policy FA2).</p> <p><b>Developing Sustainable Communities</b></p> <p>It is unclear to what extent Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) will support the wider deployment of sustainable and renewable energy technologies. While other key aspects required to manage change in a sustainable way, such as supporting sustainable modes of transport and requiring broadband infrastructure to enable effective home working, there is no mention of the need to work towards improved energy efficiency and greater deployment of low carbon energy infrastructure. Furthermore, it is not clear what 'supporting the move to a low carbon economy' means.</p> <p>The Policy SC4 (Working Towards Zero Carbon Development) should have a positive impact, as it encourages a hierarchical approach to achieving energy and carbon dioxide emissions requirements for all new developments. This approach involves improving energy efficiency, providing for renewable and Combined Heat and Power (CHP) technologies on site, and the use of additional large scale CHP or megawatt scale wind offsetting to meet remaining CO<sub>2</sub> reduction targets.</p> <p>Policy SC5 (District Heating Networks and Combined Heat and Power Systems) is also liable to produce a positive effect. By exploring opportunities to connect CHP systems to district heating networks, compliance with the Government's timetable for zero carbon homes and buildings should be expedited.</p> <p>The effect of Policy SC6 (Renewable Energy Developments) on this sustainability objective is uncertain. To date Hastings has benefited from only 70kW of installed renewable energy despite its southern coastal location and the potential to capitalise on solar and wind energy installations. It is likely that Policy SC6 could entrench this situation due to the prescriptive restrictions which place</p>

	<p>a barrier to wider deployment of renewable energy installations, and in particular for small scale technologies that have negligible impact on the natural or built environment.</p> <p>The environmental protection Policy EN1 (Built and Historic Environment) will likely have a negative effect on this objective. This is due to its presumption in favour of the conservation of heritage assets and their settings, which may reduce the number of sites deemed suitable for the deployment of sustainable energy and renewable energy technologies.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• The planning strategy should make specific reference to supporting the deployment of small scale renewable developments in new and existing buildings.</li> <li>• The planning strategy should promote the installation of energy efficiency measure in existing buildings recognising the contribution these can make to reducing fuel poverty.</li> <li>• Policy SC1 should recognise and support the contribution that sustainable energy and renewable energy technologies can make in moving towards a sustainable way and to mitigate the impacts of climate change</li> <li>• Policy SC6 could be re-worded to make distinctions between large scale and small scale renewable technologies reflecting their different level of impacts</li> </ul>

**Table 9-16: Through waste re-use, recycling and minimisation the amount of waste for disposal is reduced**

<b>Policies 'screened-in' to the appraisal</b>	<p>POLICY DS1: New Housing Development</p> <p>POLICY DS2: Employment Growth</p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p>POLICY SC3: Promoting Sustainable and Green Design</p>
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<b>Appraisal Findings</b>	<p>A number of housing related policies including Policy DS1 (New Housing Development) focus on the need to maintain and make effective use of the existing housing stock helping positively contribute to this sustainability objective. Similarly Policy DS2 (Employment Growth) also looks to encourage the renewal of the existing older stock of employment premises through the implementation of a specific employment land and premises protection policy.</p> <p>Policies FA1 to FA6 are all likely to result in increased production of waste, both household and commercial as a result of the increase in housing, retail and employment provision within the town. The extent to which the waste is minimised is likely to be dependent on individual development proposals and construction waste management plans. Proposals to support the improvement of housing conditions and reducing the number of empty dwellings within Central St Leonards and granting planning permission to proposals to tackle key buildings in need of repair (Policy FA4) will help to meet this objective.</p> <p>Policy SC3 (Promoting Sustainable and Green Design) will help positively contribute to this objective through promoting waste reduction and the use of recycled materials in new development. Notably Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) makes no reference to the need to reduce waste.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Policy SC1 should make reference to supporting the use of the waste hierarchy in all aspects of development</li> </ul>

**Table 9-17: Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice**

<b>Policies 'screened-in' to the appraisal</b>	<p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY H1: Housing Density</p>
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	<p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY T1: Strategic Road and Rail Schemes</p> <p>POLICY T2: Local Road Improvements</p> <p>POLICY T3: Sustainable Transport</p> <p>POLICY T4: Travel Plans</p>
<b>Appraisal Findings</b>	<p><b>Development Strategy</b></p> <p>The location of residential, employment and retail provision has the potential to significantly reduce the need to travel by private car and encourage greater use of public transport and walking and cycling. Data indicates that nearly 60% of Hastings' residents travel less than 5km to work and a high proportion live and work in the district.</p> <p>Policy DS2 (Employment Growth) and DS3 (Location of Retail Development) have the potential to significantly impact this objective. Policy DS2's proposed approach to encourage the renewal of existing older stock of employment premises may not be conducive to reducing road congestion and private car dependency whereby these location are poorly served by public transport/walking/cycling provision. This may be partly mitigated through the encouragement of live/work units reducing the need to travel.</p> <p>Policy DS3 is likely to positively contribute to this sustainability objective with its focus on retail development being supported in, or well connected to, established shopping areas. Specific reference to a hierarchy of site selection based on accessibility and warehousing to be delivered on edge-of-centre but accessible locations should help reduce private car dependency and vehicle pollution on both the local and strategic transport network in Hastings.</p> <p><b>Planning Focus Areas</b></p> <p>The broad approach to development in Hastings is to spread development around the town and capitalise on local perspective and sense of place, such as areas with defined communities or geography.</p> <p>Western Area comprises a number of employment areas and Policy FA1 (Strategy for Western Area) seeks to add to this with a further 36,700m<sup>2</sup> of employment provision as well as up to 1,270 new homes. Additional employment in this area should provide the opportunity to capitalise potential business synergies and further catalyse this part of town as a key centre for employment. Allocation of the majority of housing in this area may reduce the need for people to travel between their home and place of work,</p>

helping contribute to this objective. The Policy's support for the Bexhill-Hastings Link road may lead to greater car dependency in this area but should also provide opportunities for more integrated travel choices.

The Central Area, including St Leonards and Hastings town centre (Policies FA2, FA3 and FA4) is likely to see up to 1,500 new homes and 21,700m<sup>2</sup> of employment land and up to 20,500m<sup>2</sup> of retail provision. The scale of development will be matched with policy support for improved public transport accessibility and a strategic network of cycling provision to enable greater access to the centre from the wider town. The extent to which these measures will mitigate the anticipated increased visitor numbers is unknown at this stage.

The strategy for Eastern Area is for up to 910 new homes and 12,200m<sup>2</sup> of employment floor space (Policy FA5). The policy's focus on protecting and enhancing local and district centres combined with new cycle infrastructure and an improved public realm should help reduce the need to travel and provide more opportunities for cycling and walking in order to reduce local pollution levels.

Policy FA6 (The Seafront) supports the proposed Bexhill-Hastings Link Road. Based on the available information it is difficult to determine whether this would lead to a greater personal car use or whether improved public transport on this road would encourage people out of their cars on to more sustainable forms of transport. The encouragement for the development of year round tourist attractions could lead to increased road congestion during off-peak months, but may also reduce peak visitor numbers during the summer months as the tourist provision in the town is broadened.

Policy SC1 (Overall Strategy for Managing Change in a Sustainable Way) identifies the need for development that reduces the need to travel by car and are integrated with public transport and other sustainable forms of transport including walking and cycling. It also identifies the need to create quality public space with good access to the natural environment. This policy should help enable development that is less car dependent and provides incentives to walk and cycle.

Policy H1 (Housing Density) and Policy H5 (Accommodation for Travelling Communities) both specify the need to ensure development and sites should be located whether existing or potential local services are accessible by good public transport or by walking and cycling. This should help reduce car dependency and road congestion and help improve pollution levels.

Policies T1 – T4 set out the policies related to transport infrastructure development in Hastings. Policies T1 (Strategic Road and Rail Schemes) and T2 (Local Road Improvements) support the delivery of a number of road and rail improvements in order to support local regeneration. At this stage there is still uncertainty over the proposed Bexhill to Hastings Link Road and the improvement of the

	<p>A21 Trunk road and it is difficult to determine how these improvements would impact on this objective as details of the final schemes are not available. Although it is likely that improved road infrastructure will result in greater car dependency this is not necessarily the case where realistic alternative transport improvements are also provided as part of a scheme; such as the requirement for the Ridge junction improvements and A259 Bexhill Road Bus Corridor which should provide realistic alternative travel choices and safer opportunities for both pedestrians and cyclists.</p> <p>Whereby proposed rail improvements deliver anticipated benefits these should encourage greater use and reduced reliance on the personal car helping support this objective.</p> <p>Policy T3 (Sustainable Transport) specifies a number of particular priorities to helping meet this objective. Those likely to deliver greatest impact include improved bus services and facilities, the requirement for new development to be located close to existing public transport provision, and the support of new and enhanced cycle provision and the need to design for the needs of pedestrians and cyclists in developments. Policy T4 (Travel Plans) will also help support this objective with its particular focus on improved infrastructure for pedestrians, cyclists and public transport.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Policy T3 (Sustainable Transport) could specifically support bus priority lanes and junction approaches as a part of improving bus routes</li> </ul>

**Table 9-18: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *There are high and stable levels of employment and rewarding and satisfying employment opportunities for all***

<b>Policies 'screened-in' to the appraisal</b>	<p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p>
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	<p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p> <p>POLICY E4: Tourism and Visitors</p>
<b>Appraisal Findings</b>	<p><b>Development Strategy</b></p> <p>The DS2 Development Strategy Policy will provide up to 70,000m<sup>2</sup> of employment floorspace by 2028. This will provide capacity to support the predicted economic growth from regeneration initiatives. Such growth will increase employment opportunities and so reduce unemployment. Industrial park space will create diverse, high-value opportunities, bringing improved earnings. Knowledge-based jobs may not be accessible to local people most in need of employment. However, recent improvements in educational facilities may raise skill levels. Renewal of existing employment premises can help to provide stability, whilst the encouragement of live / work units will support local and accessible employment.</p> <p>Additional retail space totalling 20,500m<sup>2</sup> is to be provided by 2028 under Policy DS3. Up to 1,600 jobs are predicted to result from retail growth should this capacity be provided, leading to reduced unemployment. Town centre locations will be preferred, so providing accessible employment to a large proportion of the population. The long term stability of retail employment could be a concern due to the current, nationwide decline in town centre retailing.</p> <p><b>Planning Strategy</b></p> <p>Planning strategies (FA1-6) look to produce growth in a range of sectors. These include high-value industries, tourism, cultural areas, and mixed use developments. A key goal is to increase the availability of employment and comparison retail space. These developments have the potential to support long term economic growth, with associated reductions in unemployment. Diversification of the economy can work to provide stability, as the current reliance on public sector employers could lead to vulnerability, for instance though the impact of central government decisions.</p> <p>Various measures will support the new developments. These include improvements to road, public transport and cycle links. Such links will potentially encourage new business into the area. Improved educational infrastructure will help to raise skill levels and educational attainment, providing another incentive for investment and improving employment accessibility to all sections of the population. Flood risks and coastal defence needs are taken into account in the policies; such measures may help to improve insurance rates for businesses. Support and incentives such as these may be vital for economic growth, as</p>

	<p>the availability of space alone could prove to be of limited attraction to investors.</p> <p>The Western Area (FA1) has the greatest potential for income growth due to the development of modern industrial park space. Elsewhere tackling deprivation is a key focus. In the Central Area (Policy FA2) specific strategies are put forward for the regeneration of the Town Centre (Policy FA3) and Central St Leonards (Policy FA4) areas. The Eastern Strategy (Policy FA5) focuses on the deprived Hillcrest and Ore Valley areas. The proposals for these areas include increasing and protecting employment and retail space, the range of shops and improving public transport links, housing, leisure and cultural facilities, and encouraging tourism. These developments should support stable economic growth and help to reduce unemployment.</p> <p>The Seafront (FA6) is to be further developed a tourism asset. Although additional job creation may be relatively low paid measures to reduce the seasonality of the tourism industry in Hastings could lead to the creation of more permanent positions. A revived tourism sector building on its existing success and identifying opportunities should contribute to Hastings' economic growth and stable employment levels.</p> <p><b>Developing Sustainable Communities</b></p> <p>The overall strategy for managing change in a sustainable way (Policy SC1) acknowledges that access to education, training and jobs and the regeneration of disadvantaged areas will be essential to the development of sustainable communities. Promotion of this message can help to drive forward improvements in employment, opportunities and earnings. Additionally, the creation of cohesive and vibrant communities built around sustainable principles may encourage high value business into the area.</p> <p><b>The Local Economy</b></p> <p>Under proposals addressing the local economy, the retention, intensification and redevelopment of employment spaces is to be promoted (Policy E1). Where this is not possible maximum incorporation of employment space will be encouraged. This should provide room for economic growth, with positive effects on employment. Policy E3 meanwhile looks to ensure that within town, district and local centres vacant buildings are reused, that there are diverse building uses, and that the quality and character of the areas is improved. This should provide space for stable economic growth and create a range of employment opportunities. However, incentives for new businesses to fill vacant commercial properties could be made clearer, with vacancies running at 10.5% in 2011.</p> <p>Improved access to employment opportunities across all sections of the population is likely to occur as a result of policy E2.</p>
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	<p>This plans for continued investment in educational facilities and measures to link major employers with those struggling in the labour market. In particular, improved skills levels through educational attainment may increase inward investment and employment levels.</p> <p>An increasing role for tourism is to be provided for though Policy E4. New attractions and visitor accommodation is to be encouraged, economically viable attractions protected and tourist facilities upgraded. Such developments will attempt to lengthen the season and increase visitor numbers; so providing for increased employment opportunities. The council acknowledges that the jobs created are likely to be primarily entry level. As such, improvements in earning are likely to be low.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>The Planning Strategy, or the forthcoming Development Management Plan, should set out a strategy to ensure that the number of vacant premises is reduced in shopping centres (i.e. make best use of land) given national trends that mean shopping centres can face an uncertain future.</li> </ul>

**Table 9-19: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *Economic revival in the more deprived areas of the town is stimulated and successfully achieved***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b></p> <p>POLICY DS1: New Housing Development</p> <p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b></p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p>
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	<p><b>Theme Based Policies</b></p> <p>POLICY SC1: Overall Strategy for Managing Change in a Sustainable Way</p> <p>POLICY SC7: Flood Risk</p> <p>POLICY EN1: Built and Historic Environment</p> <p>POLICY EN2: Green Infrastructure Network</p> <p>POLICY EN3: Nature Conservation and Improvement of Biodiversity</p> <p>POLICY EN4: Conservation and Enhancement of Landscape</p> <p>POLICY EN5: Open Spaces – Enhancement, Provision and Protection</p> <p>POLICY H1: Housing Density</p> <p>POLICY H2: Housing Mix</p> <p>POLICY H3: Provision of Affordable Housing</p> <p>POLICY H4: Houses in Multiple Occupation</p> <p>POLICY H5: Accommodation for Travelling Communities</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E2: Skills and Access to Jobs</p> <p>POLICY E3: Town, District and Local Centres</p>
	<p>This objective responds to the following economic weaknesses faced by Hastings:</p> <ul style="list-style-type: none"> <li>• The unemployment rate in Hastings is higher than the county and regional average – 8.8% compared to 6.8% in East Sussex and 1.5% in the South East (June 2010).</li> <li>• 10,820 working age people in the town are on out of work benefits, with 3,109 people claiming Job Seekers Allowance. This equates to 5.7% of claimants, compared to just 2.6% across the region.</li> <li>• 22.6% of the working age population also claim key benefits, which is an increase of 2.8% over 2 years. The mean household income is below the national average at £30,290 (2010). This reflects the predominantly low wage economy.</li> </ul>

	<p>Although economic deprivation exists across Hastings as a whole, there are particular pockets of deprivation along the seafront and in parts of western and eastern Hastings.</p> <p>A number of policies seek to encourage economic revival across Hastings.</p> <p><b>Employment land</b></p> <p>Policy DS2 (Employment Growth) sets out the scale of employment land development within Hastings. It states that <i>“to support the town’s role as a major employment centre and as the focus for economic regeneration, local economic growth and diversification will be met through the development of up to 70,000m<sup>2</sup> of employment floor space between 2008 and 2028”</i>. This is likely to significantly increase the number of available jobs over the medium to long term within Hastings, which is likely to have a positive impact on the local economy. This policy is an attempt to reverse the current negative trend of a contracting workforce. A related issue is that the jobs created won’t necessarily be accessible the local economy due to their insufficient skills and training. However, the enhancement of education facilities should mean that over the longer term these jobs can be taken up by local residents.</p> <p>Policy DS3 ‘Location of Retail Development’ sets out the strategy to provide an additional 20,500m<sup>2</sup> of comparison goods floor space in the period 2014 to 2028. This is in order to make sure that other shopping centres such as Eastbourne and Tunbridge Wells do not divert an even greater proportion of the retail spending away from Hastings. This policy is likely to complement Policy DS2, which provides high skilled employment opportunities, with a number of lower skilled employment opportunities.</p> <p>Policy E1 ‘Existing Employment Land and Premises’ states that wherever possible existing employment land will be retained rather than converted for other uses. Where this is shown not to be viable, mixed use developments, which include employment areas will be preferred. This is likely to have a beneficial impact, as it will ensure that available jobs are safeguarded wherever possible.</p> <p>Policy E2 ‘Skills and Access to Jobs’ supports proposals that relate to higher or further education in Hastings and encourages major employment generating development to promote access to the jobs it creates amongst the population of Hastings. This policy will have a beneficial impact on the levels of poverty and deprivation in Hastings through improving levels of education and access to existing and newly generated employment.</p> <p>Policy E3 ‘Town, District and Local Centres’ seeks to safeguard and enhance the functions of different centres within Hastings.</p>
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	<p>Hastings Town Centre is seen as the most important and accessible and so has been the subject of regeneration. Local centres, such as Ore Village, will also be protected and enhanced. This will have a positive impact in that it will ensure adequate local services are provided to residents. There is the potential for it to have a negative impact however, if money for regeneration is focussed on these areas to the exclusion of other areas of Hastings. If this takes place, spatial patterns of deprivation will not be addressed.</p> <p>Policy E4 'Tourism and Visitors' seeks to lengthen the tourism season, increase the number of visitors, provide job opportunities and sustain the tourism economy. This will be facilitated through encouraging development of tourist attractions, supporting the development of tourist accommodation along the seafront and improve language schools. This policy is likely to have both negative and positive impacts on this objective. While it will provide employment opportunities, these are likely to be low-skilled and seasonal.</p> <p><b>Spatial Strategy</b></p> <p>The Western Area (FA1) has the greatest potential for income growth due to the development of a modern industrial park space (36,700m<sup>2</sup>). Elsewhere tackling deprivation is a key focus. In the Central Area (FA2) specific strategies are put forward for the regeneration of the Town Centre (FA3) and Central St Leonards (FA4) areas. 21,700m<sup>2</sup> of employment land will be provided here, with the potential addition of 20,500 m<sup>2</sup> of retail development. The Eastern Strategy (FA5) focuses on the deprived Hillcrest and Ore Valley areas. It is proposed that 11,400m<sup>2</sup> of employment land will be provided here. The proposals for these areas also include increasing and protecting employment and retail space, the range of shops and improving public transport links, housing, leisure and cultural facilities, and encouraging tourism. These developments should support stable economic growth and help to reduce deprivation in these areas.</p> <p>The Seafront (FA6) is to be further developed a tourism asset. Such developments will potentially create permanent jobs, so reducing unemployment. However, relatively low pay and a degree of seasonality should be anticipated. A revived tourism sector would likely help to provide economic growth, employment and stability overall</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>The ambition surrounding the development of employment land will help to reduce unemployment. The mix of skilled and unskilled employment that will be created through the development of employment land should mean that a range of jobs is</li> </ul>

	<p>available. This should mean that the gap between the least and the most deprived areas is not widened.</p> <ul style="list-style-type: none"> <li>The development of employment land will be predominantly in the Western and Central areas. This may result in less accessible employment opportunities being provided for those in the Eastern area. The improvement of public transport and cycle and pedestrian access should mitigate this risk.</li> <li>The development of employment land is supported by investment in improving the education, skills and training of the local population.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>No recommendations are made</li> </ul>
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**Table 9-20: Appraisal of the Proposed Submission Planning Strategy in relation to the objective - *The sustained economic growth of the town is achieved and linked closely to social regeneration***

<b>Policies 'screened-in' to the appraisal</b>	<p><b>Development Strategy</b>  POLICY DS2: Employment Growth  POLICY DS3: Location of Retail Development</p> <p><b>Planning Strategy</b>  POLICY FA1: Strategy for Western Area  POLICY FA2: Strategic Policy for Central Area  POLICY FA3: Strategy for Hastings Town Centre  POLICY FA4: Strategy for Central St Leonards  POLICY FA5: Strategic Policy for Eastern Area  POLICY FA6: The Seafront</p> <p><b>Theme Based Policies</b>  POLICY E1: Existing Employment Land and Premises  POLICY E2: Skills and Access to Jobs</p>
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	<p>POLICY E3: Town, District and Local Centres</p> <p>POLICY E4: Tourism and Visitors</p> <p>POLICY CI1: Infrastructure and Development Contributions</p>
	<p><b>Types of Employment</b></p> <p>Hastings is seeking to boost their local economy and to reverse the trend of decreasing levels of employment through developing a variety of skilled and unskilled employment opportunities.</p> <p>The types of employment land which are being pursued are given in policy DS2:</p> <ul style="list-style-type: none"> <li>the continuing development of new office based employment opportunities at Priory Quarter in Hastings town centre;</li> <li>the development of Enviro21 Innovation parks adjacent to Queensway, c.15,300m<sup>2</sup></li> <li>the development of c.32800m<sup>2</sup> of land on existing employment areas across the Borough by 2028 at the following locations: Churchfields, Castleham, Ponswood, West Ridge and Ivyhouse Lane</li> <li>encouraging the renewal of the existing older stock of employment premises through the implementation of an employment land and premises protection policy</li> <li>encouraging the provision of live/work units within housing developments</li> </ul> <p>In addition, policy DS3, states that 20,500m<sup>2</sup> of net comparison retail development will be provided, preferably in Hastings Town Centre.</p> <p>The creation of a range of employment opportunities, which are designed to sustain economic growth, are therefore supported through the plan making process. The link to social regeneration is provided in policy E2 (Skills and Access to Jobs), supports proposals that relate to higher or further education in Hastings and encourages major employment generating development to promote access to the jobs it creates amongst the population of Hastings.. The strategy of improving both the skill base of the local population and the local economy itself is evident in the partnership that has been developed between Sussex Coast College and local businesses. The college provides a range of academic and <i>vocational courses for 2500 students to help to bring about</i></p>



	<p><i>education-led social and economic regeneration by improving skills levels, addressing inequalities and encouraging partnership working. It is engaged with over 700 local businesses that either receive training or feed their ideas and experience into curriculum development, and is working with industry to extend its current range of relevant and effective training provision.</i></p> <p><b>Tourism</b></p> <p>The tourism industry is seen as vital to regenerating the economy of Hastings. It contributes £211m to the local economy, and supports an estimated 4,850 jobs (3550 FTE). Policy E4 (Tourism and Visitors) seeks to support the tourism industry in Hastings by promoting tourist attractions, safeguarding tourist accommodation on the seafront and developing a more diverse and high quality tourism offer. This policy is likely to enhance the tourism offer in Hastings, which should boost the local economy. However the extent to which it will contribute to sustained economic growth is uncertain. It will lead to seasonal employment and will not necessarily contribute to social regeneration.</p> <p><b>Spatial Strategy</b></p> <p>The Western Area (FA1) has the greatest potential for income growth due to the development of a modern industrial park space (36,700m<sup>2</sup>). Elsewhere tackling deprivation is a key focus. In the Central Area (FA2) specific strategies are put forward for the regeneration of the Town Centre (FA3) and Central St Leonards (FA4) areas. 21,700m<sup>2</sup> of employment land will be provided here, with the potential addition of 20,500 m<sup>2</sup> of retail development. The Eastern Strategy (FA5) focuses on the deprived Hillcrest and Ore Valley areas. It is proposed that 11,400m<sup>2</sup> of employment land will be provided here. The proposals for these areas also include increasing and protecting employment and retail space, the range of shops and improving public transport links, housing, leisure and cultural facilities, and encouraging tourism. These developments should support stable economic growth and help to reduce deprivation in these areas.</p> <p>The Seafront (FA6) is to be further developed a tourism asset. Such developments will potentially create permanent jobs, so reducing unemployment. However, relatively low pay and a degree of seasonality should be anticipated.</p>
<b>Recommendations</b>	<p>In summary, a number of planning policies impact on this sustainability objective. The key messages to be drawn out are:</p> <ul style="list-style-type: none"> <li>• The range of employment types, which are supported through the plan are well suited to creating a more robust economy, which is not reliant on a single type of employment to underpin the local economy and population;</li> <li>• This range of employment opportunities is supported by policies to improve access to these jobs among the local population through boosting education, skills and training;</li> <li>• The degree to which reliance on the tourism sector will lead to sustained growth and social regeneration is uncertain. However,</li> </ul>

	<p>in conjunction with efforts to increase other employment opportunities, this strategy is deemed appropriate for Hastings.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>No recommendations are made</li> </ul>
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**Table 9-22: Indigenous and inward investment is encouraged and accommodated**

<b>Policies 'screened-in' to the appraisal</b>	<p>POLICY DS2: Employment Growth</p> <p>POLICY DS3: Location of Retail Development</p> <p>POLICY FA1: Strategy for Western Area</p> <p>POLICY FA2: Strategic Policy for Central Area</p> <p>POLICY FA3: Strategy for Hastings Town Centre</p> <p>POLICY FA4: Strategy for Central St Leonards</p> <p>POLICY FA5: Strategic Policy for Eastern Area</p> <p>POLICY FA6: The Seafront</p> <p>POLICY E1: Existing Employment Land and Premises</p> <p>POLICY E3: Town, District and Local Centres</p>
<b>Appraisal Findings</b>	<p>Hastings' approach to regeneration is through employment led growth and that housing delivery should mirror the town's ability to attract new jobs and retain existing ones. The Planning Strategy recognises a number of important policy factors relevant to Hastings including the need to stimulate economic growth and the understanding of the strong local commitment to reverse the economic fortunes of the area and to reverse the trend of out-commuting.</p> <p>Policies DS2 (Employment Growth) and DS3 (Location of Retail Development) support the development of up to 70,000m<sup>2</sup> of employment floorspace and 20,500m<sup>2</sup> of retail provision up to 2028. This development should provide the opportunity for a variety of business across a number of sectors to access appropriate premises, including live/work units which will help encourage start-ups and small businesses. The extent to which indigenous and inward investment can be catalysed is unlikely to be possibly by relying solely on the provision of appropriate business premises but the wider redevelopment of Hastings as an attractive place to live work</p>

	<p>and spend leisure time.</p> <p>Policies FA1 – FA6 provide a variety of opportunities for inward investment across the whole town. They include the support for improved transport infrastructure, an improved natural environment and public realm and the promotion of a variety of economic opportunities including in tourism, retail, research and development and education. Furthermore they support the regeneration of a number of areas and measures to protect and enhance local and district centres.</p> <p>Policies E1 (Skills and access) and E3 (Town, District and Local Centres) should both help support this sustainability objective. Policy E1's retention for land for employment purposes and the focus of the overall strategy on employment led growth should ensure the land and property are available for a variety of business development. Furthermore, whereby continued employment use of a site is demonstrated not viable then the Policy's requirement for firstly specifying a mixed use enabling development (incorporating employment space) and then if that isn't viable the requirement to consider the proposed new use in the context of how it generated new employment should contribute positively to this objective. Policy E1 also supports Policy DS1 in the provision for live/work units which should enable entrepreneurial business opportunities for both local and new residents.</p> <p>Policy E3's safeguarding of the vitality and viability of the town and district centres through encouraging the diversity of uses within the centre including retail, leisure, social, education and arts facilities will also help to ensure Hastings is an attractive town for inward investment and provides the facilities for both existing and new residents and businesses.</p>
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• No recommendations are made</li> </ul>

## 10 WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

**“a description of the measures envisaged concerning monitoring...”** (SEA Directive, Annex I(i))

- 10.1.1 This appraisal has highlighted the potential for a range of significant negative effects and also highlighted a number of uncertain effects. Recommendations have been made to ensure that negative effects are avoided or mitigated as far as possible, through changes made to the plan before Adoption.
- 10.1.2 At the time of plan adoption, an ‘SA Statement’ will be published that summarises the ‘residual’ effects of the plan in terms of the SA framework, i.e. those effects that the Council has not been able to avoid or mitigate. Within the SA Statement measures will be proposed for monitoring these and other significant effects.

### 5.0 Measures currently envisaged for monitoring

- 10.1.3 Given that, at this stage, it is not possible to be certain of residual effects there is only a need to set out ‘a description of the measures envisaged concerning monitoring’. The Council’s draft monitoring strategy has been reviewed, and it is thought that it should be broadly appropriate to the task of monitoring the likely sustainability implications of the plan. In particular, the following indicators are supported:
- Employment rate by place of residence
  - Affordable Housing completions by size and type
  - % of households within 300m of a multifunctional green space/play area
  - Number of developments incorporating combined heat and power systems or District Heating Networks
  - Number of developments incorporating green roofs/walls
  - Number of developments incorporating recycling facilities
  - % of new development within 30 minutes travel by public transport to GP services, education facilities, employment and a major retail centre.

## APPENDIX I - APPRAISAL OF HOUSING GROWTH TARGET OPTIONS

This appendix presents an appraisal of the following four scenarios for housing provision:

- Scenario 1 – High Growth: 7,840 net new dwellings (461 per annum) up to 2028
- Scenario 2 – Lower Growth: 2,478 net new dwellings (146 per annum) up to 2028
- Scenario 3 – Medium Growth: 3,418 net new dwellings (201 per annum) up to 2028

The appraisal uses the established Hastings sustainability appraisal framework, which consists primarily of a list of sustainability objectives. For each objective, effects have been categorised as follows:

Effect category	Symbol used to denote this effect
The option will have a significant negative effect on the sustainability objective	XX
The option will have a slight negative effect on the sustainability objective	X
The impact can not be predicted at this stage - potential/uncertain effect	?
No effect/direct link at this stage	-
The option will have a slight positive effect on the sustainability objective	✓
The option will have a significant positive effect on the sustainability objective	✓ ✓

Effects have also been appraised for the short, medium and long term. The definitions used are as follows:

- Short term (S) – 0-5 years
- Medium term (M) – 5-15 years
- Long term (L) – 15+ years

The findings of the appraisal are shown in the table below.

Sustainability Objective		Scenario 1 - High Growth 7,840 net new dwellings (461 per annum) up to 2028		Scenario 2 - Lower Growth 2,478 net new dwellings (146 per annum) up to 2028		Scenario 3 - Medium Growth 3,418 net new dwellings (201 per annum) up to 2028	
		Effect	Comments	Effect	Comments	Effect	Comments
<b>1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home</b>	S	✓✓	The link between house building and affordable housing provision will lead to more opportunities being provided. This option will provide the most opportunities.	✓	The link between house building and affordable housing provision will lead to more opportunities being provided.	✓	The link between house building and affordable housing provision will lead to more opportunities being provided.
	M	✓✓		✓		✓	
	L	✓✓		✓		✓	
<b>2. The health and well-being of the population is improved and inequalities in health are reduced</b>	S	✓/?	Health and well being may improve if there are more opportunities for everyone to live in a decent home. This option will enable more affordable housing to be targeted at those in greatest need.	?	Health and well being may improve if there are more opportunities for everyone to live in a decent home.	?	Health and well being may improve if there are more opportunities for everyone to live in a decent home.
	M	✓/?		?		?	
	L	✓/?		?		?	
<b>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</b>	S	✓	May result in a more mixed community and greater investment in deprived areas	✓	May result in a more mixed community and greater investment in deprived areas	✓	May result in a more mixed community and greater investment in deprived areas
	M	✓✓		✓		✓	
	L	✓✓		✓		✓	

<b>4. Education and skills of the population improve</b>	S	-	No direct link	-	No direct link	-	No direct link
	M	-		-		-	
	L	-		-		-	
<b>5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities</b>	S	?	New housing does not have a direct link to accessibility. However, this level of growth will create significant demand but does not necessarily provide for improved accessibility. Impact will depend on levels of social infrastructure provided with new development.	?	New housing does not have a direct link to accessibility, and this level of growth will have the least effect in terms of access to services as it provides for the fewest dwellings. Impact will depend on levels of social infrastructure provided with new development.	?	New housing does not have a direct link to accessibility. However, this level of growth will create some demand but does not necessarily provide for improved accessibility. Impact will depend on levels of social infrastructure provided with new development.
	M	?		?		?	
	L	?		?		?	
<b>6. Safe and secure environments are created and there is a reduction in crime and the fear of crime</b>	S	-	No direct link, although design policies should incorporate 'Secure By Design Principles' for larger developments	-	No direct link, although design policies should incorporate 'Secure By Design Principles' for larger developments	-	No direct link, although design policies should incorporate 'Secure By Design Principles' for larger developments
	M	-		-		-	
	L	-		-		-	
<b>7. Vibrant and locally distinctive communities are created and sustained</b>	S	-	No direct link - dependent on design policies and type/mix of housing	-	No direct link - dependent on design policies and type/mix of housing	-	No direct link - dependent on design policies and type/mix of housing
	M	-		-		-	
	L	-		-		-	
<b>8. Land and buildings are used more efficiently and urban renaissance encouraged</b>	S	✓✓	Will encourage the re-use of existing buildings and more efficient use of land through higher density development, although	✓	Will encourage the re-use of existing buildings and more efficient use of land through higher density development, although also dependent on	✓	Will encourage the re-use of existing buildings and more efficient use of land through higher density development, although also

	M	✓✓	also dependent on location and type of new development. This option is likely to do this to the highest extent. This scenario will increase the pressure to build on more Greenfield land and in environmentally sensitive areas.	✓	location and type of new development.	✓	dependent on location and type of new development.
	L	✓✓		✓		✓	
<b>9. Biodiversity is protected, conserved and enhanced</b>	S	X	Higher levels of development likely to have greater impact on biodiversity, as it will involve development of a greater number of sites, likely to comprise significant Greenfield development. Will need to encourage development in built up area first, although still has potential for effect on biodiversity. Require mitigation through policy.	?	Still potential for impact on biodiversity - require mitigation through policy	?/X	Higher levels of development likely to have greater impact on biodiversity, as it will involve development of a greater number of sites. Encourage development in built up area first, although still has potential for effect on biodiversity. Require mitigation through policy
	M	X		?		?/X	
	L	X		?		X	
<b>10. The risk of flooding (fluvial &amp; tidal) and coastal erosion is managed and reduced now and in the future</b>	S	?/X	Risk mainly dependent on location of development. However, high levels of development more likely to increase flood risk from surface water run-off, regardless of mitigation measures.	?	Mitigation measures to reduce surface water run-off etc, and development located away from areas of risk - Use of Strategic Flood Risk Assessment (SFRA) and sequential test	?	Mitigation measures to reduce surface water run-off etc, and development located away from areas of risk - Use of Strategic Flood Risk Assessment (SFRA) and sequential test
	M	?/X		?		?	
	L	?/X		?		?	
<b>11. Parks and gardens, countryside, coast and the</b>	S	X	May result in more pressure for development	X	May result in more pressure for development in these areas. An	X	May result in more pressure for development in these



<b>historic environment/ townscape and landscape are protected, enhanced and made more accessible</b>	M	X	in these areas. An increasing population may also result in increased use of these areas	X	increasing population may also result in increased use of these areas	X	areas. An increasing population may also result in increased use of these areas
	L	X		X		X	
<b>12. Air pollution is reduced and air quality continues to improve</b>	S	X	Construction of greater numbers of housing is likely to contribute to pollution. This option likely to have the most negative effect, particularly over longer term. Mitigate through other policy e.g. low emission development	X	Construction of greater numbers of housing is likely to contribute to pollution. Mitigate through other policy e.g. low emission development	X	Construction of greater numbers of housing is likely to contribute to pollution. Mitigate through other policy e.g. low emission development
	M	X		X		X	
	L	XX		X		X	
<b>13. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation) and ensuring the Borough is prepared for its impacts (adaptation)</b>	S	X	All new development will result in additional pressure on resources, including water and energy. The greater number of homes will mean the most significant effect. However, locating development in accessible locations and ensuring sustainable design through design briefs will help to mitigate this.	X	All new development will result in additional pressure on resources, including water and energy. However, locating development in accessible locations and ensuring sustainable design through design briefs will help to mitigate this.	X	All new development will result in additional pressure on resources, including water and energy. The greater number of homes will mean the most significant effect. However, locating development in accessible locations and ensuring sustainable design through design briefs will help to mitigate this.
	M	XX		X		X	
	L	XX		X		XX	
<b>14. Water quality of freshwater bodies, waterways and the marine environment is maintained and improved and water consumption is reduced</b>	S	X	More homes may lead to greater amounts of sewage, waste water and increased levels of water consumption. Mitigation as above.	X	More homes may lead to greater amounts of sewage, waste water and increased levels of water consumption. Mitigation as above.	X	More homes may lead to greater amounts of sewage, waste water and increased levels of water consumption. Mitigation as above.
	M	X		X		X	
	L	X		X		X	

<b>15. Energy efficiency is increased, fuel poverty is reduced and the proportion of energy generated from renewable resources is increased</b>	S	✓	Higher levels of development will provide more opportunities for on site renewable energy generation and could facilitate stand alone schemes	✓	All development will provide further opportunities for on site energy generation, although scenarios 2 and 3 to a lesser extent due to fewer housing numbers	✓	All development will provide further opportunities for on site energy generation, although scenarios 2 and 3 to a lesser extent due to fewer housing numbers
	M	✓✓		✓		✓	
	L	✓✓		✓		✓✓	
<b>16. Through waste re-use, recycling and minimisation the amount of waste for disposal is reduced</b>	S	X	Construction of more dwellings is likely to result in an overall increase in the amount of waste. As this option provides the most housing, it is likely to have the most significant effect over the long term.	X	Construction of more dwellings is likely to result in an overall increase in the amount of waste.	X	Construction of more dwellings is likely to result in an overall increase in the amount of waste.
	M	X		X		X	
	L	XX		X		X	
<b>17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice</b>	S	✓/X	Higher levels of development will result in increased car use and congestion. However, new housing development could generate further sustainable transport options, depending on its size and location.	✓/X	Higher levels of development will result in increased car use and congestion. However, new housing development could generate further sustainable transport options, depending on its size and location.	✓/X	Higher levels of development will result in increased car use and congestion. However, new housing development could generate further sustainable transport options, depending on its size and location.
	M	✓/X		✓/X		✓/X	
	L	✓/X		✓/X		✓/X	
<b>18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all</b>	S	-	No direct link	-	No direct link	-	No direct link
	M	-		-		-	

	L	-		-		-	
<b>19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved</b>	S	✓✓	More better quality housing in these areas may increase business and investor confidence	✓	More better quality housing in these areas may increase business and investor confidence	✓	More better quality housing in these areas may increase business and investor confidence
	M	✓✓		✓		✓✓	
	L	✓✓		✓✓		✓✓	
<b>20. The sustained economic growth of the borough is achieved and linked closely to social regeneration</b>	S	✓/?	The provision of good quality housing may encourage more skilled workers to the area. In turn, this could attract business and investment, resulting in an expanding workforce and business growth. However, it could also lead to unsustainable levels of out-commuting.	✓/?	The provision of good quality housing to meet this option will still attract skilled workers, although it may not maintain a big enough workforce to attract new business or support existing growth	✓	The provision of good quality housing may encourage more skilled workers to the area. In turn, this could attract business and investment. This level of growth is unlikely to have such an effect that could lead to significant out-commuting.
	M	✓/?		✓/?		✓	
	L	✓/?		✓/?		✓	
<b>21. Indigenous and inward investment is encouraged and accommodated</b>	S	✓/?	This option will not make more land available for employment related uses, but the provision of good quality homes could attract further investment to the area.	✓/?	This option will not make more land available for employment related uses, but the provision of good quality homes could attract further investment to the area.	✓/?	This option will not make more land available for employment related uses, but the provision of good quality homes could attract further investment to the area.
	M	✓/?		✓/?		✓/?	
	L	✓/?		✓/?		✓/?	

**Table 2 – Sustainability appraisal of housing scenarios**

## APPENDIX II - APPRAISAL OF HOUSING DISTRIBUTION OPTIONS

This appendix presents an appraisal of the following four options for housing distribution:

- Option 1: development wholly within the built-up area
- Option 2: Accommodating new housing within the existing Hastings urban area plus a limited number of small greenfield sites
- Option 3: Option 1 plus an urban extension of around 1,000 new homes at Breadsell
- Option 4: Development within the built up area boundary plus greenfield sites on the periphery, plus release of one major greenfield site (Breadsell)

The appraisal uses the established Hastings sustainability appraisal framework, which consists primarily of a list of sustainability objectives. For each objective, effects have been categorised as follows:

Effect category	Symbol used to denote this effect
The option will have a significant negative effect on the sustainability objective	XX
The option will have a slight negative effect on the sustainability objective	X
The impact can not be predicted at this stage - potential/uncertain effect	?
No effect/direct link at this stage	-
The option will have a slight positive effect on the sustainability objective	✓
The option will have a significant positive effect on the sustainability objective	✓ ✓

Effects have also been appraised for the short, medium and long term. The definitions used are as follows:

- Short term (S) – 0-5 years
- Medium term (M) – 5-15 years
- Long term (L) – 15+ years

The findings of the appraisal are shown in the table below.

<b>Additional option 1 – Location of all new housing development within the boundary of the built-up area</b>				
<b>Sustainability Objective</b>	<b>Short term</b>	<b>Medium term</b>	<b>Long term</b>	<b>Comments</b>
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✓	
2. The health and well-being of the population is improved and inequalities in health are reduced	✓	✓	✓	Access to housing has links with health and quality of life
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	✓	✓	✓	
4. Education and skills of the population improve	-	-	-	
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities	✓	✓	✓	Locating development within the built up area will increase accessibility to these services
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	
7. Vibrant and locally distinctive communities are created and sustained	✓	✓	✓	
8. Land and buildings are used more efficiently and urban renaissance encouraged	✓✓	✓✓	✓✓	Prioritising land within the built up area contributes significantly to this objective
9. Biodiversity is protected, conserved and enhanced	?	?	?	Potential for loss of biodiversity on brownfield sites as well as greenfield
10. The risk of flooding (fluvial & tidal) and coastal erosion is managed and reduced now and in the future	?/✓	?/✓	?/✓	Locating development in the existing built up area is likely to have a more positive effect – unlikely that the footprint would increase significantly to cause increase in run-off potential. However, location of individual housing areas may fall within identified flood risk zones
11. Parks and gardens, countryside, coast and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	?	?	?	Dependent on design of development
12. Air pollution is reduced, air quality continues to improve	-	-	-	
13. The causes of climate change are addressed through reducing	-	-	-	

emissions of greenhouse gases (mitigation) and ensuring the Borough is prepared for its impacts (adaptation)				
14. Water quality of freshwater bodies, waterways and the marine environment is maintained and improved and water consumption is reduced	-	-	-	
15. Energy efficiency is increased, fuel poverty is reduced and the proportion of energy generated from renewable resources is increased	-	-	-	
16. Through waste re-use, recycling and minimisation the amount of waste for disposal is reduced	-	-	-	
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	?/✓	?/✓	?/✓	Development within the built up area is likely to be relatively accessible by means other than the car. However, this is still dependent on the location of individual housing sites
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	
20. The sustained economic growth of the borough is achieved and linked closely to social regeneration	-	-	-	
21. Indigenous and inward investment is encouraged and accommodated	-	-	-	

**Additional option 2 - Location of housing development within the boundary of the built-up area and on a number of separate greenfield sites outside the boundary of the built-up area**

Sustainability Objective	Short term	Medium term	Long term	Comments
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✓	
2. The health and well-being of the population is improved and inequalities in health are reduced	✓	✓	✓	Access to housing has links with health and quality of life
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	✓	✓	✓	
4. Education and skills of the population improve	-	-	-	

5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities	✓	✓	✓	Locating development within the built up area will increase accessibility to these services
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	
7. Vibrant and locally distinctive communities are created and sustained	✓	✓	✓	
8. Land and buildings are used more efficiently and urban renaissance encouraged	✓/X	✓/X	✓/X	Prioritising land within the built up area contributes significantly to this objective. However development of greenfield sites would have a negative effect
9. Biodiversity is protected, conserved and enhanced	?/X	?/X	?/X	Potential for loss of biodiversity on brownfield sites as well as greenfield
10. The risk of flooding (fluvial & tidal) and coastal erosion is managed and reduced now and in the future	?/✓	?/✓	?/✓	Locating development in the existing built up area is likely to have a more positive effect – unlikely that the footprint would increase significantly to cause increase in run-off potential. However, location of individual housing areas may fall within identified flood risk zones
11. Parks and gardens, countryside, coast and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	?/X	?/X	?/X	Dependent on design of development. Development of greenfield sites may have a negative effect on landscape
12. Air pollution is reduced, air quality continues to improve	-	-	-	
13. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation) and ensuring the Borough is prepared for its impacts (adaptation)	-	-	-	
14. Water quality of freshwater bodies, waterways and the marine environment is maintained and improved and water consumption is reduced	-	-	-	
15. Energy efficiency is increased, fuel poverty is reduced and the proportion of energy generated from renewable resources is increased	-	-	-	
16. Through waste re-use, recycling and minimisation the amount of waste for disposal is reduced	-	-	-	
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	?/✓	?/✓	?/✓	Development within the built up area is likely to be relatively accessible by means other than the car.

				However, this is still dependent on the location of individual housing sites
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	
19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	
20. The sustained economic growth of the borough is achieved and linked closely to social regeneration	-	-	-	
21. Indigenous and inward investment is encouraged and accommodated	-	-	-	

**Option 4 – Location of housing development within the boundary of the built up area and on greenfield sites outside of the boundary of the built up area, plus the major greenfield release later in the plan period.**

<b>Sustainability Objective</b>	<b>Short term</b>	<b>Medium term</b>	<b>Long term</b>	<b>Comments</b>
1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✓✓	A major greenfield release is more likely to have the potential to incorporate higher levels of sustainable design and construction i.e. Code Level 3+
2. The health and well-being of the population is improved and inequalities in health are reduced	✓	✓	✓	Access to housing has links with health and quality of life
3. Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	✓	✓	✓	
4. Education and skills of the population improve	-	-	-	
5. All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities	✓	✓	✓	Locating development within the built up area will increase accessibility to these services
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime	-	-	-	
7. Vibrant and locally distinctive communities are created and sustained	✓	✓	✓	
8. Land and buildings are used more efficiently and urban renaissance encouraged	✓/X	✓/X	✓/X	Prioritising land within the built up area contributes significantly to this objective. However development of greenfield sites would have a



				negative effect
9. Biodiversity is protected, conserved and enhanced	?/X	?/X	?/X	Potential for loss of biodiversity on brownfield sites. Likely to have more of a negative effect in development of greenfield sites
10. The risk of flooding (fluvial & tidal) and coastal erosion is managed and reduced now and in the future	?/✓	?/✓	?/✓	Locating development in the existing built up area is likely to have a more positive effect – unlikely that the footprint would increase significantly to cause increase in run-off potential. However, location of individual housing areas may fall within identified flood risk zones
11. Parks and gardens, countryside, coast and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	?/X	?/X	?/X	Dependent on design of development. Development of greenfield sites may have a negative effect on landscape
12. Air pollution is reduced, air quality continues to improve	-	-	-	
13. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation) and ensuring the Borough is prepared for its impacts (adaptation)	✓	✓	✓	A major greenfield release is more likely to have the potential to incorporate higher levels of sustainable design and construction i.e. Code Level 3+, helping to address climate change
14. Water quality of freshwater bodies, waterways and the marine environment is maintained and improved and water consumption is reduced	✓	✓	✓	A major greenfield release is more likely to have the potential to incorporate higher levels of sustainable design and construction i.e. Code Level 3+, incorporating water minimisation measures
15. Energy efficiency is increased, fuel poverty is reduced and the proportion of energy generated from renewable resources is increased	✓	✓	✓	A major greenfield release is more likely to have the potential to incorporate higher levels of sustainable design and construction i.e. Code Level 3+, incorporating energy efficiency measures
16. Through waste re-use, recycling and minimisation the amount of waste for disposal is reduced	-	-	-	
17. Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	?/✓	?/✓	?/✓	Development within the built up area is likely to be relatively accessible by means other than the car. However, this is still dependent on the location of individual housing sites
18. There are high and stable levels of employment and rewarding and satisfying employment opportunities for all	-	-	-	

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19. Economic revival in the more deprived areas of the town is stimulated and successfully achieved	-	-	-	
20. The sustained economic growth of the borough is achieved and linked closely to social regeneration	-	-	-	
21. Indigenous and inward investment is encouraged and accommodated	-	-	-	