

Introduction

Further to receipt of the Inspectors Preliminary Findings and his proposed Main Modifications to the Hastings Borough Council Development Management Plan (DMP) the Council has undertaken a proportionate Sustainability Assessment (SA) of these proposals. Set out below are the considered effects of these Main Modifications upon the Council's adopted sustainability objectives for the Development Management Plan.

Within the following schedules each of these SA Objectives is listed as SO1, SO2 etc. together with a brief assessment of each proposed Main Modification against that particular Objective. Where it is concluded that there will be no impact or no measureable impact upon the performance of the Plan by the inclusion of these modifications the term "neutral impact" is used. In other instances of an identified positive or negative impact explanatory text is given.

Please note that this Sustainability Appraisal (SA) should be read in conjunction with that already submitted as part of the examination process for the whole Plan¹. **Representations on the Inspector's proposed Main Modifications are now invited together with any relevant comments on this Sustainability Appraisal of these modifications².**

For ease of reference each Main Modification (MM) is referred to using the Inspector's numbering and then assessed against each of the Council's adopted 21 Sustainability Objectives (SO's).

The objectives used to assess the sustainability implications of the proposed Main Modifications to Development Management Plan are listed below. These were developed and refined as part of the Sustainability Appraisal Scoping process³

Social objectives

1. More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their need
2. The health and well-being of the population is improved and inequalities in health are reduced
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. Opportunities are available for everyone to acquire new skills, and the 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, including access to the countryside and the historic environment
6. Safe and secure environments are created and there is a reduction in crime and the fear of crime

¹ http://www.hastings.gov.uk/environment_planning/planning/localplan/sustainability/#plan_sa

² http://www.hastings.gov.uk/environment_planning/planning/localplan/dm_plan_siteallocations/dmplan_examination/inspectorspreliminaryfindings/

³ http://www.hastings.gov.uk/environment_planning/planning/localplan/sustainability/#scoping

7. Vibrant and locally distinctive communities are created and sustained

Environmental protection objectives

8. Land and buildings are used more efficiently and the best use is made of previously developed land
9. Biodiversity is protected, conserved and enhanced
10. The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future
11. Parks and gardens, countryside, and the historic environment / townscape and landscape are protected, enhanced and made more accessible
12. Air pollution from transport and land use planning is reduced, and air quality continues to improve
13. 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)
14. The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced
15. The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings
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

Economic objectives

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 town is achieved and linked closely to social regeneration
21. Indigenous and inward investment is encouraged and accommodated

The Inspectors Proposed Main Modification (MM) assessed against each of the Council's adopted 21 Sustainability Objectives (SO)

MM1 – Policy FB1: Deletion of Site at Upper Wilting Farm for Wind Farm development

Social Objectives

- SO1 There is no considered impact/neutral impact upon this objective
- SO2 There is no considered measureable impact/neutral impact upon this objective
- SO3 There is no considered impact/neutral impact upon this objective
- SO4 There is no considered impact/neutral impact upon this objective
- SO5 There is no considered measureable impact/neutral impact upon this objective. A small number of jobs might have been created in association with construction and running of any Wind Farm
- SO6 There is no considered impact/neutral impact upon this objective
- SO7 There is no considered impact/neutral impact upon this objective

Environmental Protection Objectives

- SO8 Neutral impact
- SO9 Deletion of the wind farm proposal will have a positive impact upon the protection of biodiversity
- SO10 Neutral impact
- SO11 Deletion of wind farm proposal will have a positive impact on the protection and enhancement of countryside
- SO12 Deletion of proposal will reduce ability of the Plan to improve air quality as alternative energy sources will need to be found
- SO13 Deletion of proposal will reduce the overall ability of the Plan to reduce the effects of climate change
- SO14 Neutral impact
- SO15 Deletion of wind farm proposal will reduce ability of the Plan to maximise use of sustainable energy
- SO16 Neutral impact
- SO17 Possible slight reduction in ability of Plan to reduce effects of road pollution for example this would apply if there was significant future increase in use of electric vehicles.

Economic Objectives

- SO18 Neutral impact
- SO19 Neutral impact

SO20 Neutral impact

SO21 Possible slight negative impact through loss of investment to develop any wind farm proposal.

MM2 - Former Convent of Holy Child Jesus, Magdalen Road – proposed enhanced Policy wording

Social Objectives

SO1 Positive impact on affordable home provision dependent upon any scheme ultimately implemented.

SO2 Neutral impact

SO3 Positive impact dependent upon delivery of affordable units in any scheme ultimately implemented

SO4 Neutral impact

SO5 Neutral impact

SO6 Positive impact through appropriate design and layout

SO7 Positive impact through protection and conservation of existing heritage assets and design of any successful scheme

Environmental Protection Objectives

SO8 Positive impact through possible conversion, enhancement and re-use of existing buildings

SO9 More limited but positive impact through use of design and layout of any successful scheme

SO10 Limited but positive impact through use of appropriate measures in design of any scheme

SO11 Positive impact in protecting and enhancing Heritage Assets and their settings

SO12 Neutral impact

SO13 Positive impact dependent upon incorporation of appropriate measures in any successful development scheme

SO14 Neutral impact

SO15 Positive impact dependent upon incorporation of appropriate measures in any successful development scheme

SO17 Positive impact dependent upon incorporation of appropriate measures such as pedestrian routes in any successful development scheme

Economic Objectives

SO18 Neutral impact

SO19 Neutral impact

SO20 Positive impacts through high quality development and conservation of existing Heritage Assets

SO21 Neutral impact

MM3 – Priority of Design Quality over indicative Housing Numbers – additional Policy wording

Social Objectives

SO1 Positive impact through securing high quality design and layout in all developments, including affordable home provision.

SO2 Positive impact in respect of wellbeing for residents of new homes

SO3 Positive impact in schemes where a percentage of affordable homes are deliverable

SO4 Neutral impact

SO5 Neutral impact as no direct impact on location of development

SO6 Positive impact achieved through good design and layout

SO7 Positive impact through good design and where local character is respected and reinforced

Environmental Objectives

SO8 Positive impact including where development occurs on previously developed land (PDL) and buildings

SO9 Limited but positive impact through good design to conserve and respect biodiversity on site

SO10 Positive impact through use of sustainable drainage systems and other measures as part of design process

SO11 Neutral/limited impact

SO12 Positive but limited impact though use of good design and incorporation of cycleways and pedestrian routes

SO13 Positive impact on climate change through design – use of recycling and water harvesting facilities

SO14 Positive impact through use of measures such as SUDS (Sustainable Urban Drainage Systems)

SO15 Positive impact by incorporating appropriate measures in design of development

SO16 Positive impact by incorporating appropriate measures in design of development

SO17 Positive impact by incorporating appropriate measures in design of development

Economic Objectives

SO18 Neutral impact

SO19 Positive impact where located within areas in need of revitalisation

SO20 Positive impact through high quality development

SO21 Positive impact through high quality development

MM4 - Deletion of proposed residential development at Harrow Lane

Social Objectives

SO1 Negative impact upon the ability of the Plan to deliver a significant number of homes and affordable homes

SO2 Negative impact in respect of provision of and upon those in need of affordable housing

SO3 Negative impact in addressing social exclusion and deprivation and better access to housing provision

SO4 Neutral impact

SO5 Neutral impact

SO6 Neutral impact

SO7 Negative impact through loss of ability to masterplan with adjoining site allocation

Environmental Protection Objectives

SO8 Neutral impact

SO9 Small but positive impact on protection of open space but with limited biodiversity interest

SO10 Neutral impact

SO11 Positive impact retaining open space

SO12 Positive impact by reduction in overall housing numbers delivered

SO13 Positive impact by reduction in overall housing numbers delivered

SO14 Neutral impact

SO15 Neutral impact

SO16 Neutral impact

SO17 Positive impact by reduction in overall housing numbers delivered

Economic Objectives

SO18 Neutral impact

SO19 Neutral impact

SO20 Negative impact through achievement of less economic growth

SO21 Neutral impact

MM5 - Deletion of proposed residential allocation at Robsack A (GH1)

Social Objectives

SO1 Negative impact through loss of housing delivery including affordable housing

SO2 Negative impact through loss of housing delivery including affordable housing

SO3 Negative impact –through loss of opportunity to help address social exclusion and equal access to housing provision

SO4 Neutral impact

SO5 Neutral impact

SO6 Neutral impact

SO6 Neutral impact

Environmental Protection Objectives

SO8 Positive impact through deletion of a greenfield site

SO9 Positive impact by deleting this allocation site which is surrounded by Ancient Woodland and Local Nature Reserve (LNR) designation

SO10 Neutral impact

SO11 Positive impact through protection of countryside and accessibility of this to residents nearby

SO12 Small positive impact by reducing overall levels of development within the Plan

SO13 Small positive impact by reducing overall levels of development within the Plan

SO14 Neutral impact

SO15 Neutral impact

SO16 Neutral impact

SO17 Small positive impact by reducing overall levels of development within the Plan

Economic Objectives

SO18 Neutral impact

SO19 Neutral impact

SO20 Slight negative impact

SO21 Neutral impact

MM6 - Proposed addition to allocation of land adjacent to Sandrock Park – Policy SH1

Social Objectives

SO1 Positive impact through enhanced meeting of housing needs and the provision of housing including affordable housing

SO2 Positive impact through enhanced meeting of housing needs and the provision of housing including affordable housing

SO3 Positive impact through enhanced meeting of housing needs and the provision of housing including affordable housing

SO4 Neutral impact

SO5 Neutral impact

SO6 Neutral impact

SO7 Neutral impact

Environmental Protection Objectives

SO8 Slight negative impact as some additional greenfield land included

SO9 Neutral/no measureable impact

SO10 Neutral impact

SO11 Positive impact through restoration and conversion/ protection of the historic asset "Lodge Cottage"

SO12 Slight negative impact through small increase in residential development overall

SO13 Slight negative impact through small increase in residential development overall

SO14 Neutral impact

SO15 Neutral impact unless specific measures included in new development

SO16 Neutral impact

SO17 Slight negative impact through small increase in residential development overall

Economic Objectives

SO18 Neutral impact

- SO19 Neutral impact
- SO20 Neutral/small positive impact
- SO21 Neutral impact

MM7 – Cornwallis Street Car Park – incorporation of a children’s play space or “pocket park”

Social Objectives

- SO1 Slight negative impact on the Plan’s ability to deliver homes, including affordable homes through land take of any play space facility
- SO2 Positive impact through provision of play space for existing and new residents
- SO3 Overall neutral impact anticipated
- SO4 Neutral impact
- SO5 Neutral impact
- SO6 Small positive impact through provision of safe secure facility for children’s play
- SO7 Positive impact

Environmental Protection Policies

- SO8 Positive impact overall
- SO9 Neutral impact
- SO10 Neutral impact
- SO11 Positive impact by provision of accessible play area or pocket park
- SO12 Neutral impact
- SO13 Neutral impact
- SO14 Neutral impact
- SO15 Neutral impact
- SO16 Neutral impact
- SO17 Neutral impact

Economic Objectives

- SO18 Neutral impact
- SO19 Neutral impact
- SO20 Neutral impact

SO21 Neutral impact

MM8 - Deletion of proposed residential allocation. Land at Victoria Avenue – Policy CVO1. Possible designation for some form of open space

Social Objectives

- SO1 Negative impact through loss of housing delivery including affordable housing
- SO2 Negative impact through loss of housing delivery including affordable housing
- SO3 Negative impact –through loss of opportunity to help address social exclusion and equal access to housing provision
- SO4 Neutral impact
- SO5 Neutral impact
- SO6 Neutral impact
- SO7 Neutral impact

Environmental protection Objectives

- SO8 Positive impact through deletion of a greenfield/wooded site of local importance to residents and community groups
- SO9 Positive impact through deletion of a proposed development site with local biodiversity interest. Parts already managed for access and community benefit on an informal basis
- SO10 Slight positive impact through retention of wooded site on sloping ground
- SO11 Positive impact by protection of countryside from development. Positive impact of any designation dependent upon landowner .
- SO12 Slight positive impact through reduction in overall levels of development
- SO13 Slight positive impact through reduction in overall levels of development
- SO14 Slight positive impact through deletion of allocation for development.
- SO15 Neutral impact
- SO16 Neutral impact
- SO17 Slight positive impact through deletion of allocation for development

Economic Objectives

- SO18 Neutral impact
- SO19 Neutral impact
- SO20 Slight negative impact through reduction in overall levels of growth

S21 Neutral impact

**MM9 – Deletion of proposed residential allocation. Land at rear of Old London Road.
Possible designation for some form of open space**

Social Objectives

- SO1 Negative impact through loss of housing delivery including affordable housing
- SO2 Negative impact through loss of housing delivery including affordable housing
- SO3 Negative impact –through loss of opportunity to help address social exclusion and equal access to housing provision
- SO4 Neutral impact
- SO5 Neutral impact
- SO6 Neutral impact
- SO7 Neutral impact

Environmental Protection Objectives

- SO8 Positive impact through deletion of a greenfield site of local importance to residents and community groups.
- SO9 Positive impact through deletion of a proposed development site with local biodiversity interest
- SO10 Slight positive impact through retention of wooded site on sloping ground
- SO11 Positive impact by protection of countryside from development. Positive impact of any designation dependent upon landowner
- SO12 Slight positive impact through reduction in overall levels of development
- SO13 Slight positive impact through reduction in overall levels of development
- SO14 Slight positive impact through deletion of allocation for development
- SO15 Neutral impact
- SO16 Neutral impact
- SO17 Slight positive impact through deletion of allocation for development

Economic Objectives

- SO18 Neutral impact
- SO19 Neutral impact
- SO20 Slight negative impact through reduction in overall levels of growth
- SO21 Neutral impact

Summary of conclusions in respect of Sustainability Appraisal for each of the nine proposed Main Modification arising from the proposed “Main Modifications”- Inspector’s Preliminary Findings

This Sustainability Appraisal (SA) of the Inspector’s proposed Main Modifications has assessed each of the proposed Main modifications against the Council’s 21 adopted sustainability objectives covering social, environmental and economic matters. These are the same objectives as those that have already been used to assess the overall sustainability and performance of the Development Management Plan (DMP) in the SA submitted for the examination of the Plan. This exercise has focussed upon the performance, in sustainability terms, of each of the Inspector’s nine proposed Main Modifications (MM’s) when compared with the DMP that has been the subject of the examination to date.

The following text provides a brief summary of the results from the SA schedules set out above for each Modification.

MM1 The proposal to delete the allocation and Policy at Wilting Farm for development of a wind farm facility will provide an overall positive effect in reducing the impact of the Plan on environmental matters including especially landscape and biodiversity interests. Whilst there is a resulting reduction in the Plan’s ability to combat climate change issues this is considered to be more than outweighed by other positive impacts and environmental benefits arising from this modification. **Positive Sustainability effect**

MM2 The proposal to clarify and strengthen the policy wording regarding the Convent of the Holy Child Jesus, in Magdalen Road, is considered to provide many positive benefits that will not only ensure the conservation and enhancement of existing Heritage assets and their settings but will also ensure that appropriate bodies such as English Heritage are fully engaged in consideration of proposals. Overall this will have a positive effect on the Plan. **Significant positive Sustainability effect.**

MM3 The proposal to clarify and emphasise that it is the specific design details and layouts of development proposals, rather than any indicative housing numbers, that are the principal and most important matters when determining applications is considered to provide positive benefits overall when assessed against many of the sustainability objectives. This will lead to the delivery of more sustainable development within the Borough. Overall this proposal will have a positive effect on the Plan. **Significant positive Sustainability effect.**

MM4 The proposal to delete the residential allocation at Harrow Lane has a number of negative impacts in respect of many of the adopted social and economic sustainability objectives. Deletion of this site will significantly reduce the ability of the Plan to meet housing needs and in particular affordable housing. Whilst there are some benefits with this modification in retaining open space and biodiversity this land has not been used as formal open space for some while and biodiversity interest here is low. These potential benefits are concluded to be outweighed by the significant negative impacts of the modification upon social and economic objectives. Overall this proposal is concluded to have a negative impact on the Plan in sustainability terms. **Significant negative Sustainability effect.**

MM5 The proposed deletion of Robsack A as a residential allocation also provides a number of negative impacts in respect of the social sustainability objectives of the Council although these are much reduced when compared with those at Harrow Lane because of the much smaller size of allocation proposed here. However the environmental benefits of the proposed modification are significant considering the sensitive location of the site adjacent to designated Ancient Woodland and a Local Nature Reserve. Overall this proposal is considered to have a positive outcome on the Plan in sustainability terms. **Positive Sustainability effect.**

MM6 The proposed inclusion of additional land for residential development adjacent to the allocation at Sandrock Park is considered to provide a number of benefits. It will facilitate the restoration and enhancement of the existing but neglected Heritage asset “Lodge Cottage” whilst also providing some limited additional scope for housing provision. The allocation of this otherwise land locked site is not considered to cause significant additional landscape impact although it is acknowledged that this may mean some minor additional take on greenfield land. Overall this proposal has a positive impact on the Plan. **Positive Sustainability effect.**

MM7 The proposal to require provision of a children’s play area or “pocket park” within the development proposed at the Cornwallis Street Car Park will provide some additional small scale community/green infrastructure without compromising the overall objective of delivering housing numbers to the indicative totals shown in the Plan. Overall this proposal is considered to have a positive impact on the Plan. **Slight positive Sustainability effect.**

MM8 The proposed deletion of the land allocated at Victoria Avenue (Policy CVO1) has a number of negative impacts upon social objectives including in particular the ability of the Plan to meet housing need including through provision of affordable housing. Some lesser negative impacts are identified in respect of economic objectives. The deletion of the site would have environmental benefits in retaining woodland and an area that already has a high degree of community interest and support. The proposal to look at some appropriate designation as open space or similar will depend upon existing landowners. Overall the proposal is considered to have a neutral impact upon the Plan. **Neutral Sustainability effect.**

MM9 The proposed deletion of the allocation for residential land at the rear of Old London Road has a number of negative impacts upon social objectives including in particular the ability of the Plan to meet housing need including through provision of affordable housing. Smaller negative impacts on economic objectives are also identified. This land forms a relatively level area considered more able to comfortably assimilate development. Whilst the Plan allocation is for a modest number of homes overall the deletion of this site is felt to have a negative impact on the Plan in terms of sustainability issues. **Slight negative Sustainability effect.**