

Hastings Town Centre and Bohemia Area Action Plan

Sustainability Appraisal (SA)

SA Report to accompany Regulation 18 consultation

Hastings Borough Council

July 2018

Quality information

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1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of the Hastings Town Centre and Bohemia Area Action Plan (AAP).
- 1.2 Hastings Town Centre and the Bohemia area have been identified by Hastings Borough Council as a key location to the continued economic and cultural regeneration of the Borough and to help meet future growth requirements. The AAP will provide the policy and spatial framework for future development and change in these areas.
- 1.3 Hastings Town Centre and the Bohemia area is identified as having a pivotal role to play in driving the local economy as the Borough's largest retail and leisure destination, service centre, tourist destination, and employment centre. Combined, the Town Centre and Bohemia area have close links with the seafront, Hastings Castle, and the Victorian Pier. The AAP brings the different elements together in order to formulate one co-ordinated strategy for regeneration, growth and change in Hastings; to build on its positioning as a destination, and to enhance local economic vitality.
- 1.4 This SA Report accompanies the Regulation 18 consultation for the AAP. It is currently anticipated that the AAP will be submitted to the Secretary of State and then undergo an independent Examination in Public in 2019.
- 1.5 Key information relating to the AAP is presented in Table 1.1.

Table 1.1: Key facts relating to the Hastings Town Centre and Bohemia Area Action Plan

Name of Responsible Authority	Hastings Borough Council
Title of Plan	Hastings Town Centre and Bohemia Area Action Plan
Subject	Spatial plan
Purpose and timescale	<p>The AAP will guide future development and land use to 2033 within the town centre and Bohemia areas of Hastings in East Sussex.</p> <p>Once adopted, The AAP will form part of a suite of Local Plan documents with the Hastings Planning Strategy (February 2014) and the Development Management Plan (September 2015) and will be used for Development Management purposes in the determination of planning applications.</p>
Area covered by the plan	<p>The town centre and Bohemia areas of Hastings, East Sussex. (Figure 1.1 below).</p> <p>This incorporates the town centre, Summerfields/Bohemia, Horntye, White Rock Gardens across to the Former Convent of the Holy Child Jesus, and parts of the seafront.</p>
Summary of content	<p>The AAP will set out:</p> <ul style="list-style-type: none">• Policies for the use of land and buildings• Development and design guidance for key sites• Proposals for new and enhanced parks and civic spaces and other environmental improvements
Plan contact point	<p>Planning Policy, Hastings Borough Council</p> <p>Email address: fplanning@hastings.gov.uk</p> <p>Telephone number: 01424 451098</p>

2. Current stage of plan making

- 2.1 Preparation of the AAP follows the adoption of the Hastings Planning Strategy (February 2014) and Development Management Plan (September 2015), both of which cover the whole of the Borough. The AAP will take forward the objectives and aspirations of the adopted Hastings Planning Strategy (2014) and will form part of the Local Plan once adopted.
- 2.2 The AAP has also been informed by the Hastings Town Centre and White Rock Retail and Leisure Assessment and Urban Design Analysis (Bilfinger GVA, March 2016) and the White Rock Park & Bohemia: A Strategy for the future of the White Rock area (White Arkitekter, July 2017). The White Rock Park and Bohemia Strategy sets out a masterplan to drive forward the transformation and regeneration of Hastings and St Leonards.
- 2.3 This SA Report accompanies the current consultation on the AAP (*Hastings Town Centre and Bohemia Area Action Plan Preferred Approaches for Public Consultation*). The Preferred Approaches document is the first key consultation document on the AAP, and is being consulted on under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations.
- 2.4 In this context, the current AAP document sets out the following:
 - 1) An overarching vision and set of objectives for the Plan area
 - 2) Policies for the use of land and buildings;
 - 3) Development and design guidance for key sites;
 - 4) Proposals for new and enhanced parks and public realm and other environmental improvements; and
 - 5) An Action Plan for the delivery of key proposals and initiatives.

3. Approach to the SA process

Sustainability Appraisal explained

- 3.1 Sustainability Appraisal (SA) is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹. It also widens the scope of the assessment from focusing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans.
- 3.2 The National Planning Policy Guidance (NPPG) states that *"the role of the Sustainability Appraisal is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."*
- 3.3 Two key procedural requirements of the SEA Directive are that:
- When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 3.4 The key stages of Local Plan preparation and their relationship with the SA process are shown in Figure 3.1 on the following page.
- 3.5 This SA Report is concerned with Stage B in the figure below. It evaluates the likely significant effects of the latest proposals for the AAP and reasonable alternatives, and considers ways of mitigating adverse effects and maximising beneficial effects.
- 3.6 A further SA Report will accompany the publication version of the Plan at Regulation 19 stage early in 2019, and will include all of the information required by the SEA Regulations.

¹ Directive 2001/42/EC

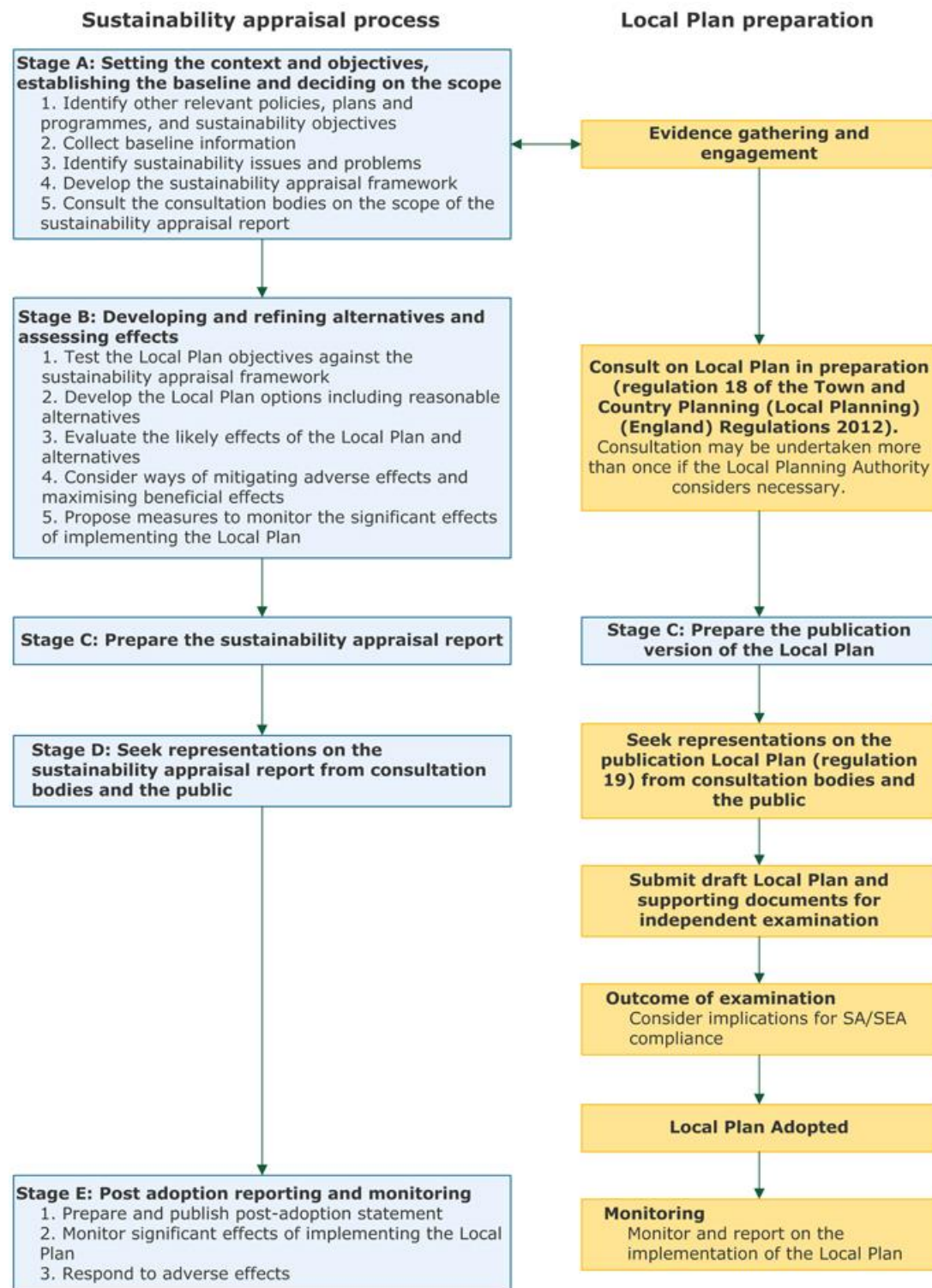


Figure 3.1: SA and Local Plan Stages²

² National Planning Practice Guidance Ref ID: 11-013-20140306 [online] available at: http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/#paragraph_013 Accessed Aug 2017

What is the scope of the SA?

SA Scoping Report

- 3.7 The SEA Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ These authorities were consulted on the scope of the AAP SA in October 2016.
- 3.8 An initial step when seeking to establish the appropriate scope of an SA involves reviewing the sustainability context set out in relevant policies, plans and programmes. As such the Scoping Report presented the sustainability context set out in relevant policies, plans and programmes. The Scoping Report also included a detailed baseline review which aids understanding of the current and likely future situation in the plan area (and therefore the identification and evaluation of 'likely significant effects' associated with the emerging plan and reasonable alternatives).
- 3.9 The baseline information (including baseline data and context review) is presented in the updated SA Scoping Report, which can be accessed at:

https://www.hastings.gov.uk/planning/policy/emergingpolicy_guidance/towncentrewhiterock/

SA Framework

- 3.10 Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains targeted. These issues were then translated into an SA 'framework' of objectives and appraisal questions.
- 3.11 The SA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach.
- 3.12 The SA Framework and the appraisal findings in this SA Report have been presented under eight SA Themes, reflecting the range of information being considered through the SA process. These are:
- Biodiversity
 - Climate Change
 - Historic Environment and Townscape
 - Land, Soil and Water Resources
 - Community Vitality
 - Health and Wellbeing
 - Transportation and Air Quality
 - Economy and Employment
- 3.13 The SA Framework is presented in Table 3.1 below.

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

Table 3.1: SA Framework for the Hastings Town Centre and Bohemia Area Action Plan

SA Theme	SA objectives	Appraisal questions: Will the option/proposal help to...
Biodiversity	Biodiversity is protected, conserved and enhanced	<ul style="list-style-type: none"> • Maintain, protect and enhance the town's sites designated for their nature conservation interests? • Protect, conserve and enhance the town's priority species and habitats, and ensure achievement of local biodiversity targets? • Encourage the development of new biodiversity assets within/alongside developments?
Climate Change	The causes of climate change are addressed through reducing emissions of greenhouse gases through zero/low carbon development (mitigation) and ensure the town is prepared for its impacts (adaptation)	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases by reducing energy consumption? • Contribute to a reduction of CO2 to contribute to national targets? • Promote efficient land use patterns that minimise the need to travel? • Promote sustainable drainage systems in new development? • Reduce vulnerability of the built environment to the effects of climate change?
	The use of sustainable energy and renewable energy technologies is maximised in new development, and in existing buildings	<ul style="list-style-type: none"> • Promote the incorporation of energy efficiency measures in existing buildings and in new development? • Reduce the incidences of fuel poverty through installation of energy efficiency measures and raising income levels? • Promote the incorporation of small-scale renewables in developments and existing buildings?
	The risk of flooding (fluvial and tidal) and coastal erosion is managed and reduced, now and in the future	<ul style="list-style-type: none"> • Minimise the risk of flooding from rivers, watercourses and the coast, to people and flooding? • Make use of Sustainable Drainage Systems (SUDs)? • Ensure that development does not increase flood risk to others? • Prevent inappropriate development in the flood plain?

SA Theme	SA objectives	Appraisal questions: Will the option/proposal help to...
Historic Environment and Townscape	Parks and gardens, countryside, and the historic environment/ townscape and landscape are protected, enhanced and made more accessible	<ul style="list-style-type: none"> • Protect, enhance and restore the town's natural environmental assets (e.g. greenspace network) • Support local character and distinctiveness through good design? • Protect, enhance and restore the town's cultural and heritage assets? • Encourage access to historic and cultural heritage? • Will it enhance and increase access to the natural environment, parks and open spaces and the coast?
Land, Soil and Water Resources	Land and buildings are used more efficiently and the best use is made of previously developed land	<ul style="list-style-type: none"> • Reduce the amount of derelict and underused land? • Encourage the re-use of existing buildings and the re-use of materials in construction
	The risk of pollution to all water resources is reduced, water quality is improved and water consumption is reduced	<ul style="list-style-type: none"> • Reduce water consumption? • Increase the use of water conservation and grey water recycling technologies? • Ensure water demand does not outstrip available supply?
	Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced	<ul style="list-style-type: none"> • Minimise the production of household waste? • Reduce waste in the construction industry?
Community Vitality	Levels of poverty and social exclusion are reduced and the deprivation gap is closed between the more deprived areas in Hastings and the rest of the town	<ul style="list-style-type: none"> • Reduce poverty and social exclusion in those areas and communities most affected?

SA Theme	SA objectives	Appraisal questions: Will the option/proposal help to...
	More opportunities are provided for everyone to live in a decent, sustainably constructed and affordable home suitable to their needs	<ul style="list-style-type: none"> • Increase access to good quality and affordable housing for all? • Improve the quality of the housing stock and reduce the number of non-decent homes? • Reduce homelessness and ensure the provision of housing for the homeless? • Promote the adoption of sustainable design and construction practices in housing (energy/water/land/materials efficiency/incorporation of biodiversity etc)? • Encourage mixed use and a range of housing tenure?
	Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve	<ul style="list-style-type: none"> • Improve the qualifications and skills of adults? • Address the skills gap and enable skills progression? • Improve the qualifications and skills of young people? • Contribute to meeting identified skills shortages • Improve access to high quality educational/training opportunities and facilities?
	All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities, including access to the countryside and the historic environment	<ul style="list-style-type: none"> • Improve accessibility and affordability to essential local services? (employment, public transport, education, open space, health services and shops) • Promote compact, mixed-use development with good accessibility to local facilities and services? • Make access easier for those without access to a car?
	Safe and secure environments are created and there is a reduction in crime and the fear of crime	<ul style="list-style-type: none"> • Reduce actual levels of crime? • Reduce the fear of crime?
	Vibrant and locally distinctive communities are created and sustained	<ul style="list-style-type: none"> • Encourage the involvement of communities in the planning and management of their neighbourhoods? • Improve residential amenity and sense of place?

SA Theme	SA objectives	Appraisal questions: Will the option/proposal help to...
Health and Wellbeing	The health and well-being of the population is improved and inequalities in health are reduced	<ul style="list-style-type: none"> • Reduce death rates? • Promote healthy living and reduce health inequalities? • Improve access to high quality health facilities? • Encourage healthy, active lifestyles and provide opportunities for sport and recreation (formal and informal) • Promote good design that minimises adverse impacts on health and well-being from crime and road traffic accidents
Transportation and Air Quality	Road congestion and pollution levels are reduced, and there is less car dependency and greater travel choice	<ul style="list-style-type: none"> • Reduce the need to travel by private car? • Promote public transport, walking and cycling? • Reduce traffic volumes?
	Air pollution from transport and land use planning is reduced, and air quality continues to improve.	<ul style="list-style-type: none"> • Improve and maintain air quality? • Promote more sustainable transport patterns including walking, cycling and public transport? • Reduce the need to travel through the location and design of new development and the provision of public transport infrastructure? • Avoid locating development where air quality could negatively impact upon people's health?
Economy and Employment	Economic revival in the more deprived areas of the town is stimulated and successfully achieved.	<ul style="list-style-type: none"> • Improve economic performance in advantaged and disadvantaged areas? • Support the regeneration of deprived areas?
	The sustained economic growth of Hastings Town Centre is achieved and linked closely to social regeneration.	<ul style="list-style-type: none"> • Encourage investment, including inward investment? • Promote and support town centres and local centres, local employment opportunities and mixed use development?
	Indigenous and inward investment is encouraged and accommodated.	<ul style="list-style-type: none"> • Make land and property available for business development?

SA Theme	SA objectives	Appraisal questions: Will the option/proposal help to...
	There are high and stable levels of employment and rewarding and satisfying employment opportunities for all.	<ul style="list-style-type: none"> • Help to improve earnings? • Increase the number and range of employment opportunities for local people and those most in need of employment? • Support economic growth in years to come? • Reduce short and long-term unemployment? • Provide good quality employment opportunities accessible to all sections of the population?

4. Appraisal of reasonable alternatives

Reasonable alternatives in SA

- 4.1 A key element of the SA process is the appraisal of 'reasonable alternatives' for the AAP. The SEA Regulations⁴ are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the "*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*".
- 4.2 The following sections therefore describe how the SA process to date has informed the preferred approaches for the AAP and potential locations for proposed development. Specifically, the chapter explain how the AAP has been developed in terms of the broad distribution and approach to development and broad policy approaches.⁵

Options appraised

- 4.3 A number of alternative approaches have been considered for the AAP as reasonable alternatives through the SA process to date. These were developed through two workshops undertaken with key officers and stakeholders with an interest in the AAP process in August 2017 and November 2017.
- 4.4 The alternative approaches relate to the following:
- Options for retail provision
 - Options for housing numbers
 - Options for the broad location of housing
 - Options for green infrastructure provision
 - Options for leisure provision
 - Options relating to the A259
 - Options for housing delivery at Bohemia
 - Options for Horntye
 - Options for the White Rock Theatre
- 4.5 Further detail on these options and their appraisal is presented from section below.

Approach to the appraisal

- 4.6 The options considered as 'reasonable alternatives' have been appraised against the SA Framework (Table 3.1.).
- 4.7 In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each SA Theme.
- 4.8 Where a causal link between the options and SA Themes was established, impacts were identified on the basis of professional judgment with reference to the evidence base. The appraisal was undertaken with reference to the criteria in Schedule 1 of the SEA Regulations, that is:

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal.

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (for example, due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to-
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values; or
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, community or international protection status.

The following sections therefore:

1. Provide more detail on the options considered as reasonable alternatives through the SA process; and
2. Present the appraisal findings relating to these options.

Appraisal of options for retail provision

- 4.9 The Local Plan, which sets out current retail need in the Borough, seeks to focus key retail and office uses in Hastings town centre. Given the transformation change to be initiated through the AAP, there is the potential to explore an alternative option which enables new town centre uses to be delivered outside of the town centre in the Bohemia area.
- 4.10 To explore these issues further, the SA process has considered two options, as follows:
- **Option TC1:** Continue to concentrate key retail and office uses in the Town Centre Core and Town Centre Edge
 - **Option TC2:** Facilitate new town centre uses in the parts of the AAP area outside of the Town Centre Core and Town Centre Edge
- 4.11 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eight SA themes.
- 4.12 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking.
- 4.13 Where an '–' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.1: Appraisal of options for retail provision

Option TC1: Continue to concentrate key retail and office uses in the Town Centre Core and Town Centre Edge

Option TC2: Facilitate new town centre uses in the parts of the AAP area outside of the Town Centre Core and Town Centre Edge

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		TC1	TC2
Biodiversity	The significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of retail and office development and the incorporation of biodiversity enhancement measures. As such it is not possible to differentiate between the two options.	?	?
Climate Change	<p>In relation to climate change mitigation, the sustainability performance of the options depend on elements such as the integration of energy efficient design within new retail and office development and the provision of renewable energy generation. This, however, can only be assessed on a site-by-site basis once the details of potential development become clearer (e.g. when 'pre-app' discussions take place between developers and the Council or a planning application is submitted). In terms of per capita emissions from transport, the town centre is a more accessible location by sustainable transport modes than Bohemia due to having the broader range of public transport options (including notably the railway station). As such Option TC1 has increased potential to promote the use of public transport and walking and cycling to access retail and employment opportunities.</p> <p>In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>In terms of the wider elements relating to climate change adaptation, this also depends on the provision of appropriate infrastructure alongside new provision, such as green infrastructure provision, and appropriate design and layout.</p>	1	2

Option TC1: Continue to concentrate key retail and office uses in the Town Centre Core and Town Centre Edge

Option TC2: Facilitate new town centre uses in the parts of the AAP area outside of the Town Centre Core and Town Centre Edge

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		TC1	TC2
Historic Environment and Townscape	<p>Hastings town centre has a rich historic environment resource. This is reflected by much of the town centre being covered by conservation area status and the large number of nationally listed structures in the area. Whilst Option TC1 has the potential to deliver an increased level of new retail and office development in the town centre, given existing uses in the area, and the likelihood of there being sufficient capacity to deliver retail and office requirements at this location, potential impacts on the historic environment would likely be relatively limited. Alongside, the focus of new retail and office development in the town centre offers opportunities for the reuse and rejuvenation of existing heritage assets. This will support the fabric and setting of the historic environment and the quality of the public realm.</p> <p>The Bohemia area, whilst in parts being less sensitive than the town centre in terms of nationally and locally designated historic environment assets, also has a sensitive historic environment in some locations. This includes a number of Grade II* and Grade II listed buildings associated with the former convent west of White Rock Gardens, a number of listed buildings along White Rock (and Hastings Pier) and the locally listed White Rock Gardens. Growth has the potential to have impacts on these key assets.</p> <p>For both options, potential effects on the historic environment will depend on factors such as the design and layout of new development, the retention of distinct features contributing to local character and the location of development in relation to key viewpoints in the area. New development also offers opportunities for enhancing the fabric and setting of the historic environment, if appropriately designed.</p> <p>However it should be noted that 1) the town centre is an area inherently suited to retail and office uses, and 2) focusing retail and office development in the Bohemia area has the potential to undermine the regeneration of the town centre as a key employment centre, and its vitality. This may undermine opportunities for enhancing the quality of the public realm and rejuvenating features and areas of historic environment interest.</p>	1	2
Land, Soil and Water Resources	<p>Both options will support the reuse and rejuvenation of previously developed or underutilised land. This will support the efficient use of land in the AAP area. Focusing such uses on the town centre however has increased potential to lead to a rejuvenation of existing structures and the intensification of uses.</p> <p>In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place.</p>	1	2

Option TC1: Continue to concentrate key retail and office uses in the Town Centre Core and Town Centre Edge

Option TC2: Facilitate new town centre uses in the parts of the AAP area outside of the Town Centre Core and Town Centre Edge

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		TC1	TC2
Community Vitality	Continuing to focus retail and office uses in the town centre will do more to support and enhance the vitality and viability of the area. This will help encourage a diversity of uses in the town centre, promote the reuse of vacant and underutilised buildings and safeguard the current character and function of the area. As such Option TC1 will do more to support economic regeneration, and, through supporting an ongoing clustering of uses in the most accessible part of the Borough, will support access to economic and employment opportunities. In addition to supporting economic vitality, this will support the quality of life of residents through contributing to a vibrant and dynamic town centre which provides a range of services, facilities, amenities and opportunities. In contrast, enabling significant retail and office development in the Bohemia area has the potential to undermine the regeneration of the town centre as a key employment centre, and its vitality. Through drawing retail and office development away from the town centre, Option TC2 has the potential to undermine its viability, and limit opportunities for economic and cultural regeneration.	1	2
Health and Wellbeing	Option TC1 seeks to continue a focus of retail and office uses in the town centre. This will do more to support and enhance the vitality and viability of the area and support the ongoing clustering of uses in the most accessible part of the Borough. In addition to supporting access to economic and employment opportunities this will support the health and wellbeing and quality of life of residents through contributing to a vibrant and dynamic town centre which provides a range of services, facilities, amenities and opportunities. In contrast, focusing retail and office development in the Bohemia area through Option TC2 has the potential to undermine the regeneration of the town centre as a key employment centre, and its vitality.	1	2
Transportation and Air Quality	The town centre is most accessible location in the Borough. This is due to the wider range of sustainable transport options available, including the rail station, bus routes and walking and cycling networks. For this reason, focusing office and retail uses in the town centre will support accessibility by sustainable transport modes and encourage modal shift from the private car. In contrast, directing retail and office development to the Bohemia area through Option TC2 has the potential to generate additional traffic movements and discourage the use of alternative modes of transport to the private car. Option TC1 therefore has increased potential to promote the use of public transport and walking and cycling to access retail and office provision.	1	2

Option TC1: Continue to concentrate key retail and office uses in the Town Centre Core and Town Centre Edge

Option TC2: Facilitate new town centre uses in the parts of the AAP area outside of the Town Centre Core and Town Centre Edge

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		TC1	TC2
Economy and Employment	Continuing to focus retail and office uses in the town centre through Option TC1 will do more to support and enhance the vitality and viability of the area. This will help encourage a diversity of uses in the area, promote the reuse of vacant and underutilised buildings and safeguard the current character and function of the area. As such Option TC1 will do more to support economic regeneration, and, through supporting an ongoing clustering of uses in the most accessible part of the Borough, will support access to economic and employment opportunities. In addition to supporting economic vitality, this will support the quality of life of residents through contributing to a vibrant and dynamic town centre which provides a range of services, facilities, amenities and opportunities. In contrast, focusing retail and office development in the Bohemia area has the potential to undermine the regeneration of the town centre as a key employment centre, and its vitality. Through drawing retail and office development away from the town centre, Option TC2 has the potential to undermine its viability, and limit opportunities for economic and cultural regeneration.	1	2

Appraisal of options for housing numbers

- 4.14 The Hastings Local Plan seeks to deliver 'at least' 3,400 net new homes over the Plan period. Annualised this equates to delivering a minimum of 200 new homes per annum across the Borough. Due to the environmental assets and physical constraints within the Borough, this target is considerably less than the objectively assessed housing needs (OAN) which was identified as part of developing the now adopted Local Plan. Recent changes in the approach to calculating housing needs and the now proposed 'standard methodology' to calculating housing need indicate that objectively assessed housing need for Hastings is likely to remain significantly higher than the current Plan target.
- 4.15 Whilst the role of the AAP will be to provide a detailed planning framework to guide change across the Town Centre and Bohemia area, consistent with the Hastings Planning Strategy, the primary focus of the AAP is not in meeting unmet housing need, though the potential to increase housing delivery and to assist in meeting and exceeding the 'at least' target is important.
- 4.16 To explore the issue in more depth, the SA process has considered a number of alternative options with regards to the delivery of housing in the AAP area. These options reflect different levels of additional housing provision which have the potential to be taken forward through the AAP.
- 4.17 In this context, the SA process has considered four options, as follows:
- **Option H1:** Deliver numbers proposed through the existing DS1 policy (i.e. at least 3,400 net new homes for the period 2011 – 2028)
 - **Option H2:** Facilitate enabling development, delivering an additional 670 homes
 - **Option H3:** Facilitate higher densities, delivering between 670 and 2,778 additional homes
 - **Option H4:** Meet residual unmet need, totalling an additional 2,778 homes

- 4.18 The following table presents appraisal findings in relation to the four options introduced above. These are organised by the eight SA themes.
- 4.19 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '4' the least favourable ranking. Where an '-' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.2: Appraisal of options for housing numbers

Option H1: Deliver numbers proposed through the existing DS1 policy (i.e. at least 3,400 net new homes for the period 2011 – 2028)

Option H2: Facilitate enabling development, delivering an additional 670 homes

Option H3: Facilitate higher densities, delivering between 670 and 2,778 additional homes

Option H4: Meet residual unmet need, totalling an additional 2,778 homes

SA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		H1	H2	H3	H4
Biodiversity	<p>The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all housing provision in the AAP area seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.</p> <p>Whilst the significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures, it can, however, be considered that a higher level of housing development in a particular location increases the likelihood (and potential magnitude) of negative effects on the sites and habitats and species present in its vicinity. This is linked to an increased likelihood of direct effects, such as from land take, disturbance or the loss of key features of ecological value, and an increased likelihood of indirect effects, such as from a reduction of ecological connectivity, changes in land use patterns or increased recreational activity. In this context, Option H4, and to a lesser extent Option H3, would require a substantial increase in the number of homes in the AAP area. As such these options have increased potential to have impacts on habitats, species and ecological networks in the AAP area.</p>	1	2	3	4

Option H1: Deliver numbers proposed through the existing DS1 policy (i.e. at least 3,400 net new homes for the period 2011 – 2028)

Option H2: Facilitate enabling development, delivering an additional 670 homes

Option H3: Facilitate higher densities, delivering between 670 and 2,778 additional homes

Option H4: Meet residual unmet need, totalling an additional 2,778 homes

SA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		H1	H2	H3	H4
Climate Change	<p>In relation to climate change mitigation, the sustainability performance of new housing development depends on elements such as the integration of energy efficient design within new development and the provision of renewable energy generation. This, however, can only be assessed on a site-by-site basis once the details of potential development become clearer (e.g. when 'pre-app' discussions take place between developers and the Council or a planning application is submitted). It should be noted though, that a higher quantum of development will do more to increase the built footprint of the AAP area, with associated potential overall increases in greenhouse gas emissions. In terms of per capita emissions from transport, this may however be limited by the accessible location of the AAP area by sustainable transport modes and the potential to promote walking and cycling. It also should be noted that increased densities associated with higher housing delivery increases opportunities for developing CHP linked to district heating network.</p> <p>In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing, such as green infrastructure provision, and appropriate design and layout.</p>	1	2	3	4

Option H1: Deliver numbers proposed through the existing DS1 policy (i.e. at least 3,400 net new homes for the period 2011 – 2028)

Option H2: Facilitate enabling development, delivering an additional 670 homes

Option H3: Facilitate higher densities, delivering between 670 and 2,778 additional homes

Option H4: Meet residual unmet need, totalling an additional 2,778 homes

SA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		H1	H2	H3	H4
Historic Environment and Townscape	<p>The AAP area has a rich historic environment. If all housing provision is appropriately located, and design and layout is sensitive to townscape character, then there should be no difference between the options in terms of townscape impacts and the setting of the historic environment. Differentiating the options in terms of potential effects on the historic environment will therefore depend on factors such as the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision. New development also offers opportunities for enhancing the fabric and setting of the historic environment, if appropriately designed.</p> <p>However it should be noted that the delivery of the level of housing provisions promoted through Options H4 and H3 would be likely to require housing delivery at locations at increased sensitivity for the historic environment. This is due to the number of homes needed to deliver the numbers proposed, and the limited availability of sites for such development. Alongside, given the limited availability of appropriate sites, it is likely that Options H3 and H4 will lead to the loss of significant areas of previously undeveloped land or open space. This will have impacts on townscape character and local distinctiveness.</p> <p>Due the numbers of dwellings required, it is likely that the size and scale of individual new housing developments to meet provision of this magnitude would lead to significant impacts on the historic environment at sensitive locations, as well as, more broadly, significant impacts on the AAP area's townscape character and local distinctiveness. Furthermore, contributions to traffic and congestion promoted by increased housing delivery in the AAP area will have impacts on townscape character and the fabric and setting of the historic environment.</p> <p>As such the options which propose an increased level of housing provision have significant potential to undermine the distinctive character of the AAP area and the integrity of its heritage resource.</p>	1	2	3	4
Land, Soil and Water Resources	<p>All of the options will support the reuse and rejuvenation of previously developed or underutilised land. This will support the efficient use of land in the AAP area.</p> <p>However, given the limited availability of appropriate sites, it is likely that Options H3 and H4 will lead to the loss of significant areas of previously undeveloped land or open space. As such, whilst the options would require a significant intensification of uses, soil and water quality may be impacted on by the loss of open spaces in the AAP area.</p> <p>In terms of specific impacts on water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place.</p>	2	1	3	4

Option H1: Deliver numbers proposed through the existing DS1 policy (i.e. at least 3,400 net new homes for the period 2011 – 2028)

Option H2: Facilitate enabling development, delivering an additional 670 homes

Option H3: Facilitate higher densities, delivering between 670 and 2,778 additional homes

Option H4: Meet residual unmet need, totalling an additional 2,778 homes

SA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		H1	H2	H3	H4
Community Vitality	<p>Options H2, H3 and H4, through delivering a larger quantum of housing across the AAP area will do more to help meet the Borough's objectively assessed need. The options also have the potential to support the delivery of affordable housing needs in the Borough, and help residents access a wider range of housing types, sizes and tenures. The delivery of an additional level of housing also has the potential to support the vitality and vibrancy of the AAP area.</p> <p>However in relation to Option H3 and H4, the scale of housing delivery proposed through these options has the potential to lead to impacts on the quality of life of residents. This includes through increases in traffic flows, the likely loss of open space to deliver the level of housing proposed (due to the lack of available sites), the loss of retail and employment uses due to a likely need to convert existing uses to housing, and impacts on the quality of the built environment and public realm. In this context the inappropriateness of delivering significant new housing in many parts of the town centre has the potential to undermine the potential benefits of increased housing provision and potential positive effects on the vitality of the area.</p>	2	1	3	4
Health and Wellbeing	<p>In relation to Option H3 and H4, the increased scale of housing delivery proposed through these options has the potential to lead to impacts on health and wellbeing. This includes through increases in traffic flows and associated impacts on air/noise quality and road safety, the likely loss of open spaces to deliver the level of housing proposed (due to the lack of available sites) and impacts on the quality of the built environment and public realm. In this context the inappropriateness of delivering significant new housing provision in many parts of the town centre has the potential to undermine health and wellbeing.</p>	2	1	3	4
Transportation and Air Quality	<p>The town centre and the Bohemia area are accessible locations, with the potential to encourage walking and cycling and public transport use, and promote modal shift from the private car. As such, the delivery of additional levels of housing may support the use of sustainable modes of transport.</p> <p>However, a significant increase in the resident population of the AAP area, and a likely requirement for a significant scale of individual housing developments has the potential to have significant impacts on traffic flows at some locations. In addition to contributing to existing congestion issues, this has the potential to impact on air and noise quality in the area.</p>	2	1	3	4

Option H1: Deliver numbers proposed through the existing DS1 policy (i.e. at least 3,400 net new homes for the period 2011 – 2028)

Option H2: Facilitate enabling development, delivering an additional 670 homes

Option H3: Facilitate higher densities, delivering between 670 and 2,778 additional homes

Option H4: Meet residual unmet need, totalling an additional 2,778 homes

SA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		H1	H2	H3	H4
Economy and Employment	<p>Population growth in the AAP area stimulated by Options H2, H3 and H4's promotion of housing growth has the potential to support the economic vitality of the town centre and Bohemia. This includes through increasing the local market for goods and services and improving the vitality of the area. Residential development as part of mixed use development may help with viability, particularly given the need to increase retail floorspace within the town centre.</p> <p>However the delivery of additional housing growth through Options H3 and H4 has the potential to undermine the economic performance of the town centre. Given the lack of available sites in the town centre, there will be a need to convert existing uses to residential. As such an inevitable loss of retail and employment uses through these options may undermine the offer of the town centre and depress opportunities for economic expansion. There is potential conflict between increased residential development within the town centre and promoting the evening economy. Alongside, the large scale of development likely to be facilitated through the options is likely to have significant impacts on traffic flows and the quality of the public realm. This has the potential to undermine the vitality of parts of the AAP area, and potentially impact on key economic sectors such as the visitor economy.</p>	2	1	3	4

Appraisal of options for the broad location of housing

4.20 Given that the AAP is likely to deliver an element of housing growth in the area, two options have been considered with regards to the broad location of housing delivery. In this context two options have been considered through the SA process, which seek to consider the relative merits of taking forward housing in either the town centre or the Bohemia part of the AAP area.

4.21 Two options have been considered, as follows:

- **Option HL1:** Focus housing delivery on Hastings town centre
- **Option HL2:** Focus housing delivery at Bohemia

4.22 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eight SA themes.

4.23 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking. Where an '–' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.3: Appraisal of options for the broad location of housing

Option HL1: Focus housing delivery on Hastings town centre

Option HL2: Focus housing delivery at Bohemia

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		HL1	HL2
Biodiversity	<p>The significance of effects depends on the detailed location of new development, its design and layout and the integration of infrastructure which supports ecological networks in the area.</p> <p>Whilst the significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures, it can, however, be considered that a higher level of housing development in a particular location increases the likelihood (and potential magnitude) of negative effects on the sites and habitats and species present in its vicinity. This is linked to an increased likelihood of direct effects, such as from land take, disturbance or the loss of key features of ecological value, and an increased likelihood of indirect effects, such as from a reduction of ecological connectivity, changes in land use patterns or increased recreational activity.</p> <p>In this context, Option HL1 has the potential to lead to additional impacts on habitats and species in Hastings town centre. Similarly, Option HL2 has the potential to focus impacts on biodiversity assets in the Bohemia area. Overall though, the relative merits of each of the options in relation to potential impacts on biodiversity depends on the specific location and approach to development, and the avoidance and mitigation measures proposed. It should also be noted that there are not significant areas of biodiversity value within the town centre.</p>	?	?
Climate Change	<p>In relation to climate change mitigation, the sustainability performance of new housing development depends on elements such as the integration of energy efficient design within new development and the provision of renewable energy generation. This, however, can only be assessed on a site-by-site basis once the details of potential development become clearer (e.g. when 'pre-app' discussions take place between developers and the Council or a planning application is submitted). It should be noted though, that a higher quantum of development will do more to increase the built footprint of the AAP area, with associated potential overall increases in greenhouse gas emissions. In terms of per capita emissions from transport, this may however be limited by the accessible location of both areas by sustainable transport modes and the potential to promote walking and cycling; in this regard it is not possible to differentiate between the options.</p> <p>In relation to flood risk, it is also not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing, such as green infrastructure provision, and appropriate design and layout.</p>	?	?

Option HL1: Focus housing delivery on Hastings town centre

Option HL2: Focus housing delivery at Bohemia

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		HL1	HL2
Historic Environment and Townscape	<p>Hastings town centre has a rich historic environment resource, as reflected by much of the town centre part of the AAP area being covered by conservation area status and the large number of nationally listed structures in the area. In this context, Option HL1 has increased potential to facilitate housing delivery at locations in the town centre at increased sensitivity for the historic environment. This is additionally likely due to the limited availability of sites for such development in the town centre, and the likelihood of new housing provision potentially being located in inappropriate locations in relation to the local heritage resource.</p> <p>The Bohemia area, whilst in parts being less sensitive than the town centre in terms of nationally and locally designated historic environment assets, also has a sensitive historic environment in some locations. This includes a number of Grade II* and Grade II listed buildings associated with the former convent west of White Rock Gardens, a number of listed buildings along White Rock (and Hastings Pier) and the locally listed White Rock Gardens. These have the potential to be impacted through focusing housing growth in this location through Option HL2. Alongside, housing growth in the Bohemia area may impact on the setting and integrity of the Eversfield Place Conservation Area, the White Rock Conservation Area and the Magdalen Road Conservation Area.</p> <p>For both options, potential effects on the historic environment will depend on factors such as the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision. New development also offers opportunities for enhancing the fabric and setting of the historic environment, if appropriately designed.</p> <p>However it should be noted that 1) the capacity of the town centre to deliver housing is reduced by the limited availability of appropriate sites, and 2) the Bohemia area has increased capacity for delivering new areas of housing. As such Option HL1 has increased scope for leading to impacts on townscape character, local distinctiveness and the fabric and setting of the historic environment in the AAP area.</p>	2	1
Land, Soil and Water Resources	<p>Both options will support the reuse and rejuvenation of previously developed or underutilised land. This will support the efficient use of land in the AAP area. Focusing housing on the town centre however has the potential to lead to a significant intensification of uses and promoting the efficient use of land. This is given the lack of available sites for housing in this part of the AAP area.</p> <p>It is likely that Option HL2 will lead to the loss of areas of previously undeveloped land or informal open space. This is given the increased availability of this type land at this location.</p> <p>In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place.</p>	1	2

Option HL1: Focus housing delivery on Hastings town centre

Option HL2: Focus housing delivery at Bohemia

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		HL1	HL2
Community Vitality	<p>Through focusing housing development in the town centre, Option HL1 has the potential to lead to impacts on the quality of life of residents in the town centre area. This includes through increases in traffic flows, the loss of employment uses due to a requirement to convert existing uses and impacts on the quality of the built environment and public realm. In this context the inappropriateness of delivering significant new housing in some parts of the town centre has the potential to undermine the potential benefits of increased housing provision and potential positive effects on the vitality of the area.</p> <p>In this context the Bohemia area has greater capacity for housing growth than the town centre. As such it provides more scope for enabling the integration of community infrastructure to support new housing growth in the area, such as pedestrian and cycle network enhancements, green infrastructure provision and the delivery of an appropriate size and scale of provision to support the quality of the townscape and public realm.</p>	2	1
Health and Wellbeing	<p>In relation to Option HL1, a focus of new housing provision in the town centre has the potential to undermine the health and wellbeing of residents in this location. This includes through increases in traffic flows and associated impacts on air/noise quality and road safety, and impacts on the quality of the built environment and public realm. In this context the inappropriateness of delivering significant new housing in many parts of the town centre has the potential to undermine health and wellbeing.</p> <p>The Bohemia area has greater capacity for housing growth than the town centre, and provides more scope for enabling the integration of community infrastructure to support new housing growth in the area, such as pedestrian and cycle network enhancements and green infrastructure provision. As such Option HL2 will help support health and wellbeing through increasing the scope for the development of high quality and well-designed neighbourhoods supported by appropriate infrastructure provision.</p> <p>The Bohemia area also offers significant potential to use housing growth as enabling development for enhanced leisure and sports facilities.</p>	2	1
Transportation and Air Quality	<p>The town centre and the Bohemia area are accessible locations, with the potential to encourage walking and cycling and public transport use, and promote modal shift from the private car. As such, the delivery of appropriate levels of housing through both options will support the use of sustainable modes of transport.</p> <p>However, a significant increase in the resident population of the town centre though Option HL1 has the potential to have significant impacts on traffic flows at some locations. In addition to contributing to existing congestion issues, this has the potential to impact on air and noise quality in the town centre, and undermine the attractiveness of walking and cycling as alternatives to the private car.</p>	2	1

Option HL1: Focus housing delivery on Hastings town centre

Option HL2: Focus housing delivery at Bohemia

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		HL1	HL2
Economy and Employment	<p>Population growth in the AAP area stimulated by the promotion of housing growth has the potential to support the economic vitality of the town centre and Bohemia. This includes through increasing the local market for goods and services and improving the vitality of the areas.</p> <p>However the delivery of additional housing growth in the town centre through Option HL2 has the potential to undermine the economic performance of the town centre. Given the lack of available sites in the town centre, there will be a requirement to convert existing uses to residential. As such an inevitable loss of employment uses may undermine the offer of the town centre and depress opportunities for economic expansion.</p> <p>Alongside, housing growth in the town centre may have impacts on traffic flows and the quality of the public realm. This has the potential to undermine the vitality of parts of the town centre, and potentially impact on key economic sectors such as the visitor economy. In this context the Bohemia area has additional capacity for housing growth without undermining existing economic uses.</p>	2	1

Appraisal of options for green infrastructure provision

- 4.24 Policy HN7 of the Development Management Plan (Green Infrastructure in New Developments) sets out an overarching approach to the provision of green infrastructure in the Borough. This includes through seeking to ensure that, where appropriate, good quality green infrastructure provision is integrated into new development and such provision enhances linkages and supports ecological networks.
- 4.25 The AAP has the potential in a number of locations to initiate significant physical change. As such the provision of high quality multifunctional green infrastructure provision alongside AAP proposals provides the opportunity to bring a range of benefits for the AAP area.
- 4.26 To explore this issue further, two alternative approaches have been considered through the SA process in relation to green infrastructure provision in the AAP Area. The SA has therefore considered an option which continues the current approach to green infrastructure provision taken forward through the Local Plan against an alternative policy which seeks to build on these policies.
- 4.27 In light of the above, the SA process has considered two options, as follows:
- **Option GI1:** Continue the approach to green infrastructure provision in the AAP area facilitated through Policy HN7 of the Development Management Plan.
 - **Option GI2:** Initiate an AAP-specific approach to green infrastructure provision to support Policy HN7.
- 4.28 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eight SA themes.
- 4.29 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking. Where an '-' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.4: Appraisal of options for green infrastructure provision

Option GI1: Continue the approach to green infrastructure provision in the AAP area facilitated through Policy HN7 of the Development Management Plan.

Option GI2: Initiate an AAP-specific approach to green infrastructure provision to support Policy HN7.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		GI1	GI2
Biodiversity	<p>The current approach promoted through Policy HN7 of the Development Management Plan seeks to support improved ecological connections through enhancements to green infrastructure provision. Supported by the other policies of the Local Plan which have a focus on enhancements to habitats and biodiversity networks, this approach will continue to support biodiversity in the AAP area.</p> <p>The current approach however provides a high level approach to green infrastructure provision in the AAP area, and does not provide additional context to the potential opportunities and enhancements that have the potential to take place. Option GI2 therefore provides further scope to set out how improved open space provision in the AAP area can be delivered through a coordinated green infrastructure approach which identifies key opportunities for biodiversity enhancements in the AAP area, and actions for improvements.</p>	2	1
Climate Change	<p>Green infrastructure enhancements will promote climate change mitigation in the AAP area through assisting carbon sequestration and promoting sustainable modes of transport. Improved green infrastructure provision will also encourage climate change adaptation through increasing shading, helping to limit the effects of extreme weather events and regulating surface water run-off.</p> <p>In this context Option GI2 may have additional potential for shaping green infrastructure enhancements which support a reduction of flood risk issues at key locations of flood risk in the AAP area. This includes along Queens Road, in the vicinity of Priory Meadow, Brook Street, Cornwallis Terrace and other locations at risk of surface water flooding.</p> <p>However, it is also considered that in relation to Option GI1, the current provisions of the Local Plan, the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure being provided alongside new development areas, and appropriate design and layout.</p> <p>Overall, given the scope to more directly target green infrastructure enhancements through Option GI2, this option has additional potential to support climate change mitigation and adaptation in the AAP area.</p>	2	1
Historic Environment and Townscape	<p>Green infrastructure enhancements will help protect and enhance townscape character and the setting of the historic environment in the AAP area, and support enhancements to the public realm. In this context the current approach to green infrastructure provision which would be taken forward through Option GI1 provides an overarching framework for green infrastructure enhancements in the AAP area which will support the setting of the historic environment and support local distinctiveness.</p> <p>Option GI2, through supporting an enhanced approach to green infrastructure provision through AAP-specific policy approaches, will help target enhancements to green infrastructure provision in the area. As such the option may have additional potential to initiate green infrastructure enhancements which enhance the setting of key features and areas of historic environment interest and support local distinctiveness and character.</p>	2	1

Option GI1: Continue the approach to green infrastructure provision in the AAP area facilitated through Policy HN7 of the Development Management Plan.

Option GI2: Initiate an AAP-specific approach to green infrastructure provision to support Policy HN7.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		GI1	GI2
Land, Soil and Water Resources	<p>Extreme weather events can impact on water quality. In this context the quality of water that flows through an urban catchment can be severely impacted due to pollutants and detritus collected from high speed runoff from urban surfaces and reduced infiltration of precipitation. By helping to retain rainfall, green infrastructure provision can limit discharge volumes, and limit pollutant loads. Green infrastructure can also help treat water that is not retained. Linked to this, green infrastructure provision can help support enhancements to soil quality through enhancing the capacity of the urban environment to regulate pollutants in surface water runoff.</p> <p>In this respect Option GI2 may have additional potential for shaping targeted green infrastructure enhancements which support water and soil quality in the area.</p> <p>The options are unlikely to have any difference in terms of encouraging the use of previously developed land.</p>	2	1
Community Vitality	<p>A high quality green infrastructure network will bring a range of benefits for the quality of life of residents. This includes through supporting the quality of the public realm, promoting perceptions of security, encouraging active lifestyles, and promoting accessibility. This will enhance the satisfaction of residents with their neighbourhoods as a place to live and work.</p> <p>In this context, whilst the current approach to green infrastructure provision promoted through the Local Plan will bring green infrastructure enhancements in the AAP area, Option GI1 provides a high level approach to green infrastructure provision in the area. As such, through initiating an AAP-specific approach to green infrastructure provision, Option GI2 will help direct green infrastructure enhancements to reflect the potential opportunities for multifunctional improvements which exist in the area.</p>	2	1
Health and Wellbeing	<p>A high quality green infrastructure network in the AAP area will bring a range of benefits for the health and wellbeing of residents, including through enhancing recreational and leisure opportunities, promoting walking and cycling, enhancing the quality of the public realm and built environment.</p> <p>Whilst the current approach to green infrastructure provision promoted through the Local Plan will bring green infrastructure enhancements to the AAP area, Option GI1 may be limited through the high level approach to green infrastructure provision in the area through the option. Option GI2 in contrast has the potential to initiate an AAP-specific approach to such provision, helping to direct green infrastructure enhancements to reflect the potential opportunities for multifunctional improvements which exist in the area. This may bring a wider range of benefits for health and wellbeing.</p>	2	1
Transportation and Air Quality	<p>Enhancements to green infrastructure provision will support sustainable transport use through promoting modal shift. This includes through encouraging walking and cycling by facilitating enhancements to the public realm, and (potentially) initiating improvements to pedestrian and cycle networks.</p> <p>Green infrastructure provision will also support air quality through facilitating increased absorption and dissipation of nitrogen dioxide and other pollutants, and improve noise quality through increasing absorption of noise.</p> <p>In this context the more focused approach to green infrastructure provision promoted through Option GI2 has increased potential to initiate green infrastructure improvements which will initiate enhancements to pedestrian and cycle routes and complement existing sustainable transport networks.</p>	2	1

Option GI1: Continue the approach to green infrastructure provision in the AAP area facilitated through Policy HN7 of the Development Management Plan.

Option GI2: Initiate an AAP-specific approach to green infrastructure provision to support Policy HN7.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		GI1	GI2
Economy and Employment	<p>Enhancements to green infrastructure networks have the potential to promote the visitor economy through enhancing the quality of the public realm and promoting local distinctiveness, enhancing leisure and recreational opportunities, and supporting local character and the setting of the historic environment.</p> <p>More broadly, enhancements to green infrastructure provision in the AAP area will support the wider economy through enhancing the vitality of the area, improving permeability and supporting enhancements to the public realm.</p> <p>In this respect a more focused approach to green infrastructure provision in the AAP area through Option GI2 has increased potential to help direct multifunctional green infrastructure enhancements in the AAP area which will support both the visitor economy and wider economic vitality.</p>	2	1

Appraisal of options for leisure provision

- 4.30 Key leisure facilities in the AAP area include Summerfields Leisure Centre, Falaise Fitness Centre and the existing underutilised outdoor facilities (including tennis courts) at White Rock Gardens. In this context there is the potential for the reconfiguration and consolidation of leisure facilities in the area.
- 4.31 A key decision therefore is whether or not to deliver a new 'super-facility' which would consolidate and expand existing uses and support viability.
- 4.32 To explore these issues further, the SA process has considered three options, as follows:
- **Option L1:** Business as usual: Summerfields, Falaise Fitness Centre, outdoor provision at White Rock Gardens
 - **Option L2:** Move Falaise Fitness Centre into Summerfields
 - **Option L3:** Relocate Summerfields and Falaise into a purpose built facility
- 4.33 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eight SA themes.
- 4.34 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking. Where an '-' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.5: Appraisal of options for leisure provision

Option L1: Business as usual: Summerfields, Falaise Fitness Centre, outdoor provision at White Rock Gardens

Option L2: Move Falaise Fitness Centre into Summerfields

Option L3: Relocate Summerfields and Falaise into a purpose built facility

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		L1	L2	L3
Biodiversity	<p>The likely locations for development through Options L1-L3 are not in areas of significance for biodiversity interest.</p> <p>Whilst Summerfields Leisure Centre is located close to Summerfield Woods, which comprises a significant area of deciduous woodland Biodiversity Action Plan Priority Habitat, and is designated as a Local Nature Reserve, the immediate site at Summerfields Leisure Centre is not of sensitivity for habitats and species. As such any reconfiguration of the facility is unlikely to have adverse effects on biodiversity interest in the area.</p> <p>Similarly, the likely location of a new consolidated purpose built leisure facility west of Bohemia Road is not within an area sensitive for biodiversity. Therefore a consolidation of uses at this location is unlikely to lead to significant impacts on biodiversity at this location.</p>	1	1	1
Climate Change	<p>The likely locations for development through Options L1-L3 are not in areas of fluvial, surface water or coastal flood risk. The impact of the options also depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new development, such as green infrastructure provision, and appropriate design and layout. A new purpose built facility through Option 3 however provides opportunities to create a hub for CHP linked to a district heat network.</p> <p>In this context, Option L1, through promoting a 'business as usual' approach, provides less opportunity for facilitating an expansion of green infrastructure provisions or other elements which can support climate change mitigation and adaptation.</p>	2	1	1
Historic Environment and Townscape	<p>Option L3 has the potential to lead to the development of a large scale leisure facility on an area currently enjoying an open perspective to the west of Bohemia Road. As reflected by potentially being (depending on location) within the setting of the Magdalen Road Conservation Area, the option has the potential to have impacts on the historic character of the area. The option also has the potential to lead to impacts on the setting of the locally listed White Rock Gardens.</p> <p>Summerfields Leisure Centre is not within an area of sensitivity for the historic environment. As such, Option L2 is less likely to lead to development which impacts on the integrity of the historic environment.</p> <p>Given the limited scope for the redevelopment of existing leisure provision, a 'business as usual' approach through Option L1 will do less to support enhancements to the setting of key features of historic environment interest in the area, including White Rock Gardens.</p> <p>Overall in terms of the three options, if design and layout is sensitive to local character, then impacts on the integrity of the historic environment should be minimised and potential enhancements secured. As such, effects depend on the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision.</p>	2	1	3

Option L1: Business as usual: Summerfields, Falaise Fitness Centre, outdoor provision at White Rock Gardens

Option L2: Move Falaise Fitness Centre into Summerfields

Option L3: Relocate Summerfields and Falaise into a purpose built facility

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		L1	L2	L3
Land, Soil and Water Resources	Both Option L2 and L3 would lead to the expansion of leisure facilities, leading to the loss of some areas of open land. However, a consolidation of leisure and recreational uses through the two options has the potential to support the efficient use of land. In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place.	2	1	1
Community Vitality	There is significant opportunity for an upgrading of current leisure provision in the AAP area. This is given the scope to enhance facilities at Summerfields Leisure Centre and Falaise Fitness Centre, and an enhancement of outside sports facilities in White Rock Gardens. In this context Option L3, and to a lesser extent, L2 provide increased opportunities for expanding leisure provision through consolidating uses. This will promote a clustering of leisure and recreational activities, and enhance local offer. It also has the potential to reinforce the viability of leisure provision, enabling a broader offer of leisure and recreation activities to be supported. This will promote the quality of life of residents, and improve the vitality of the Bohemia part of the AAP area.	3	2	1
Health and Wellbeing	There is significant opportunity for an upgrading of current leisure provision in the AAP area. This is given the scope to enhance facilities at Summerfields Leisure Centre and Falaise Fitness Centre, and an enhancement of outside sports facilities in White Rock Gardens. In this context Option L3, and to a lesser extent, L2 provide increased opportunities for expanding leisure provision through consolidating uses. This will promote a clustering of leisure and recreational activities, and enhance local offer. It also has the potential to reinforce the viability of leisure provision, enabling a broader offer of leisure and recreational activities to be supported. This will promote the health and wellbeing of residents.	3	2	1
Transportation and Air Quality	There is unlikely to be a significant differentiation between the options in relation to this SA Theme since all of the options promote leisure provision in accessible locations.	?	?	?

Option L1: Business as usual: Summerfields, Falaise Fitness Centre, outdoor provision at White Rock Gardens

Option L2: Move Falaise Fitness Centre into Summerfields

Option L3: Relocate Summerfields and Falaise into a purpose built facility

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		L1	L2	L3
Economy and Employment	<p>Enhancements to leisure and recreational provision in the AAP area will support the local economy and employment opportunities. This includes through enhancing the vitality of the area. It also offers opportunities for promoting linked economic activities. Enhanced leisure provision will also provide a more attractive location for businesses and their employees to locate.</p> <p>In this context the provision of a new purpose built facility to replace Summerfields Leisure Centre and Falaise Fitness Centre through Option L3 provides opportunities for supporting additional uses on or adjoining the new facility, such as, for example, hotel uses. This will help diversify the economy and support the visitor economy. It is considered that there are fewer opportunities for similar benefits through Option L2 given the limited site at Summerfields Leisure Centre. In a similar context, continuing with the status quo through Option L1 will also undermine opportunities for expanding offer when compared to the other two options.</p>	3	2	1

Appraisal of options for the A259

- 4.35 A key objective of the AAP is to enhance permeability for walkers and cyclists across the AAP area. One of the key barriers to permeability in the area, and particularly to the seafront, is the A259. This creates a barrier for pedestrian use and cycling, made worse at some locations by poor quality crossing points across the road.
- 4.36 To explore this in more detail, the SA process has assessed two options with a view to enhancing permeability across the A259. These options are as follows:
- **Option P1:** Improve pedestrian crossings across the A259
 - **Option P2:** Facilitate comprehensive reconfiguration of the A259 to support pedestrian and cycle use
- 4.37 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eight SA themes.
- 4.38 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking. Where an '–' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.6: Appraisal of options for the A259

Option P1: Improve pedestrian crossings across the A259

Option P2: Facilitate comprehensive reconfiguration of the A259 to support pedestrian and cycle use

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		P1	P2
Biodiversity	The significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of proposals and the incorporation of biodiversity enhancement measures. As such both options have the potential to lead to impacts on biodiversity if permeability enhancements are not undertaken to support habitats and species which may be present.	?	?
Climate Change	Option P1, through enhancing crossing points along the A259, has the potential to encourage walking and cycling as an alternative to the private car. This may support some small limitations of greenhouse gas emissions from transport. Option P2, through promoting a more far-reaching approach to permeability, has increased potential to support modal shift from the private car. However given that this approach is likely to significantly change traffic flows in the town centre, with the potential to lead to additional congestion at some locations, overall impacts on greenhouse gas emissions from transport are uncertain. In this respect likely effects can only be determined with traffic modelling associated with potential options.	?	?

Option P1: Improve pedestrian crossings across the A259

Option P2: Facilitate comprehensive reconfiguration of the A259 to support pedestrian and cycle use

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		P1	P2
Historic Environment and Townscape	<p>Hastings seafront is rich in cultural heritage assets, as highlighted by the presence of, from west to east, the Eversfield Place Conservation Area, the White Rock Conservation Area, and the Town Centre Conservation Area. In some locations the A259 provides a detrimental impact to the setting of the historic environment, particularly for pedestrians.</p> <p>In this context Option P2, through facilitating the comprehensive reconfiguration of the A259 to include, for example, pedestrianisation, the rerouting of traffic and other schemes, has the potential to enhance the setting of heritage features and facilitate their access and enjoyment. However given that this approach is likely to significantly change traffic flows in the town centre, with the potential to lead to additional congestion at some locations, impacts from a rerouting of traffic on the setting of the historic environment elsewhere in the town centre (including in at locations with a rich cultural heritage resource) may arise. As such likely effects can only be determined through modelling traffic flows associated with potential options.</p> <p>Option P1 however, through taking a less radical approach to enhancing permeability across the A259 also provides the opportunity to support access to, and enjoyment of, key features and areas of historic environment interest.</p>	1	2
Land, Soil and Water Resources	No significant impacts are predicted on land, soil and water resources through either option.	-	-
Community Vitality	<p>Both options have the potential to support community vitality in the town centre and Bohemia areas through enhancing permeability across the A259. This includes by supporting the quality of the public realm, promoting perceptions of security, encouraging active lifestyles, and promoting accessibility. This will enhance the satisfaction of residents with their neighbourhoods as a place to live and work.</p> <p>Option P2, through facilitating comprehensive reconfiguration of the A259 to include, for example, pedestrianisation, the rerouting of traffic and other schemes, has increased potential to initial more radical change to the quality of the public realm. However overall impacts depend on changes to traffic flows stimulated by the option elsewhere in the AAP area (and outside), and their effect on the quality of various neighbourhoods. In this context Option P1 may offer the potential to enhance permeability across the A259 for pedestrians and cyclists with fewer associated effects elsewhere in the AAP area.</p>	1	2
Health and Wellbeing	<p>Both options have the potential to support health and wellbeing by enhancing permeability across the A259. This includes by supporting the quality of the public realm, promoting perceptions of security, encouraging active and healthier lifestyles, and promoting accessibility. Given the poor quality of existing crossing points on the A259, including underpasses which reduce perceptions of security, this will support health and wellbeing of residents and visitors.</p> <p>Option P2, through facilitating comprehensive reconfiguration of the A259 to include, for example, pedestrianisation, the rerouting of traffic and other schemes, has increased potential to initial more radical changes to the quality of the public realm. However overall impacts on health and wellbeing depend on changes to traffic flows stimulated by the option elsewhere in the AAP area (and outside), and their effect on different neighbourhoods. In this context Option P1 offers the potential to enhance permeability, road safety and perceptions of security across the A259 for pedestrians and cyclists.</p>	1	2

Option P1: Improve pedestrian crossings across the A259

Option P2: Facilitate comprehensive reconfiguration of the A259 to support pedestrian and cycle use

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		P1	P2
Transportation and Air Quality	<p>Both Option P1 and P2 have the potential to encourage walking and cycling through reducing the existing role of the A259 as a barrier to the seafront. As such both options may support a degree of modal shift from the private car.</p> <p>Option P2, through promoting a more far-reaching approach to permeability, potentially has increased potential to support modal shift from the private car. However, given that this approach is likely to significantly change traffic flows in the town centre, with the potential to lead to additional congestion at some locations, overall impacts on traffic and emissions from transport are uncertain. In this respect likely effects can only be determined with traffic modelling associated with potential options.</p>	?	?
Economy and Employment	<p>In some locations the A259 provides a detrimental impact to the quality of the public realm. In this context, Option P2, through a reconfiguration of the A259 at particular locations, such in front of Hastings Pier and Schwerte Way, has significant potential to lead to a high quality public realm which promotes the location of cultural, leisure and retail facilities. This has the potential to encourage new economic activities at certain locations, contributing to a diversification of the economy and promoting economic vitality.</p> <p>Option P1, whilst likely to be less beneficial, will also support economic vitality through enhancing the quality of the public realm, improving accessibility to key locations on the seafront and supporting local character and the setting of the historic environment. This also has the potential to support the visitor economy through improving linkages to key destinations of interest on the seafront.</p> <p>Both options are likely to improve connectivity between key retail destinations within town centre and seafront. This has the potential to increase spend in the town from visitors.</p>	2	1

Appraisal of options for housing delivery at Bohemia

- 4.39 The Bohemia area has been identified as a key potential location for housing. Two potential options include focusing housing in the northern parts of the area, on the areas to the west of Bohemia Road, or alternatively on the southern parts of the area to make use of sea views.
- 4.40 In this context two options have been considered through the SA process, which seek to consider the relative merits of focusing housing growth in the area to the northern part of the Bohemia area or to the southern part.
- 4.41 The two options are as follows:
- **Option WR1:** Deliver new housing in the northern part of the Bohemia area.
 - **Option WR2:** Deliver new areas of housing in the southern part of the Bohemia area.
- 4.42 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eight SA themes.
- 4.43 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking. Where an '–' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.7: Appraisal of options for housing delivery at Bohemia

Option WR1: Deliver new housing in the northern part of the Bohemia area.

Option WR2: Deliver new areas of housing in the southern part of the Bohemia area.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		WR1	WR2
Biodiversity	The area west of Bohemia Road does not have a significant biodiversity resource, with no designated sites present or Biodiversity Action Plan Priority Habitats. In this context effects depend on the detailed location of new development, and its design and layout the integration of infrastructure which supports ecological networks in the area.	?	?
Climate Change	<p>In relation to climate change mitigation, the sustainability performance of new housing development depends on elements such as the integration of energy efficient design within new development and the provision of renewable energy generation. This, however, can only be assessed on a site-by-site basis once the details of potential development become clearer (e.g. when 'pre-app' discussions take place between developers and the Council or a planning application is submitted). In terms of per capita emissions from transport, this may however be limited by the accessible location of both areas by sustainable transport modes and the potential to promote walking and cycling; in this regard it is not possible to differentiate between the options.</p> <p>In relation to flood risk, it is also not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. However areas at flood risk at the potential locations for development is negligible; only a very limited part of the southern half of the area is covered by a surface water flood zone, and no fluvial or coastal flood risk zones are present.</p> <p>In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing, such as green infrastructure provision, and appropriate design and layout.</p>	?	?

Option WR1: Deliver new housing in the northern part of the Bohemia area.

Option WR2: Deliver new areas of housing in the southern part of the Bohemia area.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		WR1	WR2
Historic Environment and Townscape	<p>For both options, potential effects on the historic environment will depend on factors such as the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision. New development also offers opportunities for enhancing the fabric and setting of the historic environment, if appropriately designed. However there are some differences between the options which should be noted.</p> <p>Both Option WR1 and WR2 have the potential to lead to impacts on the Magdalen Road Conservation Area. This is given the coverage of the conservation area over the western part of the area. Similarly both options have the potential to have impacts on the fabric and setting of the features associated with the Former Convent of Holy Child Jesus and St Michael's Church. However, Option WR2 may have increased potential to lead to direct impacts on this area of heritage significance through increasing the likelihood of necessitating land take in the grounds or directly adjacent to the former convent and church.</p> <p>In terms of potential impacts on the locally listed White Rock Gardens (White Rock Pleasure Grounds), focusing housing development in the northern part of the area as proposed through Option WR1 has the potential to lead to impacts on the setting of the northern part of White Rock Gardens. However Option WR2 has increased scope for leading to direct impacts on White Rock Gardens through potentially requiring land take for housing within the park itself.</p> <p>Option WR2's focus on delivering housing to the southern part of Bohemia also has the potential to impact on the seascape of the area. This is given the location's elevated position and high visibility to and from the south of the area, including from key viewpoints such as the pier.</p> <p>In the context of the above, whilst Option WR1 has the potential to lead to some impacts on the historic environment in the north of the area, overall Option WR2 increases the scope for significant impacts on the fabric and setting of the historic environment and townscape and seascape character.</p>	1	2
Land, Soil and Water Resources	<p>Whilst both Option WR1 and Option WR2 will support the reuse and rejuvenation of underutilised land in the Bohemia area, promoting the efficient use of land, both options will also lead to the loss of existing areas of open land in the area.</p> <p>In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place.</p>	?	?
Community Vitality	<p>Both options provide scope for enabling the integration of community infrastructure to support new housing growth in the area, such as pedestrian and cycle network enhancements, green infrastructure provision and the delivery of an appropriate size and scale of provision to support the quality of the townscape and public realm.</p> <p>The northern part of the site may however have more potential to deliver a broader range of housing, including affordable housing, 3 or 4 bedroom family houses and housing of a range of types and tenures. This is given the likelihood of new housing in the south of the Bohemia area potentially being of a higher cost and less affordable, given sea views. This may encourage the development of apartment style developments rather than the affordable smaller scale family housing for which there is significant demand for in the Borough.</p>	1	2

Option WR1: Deliver new housing in the northern part of the Bohemia area.

Option WR2: Deliver new areas of housing in the southern part of the Bohemia area.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		WR1	WR2
Health and Wellbeing	Impacts on health and wellbeing through the options will depend on the development of high quality and well-designed neighbourhoods supported by appropriate infrastructure provision. As such it is not possible to differentiate between the options.	?	?
Transportation and Air Quality	Both the north and the south of the Bohemia area are within relatively accessible locations. Housing provision at both locations therefore provide the potential to encourage walking and cycling and public transport use, and promote modal shift from the private car. As such, the delivery of housing through both options has the potential to support the use of sustainable modes of transport.	?	?
Economy and Employment	Population growth in the area stimulated by the options' promotion of housing growth has the potential to support the economic vitality of the Bohemia area. This includes through increasing the local market for goods and services and improving the vitality of the area. In this respect it is not possible to differentiate between the two options.	?	?

Appraisal of options for Horntye

4.44 The current Local Plan allocates land for housing at part of Horntye Sports Centre (including the Cricket Ground) for 115 homes. Given the opportunities provided by the site, the SA process has explored potential different uses for the site.

4.45 In this context the SA process has considered three options, as follows:

- **Option HT1:** Horntye remains as an existing sports facility
- **Option HT2:** Horntye is redeveloped for housing
- **Option HT3:** Horntye is redeveloped for another use (e.g. employment)

4.46 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eight SA themes.

4.47 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking. Where an '-' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.8: Appraisal of options for housing allocations at Horntye

Option HT1: Horntye remains as an existing sports facility

Option HT2: Horntye is redeveloped for housing

Option HT3: Horntye is redeveloped for another use (e.g. employment)

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		HT1	HT2	HT3
Biodiversity	Whilst the Horntye site is located adjacent to Summerfields Woods, which comprises a significant area of deciduous woodland Biodiversity Action Plan Priority Habitat, and is designated as Local Wildlife Site and a Local Nature Reserve, the proposed development site itself is not directly sensitive for habitats and species. As such any reconfiguration of the facility is unlikely to have significant direct effects on biodiversity interest in the area. However, given the sensitivity of the immediate area for biodiversity, new development at this location should seek to deliver enhancements to habitats and biodiversity networks in the area, supporting linkages with Summerfields Woods. In this context development has some potential to provide space for the integration of green infrastructure provision which will support improvements to local ecological networks.	1	2	2
Climate Change	The provision of new housing or employment development at Horntye through Option HT2 and HT3 will increase emissions. However this is unlikely to lead to significant effects on greenhouse gas emissions if energy efficiency measures are integrated within all types of development.	1	2	2
Historic Environment and Townscape	The delivery of housing and employment through Options HT2 and HT3 has potential to impact on the townscape character in the surrounding residential areas, including the St Pauls and Amherst Road area. Impacts however depend on the design and layout of new development and the integration of high quality green infrastructure provision. The site is not within an area of significant historic interest. In this context high quality design and development will help support a high quality townscape.	1	2	3

Option HT1: Hornty remains as an existing sports facility

Option HT2: Hornty is redeveloped for housing

Option HT3: Hornty is redeveloped for another use (e.g. employment)

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		HT1	HT2	HT3
Land, Soil and Water Resources	<p>The delivery of higher densities of development at the site through Options HT2 and HT3 will support the efficient use of land.</p> <p>In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place.</p>	2	1	1
Community Vitality	<p>Through increasing the level of housing provision, Option HT2 has the potential to deliver a larger number of houses on the site. This would help meet local housing needs, including through the delivery of 3-4 bedroom houses and a broader mix of homes.</p> <p>Whilst employment land may support economic vitality, the location is less accessible than other locations in the town centre (including by rail), and such uses would not be in keeping with the surrounding residential nature of the area. This has the potential to undermine the delivery of a quality new neighbourhood which promotes the quality of life of residents and community cohesion.</p>	2	1	3
Health and Wellbeing	<p>Option H3, through delivering employment land at this location has the potential to increase traffic levels and have impacts on the quality of the public realm. This has the potential to undermine the delivery of a quality new neighbourhood which promotes the health and wellbeing of residents.</p> <p>In this respect housing development delivered through Option HT2 is likely to be more appropriate than employment uses to support the quality of life and wellbeing of residents.</p>	2	1	3
Transportation and Air Quality	<p>Hornty is in a relatively accessible location, connected by bus routes and pedestrian networks. However it is less accessible to the railway station than other locations in the Plan area.</p> <p>Housing and employment provision at this location facilitated through Option HT3 has the potential to increase traffic levels. Employment provision also in particular has the potential to have impacts on the quality of the public realm, with the potential to undermine the delivery of a liveable neighbourhood conducive to walking and cycling.</p> <p>However, the delivery of new development at this location may help deliver new pedestrian and cycle infrastructure both off site and on site. The relative merits of the options are therefore uncertain in relation to this SA theme.</p>	?	?	?
Economy and Employment	<p>Population growth in the area stimulated by Option HT2's promotion of housing growth has the potential to support the economic vitality of the area, including the local centre of Bohemia Road. This includes through increasing the local market for goods and services and improving the vitality of the area.</p> <p>Whilst employment growth at this location through Option HT3 may contribute to increasing economic opportunities, the options has the potential to undermine the vitality and viability of the town centre through locating employment growth outside of the existing commercial and retail centre of the Borough.</p>	3	1	2

Appraisal of options for the White Rock Theatre

4.48 The White Rock Theatre is currently too small for large productions, due to its current configuration not meeting performance and audience requirements placing uncertainty on its future.

4.49 Three options have therefore been considered through the SA process relating to the future of the White Rock Theatre.

4.50 These are as follows:

- **Option WRT1:** Allocate land for a new theatre which meets appropriate standards.
- **Option WRT2:** Retain a degree of flexibility for the future of the White Rock Theatre.
- **Option WRT3:** Initiate a change of use of the site for a specific (non-theatre) use.

4.51 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eight SA themes.

4.52 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking. Where an '–' is denoted in the appraisal, no impacts are envisaged. '?' denotes an uncertain ranking.

Table 4.9: Appraisal of options relating to the White Rock Theatre

Option WRT1: Allocate land for a new theatre which meets appropriate standards.

Option WRT2: Retain a degree of flexibility for the future of the White Rock Theatre.

Option WRT3: Initiate a change of use of the site for a specific (non-theatre) use.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		WRT 1	WRT 2	WRT 3
Biodiversity	The site of the White Rock Theatre is not sensitive for biodiversity. As such, the type and scale of development through the options are unlikely to have significant effects on habitats, species or ecological networks.	-	-	-
Climate Change	The difference between the options on greenhouse gas emissions is likely to be negligible, and it is not possible to differentiate the three options in this regards. The site of the White Rock Theatre is not at risk of fluvial or surface water flooding.	?	?	?
Historic Environment and Townscape	The White Rock Theatre is located in an area of sensitivity for the historic environment. In this context it is within the Eversfield Place Conservation Area and is located adjacent to the White Rock Conservation Area, and is within the setting of the Grade II listed Hastings Pier and the Grade II listed Boer War Memorial. As such all of the options have the potential to lead to changes in the fabric and setting of these features and areas of historic environment interest. Potential effects on the historic environment will however depend on factors such as the design and layout of new development, the retention of distinct features contributing to local character, and the situation of development in relation to key viewpoints in the area. New development also offers opportunities for enhancing the fabric and setting of the historic environment, if appropriately designed. At this level of detail therefore it is not possible to differentiate between the options in these regards.	?	?	?

Option WRT1: Allocate land for a new theatre which meets appropriate standards.

Option WRT2: Retain a degree of flexibility for the future of the White Rock Theatre.

Option WRT3: Initiate a change of use of the site for a specific (non-theatre) use.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		WRT 1	WRT 2	WRT 3
Land, Soil and Water Resources	<p>The options will support the reuse and rejuvenation of previously developed or underutilised land. This will support the efficient use of land in the AAP area.</p> <p>In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development to result in negative effects without an understanding of the design measures that will be put in place.</p>	?	?	?
Community Vitality	<p>The White Rock Theatre is a key community asset. However there is significant opportunity to enhance community provision at this location, given the theatre is currently too small for large productions, including relating to the size of the stage and facilities. As such Option WRT1 provides opportunities for an enhancement in theatre offer, which will build on the existing theatre's role as a key community asset. In this context Option WRT3 has the potential to lead to the loss of the site as a community asset, depending on the change of use proposed.</p>	1	2	3
Health and Wellbeing	<p>The options unlikely lead to significant impacts on health and wellbeing. It is therefore not possible to differentiate in this regard.</p>	?	?	?
Transportation and Air Quality	<p>Whilst the White Rock theatre is in an accessible location by public transport and walking and cycling networks, there is likely to be little differentiation between the options in terms of supporting sustainable transport use or air and noise quality, depending on the nature and scale of proposals.</p>	?	?	?
Economy and Employment	<p>Option WRT1 will help support the cultural regeneration of the AAP area through supporting the provision of a new theatre facility which addresses the current constraints surrounding the existing White Rock Theatre. This will help support the wholesale regeneration of the Hastings Pier/Seafront/White Rock Gardens area through providing a key destination and focus point for the area. This will support the vitality and viability of this part of the AAP area, with the potential to provide associated benefits for the town centre.</p> <p>Option WRT2 has the potential to lead to the loss of provision in the area and reduces the scope to initiate appropriate changes which will support the cultural and economic regeneration of the area. However this depends on the proposals which come forward as a result of forthcoming discussions on the site.</p> <p>The potential impacts of Option WRT3 on economic vitality will depend on the changes of proposed use for the theatre and the proposals initiated. However a change of use provides significant opportunities if distinctive and well-designed proposals are put in place as part of the wider cultural and economic regeneration of the area.</p>	1	3	2

5. Appraisal of the Hastings Town Centre and Bohemia Area Action Plan

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current Regulation 18 version of the Hastings Town Centre and Bohemia Area Action Plan. This chapter presents:
- An appraisal of the current version of the AAP under eight SA themes; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making

Approach to the appraisal

- 5.2 The appraisal is structured under the eight SA themes taken forward for the purposes of the SA. For each theme the appraisal is divided into three elements:
- Policy Framework;
 - Opportunity Areas and Opportunity Sites; and
 - Conclusions.
- 5.3 This structure allows for the detailed appraisal of the different elements of the AAP, which then informs, for each SA theme, overall conclusions regarding the effects of the AAP as a whole.
- 5.4 For each SA theme, 'significant effects' of the current version of the AAP on the baseline are predicted and evaluated. The appraisal takes account of the criteria presented within Schedule 2 of the Regulations, thus considering the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment where appropriate. The appraisal focuses on key issues. Where no effects or significant issues/opportunities are identified, then individual policies or individual Opportunity Areas/Sites may not be specifically referred to within the theme narrative.
- 5.5 Every effort is made to identify and evaluate effects accurately; however, this is inherently challenging given the relatively high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity

Policy Framework

- 5.6 Whilst the wider Borough contains significant biodiversity and geodiversity assets of national and local importance, Summerfields Wood Local Nature Reserve (LNR) is the only designated site located within the Plan area. Policies contained within the higher level (Borough wide) planning policy framework provide protection for areas designated for their biodiversity value, including Policies EN2 to EN8 of the Planning Strategy (2014), and Policies HN7 and HN8 of the

Development Management Plan (2015). These policies seek to provide protection for biodiversity against the impacts of development, as well as achieve enhancements and/or net biodiversity gain as a result of development. As such it is anticipated that the higher level policies will ensure that development does not lead to any significant negative effects on biodiversity.

- 5.7 The AAP seeks to complement the higher level policy framework by identifying key areas within the Town Centre and Bohemia area which could be improved or enhanced to support the role and function of biodiversity across the Plan area and beyond (explored further in Opportunity Areas and Sites below). Specifically the AAP focuses on a multifunctional Green Infrastructure (GI) network, incorporating the beach and seafront, which can maximise biodiversity, heritage and recreational values. This is particularly important in Bohemia in the west of the Plan area, which contains significant areas of open space and woodland habitat. In this context Policy AAP10 supports innovative solutions to improve the GI network as well as net biodiversity gains, requiring biodiversity provision and contributions, tree planting, green roofs and biodiversity enhancements within sustainable drainage systems (providing additional context to the existing green infrastructure policies in the Planning Strategy). Therefore, the AAP provides significant opportunities for the delivery of new and improved GI provision in the Plan area, with the potential for long term positive effects on biodiversity.

Opportunity Areas and Opportunity Sites

- 5.8 Within Hastings Town Centre, Opportunity Areas (OA) 1 – 4 largely focus on delivering retail, employment and housing growth, as well as significant improvements to the public realm. Where possible, improvements to the public realm include GI enhancements such as street trees. This is likely to support an overall net biodiversity gain and improve GI connectivity in the Plan area – particularly at Opportunity Sites QR1 & QR2, which seek to deliver new street trees and a new pocket park – with the potential for long term positive effects.
- 5.9 Within the Bohemia area (OA5 –OA8) there are a number of key existing GI assets such as White Rock Gardens, Summerfields Woods and recreational grounds. The AAP identifies significant opportunities to enhance the quality and connectivity of these areas to maximise biodiversity values. OA5 is unlikely to deliver significant positive effects on biodiversity as the focus is on improving the cultural offer of the town at three key sites. However, the proposed public realm improvements will be designed to support an overall biodiversity net gain with the potential for minor long term positive effects.
- 5.10 OA6 focuses on the White Rock Sports Park, with the aim of restoring and enhancing parkland settings. The proposals include opportunities to significantly enhance biodiversity values as part of a multifunctional GI network. This includes the promotion of winter gardens, greenhouses, an arboretum, sensory gardens and picnic lawns at White Rock Gardens (Policy WRP1), as well as a green roof over the proposed new replacement sports centre at White Rock Sports Park (supporting text of Policy WRP2). As such the proposals at the Opportunity Sites are likely to support a net biodiversity gain with the potential for significant long term positive effects.
- 5.11 OA7 provides a focal point for the delivery of new housing, which is connected to parkland and the woodland at Summerfields Wood LNR. There are opportunities to relocate civic uses to increase the efficiency of land in this area, and enhance the museum and its connections to the woodland and Bohemia Walled Garden. The new housing is expected to be set within a landscaped setting with a network of green spaces and play areas. Whilst development in this OA has the potential to negatively affect the woodland habitat, particularly through disturbance, noise and light pollution, Policy B1 seeks to minimise these potential effects by requiring a suitable buffer zone which protects the woodland. Policy B2 provides further support, requiring development to minimise impacts on Summerfields Wood and include an Ecological Constraints and Opportunities Plan (ECOP) (incorporating the mitigation measures identified in the ECOP into the development proposal).

- 5.12 The development of housing at Opportunity Site B2 (Horntye Park) is likely to reduce the extent of the existing green space at the cricket club, with the potential for minor negative effects due to the low biodiversity value of the existing cricket club. Policy B2 seeks to ensure development includes green space which links with the wider GI network as part of a comprehensive redevelopment of the site. Policy B2 further requires that development provides financial contributions to the management of Summerfields Wood LNR which can support ongoing maintenance and enhancement measures off site. Policy B3 requires development to retain the setting of mature trees at the Civic Quarter, and Policy B4 supports the restoration and management of the Bohemia Walled Garden, which provides additional protection for biodiversity in this area.
- 5.13 In the event of housing coming forward at Former Convent of the Holy Child Jesus, Magdalen Road at OA8, this would be likely to lead to residual minor negative effects due to the loss of the existing playing fields and potential habitats on site. Policy OA8 however seeks to reduce the extent of the potential negative effects by requiring high quality design that incorporates a network of green spaces.

Conclusions

- 5.14 Overall it is considered that the policy framework proposed through the AAP, and existing policy guidance within the Hastings Planning Strategy (2014) and Hastings Development Management Plan (2015) provides sufficient protection to ensure that development will not lead to any significant negative effects on biodiversity and geodiversity. The AAP however does propose the introduction of housing to parkland settings in the west of the plan area (OA7 & OA8). The loss of playing fields and potential habitats supporting the parkland is considered to have the potential for residual minor negative effects following implementation of mitigation measures. However this potential for residual minor negative effects needs to be weighed up against the potential for significant positive effects through proposals in the AAP to restore and enhance parkland settings in the area and enhance linkages to Summerfields Wood. The proposals at OA6, alongside contributions to new GI provisions across the plan area in public realm improvements, are considered to significantly support the potential for biodiversity gains. It is considered overall that there is the potential for net biodiversity gains through high quality development that maximises GI opportunities which can lead to significant cumulative positive effects.

Climate Change

Policy Framework

- 5.15 In terms of CO₂ emissions, the biggest contributor is identified in the baseline information as the domestic sector. In this context the AAP seeks to reduce emissions in a number of ways both within the domestic and transport sectors. In terms of domestic efficiency, Policy AAP3 requires that residential development in the Plan area incorporates measures to mitigate and adapt to climate change. Policy AAP9 supports '*exemplar proposals that have a net emission rate of near zero or below*', as well as community-led renewable energy projects. This policy also supports the transition to ultra-low emission vehicles, requiring residential development with off-street parking, and non-residential development where parking is required, to install charging facilities for electric vehicles. Policy AAP6 further requires high quality design with a high level of resource efficiency, considering incorporation of electric vehicle charging points, living roofs, green walls, rainwater harvesting, passive solar design and zero carbon buildings. The AAP therefore supports a move to more efficient energy generation and more efficient consumption of energy and water, with the potential for long term positive effects on climate change mitigation.
- 5.16 The AAP proposes to deliver in the region of 820 new homes (Policy AAP3) and employment uses (Policy AAP4) within the Plan area. As a central location, housing in this area is considered to support a modal shift away from the private car given the good accessibility to public

transport modes (rail and bus services), walking and cycling routes, services and facilities, and employment opportunities. This will support a continued reduction in emissions associated with traffic and transport with the potential for long term positive effects on climate change.

- 5.17 Policy AAP6 requires sustainable design that is resilient to climate change. Further to this, enhancements to green infrastructure networks promote climate change mitigation through supporting carbon sequestration and promoting walking and cycling, and climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. The Hastings Planning Strategy (2014) provides policy guidance and protections to minimise the effects of flooding, including; Policy SC1 requiring development to manage flood risk and reduce potential effects of climate change; Policy SC3 requiring development to incorporate appropriate climate change mitigation and adaptation measures (including flood risk management); and Policy SC7 on flood risk which includes support for development that does not increase the risk of flooding elsewhere. Alongside the provisions contained within the National Planning Policy Framework (NPPF), the existing Hastings policy framework is considered sufficient to ensure that development will not lead to any significant negative effects in terms of flood risk.

Opportunity Areas and Opportunity Sites

- 5.18 There are areas at risk of flooding within the Plan area, running along the seafront south of the A259 and into the east around Queens Road. The proposed Opportunity Sites WR1, WP2, WP4, PM1 and QR1 are located within areas at risk of flooding, with the potential for minor long term negative effects. The emphasis for development at these sites is largely focused on retail but the policies also support mixed use development that incorporates retail, employment, leisure and residential development. Opportunity Sites WR2 and QR2 are also located adjacent to areas at risk of flooding and development will need to ensure that it does not increase risks. Hastings Pier is also vulnerable to the effects of climate change, including an increased severity and frequency of storm events.
- 5.19 Mitigation for these effects is however provided through the Hastings Planning Strategy (as identified in the Policy Framework section above) and NPPF and should provide sufficient protection to ensure that development does not lead to any significant negative effects. No further mitigation is provided through the AAP policies, and whilst this is not considered likely to lead to any significant negative effects, it is recognised that there may be some potential for site allocation policies to identify the relevant flood risk areas to highlight the key issues for development at these sites, and acknowledge the need for the resilience of the seafront (including the pier) to the effects of climate change to be supported and enhanced.
- 5.20 Policies OA6, OA7 and OA8 identify the Council's intentions to work with developers in the Bohemia area and in the Station Gateway and Priory Quarter in the town centre to implement a district heating network, supported by Combined Heat and Power. This will support renewable energy generation, which will support climate change mitigation with the potential for positive effects.
- 5.21 Public realm improvements are proposed throughout most of the OAs, which seek to improve accessibility and pedestrian experience, as well as improve the GI network. These measures alongside the delivery of housing in a central area with good public transport links and access to employment opportunities should support a modal shift away from the private car and help support air quality improvements, with the potential for long term positive effects. The emphasis on improving the GI network through increased connectivity and new provisions, as well as tree planting, should support climate change adaptation through carbon sequestration, particularly through policy guidance supporting the planting of new trees at OA2 and Opportunity Site QR1.

Conclusions

- 5.22 It is considered overall that the proposals within the AAP, alongside the existing Hastings Planning Strategy (2014) and the Hastings Development Management Plan (2015), provide sufficient protections to ensure that development will not lead to any significant negative effects in relation to the climate change SA theme. In this context the AAP supports the delivery of positive measures to address climate change mitigation and adaptation. This includes; improvements in energy generation by promoting a district heating network supported by Combined Heat and Power; improving accessibility to support a modal shift away from the private car; and enhancing the Green Infrastructure network which supports healthy functioning ecosystems, as well as providing shading and carbon sequestration to combat the impacts of climate change. Overall therefore, it is considered likely that the AAP will lead to long term positive effects in relation to climate change.

Historic Environment and Townscape

Policy Framework

- 5.23 The Plan area is an urban townscape, supported by large areas of green space and woodland, and containing many significant heritage assets, which, along with their settings, give Hastings its distinct character and identity.
- 5.24 There are seven Conservation Areas either in or partly within the Plan area, as well as numerous Listed Buildings. Just adjacent to the eastern border of the Plan area is Hastings Castle, a Scheduled Monument, and just north of the railway line, adjacent to the north eastern corner of the plan area is Alexandra Park – a Grade II* Registered Park. Any development within the Plan area therefore is highly likely to affect the historic environment to some degree.
- 5.25 The Hastings Planning Strategy (2014) provides policy mitigation to ensure that no significant negative effects on the historic environment arise as a result of development. This includes Policy EN1 which seeks to ensure that development makes a '*positive contribution to the quality, character, local distinctiveness and sense of place of historic buildings and areas*', with a presumption in favour of the conservation of heritage assets and their settings. The policy requires a clear and convincing justification for any harm or loss, given that the assets are irreplaceable.
- 5.26 The Heritage Strategy for Hastings (2017) identifies four over-arching objectives, to ensure that:
- The potential of Hastings' heritage to contribute to quality of life for its residents and to attract visitors is realised
 - Heritage is a central aspect of regeneration and urban development
 - The heritage of Hastings is recognised as a priceless and irreplaceable asset
 - The heritage of Hastings is conserved appropriately.
- 5.27 The regeneration strategy (Culture-Led Regeneration: A Strategy for Hastings 2016-21) further identifies the objective to 'develop and promote a refreshed identity for Hastings which brings contemporary culture and heritage together in a coherent and marketable brand', with the following vision for achieving this objective:
- 5.28 '*Hastings and 1066 Country will have a more coherent relationship between the traditional heritage and the emerging contemporary arts sectors with an identity that celebrates both. There will be improved visibility and awareness for the area nationally and internationally attracting increased visitor numbers*'.
- 5.29 The 2015 Seafront Strategy also proposes four 'Zones of Character' along the seafront, to be enhanced with a distinctive design approach for each, so that new interventions match the zone's character and fit within an integrated design strategy covering the whole seafront. This will provide further support for proposals within the AAP in achieving high quality design and development which positively contributes to the townscape.

- 5.30 These strategies identify a positive approach to new development that complements the Town Centre and Bohemia Plan area, particularly recognising the potential for modern and contemporary cultural values and assets to support historic environment settings, the quality of residents' lives and the visitor economy. Therefore, the AAP provides the opportunity to contribute to the realisation of these objectives, by providing locations for such new development, as well as key principles for development at each location.
- 5.31 Proposed Policy AAP5 identifies the locations for new cultural facilities, and of particular significance, promotes new cultural facilities as part of a comprehensive scheme to secure the restoration and viable reuse of Listed Buildings in OA8 (see Opportunity Areas and Opportunity Sites analysis below). This supports key aims of the various heritage and regeneration strategies in the town, and is considered likely to lead to significant long term positive effects for the historic environment by securing the long term use and maintenance of designated heritage assets and their settings.
- 5.32 Design guidance provided under proposed Policy AAP6 further seeks to enhance local heritage assets and cultural landmarks and their settings in the main gateway areas into the town centre and Bohemia. This will support the regeneration strategy vision for improving visibility and awareness as people enter the central area, with the potential for long term positive effects.
- 5.33 Proposed Policy AAP7 seeks sympathetic development that avoids harm of built heritage and identifies opportunities for enhancement by integrating heritage considerations early on in the design process. The policy identifies types of proposals that will be supported, including: opportunities for enhancements, restoration & reuse; the replacement of buildings/shopfronts/signage that detract from heritage settings; the use of traditional building materials; the retention of historic views and vistas; and high quality design solutions. This is supported by proposed Policy AAP8 which seeks to ensure that shopfronts and advertising respects the style, character and appearance of areas, and that development does not lead to the loss of traditional shopfronts that add positively to the streetscene or have a historic interest. These policies provide protection for the townscape, heritage assets and their settings. They also identify the potential of Hastings' heritage to contribute to quality of life for its residents and to attract visitors, by requiring early consideration of heritage in the design process and promoting the use (particularly cultural use) of historic buildings which can secure their long term management and contribution to the local economy. Therefore, the policies are considered likely to lead to significant long term positive effects in relation to this SA theme.
- 5.34 A significant element of AAP proposals is the delivery of enhancements to the public realm, which has the potential to affect the townscape and historic environment through shaping people's experience, legibility and awareness of place. Proposed Policy AAP11 requires all new development to make a positive contribution to the quality of the public realm, emphasising the points of arrival into the town centre, reinforcing a street hierarchy and improving the pedestrian environment. This will again support the regeneration strategy vision for improving visibility and awareness as people enter the central area, as well as the objectives within the Planning Strategy to positively contribute to sense of place, with the potential for long term positive effects for the townscape and historic environment.
- 5.35 The policy framework recognises the potential for development in this central location to support enhancement to the historic environment and townscape, and contribute to the quality of lives and visitor attraction. The AAP takes a positive approach to delivering development in this area that supports and enhances assets and their settings and capitalises on opportunities to realise heritage and townscape objectives at the site level, with the potential for significant long term positive effects.

Opportunity Areas and Opportunity Sites

- 5.36 OA1 lies within the Town Centre Conservation Area, and development here is required to have regard to the heritage and conservation context of the area (Policy OA1). As the main gateway

into the Town Centre, the public realm improvements proposed within the Station Gateway and Priory Quarter Opportunity Area (OA1) focus on improving quality. This includes identified opportunities to improve the image of the Town Centre through the retention of the Former Post Office (Policy SG3), and Queensbury House (Policy SG4). The proposals for OA1 are considered likely to improve townscape, as well as contribute to achieving the recommendation within the Heritage Strategy (2017) to reinforce and enhance the town centre as point of arrival by road and rail, and the vision of the Regeneration Strategy (Culture-Led Regeneration: A strategy for Hastings 2016-21) to improve visibility and awareness of the historic environment.

- 5.37 OA2 lies within the Town Centre Conservation Area and is a focal point for retail led development; however, key aims for the area also include improving the public realm and raising the overall standard of design to create attractive and vibrant streets. Policy OA2 requires development to fully articulate the heritage significance of the townscape and key views. The proposed public realm improvements are considered likely to lead to long term minor positive effects on townscape and historic environment settings.
- 5.38 Within OA2, Opportunity Sites WP1 and WP3 are located adjacent to the listed York Buildings (Nos 3, 12 and 13) in the south, and the Grade II listed Town Hall is in the north west of Opportunity Site WP3. Both sites are separated from the many Listed Buildings in Wellington Square by Albert Road in the north east. Site WP4 is also just south east of the Listed York Buildings. Development in this area will require sensitive design that responds positively to the context surrounding the sites. Building facades at site WP1 are likely to impact upon townscape and heritage assets/settings and Policy WP1 recognises the need for active frontages to Wellington Place and Albert Road in respect of this.
- 5.39 The current buildings at Opportunity Sites WP1 and WP4 are considered to be of poor design, making a negative contribution to the streetscape and conservation area. As such, the redevelopment of these buildings can contribute to improving the townscape and heritage setting with the potential for significant long term positive effects. The AAP identifies that proposals at site WP1 will need to have particular regard to bulk, height and patterns of building blocks (given the significant level differences) so as to not compromise the significance of heritage assets.
- 5.40 Although not listed, the building at site WP3 is considered to be a distinctive building that contributes positively to the townscape, and Policy WP3 seeks to retain it in any development at the site. The policy further requires proposals to be supported by a Heritage Statement, which should ensure that development positively contributes to the townscape with the potential for minor long term positive effects.
- 5.41 Development at OA3 is focused on two key sites (the Morrisons site and Cornwallis St Car Park), and is expected to contribute to public realm improvements along Queens Road. The redevelopment of the car park and proposed public realm improvements are considered likely to lead to moderate long term positive effects for the townscape. OA3 does not lie within a conservation area, and the two Opportunity Sites do not contain and are not located in close proximity to any listed buildings. The Morrisons site (QR1) is a prominent site located along Queens Road and the railway line (albeit screened from the railway line to some degree by existing vegetation), and as such, its appearance is likely to impact upon the townscape and perceptions on arrival to the town centre from the north. Improvements at this site are likely to support the regeneration strategy vision for improving visibility and awareness as people enter the central area, with the potential for long term positive effects on the townscape. The car park and petrol filling station also front Queens Road and are considered detrimental to the existing townscape. Again, improvements here are likely to lead to long term positive effects on townscape by enhancing frontages along Queens Road. The Cornwallis St Car Park (Opportunity Site QR2) is identified through the Hastings Development Management Plan (2015) for residential development, including a 'pocket park'. The promotion of active frontages alongside new green infrastructure provisions should contribute to improving townscape in this area with the potential for long term positive effects.

- 5.42 OA4 focuses on protecting and improving the key retail role and function of the area around the Priory Meadow retail centre and promotes public realm enhancements. The Middle Street site (PM1) is located within the Town Centre Conservation Area and development of this brownfield site is likely to positively affect the townscape with the potential for minor long term positive effects.
- 5.43 OA5 focuses on expanding and improving the cultural offer of this area, and the AAP identifies further public realm improvements could create a more attractive pedestrian environment and increase footfall and dwell time. Opportunity Sites WR1 and WR2 lie within the Eversfield Place Conservation Area, and Opportunity Site WR3 lies within the Town Centre Conservation Area.
- 5.44 Hastings Pier (Opportunity Site WR1) is a Grade II listed building located adjacent to the Boer War Memorial (also Grade II listed). Opportunity Site WR2 lies just north of these listed buildings on the other side of the A259. Opportunity Site WR3 lies slightly further east adjacent to two Listed Buildings (Brassey Institute and 14 Claremont). Development at any of these sites is likely to affect townscape and heritage settings, and Policy OA5 encourages the protection, enhancement and interpretation of heritage assets in this area. The policy should help ensure that development does not detract from the designated assets and their settings.
- 5.45 The AAP seeks to expand the offer of attractions and events at Hastings Pier to support its long term viability and create a year-round attraction, whilst recognising the need to balance the importance of the heritage aspects of the pier in relation to economically viable uses. The development of further uses on the Pier has the potential to affect the designated heritage asset and its setting. To reduce the potential for negative effects on heritage values, Policy WR1 identifies the need for development to be of a high design quality in keeping with the character of the Pier and conservation area and other features of heritage importance. This should ensure that development does not lead to any significant negative effects, and help ensure the ongoing vitality of this key heritage asset. As such, through securing the economic viability and future use of the Pier, these elements support community access to and enjoyment of this important heritage asset with the potential for long term positive effects.
- 5.46 The proposed development at the White Rock Theatre (Opportunity Site WR2) seeks to expand its offer to secure its future, either through refurbishment or redevelopment. Policy WR2 requires development to be of a high quality design standard which will enhance the appearance of the White Rock and America Ground Cultural Quarter and the Conservation Area, in accordance with an agreed masterplan. This should ensure that development positively contributes to the townscape and heritage settings with the potential for minor long term positive effects. Similarly, development at Opportunity Site WR3 (the Observer Building) is required to sustain and enhance the significance and setting of the Town Centre Conservation Area and the adjacent Listed Buildings, and the restoration or reuse of this building is likely to improve the townscape setting with the potential for minor long term positive effects.
- 5.47 The focus within OA6 is on restoring and enhancing formal parkland and gardens east of Falaise Road, and consolidating leisure uses west of Falaise Road to form a new Sports Park. The OA is locally designated as a Historic Garden and lies adjacent to the convent grounds and listed convent buildings. Though the area lies just outside of the conservation area boundaries, it is largely surrounded by designated heritage settings, with Magdalen Road Conservation Area to the west, and Eversfield Place and White Rock Conservation Areas to the south, which includes Hastings Pier. The restoration of parkland and gardens in the east is likely to improve townscape and heritage settings, as well as encourage more people to access this area, and enjoy the associated benefits of these settings in terms of recreation and quality of life, with the potential for long term positive effects. Policy WRP1 identifies the potential for a hotel in this area. The development of a hotel has the potential to significantly affect the townscape and heritage setting; however, the policy recognises this potential and requires that development does not result in the loss of greenspace or impact on key views (as well as accord with other policies). The policy mitigation provided through Policy WRP1, alongside the wider AAP policies (discussed in Policy Framework Section above) should ensure that development does not lead

to any significant negative effects. A hotel of high design quality is also considered to have the potential for minor long term positive effects on the townscape and heritage settings.

- 5.48 The promotion of a sports park in the west could consolidate the existing land uses, and Policy OA6 requires development in this area to minimise impacts on heritage assets, and to be set within a landscaped setting with a network of green spaces. The concentration of uses is likely to improve legibility with the potential for minor long term positive effects on townscape. New landscaped settings are also likely to positively contribute to townscape. The policy further identifies that housing will be permitted in this area where it will not impact on the setting of the listed heritage assets, and will facilitate the enhancement of heritage assets and the parkland setting. Policy WRP2 seeks to reduce the impact of new buildings on townscape and heritage settings by locating them on the higher part of the site and The Oval. The AAP also identifies further measures that can minimise impacts and integrate new buildings successfully, including wrapping the parkland up on the roof of the new building, decked parking, and the retention of existing woodland. Given the existing and proposed policy mitigation, it is considered unlikely that development will lead to any negative effects, and the proposed enhancements are considered likely to lead to long term positive effects.
- 5.49 Development at OA7 seeks to consolidate or relocate existing uses to introduce housing into this area, in a green setting - connected to Summerfields Wood. The proposals also seek to define a Heritage Quarter incorporating Hastings Museum and Summerfields Wood. Development in this OA is subject to the relocation of existing leisure uses, and the consolidation of civic uses. The introduction of housing and consolidation of uses in this area will affect the townscape and heritage settings to some degree, and there are Listed Buildings (Roman Bath at the Summerfield Estate & Ice House) in close proximity to the proposed sites at OA7. Policy B2 requires development to sustain and enhance the significance and setting of the listed Ice House (including its insulating earth mound), and the Roman Bath site is located within, and screened by, Summerfields Wood, reducing the potential for negative effects. Considering existing policy mitigation provided through the Hastings Planning Strategy (2014), as well as mitigation provided through the AAP, it is unlikely that development will lead to any negative effects.
- 5.50 The AAP recognises the potential to significantly enhance heritage values in Opportunity Site B4 by improving the visibility and accessibility of the existing museum, as well as linking the museum with Summerfields Wood and the Bohemia Walled Garden through dedicated heritage trails. The potential enhancements support heritage objectives outlined in the planning, heritage and regeneration strategies, and are considered likely to lead to long term positive effects.
- 5.51 The restoration and reuse of the listed convent buildings in OA8 could secure the longer term viability and management of these heritage assets, with the potential for long term positive effects. Policy OA8 recognises the sensitivity of the site, and identifies that the Council will liaise with Historic England on any scheme submitted for the site – this should ensure that development does not lead to any negative effects. The restoration and reuse of these heritage assets will secure longer term management and maintenance with the potential for significant long term positive effects.

Conclusions

- 5.52 It is clear that the AAP has the potential to significantly affect the townscape and heritage settings found within Hastings Town Centre and the Bohemia area. Recognising this, the AAP takes a proactive, positive approach to delivering new development within the Plan area which complements the townscape and heritage settings, particularly recognising the potential for modern and contemporary cultural values and assets to support historic environment settings, the quality of residents' lives and the visitor economy. A number of protections for the historic environment and heritage settings are put into place, and the proposals within the AAP contribute to achieving the objectives outlined by the Heritage Strategy for Hastings 2017 and

the regeneration strategy (Culture-Led Regeneration: A Strategy for Hastings 2016-21). This will maximise the potential for coordinated positive effects. The approach to culture-led regeneration supporting the historic environment is also considered likely to lead to significant positive effects.

- 5.53 The proposals within the AAP seek to actively improve the significance, value and offer of existing heritage assets, including through the restoration and reuse of Listed Buildings. Key proposals are likely to improve heritage values associated with Hastings Pier, Hastings Museum, the convent buildings on Magdalen Road, and Historic Gardens (White Rock Gardens and Bohemia Walled Garden, including its woodland setting) in the Bohemia area. These improvements are considered to cumulatively lead to significant positive effects for the historic environment and townscape setting.
- 5.54 The proposals seek to improve the public realm and accessibility across the Plan area, including at gateway locations to the town centre, to raise the quality of the built environment, and the experience of the people using the spaces. The proposed public realm improvements, such as new street trees, seating and lighting, are likely to improve the townscape and heritage settings with the potential for long term positive effects. Further proposals will regenerate areas of previously developed land, as well as existing buildings that detract from the townscape with the potential for significant long term positive effects.

Land, Soil and Water Resources

Policy Framework

- 5.55 The AAP area is predominantly an urban town centre, supported by large areas of green space, parkland and woodland in the west of the Plan area. Proposed Policy AAP3 requires housing development to 'make the most efficient use of land and be developed at the optimum density'. This will minimise land take with the potential for long term positive effects.
- 5.56 The AAP further seeks to improve the efficiency of development in terms of water consumption. Policy AAP6 requires a high level of resource efficiency, including the consideration of features such as rainwater harvesting. Policy AAP9 further supports the efficient use of natural resources, including reducing demand for water. The policy requires that residential development must be designed not to exceed 110 litres per person per day, in line with higher 'optional' standards set out within the Building Regulations (Part G). The support for improved efficiency is considered likely to lead to long term positive effects. The proposed new housing and employment development will inevitably lead to an increased demand on water resources; however, provisions within the Southern Water Water Resources Management Plan should ensure that this does not lead to any significant effects. In this context the AAP can support the timely provision of infrastructure services through close consultation with water authorities and agreed phasing of development if deemed necessary.

Opportunity Areas and Opportunity Sites

- 5.57 Development in the east of the Plan area (OA1 – 4) focuses on the regeneration of previously developed sites, particularly at gateway locations around the central area, and this efficient use of land is considered to have the potential for long term positive effects.
- 5.58 The west of the Plan area (OA5 – 8) is largely existing open land, woodland and parkland, and mixed use / housing development in this area is likely to result in the loss of some open land with the potential for long term minor negative effects. This includes loss of open land at Horntyte Park and Summerfields (adjacent to the existing Travelodge). The consolidation of leisure uses, civic uses and cultural uses will contribute to improved land efficiency by freeing up previously developed land for the provision of new housing, with the potential for minor long term positive effects. The AAP seeks to support land and soil resources however by increasing the extent

and connectivity of the green infrastructure network, with the potential for minor long term positive effects.

- 5.59 The housing development proposals seek a higher density than proposed through the Planning Strategy Policy H1 to make full and effective use of land, for example, it is identified that housing development at Opportunity Site WRP2 could achieve a density of 80 dwellings per hectare. The high densities are considered likely to lead to long term positive effects by encouraging the efficient use of land, much of which is previously developed land.

Conclusions

- 5.60 The AAP is considered to take proactive steps to minimising land take, and minimising the loss of open land. The Plan recognises the potential to deliver housing growth in this area to support housing needs, which will inevitably result in the loss of some open land, with the potential for minor long term negative effects. Minor positive effects are also considered likely through proposals to: maximise densities, regenerate areas of brownfield land; consolidate uses to free up previously developed land; and enhance the GI network. Further to this, the plan seeks a high level of resource efficiency, as well as the incorporation of features such as rainwater harvesting which are also likely to lead to minor long term positive effects for water resources.

Community Vitality

Policy Framework

- 5.61 The AAP has the potential to support the vitality of communities by improving access to housing (particularly affordable housing), community services and facilities, public transport, and employment opportunities. This can help to reduce deprivation and promote social inclusion, particularly through the delivery of affordable housing and community infrastructure in accessible locations.
- 5.62 The delivery of new retail and employment development (Policies AAP1, AAP4 and AAP5) will increase the range of services, facilities and employment opportunities within the central area. This has the potential for long term positive effects for communities in terms of meeting local needs and increasing accessibility to key amenities. Policy AAP4 seeks to include the delivery of affordable workspace as well as co-working space and workspace for small and start-up businesses as part of mixed use development at OA6 and OA7, and Policy AAP5 supports continued growth of cultural facilities and creative industries. Both policies are considered to have the potential for long term positive effects in relation to meeting the diverse needs of the community.
- 5.63 A significant focus for the AAP is culture-led regeneration, with a focus on retaining and improving the cultural offer of the Town Centre and Bohemia Plan area, including proposed enhancements to leisure facilities, cultural venues and historic assets (including the Pier, Hastings Museum and a new sports centre). The proposed improvements will increase the range and accessibility of available cultural facilities, with the potential for significant long term positive effects for community vitality.
- 5.64 The AAP proposes the delivery of around 820 new homes in the Plan area through Policy AAP3, largely as part of mixed use development to support the creation of sustainable neighbourhoods. The policy requires a mix of housing (to include family and affordable housing) as well as contributions towards the provision of social infrastructure. Therefore, the policy supports the delivery of a range of housing to meet local needs (including affordable housing needs to support a reduction in poverty in terms of accessing decent housing), and seeks to ensure that new communities are supported by the necessary infrastructure. Alongside Policies H1 to H3 of the Hastings Planning Strategy (2014), which supports the delivery of appropriate densities, affordable housing, and a balanced mix of housing, the proposals are considered likely to lead to long term significant positive effects. The AAP also supports the delivery of housing

over and above the figures identified in the Planning Strategy, which will help in part address recent indications of a higher required housing need.

- 5.65 The central location for new housing development supports housing delivery with a high level of accessibility given the existing public transport links, services, facilities, open space, and employment opportunities in close proximity, again with the potential for significant long term positive effects for new communities. Further to this, increased housing in the central location should boost night time activity and active surveillance, potentially supporting reduced levels of, or fear of crime.
- 5.66 Much of the proposed development seeks to bring underutilised areas into more community use, for example Summerfields Wood, Bohemia Walled Garden and White Rock Gardens. Alongside, the AAP seeks to improve the Green Infrastructure (GI) network, particularly in the west of the Plan area, and new housing is proposed adjacent to high quality green infrastructure. This will support accessibility to leisure and recreational opportunities, with benefits for the quality of lives of residents.
- 5.67 The AAP seeks public realm enhancements across the plan area, and requires high quality design. The proposed public realm improvements are likely to improve accessibility and legibility with the potential for long term positive effects for communities.

Opportunity Areas and Opportunity Sites

- 5.68 The proposed public realm improvements around the station gateway will improve access and legibility in this area, and support recent educational and healthcare development around the station, with the potential for long term positive effects for community vitality.
- 5.69 The delivery of new employment and housing (largely as part of mixed use development) is proposed across the Plan area. Proposals for employment supported by new homes in the east of the Plan area (OA1, OA2 and OA3) will be located in areas with excellent accessibility, particularly given the proximity to the train station, supermarket and retail facilities, with the potential for long term positive effects. New cultural, employment and housing development in the west of the plan area (OA6, OA7 & OA8) will have good access to the train station, but is also supported by excellent access to natural assets and leisure opportunities, which is again considered to have the potential for long term positive effects for communities, and particularly the quality of residents' lives.
- 5.70 The housing development proposals seek a higher density than proposed through the Planning Strategy Policy H1 to make full and effective use of land. For example, it is identified that housing development at Opportunity Site WRP2 could achieve a density of 80 dwellings per hectare. Affordable housing is also likely to be delivered on site given the size of the potential mixed use development and requirements outlined by Policy H3 of the Planning Strategy. The high densities and delivery of on-site affordable housing is considered likely to lead to significant long term positive effects by providing for community needs in a highly accessible area.
- 5.71 Retail development is proposed within OA1, OA2, OA3 and OA4. The delivery of additional retail in these areas (located around the Priory Meadow Shopping Centre) will support a concentrated retail core, increasing accessibility and legibility for residents with the potential for long term positive effects for local communities.
- 5.72 Employment development is similarly concentrated largely within OA1. This is an appropriate location for office and retail development given the existing clustering of uses and close proximity to the railway station. This will support a high level of accessibility and contribute to the ongoing vitality and vibrancy of the Town Centre, with the potential for long term positive effects for local communities. Further employment development is proposed within OA5 and OA7, as well as employment uses as part of mixed use development at OA7 and OA8. This is largely promoted alongside new housing development to support the creation of sustainable

neighbourhoods, with the potential for long term positive effects for communities through the high level of accessibility.

Conclusions

- 5.73 The AAP is considered likely to lead to significant long term positive effects for community vitality by delivering a wide range of high quality development to include employment and retail uses, enhanced cultural and historic environment venues and assets and new homes. This will take place in a highly accessible location, largely as part of mixed-use development and supported by green infrastructure networks. New retail and employment development proposed through the AAP will also increase the range of services, facilities and employment opportunities, again in a highly accessible location, meeting the diverse needs of the community with the potential for long term positive effects. The focus on culture-led regeneration is considered likely to enhance the quality of residents' lives and community vitality, and the current version of the AAP will also assist the Council in contributing to meeting the 'at least' housing target within the Planning Strategy.

Health and Wellbeing

Policy Framework

- 5.74 The 2017 Health Profile for Hastings District⁶ identifies that the health of people in Hastings is generally worse than the England average. Hastings is one of the 20% most deprived district/unitary authorities in England and around 29% (4,900) of children live in low income families. Life expectancy for both men and women is lower than the England average. Local health priorities include reducing instances of cancers, accidents/injuries, circulatory diseases and digestive diseases in order to address the life expectancy gap between the most and least deprived areas. The AAP may reduce deprivation through supporting regeneration and delivering enhanced housing, retail and employment development. This is discussed in more detail in the Community Vitality Section above.
- 5.75 A significant aspect of the proposals contained within the AAP is the development of leisure facilities and recreational opportunities in the west of the Plan area, connecting to White Rock Park and Summerfields Woods LNR. The proposals will concentrate leisure uses in a new Sports Park within the White Rock Park area, with supported improvements to pedestrian and cycle routes to improve accessibility. The proposals improve the availability and accessibility of leisure facilities with the potential for long term positive effects on health and wellbeing. The current AAP policies also have an impetus on the protection and enhancement of green infrastructure networks. This will support the health and wellbeing of residents by facilitating improvements in levels of physical activity, enhancing social interaction between residents and promoting psychological wellbeing. This will be supported by the AAP's strong focus on improving local distinctiveness, enhancements to the public realm and on the protection and enhancement of townscape and landscape quality.
- 5.76 Health and wellbeing will be supported by the policies which directly and indirectly promote healthier modes of travel, including walking and cycling. In this context, Policies AAP6, AAP9, AAP11 and AAP12 seek to encourage walking and cycling, public transport use and ultra-low emission vehicles, as well as reclaim road space and promote new pedestrian and cycle linkages in the Plan area.
- 5.77 Further measures proposed through Policy AAP9 will enhance energy and water efficiency in new development, in housing this can support health and wellbeing by helping to reduce fuel poverty.

⁶ Public Health England (2017) Hastings District Health Profile 2017 [online] available at: <http://fingertipsreports.phe.org.uk/health-profiles/2017/e07000062.pdf> [accessed 01/05/2018]

- 5.78 The AAP promotes good design through Policy AAP6 which seeks to improve pedestrian crossings and connections (improving accessibility and safety) and requires development to promote the principles of healthy and sustainable design. Similarly, Policy AAP11 seeks to improve the pedestrian experience including through; improved pedestrian crossings at arrival points, innovative surface redesign, improved legibility, durable and high quality materials and provision for the inclusion of public art and lighting. Policy AAP12 provides further support for improved pedestrian crossings, as well as exploring the potential for reclaiming road space for pedestrians (including on the A259 seafront road). These policies are likely to support pedestrian activity, movement, accessibility, and safety, with the potential for long term positive effects on health and wellbeing.

Opportunity Areas and Opportunity Sites

- 5.79 Public realm improvements across all of the OAs seek to improve the pedestrian experience of the town, and create better east-west permeability, which will support a modal shift and healthier lifestyles as well as improve safety (particularly through the introduction of new/improved pedestrian crossings at OA1, OA2, and OA5) with the potential for minor long term positive effects. The A259 seafront road is identified as a physical barrier to pedestrian movement in the plan area, and the planned increase in pedestrian crossings in this area (OA2) should improve accessibility, improve safety and promote walking and healthier lifestyles with the potential for long term positive effects for health and wellbeing.
- 5.80 The consolidation of leisure uses to create a new sports park in OA6 will support healthy lifestyles by improving the quality of provisions, as well as the prominence / visibility of available facilities. The AAP seeks to connect the new sports park to the surrounding parkland and proposed new housing, which will increase accessibility for new residents, as well as increase the accessibility and attractiveness of routes for pedestrians and cyclists in the wider community, with the potential for long term positive effects in terms of healthy lifestyles.

Conclusions

- 5.81 The proposals within the AAP seek to improve the leisure offer within the town centre. Alongside, the impetus in the AAP to protect and enhance green infrastructure networks, as well as its close focus on improving local distinctiveness, enhancements to the public realm and on the protection and enhancement of townscape and landscape quality will support long term positive effects in relation to health and wellbeing. Further policies which directly and indirectly promote healthier modes of travel, including walking and cycling, and seek to improve the pedestrian experience and pedestrian safety are also considered likely to lead to long term positive effects.

Transportation and Air Quality

Policy Framework

- 5.82 There are no AQMAs within or in close proximity to the Plan area. The previous AQMA at Bexhill Road has been revoked given reduced PM concentrations remaining below annual air quality limit values as a result of the opening of the Bexhill to Hastings Link Road. The growth in housing, retail and employment provisions proposed through Policies AAP1, AAP3, AAP4 and AAP5 is likely to increase traffic levels within the centre to some degree with the potential for minor negative effects; however, the development is located within a highly accessible location, with good links to public transport (rail and bus), services and facilities. This is likely to reduce the need to travel for new residents in this area, as well as increase the accessibility of retail services and employment opportunities by public transport, walking and cycling for existing residents. This will support modal shift and have benefits for air quality, with the potential for long term positive effects and mitigating the identified negative effects to some extent (though the extent remains uncertain at this stage of assessment).

- 5.83 The East Sussex Local Transport Plan⁷ (2011-2026) has identified that Hastings is one of the areas needing greater investment for transport infrastructure to support regeneration and development. The focus for transport infrastructure improvements in Hastings include localised road improvements, promotion and infrastructure for public transport, and measures to support integrated sustainable travel such as: bus priority measures; cycle lanes; improved pedestrian routes; better rail/bus/cycle interchanges; less street clutter; and better use of technology such as Real Time Bus Information and charging points for electric vehicles.
- 5.84 Policy AAP9 supports the transition to ultra-low emission vehicles, requiring residential development with off-street parking and non-residential development where parking is required to install charging facilities for electric vehicles. This will support the transition to more sustainable forms of private travel and support improved air and noise quality, with the potential for long term positive effects.
- 5.85 Policy AAP11 seeks to improve the public realm, requiring development to: emphasise the points of arrival into the town with innovative surface redesign and improved pedestrian crossings; reinforce a clear street hierarchy and improve legibility; improve the pedestrian environment and connections between the OAs; use high quality materials; and make provisions for the inclusion of public art and lighting. This will support pedestrian and cycle movement by improving the quality of the spaces and increasing road safety. This has the potential for long term positive effects.
- 5.86 Policy AAP12 identifies the Council's intention to develop a sustainable transport strategy that assesses the potential for reclaiming road space for pedestrians, improved/increased pedestrian crossings and shared space junctions including on the A259 seafront road. This will address a key issue of permeability for pedestrians and cyclists in parts of the Plan area (including to and from the seafront), by supporting improved pedestrian movement and safety, as well as a better pedestrian experience with the potential for long term positive effects. The policy further identifies intentions to assess parking management across the town centre, again looking to reclaim space for leisure uses and improved pedestrian environments. These measures will continue to support a modal shift away from the private car, and increased pedestrian and cycle transport with the potential for long term positive effects. The measures further support the objectives of the Hastings Walking and Cycling Strategy (2014)⁸ in creating a safer, convenient, efficient and attractive walking and cycling network that supports access within and to Hastings, and ensuring that local policies facilitate access to walking and cycling for both utility and leisure purposes, with the potential for long term positive effects.

Opportunity Areas and Opportunity Sites

- 5.87 Development in OA1 seeks to improve the main transport interchange gateway into the Town Centre and enhance connections between the station, town centre and seafront. This will improve legibility and support pedestrian and cycle movement through the town with the potential for long term positive effects.
- 5.88 The proposals within OA1 (Opportunity Sites SG1 and SG2) seek to redevelop the car parks at Priory Street and the station to improve the efficiency of land use and the pedestrian experience in Station Approach. The proposals are not expected to significantly impact upon parking within the Town Centre given Policy SG2 requirements to provide a new multi-storey car park. An improved pedestrian experience around Station Approach will however promote pedestrian and cycle use with the potential for minor long term positive effects.

⁷ East Sussex County Council (2011) Local Transport Plan 2011 – 2026 [online] available at: https://www.eastsussex.gov.uk/media/2336/ltp3_main_doc_2011-2026.pdf [accessed 03/05/2018]

⁸ East Sussex County Council et al (2014) Hastings Walking and Cycling Strategy [online] available at: https://www.hastings.gov.uk/content/planning/planning_policy/local_plan/evidence_base/pdfs/information/hastings_A4_cycling_strategy.pdf [accessed 16/05/2018]

- 5.89 There is the opportunity within OA2 to improve connectivity and enhance this gateway location between the town centre and the seafront. The AAP identifies aspirations at Opportunity Site WP1 to create shared space linking Wellington Square with Wellington Place to support improved connectivity, with the potential for minor long term positive effects.
- 5.90 OA3 (i.e. Queens Road) is another gateway location into the Town Centre, and key objectives of the AAP include improving the public realm and vitality of the Queens Road corridor. The car parks at Morrisons and Cornwallis Street are proposed for redevelopment – with a view to decreasing land take at Morrisons by delivering decked parking, and through providing new space for housing at Cornwallis Street. The proposals seek to improve the pedestrian experience of this area of the town centre, which is considered likely to lead to minor long term positive effects for transportation and air quality by reducing the presence of cars, supporting increased pedestrian presence, as well as reducing the need to travel by private car. However it should be noted that redevelopment and intensification proposals at this location have the potential to increase overall traffic flows in the area, with associated potential negative effects.
- 5.91 Within OA5 the AAP identifies the junction between Robertson Street and Carlisle Parade for investment within the public realm improvements programme. In addition, two junctions (Harold Place/Denmark Place and Albert Road/Denmark Place) within OA2 have been identified for improvement. Together with traffic calming measures along the A259, these public realm improvements are identified within the Plan as key actions to improve connectivity and access to the town centre from the Pier and seafront, and are considered likely to lead to long term positive effects. This will be supported by localised improvements to the promenade, including traffic calming measures and enhancements to the pedestrian environment. These have been identified within the Plan as key actions to improve connectivity and access to the town centre from the Pier and seafront, and are considered likely to lead to long term positive effects.
- 5.92 The AAP further proposes to enhance the pedestrian route along the front of White Rock Gardens, which *'has an elevated view of the seafront linking back into St Margarets Road as it rises to the east and west'*. Through creating a direct physical and visual connection between the Pier and White Rock Gardens, this will promote pedestrian movement and support the pedestrian experience, with the potential for significant long term positive effects. Proposals at Opportunity Site WR2 seek to improve the facilities currently provided by the White Rock Theatre, and with the possible closure of Schwerte Road and White Rock Road to create a new civic space, this priorities pedestrian activity over car movements, with the potential for long term positive effects.
- 5.93 Within the west of the Plan area (OA6, OA7 and OA8), the focus is largely on improving pedestrian and cycle access with improved links to the central retail areas and seafront. This includes new pedestrian and cycle links around White Rock Park connecting to Bohemia Road and the seafront. The new and improved routes will promote pedestrian and cycle movement, promoting modal shift away from the private car. Within OA7, proposals to improve Bohemia Road, including new crossing points and improved frontages, are likely to improve pedestrian experience, safety and accessibility with the potential for minor long term positive effects.
- 5.94 Public realm improvements are proposed throughout most of the OAs, which seek to improve accessibility, legibility and pedestrian experience, as well as improve the GI network. These measures, alongside the delivery of employment and housing in a central location should support a modal shift away from the private car, and thus indirectly improved air quality, with the potential for long term positive effects.

Conclusions

- 5.95 The growth in housing, retail and employment provision proposed through the AAP is likely to increase traffic levels within the Plan area to some degree with the potential for minor negative effects. However, development is proposed in highly accessible locations, with good links to public transport (rail and bus) and services and facilities. This is likely to reduce the need to

travel, and promote sustainable transport options, helping to mitigate the negative effects to some degree. However, the potential extent of the negative effects remains uncertain at this stage.

- 5.96 The AAP actively seeks to support a transition to more sustainable forms of travel, including electric vehicle charging points and significant efforts to improve the pedestrian environment. Proposals include street widening, new crossings, reclaiming road space for pedestrians, improvements along the A259, and new and improved pedestrian and cycle routes in the west of the Plan area. Alongside public realm improvements at gateway locations and the redevelopment of car parks, the proposals prioritise pedestrian movements and seek to minimise impacts of the private car on the built environment. This has the potential for significant medium and long term positive effects.

Economy and Employment

Policy Framework

- 5.97 As the commercial and retail heart of the Borough, supporting the economic performance of the Town Centre is a key driver for the AAP. The town centre has been undergoing significant change through planned regeneration initiatives since the 1990s. More recently the Council and partners have been focusing on culture as an instrument of social change and economic growth. In this context the town centre presents significant opportunities for enhancements to its cultural offer, and boosting economic performance.
- 5.98 The AAP proposes new retail development across a number of locations (explored in Opportunity Areas and Opportunity Sites section below) in Policy AAP1, as well as new business employment floorspace in Policy AAP4. The delivery of new retail and employment space in the AAP area will help support economic performance in the town through widening the range and offer of the town in terms of such new space.
- 5.99 The AAP also provides support for emerging cultural and creative industries through Policy AAP5, which seeks to protect existing cultural venues and facilities and supports the provision of new venues. It also identifies new locations for the provision of workspace for creative industries. In this context the Policy is considered to support the creation of a range of employment opportunities to meet diverse local needs, with the potential for long term positive effects. The proposals to improve the cultural offer and public realm of the town centre and Bohemia area are also considered likely to bolster the visitor economy with the potential for long term positive effects.
- 5.100 The AAP further protects shopping frontages to ensure that retail remains the dominant use within the core of the town centre, including through the designation of primary and secondary shopping frontages in Policy AAP2. A concentrated retail core will support accessibility and legibility, and promote a further clustering of uses, with the potential for long term positive effects.
- 5.101 The delivery of high quality design, required through Policy AAP6, as well as the management of shopfronts and advertising proposed through Policy AAP8 and the green infrastructure and public realm enhancements required through Policies AAP10 and AAP11 will ensure that the accessibility, legibility, character and image of the town centre is strengthened to support its investment appeal. Enhancements to the quality of the public realm and townscape will also support the visitor economy, with the potential for long term positive effects.

Opportunity Areas and Opportunity Sites

- 5.102 Retail development is proposed within OA1, OA2, OA3 and OA4. The delivery of retail in these areas (located around the Priory Meadow Shopping Centre) will support a concentrated retail core, increasing accessibility, legibility, clustering and retail performance with the potential for long term positive effects.

- 5.103 Employment development is similarly concentrated largely within OA1, adjacent to the main retail area and in close proximity to the railway station. This will support a high level of accessibility with the potential for long term positive effects relating to an existing need for high quality employment space. Further employment development is proposed within OA5 and OA7, as well as employment uses as part of mixed use development at OA7 and OA8. However this is largely designated to sit alongside new housing development to support the creation of sustainable neighbourhoods.
- 5.104 Development of the cultural and creative industries is largely focused within the White Rock and America Ground Cultural Quarter (OA5), with the aim of restoring and integrating parkland to maximise the opportunity for interlinked and multifunctional green infrastructure which supports the cultural industries and associated activities. Hastings Museum (in OA7) is also linked to the objective for this area to support the creation of a cultural hub around White Rock and the Bohemia Lands. The delivery of this type of workspace will diversify the range of opportunities to meet local demand, as well as support the visitor economy, with the potential for significant long term positive effects.

Conclusions

- 5.105 The proposals within the AAP to deliver new retail and employment development are considered likely to lead to significant positive effects by improving economic performance and improving retail and employment offer in a highly accessible location. The promotion of mixed-use development will further support accessibility and the creation of sustainable neighbourhoods. The AAP's focus on retaining and enhancing retail and offices as the dominant use within the core of the town will help protect economic vitality and viability as well as the role and function of the town centre.
- 5.106 The focus on culture-led regeneration through supporting enhancements to cultural venues, leisure facilities and heritage assets will support cultural-led economic regeneration and is also considered likely to bolster the visitor economy. This will be further supported by proposed enhancements to the quality of the public realm and townscape character. This will support investment appeal, with the potential for long term positive effects.

Overall Conclusions

- 5.107 Overall, the appraisal has not identified the potential for likely significant negative effects as a result of the implementation of the current version of Town Centre and Bohemia Action Plan.
- 5.108 Whilst the proposed delivery of around 820 new homes and new employment and retail development in the AAP area has the potential for residual minor negative effects in relation to the Biodiversity, Land, Soil and Water Resources and Transportation and Air Quality SA themes, these are likely to be offset by a range of policy approaches which will help secure benefits in relation to these themes.
- 5.109 In this context the AAP is considered to have the potential for a number of significant positive effects. A key focus of the AAP relates to the Historic Environment and Townscape theme. A number of protections for the historic environment and heritage settings are put into place, and the proposals within the AAP seek to maximise the potential for facilitating enhancements to townscape quality and the fabric and setting of the historic environment. The AAP's focus on culture-led regeneration is also likely to lead to significant positive effects in this regard. As such key heritage assets in the AAP area, including Hastings Pier, Hastings Museum, the convent buildings on Magdalen Road, and White Rock Gardens will be supported through enhancements to their viability. Further proposals will regenerate areas of underutilised land, as well as existing buildings that detract from the townscape. Supporting the integrity of the historic environment and local distinctiveness, this has the potential for significant long term positive effects.

- 5.110 Significant positive effects for the Community Vitality and the Economy and Employment themes are associated with the delivery of new employment, retail and housing development, and the AAP's contribution to regeneration in the town centre and Bohemia areas. The proposed transport and public realm improvements (particularly pedestrian prioritisation) and green infrastructure enhancements are also considered to have the potential for significant positive effects in relation to the Transportation and Air Quality SA theme.
- 5.111 Proposals to restore and enhance parkland, woodland and garden settings in the Bohemia area are considered likely to lead to long term significant positive effects for ecological networks in the AAP area, and alongside proposals across the Plan area to enhance green infrastructure networks, this will support the potential for significant positive effects in relation to the Biodiversity SA theme through the achievement of biodiversity net gain.

6. Next steps

Next steps for plan making / SA process

- 6.1 This SA Report accompanies the current consultation on the AAP (*Hastings Town Centre and Bohemia Area Action Plan Preferred Approaches for Public Consultation*).
- 6.2 Following the receipt of consultation responses, the AAP will be updated and released by Hastings Borough Council for Regulation 19 consultation with an updated SA Report.
- 6.3 Once the period for representations on the Regulation 19 version of the AAP document / SA Report concludes, the main issues raised will be identified and summarised by the Council, who will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the AAP will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.
- 6.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on the AAP's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (and undergo SA) and then be subject to consultation (with an SA Report Addendum published alongside).
- 6.5 Once found to be 'sound', the AAP will be formally adopted by the Hastings Borough Council. At the time of Adoption, an SA 'Statement' must be published that sets out (amongst other elements) 'the measures decided concerning monitoring'.

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