

Sustainability Appraisal (SA) for the Hastings Local Plan

Interim SA Report to accompany
Regulation 18 consultation

January 2021

Quality information

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Technical Annex to the Interim SA Report (separate document)

SA site appraisals

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (incorporating Strategic Environmental Assessment) in support of the emerging Hastings Local Plan.
- 1.2 Hastings Borough Council (HBC) is currently developing a Local Plan for Hastings Borough. This will replace the current Local Plan, which comprises the Hastings Planning Strategy (adopted February 2014), the Hastings Local Plan Development Management Plan (adopted September 2015), the Waste and Minerals Plan (adopted February 2013)¹ and the Waste & Minerals Sites Plan (adopted February 2017)².
- 1.3 The Local Plan, which will cover the period to 2039, will be the key planning policy document for the Borough and will guide decisions on the use and development of land. It will set out the Council's spatial strategy for growth and new development in Hastings along with specific requirements for strategic sites (typically larger sites and/or critical sites for infrastructure delivery). It will also include detailed development management policies setting out the form development in Hastings will need to take and any measures required to mitigate the impact of development.
- 1.4 The objectives and approach of the plan will be refined through evidence, engagement and consultation with key stakeholders. However, HBC have identified the following priority themes and issues that it will seek to respond to:
 - addressing climate change and the low carbon agenda;
 - supporting a diverse thriving economy;
 - increasing the delivery of housing and sustainably designed homes including responding to the Government's new annual target figure of 430 net new homes per year;
 - maximising delivery of affordable housing that meets local need;
 - promoting more sustainable transport;
 - creating healthy places with opportunities for more active lifestyles; and
 - achieving growth while mitigating any impacts on and enhancing valued natural environment assets.
- 1.5 It is currently anticipated that the Local Plan will be submitted the Secretary of State and then undergo an independent Examination in Public during Quarter 4 of 2021/22.
- 1.6 Key information relating to the Local Plan is presented in **Table 1.1** below.

¹ East Sussex County Council, South Downs National Park Authority and Brighton & Hove City Council (February 2013) East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan

² East Sussex County Council, South Downs National Park Authority and Brighton & Hove City Council (February 2017) East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan



Table 1.1: Key facts relating to the Hastings Local Plan

Name of Responsible Authority	Hastings Borough Council
Title of Plan	Hastings Local Plan
Subject	Development plan
Purpose	<p>The Local Plan will guide future development and land use within Hastings Borough over the period up to 2039.</p> <p>Replacing the Hastings Planning Strategy and the Hastings Development Management Plan, the Local Plan will, alongside Neighbourhood Plans and the Waste and Minerals Plans, comprise the development plan for the Borough and will be the primary basis against which planning applications are assessed.</p>
Timescale	To 2039
Area covered by the plan	<p>Hastings Borough</p> <p>(Figure 1.1)</p>
Summary of content	<p>The Local Plan will set out the vision, strategy and policies to manage growth and development in Hastings Borough in the period to 2039.</p> <p>It will set out the Council's spatial strategy for growth and new development in Hastings along with specific requirements for strategic sites (typically larger sites and/or critical sites for infrastructure delivery). It will also include detailed development management policies setting out the form development in Hastings will need to take and any measures required to mitigate the impact of development.</p>
Plan contact point	<p>Kerry Culbert, Planning Policy Manager, Hastings Borough Council</p> <p>Email address: kculbert@hastings.gov.uk</p>

Current stage of plan making

- 1.7 This Interim SA Report accompanies the current consultation on the Regulation 18 Local Plan document.³
- 1.8 At the current stage of plan-making HBC is not consulting on a full final draft plan. Rather, the Council is consulting on a consultation draft of the Local Plan, which includes proposed allocations and policy approaches. The aim of the Regulation 18 consultation is to gain stakeholders' views on the approach Local Plan policies can take on various key planning issues and on potential allocations in the Borough. The document is an interim stage in developing the Local Plan and has been prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012).
- 1.9 The current consultation precedes the release of the full draft Local Plan for Regulation 19 consultation in 2021. Drawing on consultation responses received at the current stage of plan-making and evidence base studies undertaken to inform the Local Plan, this document will set out the proposed policies for the Local Plan, including a preferred development strategy and allocations.

Sustainability Appraisal (SA) explained

- 1.10 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution to sustainable development.
- 1.11 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transposed into national law the EU Strategic Environmental Assessment (SEA) Directive⁴. SA also widens the scope of the assessment from focusing generally on environmental issues to also explicitly include social and economic issues.
- 1.12 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.13 The 'likely significant effects on the environment', are those defined in the SEA Regulations as 'including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'. Reasonable alternatives to the plan need to take into consideration the objectives for the plan and its geographic scope. The choice of 'reasonable alternatives' is determined by means of a case-by-case assessment and a decision.⁵

³ Hastings Borough Council (December 2020) *Hastings Local Plan Consultation Draft (Regulation 18)t*

⁴ Directive 2001/42/EC

⁵ Commission of the European Communities (2009) Report from the Commission to the Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC). (COMM 2009 469 final).

This Interim SA Report

- 1.14 At the current stage of plan-making, HBC is not consulting on a full final draft plan. Rather, the Council is consulting on an interim document which sets out key approaches to the Local Plan
- 1.15 This Interim SA Report has therefore been produced voluntarily with the intention of informing this interim stage of preparation of the Local Plan. Specifically, this report presents an assessment of the sites available for development and an appraisal of a series of approaches and alternatives which are currently being evaluated as part of plan development. This is for the benefit of those who might wish to make representations through the consultation and for the benefit of the plan-makers tasked with selecting preferred approaches for the Local Plan.
- 1.16 Subsequent stages of the SA process will consider more detailed Local Plan options, including through an assessment of spatial strategy alternatives. It will also assess the draft plan. The findings of these assessments will be presented in the SA Report accompanying Regulation 19 consultation on the Pre-Submission version of the Local Plan in mid 2021.
- 1.17 The next steps for the Local Plan's development and accompanying SA process are discussed in more detail in Chapter 6.

2. Scope of the appraisal

What is the scope of the SA?

SA Scoping Report

- 2.1 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.⁶ These authorities and a range of other stakeholders were consulted on the scope of the Local SA in August and September 2020 through an SA Scoping Report jointly prepared with Rother District Council.
- 2.2 The baseline information (including baseline data and context review) initially included in the SA Scoping Report has been updated to reflect consultation comments and provides the basis for the SA process.

SA Framework

- 2.3 Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability issues that should be a particular focus of SA, ensuring it remains targeted on the most important issues. These issues were then translated into an SA ‘framework’ of objectives and appraisal questions.
- 2.4 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.
- 2.5 The SA Framework and the appraisal findings in this Interim SA Report have been presented under ten SA Themes, reflecting the range of information being considered through the SA process. These are:
 - Air Quality
 - Biodiversity
 - Energy and Water Consumption
 - Climate Change Adaptation, Flooding and Coastal Change
 - Population, Health and Wellbeing
 - Heritage
 - Land and Water Quality
 - Natural Landscape
 - Skills, Employment and Economic Development
 - Transport
- 2.6 The SA Framework is presented in **Table 2.1** below.

⁶ 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 2.1: SA Framework for the SA of the Hastings Local Plan

SA objective	Appraisal questions... will the option/proposal help to...
SA theme: Air Quality	
1. Reduce air pollution from transport and development and improve air quality.	<ul style="list-style-type: none"> • Improve air quality? • Avoid locating development where air quality could negatively impact upon people's health? • Reduce the amount of Air Quality Management Areas? • Does it support the take up of low or ultra-low emission vehicles?
SA theme: Biodiversity	
2. Biodiversity is protected, conserved and enhanced.	<ul style="list-style-type: none"> • Protect and enhance sites designated for their nature conservation interests? • Protect, conserve and enhance the town's priority species and habitats, and increase local biodiversity? • Achieve a net gain in biodiversity? • Protect and enhance ecological networks?
SA theme: Energy and Water Consumption	
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	<ul style="list-style-type: none"> • Reduce energy consumption? • Reduce CO₂ to contribute to identified national targets? • Lead to efficient land use patterns that minimise the need to travel? • Lead to more sustainable travel including walking, cycling and public transport? • Does it enable the take up of low or ultra-low emission vehicles?
4. Minimise water consumption.	<ul style="list-style-type: none"> • Reduce water consumption? • Increase the use of water conservation and greywater recycling technologies? • Ensure water demand does not outstrip available supply?
SA theme: Climate Change Adaptation, Flooding and Coastal Change	
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	<ul style="list-style-type: none"> • Reduce the risk of flooding from rivers, watercourses and the coast to people and property? • Reduce the risk of surface water flooding? • Ensure that development does not increase flood risk to others? • Prevent inappropriate development in the flood plain? • Improve and extend green infrastructure networks? • Increase the resilience of the built and natural environment to the effects of climate change?
6. The risk of coastal erosion is managed and reduced, now and in the future.	<ul style="list-style-type: none"> • Protect land stability in designated vulnerable areas? • Protect coastal areas from deterioration?
SA theme: Population, Health and Wellbeing	
7. The health and well-being of the population is improved and inequalities in health are reduced.	<ul style="list-style-type: none"> • Reduce levels of childhood obesity? Reduce death rates? • Promote healthy living and active lifestyles? • Reduce health inequalities? • Improve access to high quality health facilities?

SA objective

Appraisal questions... will the option/proposal help to...

8. More opportunities are provided for everyone to live in a suitable home to meet their needs.	<ul style="list-style-type: none"> • 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? • Encourage housing types that meet local needs?
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	<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 development with good accessibility to local facilities and services? • Make access easier for those without a car? • Improve residential amenity and sense of place?
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	<ul style="list-style-type: none"> • Reduce actual levels of crime? • Reduce the fear of crime?

SA theme: Heritage

11. Historic environment/ townscape is protected, enhanced and made more accessible.	<ul style="list-style-type: none"> • Protect, enhance and restore heritage assets? • Reduce the number of buildings at risk? • Encourage access to historic and cultural heritage? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Conserve and enhance archaeological remains, including those contributing to historic landscapes and townscapes?
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SA theme: Land and Water Quality

12. The risk of pollution to land and soils is reduced and quality is improved.	<ul style="list-style-type: none"> • Reduce land contamination? • Minimise development on the best and most versatile agricultural land?
13. 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?
14. The risk of pollution to water is reduced and water quality is improved.	<ul style="list-style-type: none"> • Avoid water pollution due to contaminated runoff from development? • Support improvements to water quality consistent with the aims of the Water Framework Directive?

SA theme: Natural Landscape

15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	<ul style="list-style-type: none"> • Conserve and enhance the High Weald AONB in line with the aims and objectives of the 2019-2024 Management Plan? • Protect and enhance the natural environment? • Encourage access to the natural environment (including parks, open spaces, recreational opportunities and the coast)? • Protect sensitive and special landscapes?
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SA theme: Skills, Employment and Economic Development

16. Economic performance is improved.	<ul style="list-style-type: none"> • Improve economic performance?
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SA objective

Appraisal questions... will the option/proposal help to...

17. There are high and stable levels of employment and diverse employment opportunities for all.

- Reduce short and long-term unemployment?
- Help to improve earnings?
- Increase the number and range of employment opportunities?

18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.

- Reduce poverty and social exclusion in those areas and communities most affected?
- Reduce gap between least and most deprived areas?

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

- Improve the qualifications and skills of young people?
- Improve the qualifications and skills of adults?
- Address the skills gap and enable skills progression?
- Contribute to meeting identified skills shortages?
- Improve access to high quality educational/training opportunities and facilities?

SA theme: Transport

20. Road congestion levels are reduced and there is less car dependency and greater travel choice.

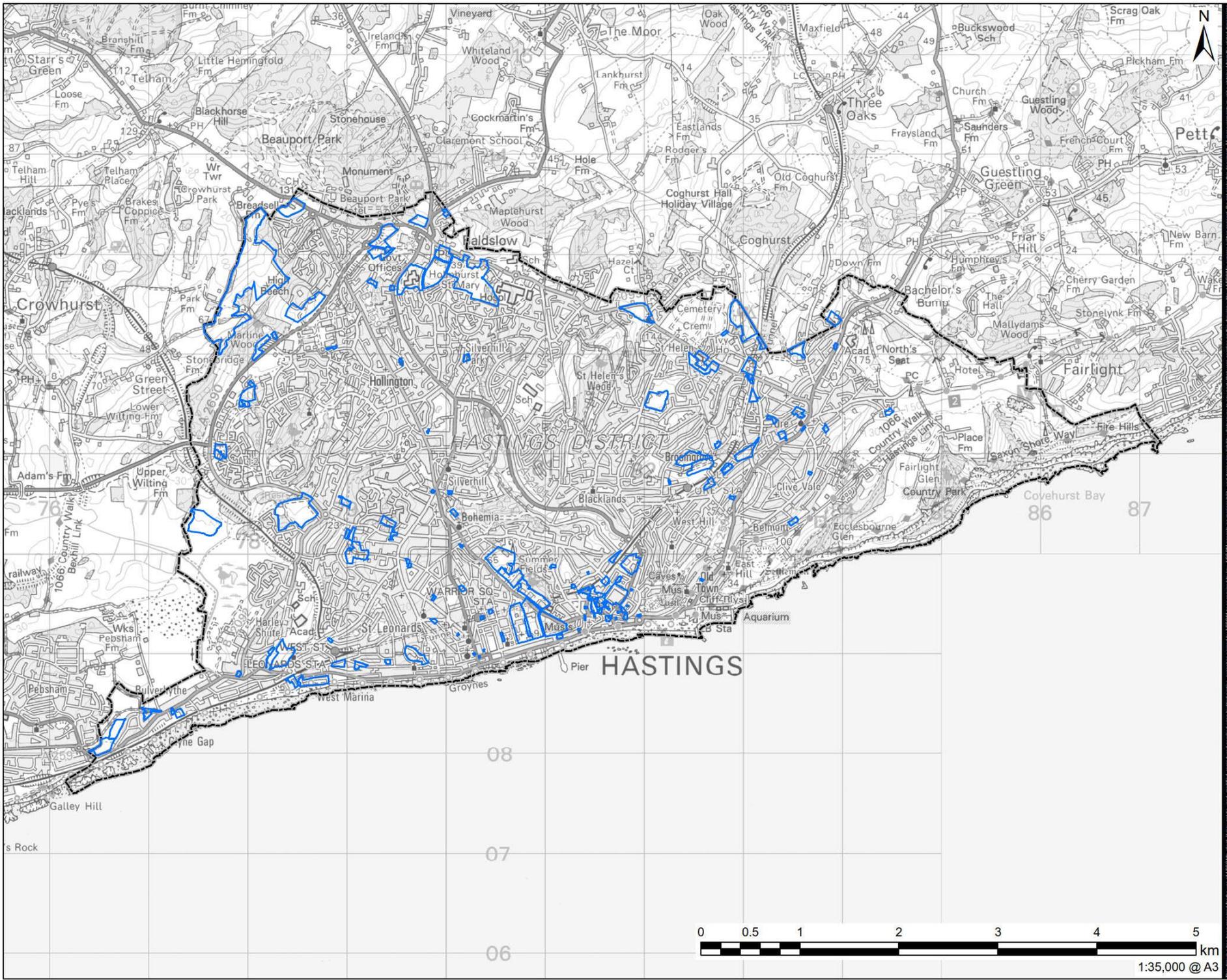
- Reduce the need to travel by private car?
- Enable more sustainable transport patterns including walking, cycling and public transport?
- Reduce the need to travel by car through the location and design of new development and places which provide more opportunities for active travel and for the provision and link to public transport infrastructure?
- Reduce road traffic accidents?

3. SA site appraisal

Appraisal of sites for potential allocation

- 3.1 A range of potential locations are in the process of being considered for allocation through the Local Plan.
- 3.2 In late 2019, HBC undertook a Call for Sites consultation.⁷ The Call for Sites asked for information about land and sites which could potentially be developed in the future in the Borough. It provided an opportunity for individuals, landowners, developers and other interested parties to submit their sites or broad locations to HBC, with a view to suggesting sites for development in the Local Plan period.
- 3.3 Potential sites for the following uses were requested:
- Housing, including specialist housing such as housing for older people;
 - Business uses, including offices, research and development, industrial and storage; and
 - Other commercial uses including leisure and cultural uses.
- 3.4 Land and sites should be:
- for housing, capable of delivering 5 or more homes and
 - for all other uses, 0.25 hectares or more in size or capable for supporting 500 square metres of floorspace or above.
- 3.5 To inform future decisions on allocations in the new Local Plan, the sites which came forward through the call for sites were subsequently assessed as part of HBC's Strategic Housing and Employment Land Availability Assessment (SHELAA). This process considered whether sites were available, suitable and deliverable, with a view to supporting the choice of housing and employment allocations to be taken forward through the Local Plan.
- 3.6 To support the consideration of sites identified through the Call for Sites and assessed through the SHELAA, a separate appraisal of each of the 125 sites in the Borough has been undertaken through the SA process, with the aim of informing the proposed allocation of sites through the Local Plan. Evaluating the constraints and opportunities on each site, the sites were appraised through the SA against a set of consistent criteria which were developed specifically for the SA process. Based on these criteria, a 'red/amber/green' rating was then applied to each site for each criterion to provide an indication of site constraints and opportunities and the relative sustainability merits of the sites.
- 3.7 The site appraisal undertaken through the SA process is therefore distinct from the assessments undertaken through the SHELAA. In this respect the SHELAA considers factors such as size, suitability, availability, and deliverability, whilst the SA site appraisal focuses on the constraints and opportunities associated with the sites. Whilst distinct, the SA and the SHELAA will both form part of the evidence base for the Local Plan, and, with other studies undertaken for the Local Plan and engagement with stakeholders, support decision making on the choice of sites to allocate.
- 3.8 The findings of the appraisal of the sites undertaken through the SA process, accompanied by an explanation of the approach and criteria utilised for the appraisal, is presented in the Technical Annex accompanying this SA Report (*SA Report Technical Annex to accompany the Regulation 18 consultation version of the Local Plan*).
- 3.9 The locations of the sites are presented in **Figure 3.1** below, with a summary of the site appraisal subsequently presented in **Table 3.1** and **Table 3.2**.

⁷ The Call for Sites was undertaken between August and October 2019 <https://www.hastings.gov.uk/planning/policy/new-local-plan/action/aap-evidence-base/call-for-sites/>



Summary of site appraisal

Table 3.1: Summary of site appraisal (1)

AECOMID	SHELAA Reference	Does the site intersect with an SSSI IRZ?	Proximity to a Local Wildlife Site	Proximity to a BAP Priority Habitat	Proximity to a Local Nature Reserve	Proximity to a Conservation Area	Proximity to a Registered Park or Garden	Proximity to a Scheduled Monument	Proximity to a nationally Listed Building	Proximity to a Locally Listed Building	Proximity to an Area of Archaeological Importance	Agricultural land quality
AECOM001	HL40											
AECOM002	HL4											
AECOM003	HL12											
AECOM004	HL97											
AECOM005	HL35											
AECOM006	HL37/EL18											
AECOM007	HL9											
AECOM008	HL39											
AECOM009	HL33											
AECOM010	HL6											
AECOM011	HL38											
AECOM012	HL43											
AECOM013	HL57											
AECOM014	HL22											
AECOM015	HL36											
AECOM016	HL27											
AECOM017	HL18											
AECOM018	HL32											
AECOM019	HL11											
AECOM020	HL5											
AECOM021	HL30											
AECOM022	HL59											
AECOM023	HL3											
AECOM024	HL34											
AECOM025	HL31											

AECOMID	SHELAA Reference	Does the site intersect with an SSSI IRZ?	Proximity to a Local Wildlife Site	Proximity to a BAP Priority Habitat	Proximity to a Local Nature Reserve	Proximity to a Conservation Area	Proximity to a Registered Park or Garden	Proximity to a Scheduled Monument	Proximity to a nationally Listed Building	Proximity to a Locally Listed Building	Proximity to an Area of Archaeological Importance	Agricultural land quality
AECOM026	HL42											
AECOM027	HL24											
AECOM028	HL14											
AECOM029	HL45											
AECOM030	HL28											
AECOM031	HL41											
AECOM032	HL19											
AECOM033	HL2											
AECOM034	HL7											
AECOM035	HL96/CR2											
AECOM036	HL90											
AECOM037	HL99											
AECOM038	HL87/CR5											
AECOM039	HL16											
AECOM040	HL98											
AECOM041	HL17											
AECOM042	HL56											
AECOM043	HL44											
AECOM044	HL26											
AECOM045	HL60											
AECOM046	HL61											
AECOM047	HL25											
AECOM048	HL62											
AECOM049	HL63											
AECOM050	EL15											
AECOM051	HL64											
AECOM052	HL66											
AECOM053	HL67											

AECOMID	SHELAA Reference	Does the site intersect with an SSSI IRZ?	Proximity to a Local Wildlife Site	Proximity to a BAP Priority Habitat	Proximity to a Local Nature Reserve	Proximity to a Conservation Area	Proximity to a Registered Park or Garden	Proximity to a Scheduled Monument	Proximity to a nationally Listed Building	Proximity to a Locally Listed Building	Proximity to an Area of Archaeological Importance	Agricultural land quality
AECOM054	HL68											
AECOM055	HL69											
AECOM056	HL71											
AECOM057	HL85											
AECOM058	HL72											
AECOM059	HL70											
AECOM060	HL73											
AECOM061	HL74											
AECOM062	HL75											
AECOM063	HL76											
AECOM064	HL77											
AECOM065	HL78											
AECOM066	HL79											
AECOM067	HL81											
AECOM068	HL82											
AECOM069	HL83											
AECOM070	EL9											
AECOM071	EL6											
AECOM072	EL1											
AECOM073	EL11											
AECOM074	EL5											
AECOM075	EL7											
AECOM076	EL8											
AECOM077	HL51											
AECOM078	EL13											
AECOM079	EL17											
AECOM080	HL52											
AECOM081	HL53											

AECOMID	SHELAA Reference	Does the site intersect with an SSSI IRZ?	Proximity to a Local Wildlife Site	Proximity to a BAP Priority Habitat	Proximity to a Local Nature Reserve	Proximity to a Conservation Area	Proximity to a Registered Park or Garden	Proximity to a Scheduled Monument	Proximity to a nationally Listed Building	Proximity to a Locally Listed Building	Proximity to an Area of Archaeological Importance	Agricultural land quality
AECOM082	HL54											
AECOM083	HL55											
AECOM084	HL21											
AECOM085	EL19											
AECOM086	HL86											
AECOM087	HL91											
AECOM088	HL93											
AECOM089	HL95											
AECOM090	HL101											
AECOM091	HL102											
AECOM092	HL103											
AECOM093	HL104											
AECOM094	HL105											
AECOM095	HL106											
AECOM096	HL107											
AECOM097	HL108											
AECOM098	HL109											
AECOM099	EL20											
AECOM100	HL84											
AECOM101	HL58											
AECOM102	EL23											
AECOM103	HL1											
AECOM104	HL115											
AECOM105	HL23											
AECOM106	EL25											
AECOM107	EL24											
AECOM108	EL27											
AECOM109	HL111											

AECOMID	SHELAA Reference	Does the site intersect with an SSSI IRZ?	Proximity to a Local Wildlife Site	Proximity to a BAP Priority Habitat	Proximity to a Local Nature Reserve	Proximity to a Conservation Area	Proximity to a Registered Park or Garden	Proximity to a Scheduled Monument	Proximity to a nationally Listed Building	Proximity to a Locally Listed Building	Proximity to an Area of Archaeological Importance	Agricultural land quality
AECOM110	HL100											
AECOM111	HL94											
AECOM112	HL112											
AECOM113	HL114											
AECOM114	HL113											
AECOM115	HL110											
AECOM116	HL89											
AECOM117	HL92											
AECOM118	EL26											
AECOM119	EL28											
AECOM120	HL80											
AECOM121	BP1											
AECOM122	DEB											
AECOM123	CR7											
AECOM124	CR8											
AECOM125	EL16											
AECOM126	HL50/EL12											

Table 3.2: Summary of site appraisal (2)

AECOMID	SHELAA Reference	Fluvial Flood Risk	Surface Water Flood Risk	Loss of Public Open Space	Previously developed land	Proximity to a town, district or local centre	Proximity to a school	Proximity to a doctor or health centre	Proximity to a train station	Proximity to a bus stop	Proximity to a cycle route
AECOM001	HL40										
AECOM002	HL4										
AECOM003	HL12										
AECOM004	HL97										
AECOM005	HL35										
AECOM006	HL37/EL18										
AECOM007	HL9										
AECOM008	HL39										
AECOM009	HL33										
AECOM010	HL6										
AECOM011	HL38										
AECOM012	HL43										
AECOM013	HL57										
AECOM014	HL22										
AECOM015	HL36										
AECOM016	HL27										
AECOM017	HL18										
AECOM018	HL32										
AECOM019	HL11										
AECOM020	HL5										
AECOM021	HL30										
AECOM022	HL59										
AECOM023	HL3										
AECOM024	HL34										
AECOM025	HL31										
AECOM026	HL42										
AECOM027	HL24										
AECOM028	HL14										
AECOM029	HL45										
AECOM030	HL28										

AECOMID	SHELAA Reference	Fluvial Flood Risk	Surface Water Flood Risk	Loss of Public Open Space	Previously developed land	Proximity to a town, district or local centre	Proximity to a school	Proximity to a doctor or health centre	Proximity to a train station	Proximity to a bus stop	Proximity to a cycle route
AECOM031	HL41										
AECOM032	HL19										
AECOM033	HL2										
AECOM034	HL7										
AECOM035	HL96/CR2										
AECOM036	HL90										
AECOM037	HL99										
AECOM038	HL87/CR5										
AECOM039	HL16										
AECOM040	HL98										
AECOM041	HL17										
AECOM042	HL56										
AECOM043	HL44										
AECOM044	HL26										
AECOM045	HL60										
AECOM046	HL61										
AECOM047	HL25										
AECOM048	HL62										
AECOM049	HL63										
AECOM050	EL15										
AECOM051	HL64										
AECOM052	HL66										
AECOM053	HL67										
AECOM054	HL68										
AECOM055	HL69										
AECOM056	HL71										
AECOM057	HL85										
AECOM058	HL72										
AECOM059	HL70										
AECOM060	HL73										
AECOM061	HL74										
AECOM062	HL75										

AECOMID	SHELAA Reference	Fluvial Flood Risk	Surface Water Flood Risk	Loss of Public Open Space	Previously developed land	Proximity to a town, district or local centre	Proximity to a school	Proximity to a doctor or health centre	Proximity to a train station	Proximity to a bus stop	Proximity to a cycle route
AECOM063	HL76										
AECOM064	HL77										
AECOM065	HL78										
AECOM066	HL79										
AECOM067	HL81										
AECOM068	HL82										
AECOM069	HL83										
AECOM070	EL9										
AECOM071	EL6										
AECOM072	EL1										
AECOM073	EL11										
AECOM074	EL5										
AECOM075	EL7										
AECOM076	EL8										
AECOM077	HL51										
AECOM078	EL13										
AECOM079	EL17										
AECOM080	HL52										
AECOM081	HL53										
AECOM082	HL54										
AECOM083	HL55										
AECOM084	HL21										
AECOM085	EL19										
AECOM086	HL86										
AECOM087	HL91										
AECOM088	HL93										
AECOM089	HL95										
AECOM090	HL101										
AECOM091	HL102										
AECOM092	HL103										
AECOM093	HL104										
AECOM094	HL105										

AECOMID	SHELAA Reference	Fluvial Flood Risk	Surface Water Flood Risk	Loss of Public Open Space	Previously developed land	Proximity to a town, district or local centre	Proximity to a school	Proximity to a doctor or health centre	Proximity to a train station	Proximity to a bus stop	Proximity to a cycle route
AECOM095	HL106										
AECOM096	HL107										
AECOM097	HL108										
AECOM098	HL109										
AECOM099	EL20										
AECOM100	HL84										
AECOM101	HL58										
AECOM102	EL23										
AECOM103	HL1										
AECOM104	HL115										
AECOM105	HL23										
AECOM106	EL25										
AECOM107	EL24										
AECOM108	EL27										
AECOM109	HL111										
AECOM110	HL100										
AECOM111	HL94										
AECOM112	HL112										
AECOM113	HL114										
AECOM114	HL113										
AECOM115	HL110										
AECOM116	HL89										
AECOM117	HL92										
AECOM118	EL26										
AECOM119	EL28										
AECOM120	HL80										
AECOM121	BP1										
AECOM122	DEB										
AECOM123	CR7					N/A	N/A	N/A			
AECOM124	CR8					N/A	N/A	N/A			
AECOM125	EL16										
AECOM126	HL50/EL12										

4. Options appraised as reasonable alternatives

Reasonable alternatives in SA

- 4.1 A key element of the SA process is the appraisal of ‘reasonable alternatives’ for the Local Plan. The SEA Regulations⁸ 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*”.

Options appraised

- 4.2 In response to this, a number of alternative policy approaches have been considered for the Local Plan through the SA process to date. These relate to the following:
- Options for Ashdown House
 - Options for the land east of Harrow Lane
 - Options for housing delivery at Bohemia
 - Options for Horntye
 - Options for leisure provision
 - Options for town centre parking zones
 - Option for affordable housing provision
 - Options for green infrastructure provision
 - Options for biodiversity net gain
 - Options for energy efficiency standards
- 4.3 Further detail on these options and their appraisal is presented in **Chapter 5**.
- 4.4 Prior to Regulation 19 consultation on the draft Local Plan later in 2021, a range of development strategy options will also be appraised through the SA. This additional appraisal work will reflect the importance of ensuring that alternative spatial strategies, which are based on robust evidence and deliverable sites, are appropriately considered through the SA process, and play a role in supporting decision making on the preferred spatial strategy for the Local Plan.

Approach to the appraisal

- 4.5 The options considered as ‘reasonable alternatives’ have been appraised against the SA Framework (**Table 2.1**).
- 4.6 In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each SA theme.
- 4.7 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:
- the probability, duration, frequency and reversibility of the effects;
 - the cumulative nature of the effects;

⁸ Environmental Assessment of Plans and Programmes Regulations 2004

- 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.

4.8 The following chapter therefore:

- Provides more detail on the options considered as reasonable alternatives through the SA process; and
- Presents the appraisal findings relating to these options.

5. Appraisal of options for key policy themes

Key policy themes

- 5.1 The aim of the current consultation is to gain stakeholders' views on the approach Local Plan policies can take on various planning issues.
- 5.2 Reflecting this, HBC have considered alternative approaches for number of key locations and policy themes for the Local Plan. To support this process, the SA has appraised a series of options for a range of themes, with a view to informing the current consultation on the Local Plan.
- 5.3 The detail of the options appraised, and the appraisal findings, are presented below.

Appraisal of options for Ashdown House

- 5.4 Ashdown House is located between Sedlescombe Road North and Harrow Lane in Hastings. Comprising the Department for Work & Pensions site, the site is a 5.18ha brownfield site previously comprising 20,438 sq. m. of employment space.



Figure 5.1: Ashdown House

- 5.5 HBC has identified the site as a key location for change in the Little Ridge area.
- 5.6 With regards to the Local Plan, there is the potential to allocate the site for different uses. The SA process has therefore considered five options for these alternative uses, as follows.
 - **Option AH1:** Deliver a residential-led development at Ashdown House
 - **Option AH2:** Deliver a mixed-use development with an element of small scale retail
 - **Option AH3:** Deliver a mixed-use development with a large retail facility
 - **Option AH4:** Deliver a mixed-use development with a strong employment land focus
 - **Option AH5:** Deliver an employment-led development
- 5.7 The following table presents appraisal findings in relation to the five options introduced above. These are organised by the ten SA themes and use the SA Framework set out above. 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 ‘5’ the least favourable ranking. Where an ‘=’ is denoted in the appraisal, a comparable ranking is anticipated, and a ‘?’ denotes an uncertain ranking.

Table 5.1: Appraisal of options for Ashdown House

Option AH1: Deliver a residential-led development at Ashdown House

Option AH2: Deliver a mixed-use development with an element of small scale retail

Option AH3: Deliver a mixed-use development with a large retail facility

Option AH4: Deliver a mixed-use development with a strong employment land focus

Option AH5: Deliver an employment-led development

SA theme	Discussion of potential effects and relative merits of options	Rank of preference				
		1	2	3	4	5
Air Quality	<p>The site is not located at an area at risk of exceedances of national air quality objectives.</p> <p>Located adjacent to key bus routes along Sedlescombe Road North, the site is in good proximity to existing public transport networks. As such, residential and employment provision taken forward by the options would be located at an accessible location by public transport. This may have potential medium and long term benefits for air quality.</p> <p>Option AH3, through delivering a mixed-use development with a large retail facility, has the potential to increase traffic flows in the area. This may have implications for air quality. The impact on traffic (and associated emissions) from Option AH4 and Option AH5 depends on the type of employment provision delivered at the Ashdown House site. However, the delivery of an additional level of land use classes B2 (general industrial use) or B8 (storage or distribution) would be likely to impact on air quality through delivering additional heavy vehicle traffic movements in the vicinity of the site.</p>	1	1	5	3	4
Biodiversity	<p>The Ashdown House site has limited biodiversity value. In terms of key biodiversity habitats, no BAP priority habitats are present on the site. Whilst areas of deciduous woodland are present on the opposite side of Harrow Lane to the east, and on the opposite side of Sedlescombe Road North to the west, development of the site is unlikely to have direct impacts on these areas of woodland. The site otherwise largely contains no areas of biodiversity value.</p> <p>A very small section of the western part of the site is within an SSSI Impact Risk Zone for “Residential development of 100 units or more” and “Large infrastructure such as warehousing / industry where net additional gross internal floorspace is > 1,000m² or any development needing its own water supply.” This is however a limited constraint for the site.</p> <p>Given the relatively limited biodiversity value of the site, and the presence of key habitats nearby, there are significant opportunities for ‘greening’ of the site, and the initiation of biodiversity net gain. The significance of effects from the five options therefore depend on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if development proactively seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.</p>	=	=	=	=	=

- Option AH1:** Deliver a residential-led development at Ashdown House
- Option AH2:** Deliver a mixed-use development with an element of small scale retail
- Option AH3:** Deliver a mixed-use development with a large retail facility
- Option AH4:** Deliver a mixed-use development with a strong employment land focus
- Option AH5:** Deliver an employment-led development

Energy and Water Consumption	<p>In terms of energy and water consumption, the performance of the options depends on the implementation of sustainable building design, energy and water efficiency measures within new development at the Ashdown House site. Whilst some uses may in theory lead to increased overall energy and water use, it is therefore difficult to differentiate between the options.</p> <p>Located on key bus routes along Sedlescombe Road North, the site is in good proximity to existing bus networks. As such residential and employment provision taken forward by the options would be located at an accessible location by public transport.</p>	?	?	?	?	?
Climate Change Adaptation, Flooding and Coastal Change	<p>The site is not at risk of fluvial flooding. Some very limited areas of the site are at 'medium' risk of surface water flooding, meaning that each year these areas have a chance of flooding of between 1% and 3.3%.</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 drainage systems, green infrastructure provision and similar. 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 adapting to the effects of climate change, this also depends on the provision of appropriate infrastructure alongside new development, such as green infrastructure provision and appropriate design and layout. As such, it is not possible to differentiate between the options with regards to climate change adaptation.</p>	=	=	=	=	=
Population, Health and Wellbeing	<p>Options AH1 and AH2 have increased potential to deliver housing of a range of types and tenures, including affordable housing provision, housing for older people and family housing. This is given the options are likely to facilitate a more significant level of housing delivery than the other options. In this respect, Option AH4 and potentially Option AH3 have less potential to deliver a broad range of housing, with Option AH5 not delivering housing due to its employment land focus.</p> <p>Option AH2, through delivering a mixed-use development with an element of small-scale retail, will support local residential provision through the delivery of local amenities. This will support accessibility and community vitality (although it should be noted that there already exists large and small scale provision within 800m of the site). The delivery of significant large-scale retail through Option AH3, whilst in part serving new residential areas, also has the potential to undermine the quality of a new residential neighbourhood in the area, including through visual impacts, and impacts on traffic and congestion. The option also would not significantly enhance access to retail provision; there is existing access to large scale retail locally, including associated with existing supermarket provision on the western side of Sedlescombe Road North. Similarly, the additional delivery of employment land provision through Option AH4 also has the potential to undermine the residential amenity of the area.</p>	2	1	3	3	5

- Option AH1:** Deliver a residential-led development at Ashdown House
- Option AH2:** Deliver a mixed-use development with an element of small scale retail
- Option AH3:** Deliver a mixed-use development with a large retail facility
- Option AH4:** Deliver a mixed-use development with a strong employment land focus
- Option AH5:** Deliver an employment-led development

Heritage	Whilst redevelopment of the site offers potential for positive and negative impacts on the townscape of the area, no features or areas of historic environment interest are present in the vicinity of the site, including scheduled monuments, registered parks and gardens, nationally or locally listed buildings or conservation areas. The site is also not in an Area of Archaeological Importance. As such there should be limited difference between the options in terms of impacts on features and areas of heritage interest.	=	=	=	=	=
Land and Water Quality	The redevelopment of this brownfield site will support the efficient use of land. In this respect all options will support the development of significant areas of previously developed land at this location.	=	=	=	=	=
Natural Landscape	The site is a previously developed site within the urban area of Hastings. As such, redevelopment of the site is unlikely to lead to significant negative or positive effects on the natural landscape of the area.	=	=	=	=	=
Skills, Employment and Economic Development	The redevelopment of the site for residential-led development through AH1 and AH2 will lead to the increased loss of employment land in the Borough (although the Local Plan may initiate policies to limit this loss). In contrast, Options AH4 and AH5, through delivering economic uses at Ashdown House, have additional potential to facilitate and support employment opportunities on the site. Option AH3 also has the potential to deliver jobs on the site through a new retail facility; however, large scale retail is less likely to deliver the wider variety of employment opportunities with the potential to be delivered through Options AH4 and AH5.	5	4	3	2	1
Transport	<p>Located on key bus routes along Sedlescombe Road North, the site is in good proximity to existing public transport networks. As such, residential and employment provision taken forward by the options would be located at an accessible location by both public transport and bus.</p> <p>Option AH2, through delivering small scale retail, will help limit the need to travel to such provision (although it should be noted that small scale retail is currently available within 800m of the site). Whilst Option AH3 will also deliver retail provision locally, the option has the potential to significantly increase traffic flows in the area through the delivery of a larger scale retail facility. This has the potential to increase traffic pressures on access points to Sedlescombe Road North, which, as part of the A21, is a key link to and from the town.</p> <p>The impact on traffic from Option AH4 and Option AH5 depends on the type of employment provision delivered at the Ashdown House site. For example, the delivery of land use classes B2 (general industrial use) or B8 (storage or distribution) would have the potential to lead to increased traffic movements in the vicinity of the site.</p>	2	1	5	3	4

Appraisal of options for the land east of Harrow Lane

- 5.8 Two potential development sites are available to the east of Harrow Lane. Previously allocated in the Development Management Plan 2015, the sites comprise the former Harrow Lane Playing Fields (SHELAA site reference HL2) and a further site located directly to the north, located to the south of The Ridge (SHELAA site reference HL3). The total size of the sites is approximately 6.6ha.
- 5.9 Together, these sites comprise a strategic opportunity site offering the potential to deliver a significant number of homes for the Borough.
- 5.10 In terms of the delivery of new housing on the sites, highways and public transport access to the sites will be a key consideration. This will influence the type of residential uses delivered, and accessibility for those living in the area.
- 5.11 To explore these elements further, the SA process has considered three options, as follows:
- **Option Har1:** Incorporation of a bus only route through the east of Harrow Lane sites
 - **Option Har2:** Deliver a coordinated approach to highways in the east of Harrow Lane sites
 - **Option Har3:** Deliver low density development at the east of Harrow Lane sites through a do minimum approach
- 5.12 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes and use the SA Framework set out above.
- 5.13 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, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.2: Appraisal of options for the land east of Harrow Lane

Option Har1: Incorporation of a bus only route through the east of Harrow Lane sites

Option Har2: Deliver a coordinated approach to highways in the east of Harrow Lane sites

Option Har3: Deliver low density development at the east of Harrow Lane sites through a do minimum approach

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Har1	Har2	Har3
Air Quality	<p>Option Har1, through delivering a bus only route through the development areas to the east of Harrow Lane, will encourage public transport use for those living at these locations. The delivery of a bus only route also has the potential to enhance the reliability of bus routes in the area through enabling bus routes to avoid congested areas on The Ridge. This has the potential to support air quality through encouraging modal shift from the private car. Option Har2 also has the potential to support sustainable transport use through implementing design and layout which supports permeability.</p> <p>A lower density development taken forward through Option Har3, which would potentially incorporate a cul-de-sac or similar approach to housing provision at the sites, is less likely to encourage permeability within new development areas. This is likely to lead to a car-led development, with implications for air quality.</p>	1	2	3

Option Har1: Incorporation of a bus only route through the east of Harrow Lane sites

Option Har2: Deliver a coordinated approach to highways in the east of Harrow Lane sites

Option Har3: Deliver low density development at the east of Harrow Lane sites through a do minimum approach

Biodiversity	<p>In terms of biodiversity habitats, an area of deciduous woodland BAP priority habitat is present to the south of the proposed development area.</p> <p>The significance of effects from the three options on this habitat and other assets of biodiversity value however depend on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if development (including associated with road layout) proactively seeks to integrate these elements, then there should be no difference between the options in terms of impacts on this habitat and wider biodiversity and ecological networks.</p>	=	=	=
Energy and Water Consumption	<p>Option Har1, through delivering a bus only route, has the potential to do more to support public transport use as an alternative to the private car. This will support climate change mitigation through limiting emissions from transport. Option Har2 also has the potential to support sustainable transport use through implementing design and layout which supports permeability by walking and cycling and which facilitates new bus routes.</p> <p>In terms of energy and water consumption within new development areas, the performance of the options depends on the implementation of sustainable building design, and energy and water efficiency measures within new development.</p>	1	2	3
Climate Change Adaptation, Flooding and Coastal Change	<p>In relation to flood risk, the sites are not at risk of fluvial or surface water flooding. However, it is not possible to differentiate between the options in terms of contribution to wider flood risk (including surface water flood risk) given this depends on the location of development and the incorporation of mitigation measures such as sustainable drainage systems, green infrastructure provision and similar. 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 adapting to the effects of climate change, this also depends on the provision of appropriate infrastructure alongside new development, such as green infrastructure provision and appropriate design and layout. As such, it is not possible to differentiate between the options with regards to climate change adaptation.</p>	=	=	=
Population, Health and Wellbeing	<p>Option Har1, through supporting a bus only route through the sites, will promote accessibility by public transport to key services, facilities and amenities. Through promoting alternatives to the private car, the option will also support healthier modes of travel. Option Har2 also has the potential to support sustainable transport use through implementing design and layout which supports permeability by walking and cycling and which facilitates new bus routes.</p> <p>Option Har3 will do less to deliver an integrated, permeable residential community which supports neighbourhood vitality.</p>	1	2	3

Option Har1: Incorporation of a bus only route through the east of Harrow Lane sites

Option Har2: Deliver a coordinated approach to highways in the east of Harrow Lane sites

Option Har3: Deliver low density development at the east of Harrow Lane sites through a do minimum approach

Heritage	<p>No features or areas of historic environment interest are present on or adjacent to the potential development areas, including scheduled monuments, registered parks and gardens, nationally or locally listed buildings or conservation areas. The Ridge, which adjoins the site is within an Area of Archaeological Importance.</p> <p>The Grade II listed Baldslow Windmill is located approximately 50m to the north of the potential development area. However, this is located on the opposite side of The Ridge, and screened from the northern part of the potential development area.</p> <p>For all three options, potential effects on townscape 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.</p>	=	=	=
Land and Water Quality	<p>The potential development area largely comprises undeveloped land. As such all of the options have the potential to lead to the loss of greenfield 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>	=	=	=
Natural Landscape	<p>The delivery of housing through Options Har1-Har3 has the potential to impact on local townscape character, including through the loss of open space. Impacts however depend on the design and layout of new development and the integration of high-quality green infrastructure provision. It is not possible to differentiate between the options in this respect.</p>	=	=	=
Skills, Employment and Economic Development	<p>Given development at the site is likely to be a residential-led development, there are no significant differences between the options in relation to this SA theme.</p>	=	=	=

Option Har1: Incorporation of a bus only route through the east of Harrow Lane sites

Option Har2: Deliver a coordinated approach to highways in the east of Harrow Lane sites

Option Har3: Deliver low density development at the east of Harrow Lane sites through a do minimum approach

		1	2	3
Transport	<p>Option Har1, through supporting a bus only route through the potential development area, will encourage the use of alternative modes of transport to the private car and promote public transport use. The delivery of a bus only route also has the potential to enhance the reliability of bus networks in the wider area through enabling routes to avoid congested areas on The Ridge. Option Har2 also has the potential to support sustainable transport use through implementing design and layout which supports permeability by walking and cycling and which facilitates new bus routes.</p> <p>A lower density development taken forward through Option Har3, is less likely to encourage permeability within new development areas. In this respect the option will deliver a lower density development which would potentially incorporate a cul-de-sac or similar approach to housing provision at the sites. It would also deliver a less coordinated approach to transport provision at this location. This has lower potential to deliver development which encourages the use of alternative modes of transport to the private car.</p>			

Appraisal of options for housing delivery at Bohemia

- 5.14 The Bohemia area of the town has been identified as a key potential location for housing. Potential options include an option which focuses housing in the northern parts of the area (north of Bohemia Road) and an option which focuses housing on the areas to the south of Bohemia Road, including within the area known as 'The Oval' and locations west of Falaise Road.
- 5.15 In this context two options have been considered through the SA process, which seek to consider the relative merits of focusing housing growth in these two areas.
- 5.16 The two options are as follows:
- **Option B1:** Deliver new housing in the northern part of the Bohemia area.
 - **Option B2:** Deliver new areas of housing south of Bohemia Road, including within the area known as 'The Oval' and west of Falaise Road.
- 5.17 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.
- 5.18 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, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.3: Appraisal of options for housing delivery at Bohemia

Option B1: Deliver new housing in the northern part of the Bohemia area.

Option B2: Deliver new areas of housing south of Bohemia Road, including within the area known as 'The Oval' and west of Falaise Road.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		B1	B2
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, with benefits for air quality.	=	=
Biodiversity	The areas covered by the options do 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.	?	?
Energy and Water Consumption	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.	=	=
Climate Change Adaptation, Flooding and Coastal Change	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. 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. 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. 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.	=	=

Option B1: Deliver new housing in the northern part of the Bohemia area.

Option B2: Deliver new areas of housing south of Bohemia Road, including within the area known as ‘The Oval’ and west of Falaise Road.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		B1	B2
Population, Health and Wellbeing	<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>In terms of the ability of the options to deliver a range of types and tenures of housing, this depends on the Local Plan policies in this regard. Whilst housing in the southern part of the area may have some the potential to deliver higher value and (less affordable) homes given sea views and other similar considerations, this will depend on the policy provisions of the Local Plan with regards to housing.</p>	?	?
Heritage	<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 B1 and B2 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 setting of the features associated with the Former Convent of Holy Child Jesus and St Michael’s Church. However, Option B2 may have increased potential to lead to direct impacts on this area of heritage significance through the likelihood of impact on the setting of these heritage assets.</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 B1 has the potential to lead to impacts on the setting of the northern part of White Rock Gardens.</p> <p>Option B2’s focus on delivering housing to the southern part of Bohemia also has the potential to impact on wider views in 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 B1 has the potential to lead to some impacts on the historic environment in the north of the area, overall Option B2 increases the scope for significant impacts on the fabric and setting of the historic environment and townscape character.</p>	1	2
Land and Water Quality	<p>Whilst both Option B1 and Option B2 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>	=	=

Option B1: Deliver new housing in the northern part of the Bohemia area.

Option B2: Deliver new areas of housing south of Bohemia Road, including within the area known as ‘The Oval’ and west of Falaise Road.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		B1	B2
Natural Landscape	The delivery of housing through the two options has the potential to impact on townscape character locally, including through the loss of open space. Impacts however depend on the design and layout of new development and the integration of high-quality green infrastructure provision. Impacts on the historic environment have been discussed above.	=	=
Skills, Employment and Economic Development	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.	=	=
Transport	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.	=	=

Appraisal of options for Horntye

- 5.19 The current Local Plan allocates land for housing at part of Horntye Sports Centre (including the Cricket Ground) for 115 homes. The Regulation 18 consultation version of the Hastings Town Centre and Bohemia Area Action Plan subsequently increased this to 250 homes and increased the area proposed for development.
- 5.20 Given this development has not progressed to date, HBC would like to explore alternative uses for the site as part of the current Local Plan development process.
- 5.21 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)
- 5.22 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.
- 5.23 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 ‘3’ the least favourable ranking. Where an ‘=’ is denoted in the appraisal, a comparable ranking is anticipated, and a ‘?’ denotes an uncertain ranking.

Table 5.4: 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
Air Quality	<p>Horntye is in a relatively accessible location, connected by bus routes and pedestrian networks.</p> <p>Housing and employment provision at this location facilitated through Option HT2 has the potential to increase traffic levels. Employment provision taken forward through Option HT3 (depending on the type of 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>	?	?	?
Biodiversity	<p>Whilst the Horntye site is located adjacent to Summerfields Woods, which comprises a significant area of deciduous woodland BAP 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.</p> <p>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.</p>	1	2	2
Energy and Water Consumption	<p>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.</p>	1	2	2

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
Climate Change Adaptation, Flooding and Coastal Change	The site is not at significant risk of flooding. In terms of fluvial flood risk, the whole site is within a very low risk of flooding, means that each year this area has a chance of flooding of less than 0.1%. Very limited parts of the southern section of the site are at medium risk of surface water flooding. However, it is not possible to differentiate between the options in terms of contribution to wider flood risk (including surface water flood risk) given this depends on the location of development and the incorporation of mitigation measures such as sustainable drainage systems, green infrastructure provision and similar. 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 adapting to the effects of climate change, this also depends on the provision of appropriate infrastructure alongside new development, such as green infrastructure provision and appropriate design and layout. As such, it is not possible to differentiate between the options with regards to climate change adaptation.	=	=	=
Population, Health and Wellbeing	Both Options HT2 and HT3 would require the re-provision of a key sports facility in the Borough. 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. Whilst employment land may support economic vitality, the location is less accessible than other locations in the town centre 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. 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. 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.	2	1	3

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
Heritage	<p>The Ice House, which is Grade II listed, is located within the south eastern part of the potential development area. This comprises a C19th ice house consisting of a semi-subterranean single beehive-shaped chamber measuring 3.7m built into a north facing bank. The location is not otherwise within an area of significant historic interest.</p> <p>The delivery of housing and employment through Options HT2 and HT3 has potential to impact on the townscape character of the surrounding residential areas, including the St Pauls and Amherst Road area.</p> <p>Impacts however depend on the design and layout of new development and the integration of high quality green infrastructure provision.</p>	1	2	3
Land and Water Quality	<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. However, a large proportion of the site is former landfill, with potential contamination issues associated with this former use.</p>	2	1	1
Natural Landscape	<p>The delivery of housing and employment development has the potential to impact on townscape character locally, including through the loss of open space. Impacts however depend on the design and layout of new development and the integration of high-quality green infrastructure provision.</p>	1	2	2
Skills, Employment and Economic Development	<p>Population growth in the area stimulated by Option HT2's promotion of housing growth has the potential to support economic vitality locally, including the local centre of Bohemia Road. This includes through increasing the local market for goods and services and improving the community vitality of the area.</p> <p>Whilst employment growth at this location through Option HT3 may contribute to increasing economic opportunities, the option 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
Transport	<p>Horntye is in a relatively accessible location, connected by bus routes and pedestrian networks.</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>	?	?	?

Appraisal of options for leisure provision

- 5.24 Summerfields Leisure Centre is a key leisure facility in the Borough. The nearby Falaise Fitness Centre and the existing underutilised outdoor facilities (including tennis courts) at White Rock Gardens provide more local appeal. In this context there is the potential for the reconfiguration, consolidation and improvement of leisure facilities in the area.
- 5.25 A key decision therefore is whether or not to deliver a new 'super-facility' which would consolidate and expand existing uses and support viability.
- 5.26 To explore these elements 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
- 5.27 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.
- 5.28 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, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.5: Appraisal of options for leisure provision

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		L1	L2	L3
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.	=	=	=
Biodiversity	The likely locations for development through Options L1-L3 are not in areas of significance for biodiversity interest. Whilst Summerfields Leisure Centre is located close to Summerfield Woods, which comprises a significant area of deciduous woodland BAP 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. Similarly, the likely location of a new consolidated purpose-built leisure facility south 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.	=	=	=

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
Energy and Water Consumption	<p>With regard to climate change mitigation, the sustainability performance of leisure provision 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). For example, a new purpose built facility through Option L3 however may provide opportunity to create a hub for CHP linked to a district heat network.</p> <p>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>	=	=	=
Climate Change Adaptation, Flooding and Coastal 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.</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>	3	1	1
Population, Health and Wellbeing	<p>There is significant opportunity for an upgrading of current leisure provision in the 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.</p> <p>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 and health/wellbeing of residents, and improve the vitality of this part of Hastings.</p>	3	2	1

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
Heritage	<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 south 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>	?	?	?
Land and Water Quality	<p>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.</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	2
Natural Landscape	<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 south of Bohemia Road. The option also has the potential to lead to impacts on the setting of White Rock Gardens.</p> <p>Effects on local townscape/landscape character 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>	?	?	?

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
Skills, Employment and Economic Development	<p>Enhancements to leisure and recreational provision in the 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
Transport	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.	?	?	?

Appraisal of options for town centre parking zones

- 5.29 Hastings town centre is well connected by public transport links. In addition to the railway station, the town centre is the key node for the town's bus network. Many of the key services and facilities in the Borough are also accessible from the town centre.
- 5.30 In light of this, HBC would like to explore alternative options for the delivery of parking provision alongside new residential and office development in the town centre. This includes an option for restricting new parking provision, with a view to supporting sustainable transport use.
- 5.31 The options considered through the SA process are therefore as follows:
- **Option PZ1:** Apply parking standards in the town centre at current ESCC standards
 - **Option PZ2:** No new parking (excluding disabled parking) to be provided alongside residential or office development within 400m of the square outside of Hastings railway station. Unless it is demonstrated that car parking is necessary for deliverability, new development should deliver fewer than one space per home overall.
- 5.32 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes and use the SA Framework set out above.
- 5.33 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 more favourable ranking and '2' the less favourable ranking. Where an '=' is denoted in the appraisal, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.6: Appraisal of options for town centre parking zones

Option PZ1: Apply parking standards in the town centre at current ESCC standards.

Option PZ2: No new parking (excluding disabled parking) to be provided alongside residential or office development within 400m of the square outside Hastings railway station.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		PZ1	PZ2
Air Quality	<p>The restriction of parking spaces in accessible locations such as the town centre can stimulate modal shift away from use of the private car towards use of active modes of transport (walking, cycling) and public transport (bus, train).</p> <p>However, in some cases, residents and those using offices may respond to a restricted number of parking spaces by parking on roads with fewer restrictions in locations just outside the core town centre area (such as Clive Vale, Upper Bohemia or the West Hill), which can also cause problems in respect of localised traffic congestion. In terms of air quality, increased stop-starts can lead to increased air pollution.⁹</p> <p>It is also noted that applying parking standards through Option PZ1 may support the shift towards Electric Vehicles (EVs), as EVs benefit from designated parking spaces with access to a charging point. Given they produce negligible emissions, any increase in the uptake of EVs will help support air quality locally. It should be noted though that, given the high deprivation levels present locally, the cost of EVs may be prohibitive in the short and medium term for many of those living in the town centre.</p>	1	2
Biodiversity	<p>Delivering limited new parking in Hastings town centre through Option PZ2 may lead to more land being made available for other uses, including green infrastructure which may support ecological networks in the area.</p>	2	1

⁹ Zhang K, Batterman S. Air pollution and health risks due to vehicle traffic. *Sci Total Environ.* 2013;450-451:307-316. doi:10.1016/j.scitotenv.2013.01.074 [online] available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4243514/>

Option PZ1: Apply parking standards in the town centre at current ESCC standards.

Option PZ2: No new parking (excluding disabled parking) to be provided alongside residential or office development within 400m of the square outside Hastings railway station.

Energy and Water Consumption	<p>Hastings town centre is particularly accessible given the presence of the railway station, bus services, and services and facilities locally. In this respect, the restriction of parking spaces through Option PZ2 can stimulate modal shift away from use of the private car towards use of active modes of transport (walking, cycling) and public transport (bus, train), supporting a reduction of energy use from transport. Option PZ2 may also lead to more land being made available for other use, including green infrastructure provision. This has the potential to increase the percentage cover of natural carbon sequesters located within the town centre environment (e.g. trees, shrubs and other green landscaping approaches), with the potential to positively contribute to climate change mitigation efforts. However, this is dependent on the design of new development areas.</p> <p>It is also noted that meeting parking standards in the town centre through Option PZ1 may support the shift towards Electric Vehicles (EVs), as EVs benefit from designated parking spaces with access to a charging point. Given they produce negligible emissions, an increase in EVs will help lead to positive effects in the short, medium and long term with regards to energy use and climate change mitigation. It should be noted though that, given the high deprivation levels present locally, the cost of EVs may be prohibitive in the short and medium term for many of those living in the town centre.</p>	2	1
Climate Change Adaptation, Flooding and Coastal Change	<p>In terms of adapting to the effects of climate change, Option PZ1 has the potential to perform less positively in terms of flood risk due to the option's increased delivery of impermeable hard-standing and its likely contribution to surface water run-off (depending on development management policies). In this respect, Option PZ1 has increased potential to exacerbate flood risk issues that may be present locally, including areas of land within proximity to Queen's Road and along the A259 (e.g. Carlisle Parade and Denmark Place) which are within Flood Zone 2 and 3.</p> <p>Limiting parking provision in the town centre through Option PZ2 may lead to more land being made available for other uses, including green infrastructure provision. This has the potential to positively respond to the potential effects of climate change (particularly from extreme weather events), including through reducing surface water run-off and limiting the urban heat island effect.</p>	2	1

Option PZ1: Apply parking standards in the town centre at current ESCC standards.

Option PZ2: No new parking (excluding disabled parking) to be provided alongside residential or office development within 400m of the square outside Hastings railway station.

Population, Health and Wellbeing	<p>It is recognised that parking is a sensitive and contentious area for many communities.</p> <p>Option PZ2 will enable the planning of new residential and office development to influence behaviour, as part of wider packages to encourage modal shift and promoting walkable neighbourhoods within the town centre environment. Hastings town centre is particularly accessible given the presence of the railway station, bus services, and services and facilities locally. In this respect, Option PZ2 will do more to support health and wellbeing through promoting active modes of travel.</p> <p>In some cases, residents and those working in offices may respond to a restricted number of parking spaces by parking on roads with fewer restrictions in locations just outside the core town centre area (such as Clive Vale, Upper Bohemia or the West Hill). This can cause problems in respect of localised traffic congestion (impeding both safe cyclists and walkers – including those with mobility challenges i.e. mobility scooters and wheelchair users), road safety issues, and public realm impacts.</p> <p>Applying existing parking standards in the town centre through Option PZ1 recognises that where car use is necessary, it may be appropriate to maintain standards to support communities and businesses, supporting accessibility.</p> <p>While it is difficult to differentiate between the two options it is considered that Option PZ2 has the most potential to support the quality of life and health of residents in the town centre, supporting active/sustainable travel. However, the approach may also lead to a number of disbenefits which would need to be considered if such an approach was progressed.</p>	2	1
Heritage	<p>Hastings town centre a large concentration of heritage assets. In this respect, Option PZ2 may support the setting of the historic environment through limiting parking provision, reducing the impact of parking on the built environment. However, Option PZ2 may lead to increased pressures on the setting and fabric of the historic environment through an increased prevalence of on-street parking, particularly on roads with fewer restrictions in locations just outside the core town centre area (such as Clive Vale, Upper Bohemia or the West Hill). In addition, the delivery of parking standards through Option PZ1 has the potential to enable the more effective management of parking provision, which better responds to local historic environment constraints.</p>	?	?
Land and Water Quality	<p>Limiting new parking provision in developments in the town centre through Option PZ2 may lead to more land being made available for other uses, including green infrastructure provision. This will directly help promote and protect natural resources, including the promotion of green networks in new development areas and the protection and enhancement of key natural features in the townscape. This will help support the capacity of the landscape and townscape to regulate soil and water quality. Option PZ1 performs less positively in terms of land and water resources due to its potential to increase the requirement for land take for parking provision within Hastings town centre.</p>	2	1
Natural Landscape	<p>Neither option has the potential to directly impact on landscape character, given they would apply parking standards to the town centre.</p>	=	=

Option PZ1: Apply parking standards in the town centre at current ESCC standards.

Option PZ2: No new parking (excluding disabled parking) to be provided alongside residential or office development within 400m of the square outside Hastings railway station.

Skills, Employment and Economic Development	The application of parking standards through Option PZ1 increases the potential to deliver parking which meets specific economic needs for employment areas within the town centre. This includes through enabling a consideration of the likely accessibility needs of each location and its economic function. In a similar context, Option PZ2 has the potential to limit opportunities for the effective management of parking to meet specific economic needs. However, through limiting the impacts of traffic, congestion and parking provision, the option has the potential to help support the vitality of parts of the town centre. This includes through supporting enhancements to the quality of the public realm and townscape.	?	?
Transport	<p>Hastings town centre is particularly accessible given the presence of the railway station, bus services, and services and facilities locally. In this respect the restriction of parking spaces in this accessible location through Option PZ2 has the potential to stimulate modal shift away from use of the private car towards the use of active modes of transport (walking, cycling) and public transport (bus, train). This option therefore offers an opportunity to influence behaviour as part of wider packages to encourage modal shift and promoting walkable neighbourhoods in the town centre.</p> <p>With regard to Option PZ2, in some cases, residents may respond to a restricted number of parking spaces by parking on-street, which may lead to issues in respect of localised traffic congestion, particularly on roads with fewer restrictions in locations just outside the core town centre area (such as Clive Vale, Upper Bohemia or the West Hill). While it is recognised that providing private parking spaces within new development areas would reduce potential for bottlenecking along streets (and subsequent congestion), this may also facilitate increased day-to-day private vehicle use.</p> <p>Overall therefore, Option PZ2 will do more to encourage sustainable transport use.</p>	1	2

Appraisal of options for affordable housing provision

- 5.34 Affordable housing provision in Hastings continues to be a significant issue for the Borough. In 2017 median house prices were at 9.33 times annual income and while there is a strong private rental sector with rental levels amongst the lowest in the region, rent levels are rising and there remains a need to provide for a range of housing options. Reflecting these issues, demand for affordable housing is in the region of 360 homes per year to 2039, which is significantly higher than the land available to deliver this number under current affordable housing policies.¹⁰
- 5.35 A key issue for affordable housing delivery is viability. Some parts of the Borough have a challenging viability context for the delivery of affordable housing provision. In response to this, a higher proportion of private homes for sale may be more appropriate to deliver in these areas. Likewise, in the parts of the Borough where sales values are highest, and viability strongest, there may be an opportunity to introduce a greater amount of affordable housing.
- 5.36 With a view to potentially increasing the delivery of affordable housing provision, the SA process has explored two options. The first option would be to continue to take forward a Borough-wide approach to affordable housing provision. An alternative option would be to deliver a zoning-style approach to affordable housing provision, which would seek to target elevated levels of provision in locations where there is most need, with lower levels of provision where viability is a significant issue.
- 5.37 On this basis, the options considered through the SA process are as follows:
- **Option H1:** Take forward a Borough-wide approach to affordable housing provision.
 - **Option H2:** Deliver a zoning approach to the delivery of affordable housing provision.
- 5.38 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes and use the SA Framework set out above.
- 5.39 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 less favourable ranking. Where an '=' is denoted in the appraisal, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.7: Appraisal of options for affordable housing provision

Option H1: Take forward a Borough-wide approach to affordable housing provision.

Option H2: Deliver a zoning approach to the delivery of affordable housing provision.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		H1	H2
Air Quality	The significance of effects through both options depends on the design and layout of new development areas and the integration of features which support air quality improvements (e.g. trees, shrubs and other green landscaping approaches for carbon sequestration and supporting the ability of natural processes to dissipate pollutants, and enhancing and extending multi-functional green infrastructure networks to support a modal shift to sustainable transport methods). As such, if all housing provision - including affordable housing - seeks to integrate these elements, then there should be no difference between the options in terms of air quality impacts.	=	=

¹⁰ Hastings Borough Council and Rother District Council Housing and Economic Development Need Assessment, GL Hearn, August 2020, page 111

Option H1: Take forward a Borough-wide approach to affordable housing provision.

Option H2: Deliver a zoning approach to the delivery of affordable housing provision.

Biodiversity	The significance of effects through both options depends on the design and layout of new development areas and the integration of infrastructure which supports ecological networks in the area. As such, if all housing provision - including affordable housing - seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.	=	=
Energy and Water Consumption	Both options are unlikely to lead to significant effects on greenhouse gas emissions if energy efficiency measures are integrated within all types of housing provision. There should also be no difference between the options in terms of water efficiency if similar water efficiency measures are implemented in both affordable and market housing. In terms of the wider elements relating to climate change mitigation, this also depends on the provision of appropriate infrastructure alongside new housing, such as green infrastructure provision, and appropriate design and layout.	=	=
Climate Change Adaptation, Flooding and Coastal Change	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.	=	=
Population, Health and Wellbeing	Option H1, through meeting affordable housing needs via a Borough-wide approach, will help residents access a wider range of housing types, sizes and tenures. This will support the quality of life of residents and support the vitality and cohesiveness of communities. However, given the challenging viability context for the delivery of affordable housing provision in some parts of the Borough, initiating a zoning approach through Option H2 has increased potential to deliver affordable housing more effectively. A flexible approach may also help rejuvenate and regenerate certain areas of the Borough through helping to support the viability of particular types of development by reducing the requirement to deliver affordable housing provision. Option H2 may also help support an increased delivery of affordable housing in the locations where it is more viable to do so.	2	1
Heritage	In terms of Options H1 and H2, if all housing provision - including affordable housing - is appropriately located and sensitive to heritage assets, then there should be no difference between the options in terms of the setting of the historic environment. Effects depend on the design and layout of new development areas, the retention of distinct features contributing to local distinctiveness, the location of development in relation to key features and buildings in the area, the integration of high quality green infrastructure provision, and the extent to which proposals rejuvenate and regenerate areas of poor quality townscape and deprivation. However, a flexible approach to affordable housing provision may have additional potential to support enhancements to features and areas of historic environment interest. This includes by helping to support the viability of rejuvenating heritage assets through reducing the requirement to deliver affordable housing provision. This may be particularly applicable in the town centre, where the largest concentration of the Borough's heritage assets are situated.	2	1

Option H1: Take forward a Borough-wide approach to affordable housing provision.

Option H2: Deliver a zoning approach to the delivery of affordable housing provision.

Land and Water Quality	<p>Both options have the potential to facilitate a proportion of dwellings on greenfield land, depending on the scale and location of new development areas. There is not likely to be any significant differences between Option H1 or Option H2 in this respect, particularly as the Borough is mostly urban in character.</p> <p>In terms of water quality, it is difficult to establish 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. For example, sustainable drainage systems (SuDS) are an effective means of minimising surface water run-off and hence pollution.</p>	=	=
Natural Landscape	<p>In terms of Options H1 and H2, if all housing provision - including affordable housing - is appropriately located and sensitive to local character and natural landscape features, then there should be no difference between the options. Effects depend on the design and layout of new development areas, the retention of distinct features contributing to local distinctiveness, the location of development in relation to the setting of the High Weald AONB, the integration of high quality green infrastructure provision, and the extent to which proposals rejuvenate and regenerate areas of poor quality townscape and deprivation. As such, it is not possible to differentiate the options in terms of potential effects on the natural landscape.</p>	=	=
Skills, Employment and Economic Development	<p>The implementation a more flexible approach to affordable housing provision through Option H2 has the potential to support the regeneration of more deprived areas in the Borough through enhancing the viability of development proposals in these locations. This has the potential to support local vitality, with associated benefits for community and economic vitality.</p>	2	1
Transport	<p>There is unlikely to be a significant differentiation between the options in relation to this SA theme since the performance of the options will depend on the location of affordable housing provision and the delivery of infrastructure alongside such provision.</p>	=	=

Appraisal of options for green infrastructure provision

- 5.40 In recent years there has been a concern that new development in parts of the town, in particular in the town centre, has not been delivered with an accompanying level of green infrastructure provision.
- 5.41 With a view to further supporting green infrastructure delivery in the Borough, HBC would like to explore the possibility of applying an Urban Greening Factor approach on more tightly constrained urban brownfield sites.
- 5.42 Urban Greening Factor is a tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides to inform decisions about appropriate levels of greening in new developments. The purpose of this approach would be to provide an appropriate target for sites to deliver the greening of new developments.
- 5.43 In light of the above, the SA process has considered two options, as follows.
- **Option UG1:** Continue the approach to green infrastructure provision facilitated through Policy HN7 of the Development Management Plan.
 - **Option UG2:** Apply an urban greening factor for brownfield development sites.
- 5.44 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes and use the SA Framework set out above.
- 5.45 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 less favourable ranking. Where an '=' is denoted in the appraisal, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.8: Appraisal of options for green infrastructure provision

Option UG1: Continue the approach to green infrastructure provision facilitated through Policy HN7 of the Development Management Plan.

Option UG2: Apply an urban greening factor for brownfield development sites.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		UG1	UG2
Air Quality	<p>The purpose of the Urban Greening Factor (UGF) is to ensure that appropriate greening measures are provided alongside new development, including through green infrastructure provision.</p> <p>Application of a UGF has the potential to bring a number of benefits for air quality; for example, trees in urban areas improve air quality by removing different types of air pollution, including particulate matter, sulphur dioxide, nitrogen dioxide and ozone.¹¹ Applying an UGF also encourages the greening of buildings. Green roofs and wall planting can similarly will improve air quality.</p> <p>In light of the above, whilst both options support air quality, it is considered that Option UG2 is best performing of the two options. This is significant in the context that development on more tightly constrained urban brownfield sites has not historically been delivered with an accompanying level of green infrastructure provision.</p>	2	1

¹¹ Forestry Research (2010) Benefits of Green Infrastructure [online] available at: https://www.forestryresearch.gov.uk/documents/2515/urqp_benefits_of_green_infrastructure.pdf

Option UG1: Continue the approach to green infrastructure provision facilitated through Policy HN7 of the Development Management Plan.

Option UG2: Apply an urban greening factor for brownfield development sites.

Biodiversity	<p>Applying a UGF approach to green infrastructure provision through Option UG2 would provide a specific target for brownfield sites to deliver an appropriate level of greening. This has the potential to deliver gains for biodiversity which are proportionate to the scale of development proposed.</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 is anticipated that a UGF approach could be developed to reflect the local circumstances in Hastings. For example, allowing specific biodiversity features to be prioritised in new development is likely to lead to long-term positive effects on Hastings' biodiversity resource.</p> <p>Under the existing Local Plan policy framework (Option UG1), the provision of green infrastructure "should be integrated into the design of new developments, where appropriate" (Policy HN7). However, new development on more tightly constrained urban brownfield sites has historically not been delivered with an accompanying level of green infrastructure. Providing a target for green infrastructure delivery through Options UG2 can therefore ensure that greening measures are integral to the planning of new development areas. This includes through an expectation on developers to set out the measures they have taken to achieve greening on-site and quantify their UGF score. It is considered that this will help achieve an appropriate standard of greening, and ensure that locally important biodiversity features are prioritised, retained, and enhanced.</p> <p>Overall, both options perform positively in terms of supporting the delivery of green infrastructure in Hastings which in turn will support species, habitats and ecological networks. However, in light of the above, it is considered that Option UG2 is best performing of the two options in relation to the biodiversity SA theme.</p>	2	1
Energy and Water Consumption	<p>Option UG2, through applying a UGF approach to major development sites, has the potential to increase the percentage cover of natural carbon sequesters located within the town centre environment (e.g. trees, shrubs and other green landscaping approaches). This is notable given that new development on more tightly constrained urban brownfield sites has sometimes not been delivered with an accompanying level of green infrastructure. Option UG1, whilst facilitating green infrastructure provision, does not necessarily guarantee that such provision will be delivered effectively, especially on tightly constrained urban brownfield sites.</p> <p>An UGF approach also has the potential to aid the capture, storage and release of water. This will support a limitation of water consumption in new development areas.</p>	2	1
Climate Change Adaptation, Flooding and Coastal Change	<p>In terms of adapting to the effects of climate change, applying a UGF approach (Option UG2) will promote urban greening and support the delivery of features such as green walls, green roofs, rain gardens and other sustainable drainage features (SuDS). Providing a target for green infrastructure delivery through Option UG2 can therefore ensure that greening measures are integral to the planning of new development areas. Option UG1, whilst facilitating green infrastructure provision, does not necessarily guarantee that such provision will be delivered effectively, especially on tightly constrained urban brownfield sites.</p>	2	1

Option UG1: Continue the approach to green infrastructure provision facilitated through Policy HN7 of the Development Management Plan.

Option UG2: Apply an urban greening factor for brownfield development sites.

Population, Health and Wellbeing	<p>It is considered that implementing a UGF approach for major development sites through Option UG2 could, drawing on application elsewhere, provide an additional contribution to supporting sustainable communities, improving quality of life for residents within new development.¹² In this respect applying a UGF approach for major development sites will accelerate greening of the built environment, delivering community benefits in the long-term.</p> <p>A UGF approach is anticipated to support green infrastructure delivery that is “planned, designed and managed in an integrated way to achieve multiple benefits”.¹³ This is likely to deliver numerous benefits in terms of residents’ mental and physical health and well-being.¹⁴ For example, applying a UGF approach (Option UG2) has the potential to support health through supporting air and noise quality enhancements.</p> <p>Under the existing Local Plan policy framework (Option UG1), “new green infrastructure provided as part of a development scheme should create safe links for the community and connectivity for biodiversity” (Policy HN7). This is also likely to support health and wellbeing through stimulating active modes of travel (i.e. walking and cycling) and encouraging healthier lifestyles.</p> <p>Overall however, it is considered that securing the benefits of greening through applying a UGF approach on brownfield development sites can make a greater contribution to supporting healthy, sustainable communities. This is significant in the context that new development on more tightly constrained urban brownfield sites has sometimes historically not been delivered with an accompanying level of green infrastructure. Option UG2 is therefore considered the best performing of the two options in relation to this SA theme.</p>	2	1
Heritage	<p>Applying an UGF through Option UG2 can have beneficial impacts in terms of the quality of the public realm and built environment. In addition to supporting enhancements to the setting of features and areas of historic environment interest, it has the potential to support the quality of historic townscapes in the Borough. This is pertinent given the character of the Borough has historically been framed by the delivery of parks, open spaces and trees and vegetation alongside new development as an integral part of the built environment.</p> <p>It is noted that applying a UGF to historic environments can be difficult at times due to historic sensitivity; e.g. a green roof is unlikely to be appropriate on a historic building where it would not be sympathetic to its character.¹⁵ However, a UGF approach is designed to be flexible on how the target is reached and incentivises high quality greening, rather than quantity, thereby lending itself to implementation in sensitive settings.</p> <p>Overall, Option UG2 is considered to be best performing in relation to the historic environment. This is given development taken forward through this option could potentially do more to improve the setting of the historic environment on brownfield development sites.</p>	2	1

¹² The Ecology Consultancy (2017) Urban Greening Factor For London: Research Report [online] available at: https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

¹³ Mayor of London (2019) London Plan Intend to Publish [online] available at: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf

¹⁴ Major of London (2017) Natural Capital Account for London [online] available at: <https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/green-infrastructure/natural-capital-account-london?source=vanityurl>

¹⁵ Historic England (2015) Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency [online] available at: <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

Option UG1: Continue the approach to green infrastructure provision facilitated through Policy HN7 of the Development Management Plan.

Option UG2: Apply an urban greening factor for brownfield development sites.

Land and Water Quality	Both options support the provision of green infrastructure, potentially delivering ecosystem services relating to this SA theme including soil formation, flood and erosion protection and water quality regulation. However, it is considered that the application of an UGF approach through Option UG2 has additional potential over Option UG1 to deliver benefits on brownfield development sites given the targeted approach it proposes. Option UG2 is therefore considered best performing of the options.	2	1
Natural Landscape	Option UG1, whilst facilitating green infrastructure provision, does not necessarily guarantee that such provision will be delivered effectively, especially on tightly constrained urban brownfield sites. Providing a target for green infrastructure delivery through Option UG2 can therefore ensure that greening measures are integral to the planning of new development areas. As such, it is considered that the additional application of a UGF approach through Option UG2 would perform more positively through increasing the level of greening that is delivered on brownfield development sites. For example, biodiversity features (trees, grass, shrub, etc.) can assist in landscape buffering, provide screening to restrict undesirable views, contribute towards sense of place and local distinctiveness, and deliver public realm improvements. While positive effects in this respect may be delivered through Option UG1, Option UG2 has the potential to secure additional benefits in terms of green infrastructure delivery.	2	1
Skills, Employment and Economic Development	The implementation a more proactive approach to green infrastructure provision through Option UG2 has the potential to have particular benefits for those locations where the delivery of green infrastructure and open space provision has been a key issue (such as within the town centre). This will support the wider economic and community regeneration of these areas by delivering public realm improvements and townscape enhancements.	2	1
Transport	The increased provision of green infrastructure on brownfield development sites through Option UG2 has the potential to enhance permeability by walking and cycling, with benefits for the quality of local active travel networks. Whilst both options support green infrastructure provision, it is considered that Option UG2 is likely to be best performing of the two options in this regard.	2	1

Appraisal of options for biodiversity net gain

- 5.46 At present, Biodiversity Net Gain is required by local and national planning policy. This is accompanied by the provisions of the Environment Bill, expected to be enacted later in 2021, which sets out a mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.
- 5.47 With a view to helping to support enhancements to habitats, species and ecological networks in the Borough, HBC would like to explore the possibility of extending the 10% provision through introducing a requirement through the Local Plan which delivers a higher figure for biodiversity net gain on major development sites.
- 5.48 In light of the above, the SA process has considered two options, as follows:
- **Option NG1:** Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.
 - **Option NG2:** Seek to deliver net gain which exceeds the minimum 10% target on major development sites.
- 5.49 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes and use the SA Framework set out above.
- 5.50 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 less favourable ranking. Where an '=' is denoted in the appraisal, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.9: Appraisal of options relating to Biodiversity Net Gain

Option NG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.

Option NG2: Seek to deliver net gain which exceeds the minimum 10% target on major development sites.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		NG1	NG2
Air Quality	With respect to air quality, whilst Option NG1 will provide benefits, Option NG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG). In this respect the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution, including particulate matter, sulphur dioxide, nitrogen dioxide and ozone. BNG can also deliver air quality benefits at the microscale. For example, the introduction of green walls and roofs trap pollutants which in turn deliver cleaner air. As such, an increased requirement for net gain through Option NG2 has additional potential to lead to positive effects in relation to air quality.	2	1
Biodiversity	BNG approaches include habitat creation and avoided habitat loss, notably through steering development towards the least environmentally damaging areas and design practice. Through introducing an increased net gain requirement, Option NG2 would therefore contribute most positively towards the 25 Year Environment Plan's ¹⁶ commitment to protecting and restoring nature. In many cases a 10% uplift in biodiversity where the previous baseline is zero (for example often seen on brownfield sites) provides limited benefit.	2	1

¹⁶ Department for Environment, Food and Rural Affairs (2019) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

Option NG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.

Option NG2: Seek to deliver net gain which exceeds the minimum 10% target on major development sites.

In this respect the Chartered Institute of Ecology and Environmental Management (CIEEM) argue that 10% may be within the margin of error for the valuation of habitats, and it may be too low to deliver real benefits; at most it might achieve no net loss.¹⁷

A requirement for 10% net gain (Option NG1) would therefore lead to greater uncertainty over whether BNG would, in practice, be achieved at the site rather than the landscape scale.

In the Hastings context, many species of conservation interest in the Borough are separated from other patches of suitable habitat which exceed their normal dispersion capabilities. Creating a more interconnected network of habitats allows species to expand their range, counteracting the ongoing trend for habitat fragmentation and adapting to the threats of climate change. A requirement to demonstrate a higher level of net gain (Option NG2) will likely provide greater certainty in terms of ensuring existing habitat is retained where possible and habitats and ecological connections enhanced. The obligation to deliver an increased level of net gain in biodiversity is also more likely to ensure that mitigation and compensation measures are adequately considered in relation to development, which may in some cases result in the need for offsite compensation. A stronger approach to NG will also help to fund opportunities to work towards rebuilding the wider natural environment through the development of Nature Recovery Networks in Hastings, East Sussex and regionally.

It is noted though that securing a higher net gain requirement could be difficult to achieve on major development sites where the site is more ecologically sensitive, or where the loss of higher value habitats is unavoidable. This would be likely to significantly increase the demand for habitat banks and biodiversity offsetting, and may lead to disproportionate implications for the viability of particular development types.

Overall though, Option NG2 is considered to be the best performing in terms of improving and enhancing Hastings' biodiversity resource.

Energy and Water Consumption	The delivery of biodiversity net gain through green infrastructure enhancements may have indirect effects on supporting climate change mitigation through safeguarding and enhancing natural carbon sequesters located within the townscape (e.g. trees, shrubs and other green landscaping approaches). It also offers the potential to deliver ecosystem services that will support water resources. However, in terms of direct effects in relation to energy and water consumption, there are likely to be limited effects from the increased provision of Biodiversity Net Gain through Option NG2.	2	1
Climate Change Adaptation, Flooding and Coastal Change	As highlighted by the NPPF, well planned green infrastructure can help an area adapt to, and manage the risks of climate change (including flood risk). The provision of green infrastructure within new developments can support flood risk management through the provision of permeable surfaces and the introduction of sustainable drainage systems (SuDS). In this respect, Option NG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain.	2	1
Population, Health and	From a development viability perspective, Option NG1 seeks a requirement for biodiversity net gain which is in line with figures which respond to the evidence available, and is therefore not expected to have	2	1

¹⁷ CIEEM (2019) Defra Biodiversity Net-Gain Consultation Response Document [online] available at: <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

Option NG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.

Option NG2: Seek to deliver net gain which exceeds the minimum 10% target on major development sites.

Wellbeing	<p>adverse impacts on development and infrastructure delivery. Under Option NG2, there is potential for this stricter requirement to affect the viability of new developments, potentially reducing the overall rate of housing and employment delivery. The implications of BNG on the viability of development is likely to be disproportionate for certain development types, for example public service infrastructure and redevelopment of post-industrial developed land.¹⁸ Risks are uncertain. While further evidence is required to understand the scale of the risk involved in Hastings, it is noted that elsewhere Lichfield District Council requires a net gain of 20% on new development, and experience there to date suggests that developers are able to meet this requirement and often achieve much greater levels of biodiversity net gain. Otherwise, attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. 'Green' neighbourhoods are also more desirable places to live, with access to green space found to markedly increase property values. The Office for National Statistics (2019) estimates that green and blue space add £2,813 to the price of the average house in Great Britain, and this is likely to increase in light of Covid-19 and the increased value placed on accessible green space.¹⁹ Biodiversity is of intrinsic value to people through supporting healthy lifestyles, however development often makes a significant contribution to land use change and to the loss of natural habitats that reduces biodiversity.²⁰ The 25 Year Environment Plan recognises this, acknowledging that there is unequal access to nature and green spaces, and therefore sets out commitments to better connect people with the environment to improve health and wellbeing.²¹ It is therefore considered that delivering a higher net gain requirement (Option NG2) provides an increased opportunity to facilitate the wider social and wellbeing benefits that healthy ecosystems offer. An increased net gain requirement may also encourage developers to take a strategic approach to protecting, restoring and creating quality habitat that contributes towards a network of multifunctional green infrastructure. This can have significant wellbeing benefits, including providing open space, leisure and recreational opportunities which in turn support healthy and active lifestyles. Numerous mental and physical health benefits can be anticipated as a result; with the potential for significant positive effects in the long-term. In light of the above, it is considered that a higher net gain requirement (Option NG2) is anticipated to perform most positively of the two options.</p>	
Heritage	<p>Delivering net gains in biodiversity can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. With regards to Option NG2, the increased provision of green infrastructure that will be utilised in developments to facilitate a higher net gain in biodiversity has the potential to enhance and improve</p>	<p>2 1</p>

¹⁸ Department for Environment, Food and Rural Affairs (2019) Net gain: Summary of responses and government responses [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

¹⁹ ONS (2019) Urban green spaces raise nearby house prices by an average of £2,500 [online] available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/urbangreenspacesraisenearbyhousepricesbyanaverageof2500/2019-10-14>

²⁰ RSPB (2016) State of Nature UK Report [online] available at <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/state-of-nature/state-of-nature-uk-report-2016.pdf>

²¹ Department for Environment, Food and Rural Affairs (2019) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

Option NG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.

Option NG2: Seek to deliver net gain which exceeds the minimum 10% target on major development sites.

	<p>the quality of the public realm. In this respect enhancements to the built and natural environment supported by BNG has the potential to support the setting of the historic environment and contribute to historic landscape character.</p> <p>While positive effects in this respect may be delivered through Option NG1, these are likely to be less significant than the benefits under Option NG2.</p>		
Land and Water Quality	<p>Biodiversity enhancements have the potential to deliver a range of ecosystem services which will support land, soil and water resources. These include soil formation; flood and erosion protection; and water quality regulation. The provision of green infrastructure within new developments can further support soil and water quality through provision of permeable surfaces and the introduction of sustainable drainage systems (SuDS).</p> <p>Option NG2 is therefore likely to perform most positively in this respect given its increased net gain requirement.</p>	2	1
Natural Landscape	<p>Delivering net gains in biodiversity has the potential to help conserve and enhance landscape character, including its special qualities and sense of place. For example, enhanced habitats (trees, grass, shrub, etc..) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. They can also play a role in contributing towards local distinctiveness and a sense of place. While positive effects in this respect may be delivered through Option NG1, these are likely to be less significant than the benefits under Option NG2.</p> <p>However, it is recognised that BNG needs to be appropriately designed to reinforce the special qualities of a landscape. The design of BNG will therefore need to be sensitive to the surrounding landscape, and exercises in habitat restoration and creation should be carefully selected to complement existing character and setting.</p>	2	1
Skills, Employment and Economic Development	<p>Attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. 'Green' neighbourhoods are also more desirable places to live, with access to green space found to markedly increase property values. Wider benefits to the economy are similarly high, with biodiversity being a significant contributor to the economy. In this respect the Borough's various habitats and wildlife, whether found in urban or more rural greenspaces, bring substantial economic value through tourism and leisure.²²</p>	2	1
Transport	<p>Whilst with regards to Option NG2, the increased provision of green infrastructure that will be utilised in developments to facilitate a higher net gain in biodiversity has the potential to enhance and improve the quality of walking and cycling networks, the additional effects of further NG provision are likely to be negligible in this regard.</p>	=	=

²² Ecological Expertise, Evolved (Building Biodiversity Net Gain into Housing) https://assets.website-files.com/5e5fb414845bab39bfd2015f/5e6809ce13930fcb39f12bce_EPR-Report-NetGain-v01-compressed.pdf

Appraisal of options for energy efficiency standards

- 5.51 Current energy efficiency standards in England are led by the Building Regulations. The Building Regulations set standards for how buildings must be constructed or altered to achieve a minimum level of acceptable performance. The regulations apply mainly to new buildings and there is no general requirement for all existing buildings to be upgraded to meet these standards. However, certain alterations such as the change of use of the building or renewing some of its elements can trigger the need to comply with Building Regulations.
- 5.52 In terms of energy efficiency, due to national policy, there has recently been limited scope to set higher standards through development plans. As such current Local Plan policy in Hastings does not require standards higher than those of the current Building Regulations.
- 5.53 HBC however recognise that ensuring the highest possible standard of energy and thermal efficiency from new buildings is a key element of reducing Hastings' carbon footprint. In light of likely changes to national policy potentially to be introduced as part of planning reforms and elements such as the potential introduction of the Future Homes Standard, HBC would therefore like to consider introducing a requirement for higher energy efficiency standards for new development.
- 5.54 In response to the above, the SA process has considered two options, as follows:
- **Option EE1:** Continue with existing Local Plan policy, which does not currently require standards higher than those set out by the current building regulations.
 - **Option EE2:** Deliver higher energy efficiency standards than national standards, where possible in light of national policy.
- 5.55 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.
- 5.56 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 less favourable ranking. Where an '=' is denoted in the appraisal, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.10: Appraisal of options relating to energy efficiency

Option EE1: Continue with existing Local Plan policy, which does not currently require standards higher than those set out by the current building regulations.

Option EE2: Deliver higher energy efficiency standards than national standards, where possible in light of national policy.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		EE1	EE2
Air Quality	Whilst there is no direct link between higher energy efficiency standards and localised air quality in Hastings, Option EE2 may help reduce the need for (and limit emissions from) power generation, with benefits for air quality elsewhere. However, the difference between the options in this respect is negligible.	=	=
Biodiversity	Requiring new buildings to meet significantly higher targets for energy efficiency is unlikely to lead to significant effects on biodiversity. However, it is recognised that measures which support biodiversity such as green roofs and shading have a role to play in terms of thermal efficiency, in particular avoiding overheating in the summer and need for air conditioning. Given the commitment to higher standards, Option EE2 is considered to be best performing of the two options.	2	1

Option EE1: Continue with existing Local Plan policy, which does not currently require standards higher than those set out by the current building regulations.

Option EE2: Deliver higher energy efficiency standards than national standards, where possible in light of national policy.

Energy and Water Consumption	<p>Option EE2, through delivering higher standards than required by Option EE1, will do more to increase the energy efficiency of new homes in Hastings. This will help reduce energy consumption in new residential dwellings, supporting climate change mitigation.</p> <p>Option EE2, through seeking to deliver increased efficiency standards within new development, has increased potential to support a reduction in resource use. This includes from a likely increase in activities such as heat recovery, grey water recycling and on-site recycling.</p> <p>Option EE2 is therefore considered to be best performing of the two options.</p>	2	1
Climate Change Adaptation, Flooding and Coastal Change	<p>Higher energy efficiency standards proposed by Option EE2 are unlikely to lead to direct significant effects on climate change adaptation, including in relation to flood risk. However, it is recognised that measures associated with sustainable design (such as green roofs and shading) have a role to play in terms of adapting to the effects of climate change.</p>	2	1
Population, Health and Wellbeing	<p>The delivery of higher energy efficiency standards through Option EE2 will bring a range of benefits for the quality of life and health of residents. This is linked to the delivery of high quality, energy efficient housing, which will support good physical and mental health by creating healthy indoor living environments with healthy air temperatures, humidity levels, noise levels, and improved air quality. This has particular potential to benefit the health and wellbeing of groups with poor health, including older people or disabled people or those who suffer from fuel poverty.</p> <p>Whilst increased energy efficiency in new housing will bring a range of benefits for the quality of life of residents, there is potential for a stricter policy to affect the deliverability and viability of new developments. This could result in a reduction in the rate of housing delivery. However, the effects of this are uncertain as the rate of housing delivery will ultimately depend on a wider range of factors.</p>	2	1
Heritage	<p>Through the delivery of Option EE2 and a commitment to higher energy efficiency standards, it is recognised that there are opportunities and challenges in terms of the built historic environment. Notably, standards for refurbishment and conversion can typically be challenging, reflecting the fact that many buildings may be in conservation areas. Some buildings may be listed, and changes to the external appearance of buildings will be restricted by wider policy. However, there is advice available from Historic England²³ focusing on the challenges and opportunities for achieving energy efficiency in historic buildings and areas. This includes advice on secondary glazing, insulating solid walls and other interventions.</p> <p>It is therefore considered that while challenging, proposals can help to increase resilience of historic buildings to climate change, secure a sustainable future for designated and non-designated heritage assets and conserve and where appropriate enhance the design, character, appearance and historical significance of features and areas of historic environment interest.</p> <p>However, impacts from the options on the fabric and setting of the heritage assets depend on the detailed design, scale and layout of energy efficiency provision; as such it is not possible to differentiate</p>	?	?

²³ Historic England (2018) Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency [online] available at: <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

Option EE1: Continue with existing Local Plan policy, which does not currently require standards higher than those set out by the current building regulations.

Option EE2: Deliver higher energy efficiency standards than national standards, where possible in light of national policy.

	between the options in terms of potential effects on the historic environment.		
Land and Water Quality	Option EE2, through seeking to deliver increased energy efficiency standards within new development, has increased potential to support a reduction in resource use. This includes from a likely increase in activities such as heat recovery, grey water recycling and on-site recycling. Option EE2 is therefore considered to be best performing of the two options.	2	1
Natural Landscape	<p>Improving energy efficiency standards within buildings has the potential to impact both positively and negatively upon the character of the landscape and local distinctiveness. For example, a well-designed landscape or townscape can reduce heating and cooling costs through landscape features delivering effective shade and potentially acting as a windbreak.²⁴ The potential for positive effects in this respect is likely to be greater under Option EE2 given the higher requirement for energy efficiency. Conversely, energy efficiency measures that are poorly designed can adversely impact upon the character of the built environment, local distinctiveness and views. These effects are likely to exist both alone and in-combination with other development, and again have the potential to be greater under Option EE2 given efficiency standards would be higher.</p> <p>However, it is considered that through careful management, following appropriate guidance, energy efficiency can be delivered while ensuring that the important characteristics of the landscape are not unacceptably harmed.</p> <p>Overall, impacts from the options on the landscape depend on the detailed design, scale and layout of energy efficiency provision; as such it is not possible to differentiate between the options in terms of potential effects.</p>	?	?
Skills, Employment and Economic Development	The implementation of increased energy efficiency standards in the Borough though Option EE2 has the potential to support the 'green economy' locally. In addition to supporting employment opportunities, this will promote skills development.	2	1
Transport	Higher energy efficiency standards proposed by Option EE2 are unlikely to have significant implications with regard to accessibility and transport.	=	=

²⁴ U.S Department of Energy (date unknown) Landscaping For Energy Efficient Homes [online] available at: <https://www.energy.gov/energysaver/design/landscaping-energy-efficient-homes>

Appraisal of options for wind energy

- 5.57 The NPPF requires that wind energy development involving one or more turbines should not be considered acceptable unless they are in an area identified as suitable for wind energy development in the development plan.
- 5.58 The current Local Plan does not set out allocations or suitable areas for wind energy. Whilst current Local Plan policy would allow wind energy to be allocated through Neighbourhood Plans, this has not to date been a mechanism which has delivered significant wind energy provision in the Borough.
- 5.59 Given the potential contribution onshore wind energy can provide to mitigating climate change in Hastings, HBC would like to explore extending Local Plan provisions relating to onshore wind energy. This is with a view to providing an additional degree of certainty as to the locations which are likely to be appropriate for new wind energy provision in the Borough.
- 5.60 In light of this, the SA process has considered three options, as follows:
- **Option WE1:** Continue current Local Plan approach to wind power which would allow Neighbourhood Plans to allocate locations for wind power in the Borough.
 - **Option WE2:** Designate through the Local Plan 'suitable areas' for larger scale wind energy with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.
 - **Option WE3:** Designate specific sites for wind energy provision through the Local Plan with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.
- 5.61 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.
- 5.62 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, a comparable ranking is anticipated, and a '?' denotes an uncertain ranking.

Table 5.11: Appraisal of options for wind energy

Option WE1: Continue current Local Plan approach to wind power which would allow Neighbourhood Plans to allocate locations for wind power in the Borough.

Option WE2: Designate through the Local Plan ‘suitable areas’ for larger scale wind energy with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.

Option WE3: Designate specific sites for wind energy provision through the Local Plan with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		WE1	WE2	WE3
Air Quality	If managed appropriately, wind energy has the potential to reduce the use of fossil fuels for generating electricity, which in turn has the potential to reduce air pollution in other locations. ²⁵ However, the air quality benefits of onshore wind will vary by location, depending on the mix of existing energy sources. As such it is difficult to differentiate between the options.	?	?	?
Biodiversity	<p>Under all options, the construction of wind turbines has the potential to result in habitat and species disturbance and loss. Wind turbine operation and maintenance may disturb sensitive species, and there is a risk of bird and bat collision with moving blades and any additional overhead wires. Geological impacts can include loss of geological exposures, damage or obscuring of geomorphological features, disruption to geomorphological processes and a range of impacts on soils.²⁶ As such, effects from each option on features and areas of biodiversity and geodiversity interest largely depend on the detailed location, scale and nature of development and the incorporation of avoidance, mitigation and enhancement measures.</p> <p>While local planning policy provisions provide a level of protection to biodiversity, it is considered that a ‘suitable area’ approach to onshore wind development (Option WE2) may not capture all potential adverse effects. For example, broader areas of search may include protected and priority BAP habitats and species that are susceptible to the effects of wind turbines.²⁷ However, it is recognised that the identification of broader areas is only the beginning of the development process, and that impacts on biodiversity will be considered later at the planning application stage.</p> <p>In terms of Option WE3, it is considered that defining specific sites may restrict the likelihood for adverse effects through setting tighter development parameters. Similarly, it is considered that with regard to Option WE1, given any proposal coming forward through the option would be community-led, impacts on the natural environment would likely be a key consideration for residents when considering specific sites for allocation.</p>	=	=	=

²⁵ Lindenberg, S., B. Smith, K. O’Dell, E. DeMeo, and B. Ram. (2008) 20% Wind Energy by 2030: Increasing Wind Energy’s Contribution to U.S. Electricity Supply. U.S. Dept. of Energy, Office of Energy Efficiency and Renewable Energy Technical Report

²⁶ Natural England (date unknown) Assessing On-Shore Wind Energy Development [online] available at: <http://publications.naturalengland.org.uk/file/97013>

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Option WE3: Designate specific sites for wind energy provision through the Local Plan with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		WE1	WE2	WE3
	<p>Furthermore, in line with Natural England's Technical Information Note²⁸, some form of ecological assessment is likely to be required for any proposed wind farm, although very small developments away from vulnerable bird species may only require a limited desk study to confirm the low likelihood of an impact.²⁹</p> <p>A Habitats Regulations Assessment (HRA) is being undertaken alongside the development of the Local Plan which will determine whether the Local Plan, either alone or in combination with other relevant projects and plans is likely to result in a significant effect upon European sites. It is therefore assumed that under all options, consideration will be given to the impacts of wind energy on internationally designated sites notably in accordance with the conclusions and recommendations of the emerging HRA.</p>			
Energy and Water Consumption	Option WE3 has the potential to provide additional certainty as to the delivery of onshore wind energy in the Borough through allocating such provision. Option WE2 will also provide a degree of certainty as the broad location of such provision. In this respect, and given the lack of onshore renewable provision which has been delivered under the current approach (Option WE1), these options have increased potential to support climate change mitigation.	3	1	1
Climate Change Adaptation, Flooding and Coastal Change	It is not possible to differentiate between the options with regards to climate change adaptation, given this depends on the location of wind energy provision. However, the delivery of wind turbines are not likely to have a significant influence on climate change adaptation, including resilience to extreme weather events and flood risk.	=	=	=
Population, Health and Wellbeing	<p>It is considered that all options have merits, as allocating sites or identifying suitable areas for wind development should improve certainty for applicants and therefore their willingness to make applications. The approach outlined in Option WE2 may provide less certainty on individual sites, but it does provide greater flexibility and offers the potential for a high proportion of the total wind resource across the Borough to be utilised.</p> <p>In terms of Option WE1, enabling Neighbourhood Plans to allocate wind turbines offers opportunities relating to community buy-in to such provision. This provides opportunity for local residents to take control of the process, delivering early stakeholder engagement to minimise conflict and increase public acceptance. Community-led development may, however be</p>	3	1	1

²⁸ Natural England (2010) Natural England Technical Information Note TIN069 [online] available at: <http://planning.allerdale.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=109418>

²⁹ Natural England (2010) Natural England Technical Information Note TIN069 [online] available at: <http://planning.allerdale.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=109418>

Option WE1: Continue current Local Plan approach to wind power which would allow Neighbourhood Plans to allocate locations for wind power in the Borough.

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Option WE3: Designate specific sites for wind energy provision through the Local Plan with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		WE1	WE2	WE3
	<p>difficult to deliver where residents are not supportive of wind energy, for example through concerns relating to property values due to proximity to onshore wind farms, or a potential drop in tourism.³⁰ In this respect the requirement for a referendum ensures development can only come forward through a Neighbourhood Plan where there is an appropriate level of community support. It should also be noted that this mechanism has not recently delivered new wind energy provision in the Borough.</p> <p>Option WE3, through allocating specific sites through the Local Plan, will help provide additional certainty as to the delivery and location of wind energy. If combined with a community-led approach to wind energy provision, this has the potential to lead to an increased delivery of the significant community benefits which have the potential to arise from wind power in the Borough.</p>			
Heritage	<p>Under all options, consideration will be given to the impacts of wind energy on the historic environment, in line with NPPG (para 019), and Historic England's guidance.³¹</p> <p>Depending on their scale, design and prominence, a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset³² As such, while the Local Plan policy framework provides a level of protection to heritage assets, a 'suitable area' approach (Option WE2) to development locations may not suitably mitigate against potential adverse effects. However, the identification of suitable areas is only the start of the development process, and it is considered that heritage constraints will later be considered at the planning application stage.</p> <p>In terms of Option WE3, it is considered that defining specific sites may restrict the likelihood for adverse effects through setting tighter development parameters. Similarly, it is considered that through Option WE1, given any proposal coming forward would be community-led, impacts on the setting of historic assets would be likely to be a key consideration for residents when considering specific sites for allocation.</p> <p>In light of the above, it is not considered possible to distinguish between the options in relation to the historic environment.</p>	=	=	=

³⁰ The Crown Estate (2015) Understanding the impacts of offshore wind farms [online] available at: <https://www.offshorewindindustry.com/sites/default/files/ei-understanding-the-impacts-of-offshore-wind-farms-on-well-being.pdf>

³¹ Historic England (2020) Wind Energy [online] available at: <https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/wind-energy/>

³² Ibid.

Option WE1: Continue current Local Plan approach to wind power which would allow Neighbourhood Plans to allocate locations for wind power in the Borough.

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Option WE3: Designate specific sites for wind energy provision through the Local Plan with an accompanying criteria-based policy to evaluate smaller scale development proposals as they come forward.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		WE1	WE2	WE3
Land and Water Quality	Uncertain effects are expected for all options in relation to this SA theme as it is possible that such developments could result in the loss of high quality agricultural land (until the site is restored to its previous use at the end of its lifecycle).	?	?	?
Natural Landscape	Under all options, consideration will be given to the impacts of wind energy on landscape character. The current Local Plan approach to the protection of landscape character is further supplemented by the NPPG (para 022 and 023) and Natural England guidance. ³³ However, whilst the policy does include provisions to limit the impacts on sensitive landscape receptors, there is still potential for onshore wind development to alter the intrinsic rural character of locations within Borough through a 'suitable area' approach (Option WE2). However, it is recognised that the identification of suitable areas is only the start of the development process, and that landscape would be considered in detail at the later planning application stage. In terms of Option WE3, it is considered that defining specific sites may restrict opportunity for adverse effects through setting tighter development parameters. Similarly, it is considered that through Option WE1, given any proposal coming forward the option would be community-led, impact on landscape would likely be a key consideration for residents when considering specific sites for allocation. In light of the above, it is not considered possible to distinguish between the options in terms of potential effects on landscape character.	=	=	=
Skills, Employment and Economic Development	All options are expected to lead to positive effects in relation to jobs and the local economy due to the investment and employment opportunities that are likely to arise from renewable energy development. Furthermore, financial contributions from developers and investments in community projects will support the development of social capital; it is recognised that projects supported by community funds originating from wind energy have been wide ranging. ³⁴	3	1	1
Transport	The options are unlikely to have significantly different effects in relation to this theme.	=	=	=

³³ Natural England (date unknown) Assessing On-Shore Wind Energy Development [online] available at: <http://publications.naturalengland.org.uk/file/97013>

³⁴ The Crown Estate (2015) Understanding the impacts of offshore wind farms [online] available at: <https://www.offshorewindindustry.com/sites/default/files/ei-understanding-the-impacts-of-offshore-wind-farms-on-well-being.pdf>

6. Next steps

- 6.1 This Interim SA Report accompanies the current consultation on the Hastings Local Plan (*Hastings Local Plan: Consultation Draft, Regulation 18*).
- 6.2 Following the receipt of consultation responses, the full draft of the Local Plan will be prepared by HBC and released for Regulation 19 consultation. Development of the draft Local Plan will continue to be informed by the findings of this Interim SA Report, representations made through the current consultation and the outcomes of further evidence base studies prepared to inform the Local Plan.
- 6.3 A central element of the ongoing development of the Local Plan will be the appraisal of further alternative options for the Local Plan through the SA process. A key element of this process will be to undertake appraisal of more detailed development strategy options.
- 6.4 To support the draft Local Plan, a full SA Report will be prepared. The SA Report, which will be presented for consultation alongside the Regulation 19 version of the Local Plan, will present the information required by the SEA Regulations.
- 6.5 In line with the SEA Regulations, the SA Report will answer the three questions:
 - What has plan-making / SA involved up to this point?
 - Including with regards to the consideration of ‘reasonable alternatives’
 - What are the appraisal findings at this current stage?
 - i.e. in relation to the policies currently proposed for the Local Plan, as presented in the Regulation 19 consultation Local Plan document
 - What are the next steps for plan making?
- 6.6 These questions are derived from Schedule 2 of the SEA Regulations, which set out ‘the information to be provided within the [environmental] report’.
- 6.7 It is currently anticipated that Regulation 19 consultation on the Local Plan and accompanying SA Report will take place in mid-2021.
- 6.8 Once the period for representations on the Regulation 19 version of the Local Plan / SA Report has finished, the main issues raised will be identified and summarised by HBC, and the Council will then consider whether, in light of representations received, the plan can still be deemed ‘sound’. If this is the case, the Local Plan will be submitted to the Secretary of State for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report alongside it.
- 6.9 At Examination, the Inspector will consider representations (alongside the SA Report) before then reporting back. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (and undergo SA) and will then be subject to consultation (with an SA Report Addendum published alongside).
- 6.10 Once found to be ‘sound’, the Local Plan will be formally adopted by HBC. At the time of adoption, a SA ‘Statement’ must be published that sets out (amongst other elements) “the measures decided concerning monitoring the Plan”.

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