

# Sustainability Appraisal for the Hastings Local Plan

Interim SA Report to accompany the  
Hastings draft Local Plan Preferred  
Options - Regulation 18 consultation  
version of the Local Plan

Hastings Borough Council

February 2026

**Quality Information**

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# 1. Introduction

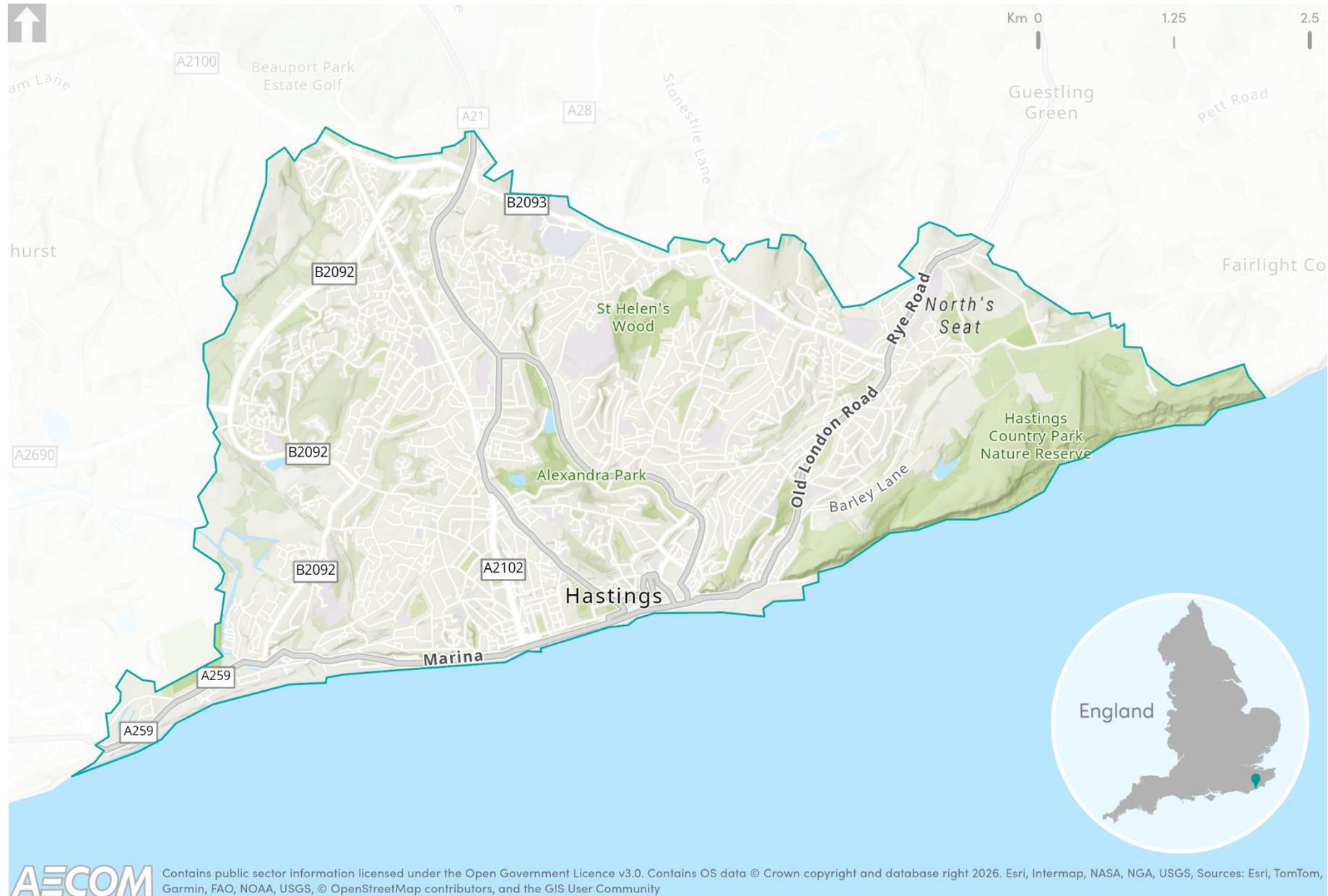
## 1.1. Background

- 1.1.1. AECOM has been commissioned to undertake an independent sustainability appraisal/strategic environmental assessment (SA/SEA) in support of Hastings Borough Council's emerging Local Plan.
- 1.1.2. 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) and the Hastings Local Plan Development Management Plan (adopted September 2015).
- 1.1.3. The Local Plan, which will cover the period to 2041, 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.
- 1.1.4. This Interim SA Report accompanies the Preferred Options version of the Local Plan, which is being consulted on under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations in February 2026.
- 1.1.5. Key information relating to the new Local Plan is presented in **Table 1-1**.

**Table 1-1: Key Facts Relating to the Hastings Local Plan**

<b>Name of Responsible Authority</b>	<b>Hastings Borough Council</b>
<b>Title of the strategy</b>	Hastings Local Plan
<b>Subject</b>	Local Plan
<b>Purpose</b>	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.
<b>Timescale</b>	The Local Plan will guide future development and land use within Hastings Borough over the period up to 2041
<b>Area covered by the local plan</b>	Hastings Borough ( <b>Figure 1-1</b> )
<b>Summary of content</b>	The Local Plan will set out the vision, strategy and policies to manage growth and development in Hastings Borough during the period to 2041.

**Figure 1-1: Map of Hastings Borough**



## 1.2. Sustainability Appraisal Explained

- 1.2.1. 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.
- 1.2.2. An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). SA also widens the scope of the assessment from focusing generally on environmental issues to include social and economic issues.
- 1.2.3. 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.
- 1.2.4. 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.

## 1.3. Structure of this Interim SA Report

- 1.3.1. This Interim SA Report incorporates the information required for Environmental Reports by the SEA Regulations.
- 1.3.2. At this current stage of the plan-making process, HBC is consulting on the Regulation 18 'Preferred Options' version of their Local Plan. This Interim SA Report has therefore been produced with the intention of informing this stage in the Local Plan's preparation.

- 1.3.3. Specifically, this SA Report has been structured into three parts to address the key requirements stipulated by the SEA Regulations, as follows:
- **Part 1** provides an outline of plan making to date, in association with the parallel SA process (including in relation to ‘reasonable alternatives’).
  - **Part 2** assesses the policies presented in the draft Local Plan Preferred Options – Regulation 18 consultation document, with which this SA Report accompanies.
  - **Part 3** sets out the next steps for the Local Plan/SA process.
- 1.3.4. This SA Report addresses the requirements outlined above in turn, as discrete ‘parts’ of the report.

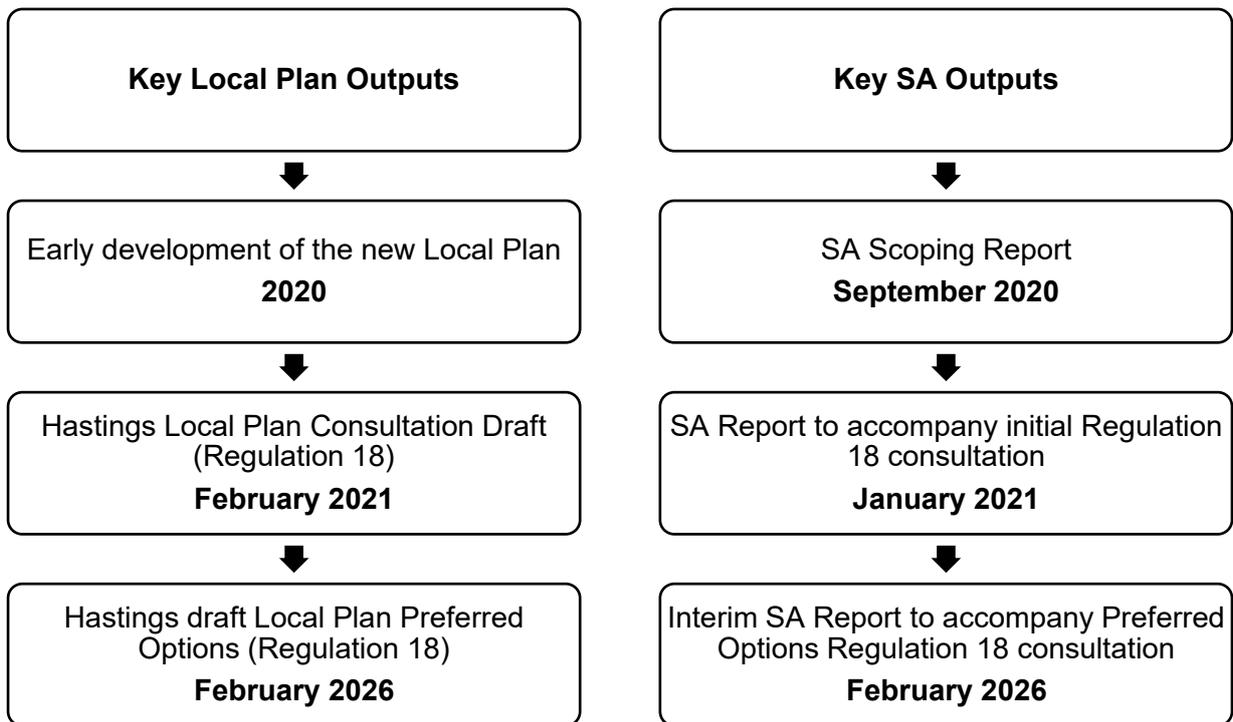
# **Part 1: What has plan making/SA involved up to this point?**

## 2. Stages of the Sustainability Appraisal Undertaken to Date

### 2.1. Overview of SA Stages Completed

2.1.1. A number of stages have been undertaken for the SA to date, with three main outputs. These stages are represented in **Figure 2-1**.

**Figure 2-1: SA Work Undertaken to Date**



## **3. SA Scoping Report**

### **3.1. Scoping**

- 3.1.1. 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. These organisations were consulted on the scope of the SA for the Local Plan in August and September 2020 through an SA Scoping Report jointly prepared with Rother District Council.
- 3.1.2. The baseline information (including baseline data and context review) initially included in the SA Scoping Report provides the basis for the SA process and has been reviewed and updated in light of the responses received at scoping consultation.

### **3.2. SA Framework**

- 3.2.1. 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.
- 3.2.2. The SA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach.
- 3.2.3. 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
  - Climate Change Adaptation, Flooding and Coastal Change
  - Energy and Water Consumption
  - Heritage
  - Land and Water Quality
  - Natural Landscape
  - Population, Health and Wellbeing

- Skills, Employment and Economic Development
- Transport

3.2.4. The SA Framework is presented in **Table 3-1**.

**Table 3-1: 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.

- 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.

- 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)

- Reduce energy consumption?
- Reduce CO<sub>2</sub> 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?

**SA objective****Appraisal Questions. Will the option/proposal help to...**

	<ul style="list-style-type: none"> <li>• Does it enable the take up of low or ultra-low emission vehicles?</li> </ul>
4. Minimise water consumption.	<ul style="list-style-type: none"> <li>• Reduce water consumption?</li> <li>• Increase the use of water conservation and greywater recycling technologies?</li> <li>• Ensure water demand does not outstrip available supply?</li> </ul>
<b>SA theme: Climate Change Adaptation, Flooding and Coastal Change</b>	
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"> <li>• Reduce the risk of flooding from rivers, watercourses and the coast to people and property?</li> <li>• Reduce the risk of surface water flooding?</li> <li>• Ensure that development does not increase flood risk to others?</li> <li>• Prevent inappropriate development in the flood plain?</li> <li>• Improve and extend green infrastructure networks?</li> <li>• Increase the resilience of the built and natural environment to the effects of climate change?</li> </ul>
6. The risk of coastal erosion is managed and reduced, now and in the future.	<ul style="list-style-type: none"> <li>• Protect land stability in designated vulnerable areas?</li> <li>• Protect coastal areas from deterioration?</li> </ul>

**SA theme: Population, Health and Wellbeing**

**SA objective****Appraisal Questions. Will the option/proposal help to...**

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

- Reduce levels of childhood obesity?
- Promote healthy living and active lifestyles?
- Reduce health inequalities?
- Improve access to high quality health facilities?

8. More opportunities are provided for everyone to live in a suitable home to meet their needs.

- Improve the quality of the housing stock and limit 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.

- 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.

- Reduce actual levels of crime?
- Reduce the fear of crime?

**SA theme: Heritage**

11. Historic environment/ townscape is protected, enhanced and made more accessible.

- Protect, enhance and restore heritage assets?
- Reduce the number of buildings at risk?

**SA objective****Appraisal Questions. Will the option/proposal help to...**

- 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?

**SA theme: Land and Water Quality**

12. The risk of pollution to land and soils is reduced and quality is improved.

- 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.

- 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.

- 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.

- Conserve and enhance the High Weald AONB in line with the aims and objectives of the 2024-2029 Management Plan?
- Protect and enhance the natural environment?
- Encourage access to the natural environment (including parks, open spaces, recreational opportunities and the coast)?

**SA objective****Appraisal Questions. Will the option/proposal help to...**

- 
- Protect sensitive and special landscapes?
- 

**SA theme: Skills, Employment and Economic Development**

16. Economic performance is improved.

- Improve economic performance?

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

- Reduce the need to travel by private car?

**SA objective**

**Appraisal Questions. Will the option/proposal help to...**

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dependency and greater travel choice.

- 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?
- Support road safety?

## **4. Regulation 18 Consultation (2021)**

### **4.1. Local Plan Consultation Draft (Regulation 18)**

4.1.1. In February and March 2021, consultation was undertaken on an early draft of the Local Plan.<sup>1</sup> The aim of the consultation was to present emerging policy ideas for the future development of Hastings. In this respect the consultation sought to gain stakeholders' views on the approach Local Plan policies can take on various key planning issues and on potential allocations in the Borough.

4.1.2. The Local Plan Consultation Draft was the key output of the initial stage in developing the new Local Plan and was prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012.

### **4.2. SA Work to Accompany the Local Plan Consultation Draft (Regulation 18)**

#### **Appraisal of high-level options for development**

4.2.1. To support the initial Regulation 18 consultation, an earlier Interim SA Report was produced with the intention of informing this stage of the preparation of the Local Plan.<sup>2</sup> Specifically, the Interim SA Report presented an appraisal of a series of high-level approaches and alternatives (hereafter referred to as "options") which were evaluated as part of plan development. This was with a view to presenting an evaluation of the relative sustainability merits of different approaches that could be taken for the Local Plan. This was for the benefit of stakeholders and plan-makers tasked with selecting preferred options for the Local Plan and for consideration alongside the representations received during the consultation.

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<sup>1</sup> Hastings Borough Council (February 2021). Hastings Local Plan Consultation Draft (Regulation 18), Winter 2020/21

<sup>2</sup> AECOM (January 2021). Sustainability Appraisal for the Hastings Local Plan

4.2.2. The options considered related to the following:

- Options for Ashdown House
- Options for the land east of Harrow Lane
- Options for housing delivery at Bohemia
- Options for Horntyte
- 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

4.2.3. Each option was considered against the SA Framework of objectives and assessment questions developed at scoping (**Table 3-1**).

4.2.4. Presenting the appraisal of these options, the following information was presented in the Interim SA Report:

- A description of the options appraised.
- An overview of the likely significant positive and negative effects of each option; and
- A ranking of the sustainability performance of each option relating to each SA theme to highlight their relative sustainability merits.

4.2.5. The findings of the options appraisal are presented in the Interim SA Report which is available on HBC's website.<sup>3</sup>

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<sup>3</sup> Hastings Planning Policy Consultations (2021). Sustainability Appraisal (SA) for the Hastings Local Plan interim SA Report to accompany Regulation 18 Consultation

## SA Site Appraisal

- 4.2.6. In addition, the Interim SA Report presented a GIS-based assessment of the long list of sites available for potential allocation through the Local Plan, including those relating to:
- 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.
- 4.2.7. The site appraisal undertaken through the SA process is distinct from the assessments undertaken through HBC's Strategic Housing and Employment Land Availability Assessment (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.
- 4.2.8. A refreshed appraisal of the sites undertaken through the SA process, accompanied by an explanation of the approach and criteria utilised for the appraisal, will be presented in the full SA Report that will accompany Regulation 19 consultation.

## 5. Assessment of Growth Strategy Options

### 5.1. Development of Growth Strategy Options

- 5.1.1. A key component of the new Local Plan will be to present an overall spatial strategy for the borough during the plan period to 2041.
- 5.1.2. To support the development of the preferred approach for the new Local Plan (i.e., the spatial strategy), the SA process has considered a range of growth strategy options. This is with a view to understanding the relative sustainability merits of different potential spatial strategies for the Local Plan.
- 5.1.3. These growth strategy options have been developed based on strategic variables associated with the following two components:
- different scales of growth; and
  - different locations of growth.
- 5.1.4. A description of the growth strategy options, and components, is presented in **Table 5-1**.

**Table 5-1: Growth Scenario Options Considered as Reasonable Alternatives**

<b>Growth scenario options</b>	<b>Rationale</b>
<b>Option 1a and 1b:</b> Constraint adjusted growth scenario	<p>The approach has taken an evidence-led approach, which has focused on the suitability, availability, and achievability of sites for development, and the constraints present. Options 1a and 1b reflect higher and lower density numbers on some sites.</p> <p>These options would deliver in the region of 3,141 (Option 1a) to 3,373 homes over the plan period (Option 1b). This comprises 25.04% to 26.89% of local housing need (LHN) as established under the standard methodology.</p>
<b>Option 2:</b> Constraint adjusted growth plus opportunity areas	<p>This option builds on Option 1a/b by adding four additional sources of potential housing delivery:</p> <ul style="list-style-type: none"> <li>(i) Hastings Central and the area around St Johns Road</li> <li>(ii) The Former Convent of the Holy Child Jesus, Magdalen Road</li> <li>(iii) Housing renewal areas</li> <li>(iv) Land at Breadsell</li> </ul> <p>It assumes these sites will become available over the plan period and contribute to meeting housing needs.</p> <p>This option would deliver in the region of 4,309 to 4,541 homes over the plan period. This comprises 33.71% to 35.53% of LHN as established under the standard methodology.</p>
<b>Option 3:</b> Increase densification at Hastings Central & St Johns Road opportunity sites	<p>This option provides an alternative approach to Option 2 by applying elevated densities at town centre and St Johns Road opportunity sites beyond the standard assumptions. It excludes the additional two sites considered through Option 2, and excludes additional delivery through housing renewal areas.</p> <p>This option would deliver in the region of 2,699 homes over the plan period. This comprises 21.5% of LHN as established under the standard methodology.</p>
<b>Option 4:</b> Increase densification at Hastings Central and St Johns Road opportunity sites and increased densification assumptions on selected sites and housing renewal areas in the urban area	<p>Focussing on the built up part of the borough, the Option applies densification at opportunity sites in Hastings Town centre and St Johns Road as well as selected sites in the wider urban area. It also increases densification in housing renewal areas.</p> <p>This option would deliver in the region of 4,654 homes over the plan period. This comprises 37.1% of LHN as established under the standard methodology.</p>

Growth scenario options	Rationale
<b>Option 5:</b> Elevated density assumption at Breadsell and co-location housing employment option at the Ivyhouse Lane employment site	<p>This option would seek to increase densities at Breadsell and deliver a co-location housing/employment option at the Ivyhouse Lane employment site.</p> <p>It would also include the delivery set out under Option 1b.</p> <p>The options set out an alternative to the urban focus of Option 4.</p> <p>This option would deliver in the region of 4,104 homes over the plan period. This comprises 32.71% of LHN as established under the standard methodology.</p>
<b>Option 6:</b> 100% LHN	<p>This option seeks to deliver the full Local Housing Need (LHN) as calculated under the standard methodology. It combines all components from previous options, including densification, new delivery locations, and co-location opportunities, and applies the most optimistic assumptions for site capacity.</p> <p>The approach assumes that every suitable hectare of land identified for housing is utilised to address the projected shortfall.</p> <p>This option would deliver in the region of 12,546 homes over the plan period. This comprises 100% of LHN as established under the standard methodology.</p>
<b>Option 7:</b> 110% LHN	<p>This option builds on the 100% scenario (Option 6) by introducing an additional uplift to provide contingency and flexibility in meeting future housing requirements. It includes all components and applies the highest feasible density assumptions across all sites.</p> <p>This option would deliver in the region of 13,800 homes over the plan period. This comprises 110% of LHN as established under the standard methodology.</p>

5.1.5. **Table 5-2** below provides a breakdown of the growth scenario options.

**Table 5-2: Breakdown of the Growth Scenario Options**

	<b>Option 1a: Constraint adjusted growth scenario (lower density)</b>	<b>Option 1b: Constraint adjusted growth scenario (higher density)</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions on selected sites and HRAs in the urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location housing employment option at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
<b>Commitments, completions and windfall</b>								
<b>Commitments (planning permissions not yet built and current LP allocations)</b>	768	768	768	768	768	768	768	768
<b>Completions</b>	529	529	529	529	529	529	529	529
<b>Windfall sites</b>	720	720	720	720	720	720	720	720
<b>Options</b>								
<b>Options</b>	1124	1356	2292	682	2637	2087	Net requirement = 10529 – 10763	Net requirement = 11582 - 11839
<b>Total</b>	<b>3141</b>	<b>2273</b>	<b>4309 – 4541</b>	<b>2699</b>	<b>4654</b>	<b>4104</b>	<b>2017</b>	<b>2017</b>

	<b>Option 1a: Constraint adjusted growth scenario (lower density)</b>	<b>Option 1b: Constraint adjusted growth scenario (higher density)</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions on selected sites and HRAs in the urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location housing employment option at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
<b>Local Housing Needs (standard methodology December 2024, 710x18)</b>	<b>12780</b>	<b>12780</b>	<b>12780</b>	<b>12780</b>	<b>12780</b>	<b>12780</b>	<b>12780</b>	<b>12780</b>
<b>Percent of need met through option</b>	<b>24.58%</b>	<b>26.39%</b>	<b>33.72% - 35.53%</b>	<b>21.12%</b>	<b>36.42%</b>	<b>32.11%</b>	<b>15.78%</b>	<b>15.78%</b>
<b>Local Housing Needs (current standard methodology May 2025, 697x18)</b>	<b>12546</b>	<b>12546</b>	<b>12546</b>	<b>12546</b>	<b>12546</b>	<b>12546</b>	<b>12546</b>	<b>12546</b>
<b>Percent of need met through option</b>	<b>25.04%</b>	<b>26.89%</b>	<b>34.35% - 36.19%</b>	<b>21.51%</b>	<b>37.10%</b>	<b>32.71%</b>	<b>16.08%</b>	<b>16.08%</b>

## 5.2. Appraisal of Growth Scenarios

### Appraisal Methodology

- 5.2.1. The growth scenario options presented in **Table 5-2** have been appraised against the SA Framework developed during scoping. The purpose of the appraisal is to compare how each scenario performs across a wide range of environmental, social and economic considerations, and to highlight the implications of different levels and patterns of growth for Hastings.
- 5.2.2. The appraisal is carried out in two stages. First, each scenario is considered before any Local Plan policies or mitigation are applied, to understand its inherent impacts. Findings for each SA theme are presented in the following subsections, including a brief commentary on likely effects, a numerical ranking of options (with 1 being most favourable), and identification of any significant positive or negative effects.
- 5.2.3. Then, in **Chapter 9**, the appraisal considers the preferred option and how these effects may change once reasonable policy measures and mitigation are introduced, reflecting how the Local Plan would operate in practice.

### Air Quality

**Table 5-3: Appraisal Findings for the Air Quality SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions on selected sites and HRAs in the urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	2	4	1	3	5	6	7
Likely significant effects?	No	No	No	No	No	<b>Yes - adverse</b>	<b>Yes - adverse</b>

- 5.2.4. There are no Air Quality Management Areas (AQMAs) within the borough, and overall air quality is generally good. Hastings benefits from four railway stations and a comprehensive bus network, providing opportunities to deliver growth in locations that support sustainable travel and reduce reliance on private cars.

- 5.2.5. The borough's road network includes two primary routes: the A259 (coastal route) and the A21 (north-south corridor). Development located close to these roads may experience localised air quality issues due to traffic emissions and congestion. While all growth scenarios could involve development near these corridors, the scale and distribution of growth will influence the extent of potential impacts.
- 5.2.6. All growth options have the potential to increase traffic and congestion, which could lead to adverse effects on local air quality. However, options that have lower growth rates, and options that focus growth in accessible locations or near public transport hubs, are likely to perform more favourably by limiting car dependency. Conversely, options that maximise growth across the borough are likely to have greater adverse effects.
- 5.2.7. **Option 3 and Options 1a and 1b**, which represent the lowest overall growth, are likely to perform most favourably with regards to air quality because they would generate the least additional traffic. Options that deliver additional growth in Hastings Central and St Johns Road locations (**Options 3 and 4**) will also support air quality by concentrating additional development in areas with good public transport accessibility (including closer to the railway stations in these locations and bus links) thereby limiting reliance on private cars. **Option 2** will also deliver growth at these accessible locations; however an additional delivery of growth at the less accessible location of Breadsell may lead to an increase in traffic flows which may contribute to emissions.
- 5.2.8. **Option 5**, which seeks to deliver higher density development at non-town centre locations at Breadsell and Ivyhouse Lane is likely to have negative effects relating to air quality. While co-location could for some limit commuting distances for those both working and living at the current Ivyhouse Lane employment area, this would be of very limited benefit for air quality; overall, increased densities in less connected areas may lead to higher localised emissions due to a stimulation of traffic.
- 5.2.9. **Options 6 and 7**, which aim to deliver 100% and 110% of Local Housing Need respectively, are expected to perform least favourably. The scale of growth under these scenarios has the potential to significantly increase emissions across the borough, including from the delivery of high levels growth at locations less well connected to key services and amenities by sustainable transport modes. In addition, these options assume that every suitable hectare of land identified for housing is utilised increased, which has the potential to lead to the loss of key areas of open space and green infrastructure which help support good air quality. This will have impacts on air quality across the borough, with the potential for significant negative effects.

## Conclusion

- 5.2.10. Overall, all growth scenarios have the potential for adverse effects on air quality. The magnitude of these effects increases with the scale of growth, and the distance of development from key transport links. Options 3 and 1a / 1b perform most favourably as they involve more limited growth in accessible locations, while Options 6 and 7 perform least favourably and could result in significant adverse effects on air quality without robust mitigation measures. The remaining options would require some facilitation of sustainable modes of transport recognising growth in peripheral areas.

## Biodiversity

**Table 5-4: Appraisal Findings for the Biodiversity SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	1	4	2	3	5	6	7
Likely significant effects?	No	Yes - adverse	Yes - adverse	Yes - adverse	Yes - adverse	Yes – adverse	Yes - adverse

- 5.2.11. All options have the potential to affect biodiversity through land take, habitat loss, fragmentation, and disturbance during construction and operation. The scale and distribution of growth are key determinants of the likely significance of these effects. Options that deliver lower levels of development and focus growth within the existing urban area are likely to perform most favourably, as they reduce the need for greenfield development and limit encroachment into sensitive habitats. Conversely, options that maximise growth across the borough, including in more sensitive locations, have the potential to lead to increased adverse effects on biodiversity.
- 5.2.12. **Options 1a / 1b**, which represent constraint-adjusted growth scenarios, are likely to perform most favourably. These options assume a limited overall quantum of development and are based on an evidence-led approach that considers suitability and achievability. This has the potential to minimise direct impacts on habitats and species and reduce pressure on designated sites and ecological networks.

- 5.2.13. **Option 3** delivers the lowest level of growth through densification in the Hastings Central and St Johns Road. An increased focus on these locations can reduce the need for outward expansion and associated loss and fragmentation of habitats. However, impacts on brownfield habitats and species in Hastings Central and St Johns Road locations may be increased through this approach.
- 5.2.14. **Option 2**, which introduces additional opportunities in central areas but also includes some peripheral growth, is likely to perform less favourably than Options 1a/1b. While concentrating development in urbanised locations can limit biodiversity impacts, the inclusion of growth at the borough's edge at Breadsell introduces potential risks of habitat fragmentation and disturbance near sensitive ecological areas (such as Marline Valley Woods SSSI). The option also delivers more growth than Options 1a/b, 3 and 5.
- 5.2.15. **Options 4 and 5** also introduce higher growth assumptions, including through elevated densities at locations outside of Hastings Central and St Johns Road. Option 5 performs less favourably than Option 4, as it builds on this approach by increasing densities at sites at the borough's periphery (including Breadsell), thereby increasing the potential for direct and indirect impacts on biodiversity. These areas often act as buffers between the built-up area and designated sites, so development here has the potential to increase fragmentation and reduce ecological connectivity between key habitats. Option 5 though, whilst seeking to deliver co-located housing/employment at Ivyhouse Lane, is unlikely to have significant additional effects at this location given it would involve the reconfiguration of existing employment land.
- 5.2.16. **Options 6 and 7**, which seek to deliver 100% and 110% of LHN respectively, are likely to perform least favourably in relation to biodiversity. These options assumes that every suitable hectare of land identified for housing is utilised and apply the most ambitious density assumptions across the borough. While they offer the greatest opportunities for biodiversity net gain (BNG) and strategic habitat creation, the scale of development proposed has the potential to significantly increase direct and indirect impacts on habitats and species, particularly where development extends into greenfield areas or areas of ecological value.
- 5.2.17. All options will be subject to the requirement to deliver at least 10% BNG under the Environment Act 2021, which will help mitigate negative effects and provide opportunities for enhancement, although the effectiveness of this will depend on site-specific design and implementation, and the size of sites being developed.

## Conclusion

- 5.2.18. Overall, Options 6 and 7 perform least favourably for biodiversity due to the scale of growth proposed and the associated risk of habitat loss, fragmentation, and disturbance, particularly in peripheral and ecologically sensitive areas. These higher growth options however have the potential to deliver additional BNG; the impacts of this though depend on application of net gain, and the application of the precautionary principle highlights the risk of these options to habitats, species and ecological networks. Whilst delivering significantly less growth, Options 2 and 5 also have the potential to have additional impacts on biodiversity at the edge of the built up area of the borough.
- 5.2.19. Options 3 and 4 have potential impacts on brownfield and urban biodiversity sites, with Option 3 increasing densification in the Hastings Central and at St Johns Road opportunity sites and Option 4 also introducing growth through densification within the wider urban area. Given significantly higher growth and a wider spatial distribution of growth, Option 4 has the potential to lead to additional impacts on biodiversity over Option 3.
- 5.2.20. Options 1a / 1b performs most favourably given their limited quantum of development and constraint-led approach, which accounts for ecological sensitivities.
- 5.2.21. All options however have the potential for significant adverse effects on biodiversity, given the potential for impacts on nationally designated sites. It should be noted though that this will depend on the site-specific design and implementation of biodiversity measures, and the application of BNG.

## Energy And Water Consumption

**Table 5-5: Appraisal Findings for the Energy and Water Consumption SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	2	4	1	5	3	6	7
Likely significant effects?	No	No	No	No	No	No	No

- 5.2.22. Energy and water consumption are directly related to the scale of development. Whilst it depends on the application of energy and water efficiency measures within new development, as the overall quantum of growth increases, so does demand for these resources. Options that deliver lower levels of growth are therefore likely to perform most favourably, while options that maximise growth across the borough are likely to perform least favourably.
- 5.2.23. **Option 3, followed by Options 1a / 1b**, which assume the lowest level of development, are likely to perform most favourably. **Options 5, 2 and 3** respectively introduce additional growth and are likely to perform less favourably. **Options 6 and 7**, which seek to deliver 100% and 110% of LHN, are likely to perform least favourably, as they assume the highest levels of development and therefore the greatest resource demand.

### Conclusion

- 5.2.24. Overall, the ranking for this theme reflects the quantity of development proposed under each option.
- 5.2.25. While all options will need to incorporate energy and water efficiency measures, and larger developments (such as proposed under some options for Breadsell) may offer opportunities for renewable energy and district-scale solutions, these benefits are unlikely to fully offset the increased consumption associated with higher growth levels.

## Climate Change Adaptation, Flooding, and Coastal Change

**Table 5-6: Appraisal Findings for the Climate Change Adaptation, Flooding, and Coastal Change SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	1	3	2	4	5	6	7
Likely significant effects?	No	No	No	No	No	Uncertain	Uncertain

## Climate Change Adaptation

- 5.2.26. All options have the potential to support climate change adaptation through measures such as green infrastructure provision, sustainable drainage systems, and energy-efficient design. However, the ability to deliver significant new green infrastructure is likely to vary according to the scale and nature of development. Options that involve larger-scale development, such as **Options 2, 5, 6 and 7**, may offer greater opportunities to incorporate strategic green infrastructure networks, which can help mitigate the effects of flooding and overheating. Conversely, these same options also have the potential to result in greater loss of existing greenfield land, which could negatively affect climate resilience.

## Flooding

- 5.2.27. Hastings generally has a relatively low risk of fluvial flooding, although areas of the borough are within Flood Zones 2 and 3, particularly along watercourses. Coastal flooding is also an issue along the seafront. All options have the potential to include development in areas subject to some degree of flood risk, including surface water flooding, which is more widespread across the borough and particularly prevalent in low-lying urban areas.
- 5.2.28. From a strategic perspective, **Options 3, 1a and 1b** are likely to perform most favourably in relation to flood risk, as these options propose the lowest overall quantum of growth over the fewest number of sites (and therefore have the potential to minimise exposure to areas of flood risk). Conversely, **Options 6, and 7**, which seek to utilise every suitable hectare of land identified for housing, perform least favourably as they would require the highest level of development across the borough, increasing the likelihood that sites in areas of flood risk or affecting flood risk would need to be utilised to deliver the growth.
- 5.2.29. **Options 2 and 4** perform moderately, with the potential for increasing exposure to flood risk as densities and overall growth levels rise. These options are also likely to deliver additional growth in town centre locations, with the potential for development to affect (or be affected by) key areas of fluvial flood risk (such as, for example, around Priory Meadow) or surface water flood risk. **Option 5** will deliver additional growth at Breadsell, which has some limited areas of fluvial flood risk, and the Ivyhouse Lane employment area, which has some surface water flood issues. These are not significant constraints to development in these areas however as areas of flood risk can be readily avoided.

- 5.2.30. It is noted that all options would be subject to the application of the sequential and exception tests, which are likely to mitigate significant effects. However, as the scale of development increases, so does the potential for cumulative impacts on surface water run-off and drainage capacity, which could affect both new and existing development.

### **Coastal Change**

- 5.2.31. The Hastings coastline is heavily managed and protected, as set out in the South Foreland to Beachy Head Shoreline Management Plan, which seeks to maintain defences along the urban frontage. All options have the potential to include development in proximity to the coast, where risks associated with coastal flooding and erosion may increase over the plan period due to sea level rise and climate change.
- 5.2.32. Options proposing higher levels of growth, particularly **Options 6 and 7**, are likely to perform least favourably in relation to coastal change, as they have the greatest potential to increase development pressure in low-lying areas and may require more extensive adaptation measures. In contrast, **Options 3, 1a and 1b** perform most favourably, as their lower growth assumptions reduce the likelihood of significant additional development in areas vulnerable to coastal change. However, an increased focus on the town centre may lead to increased development in areas at risk of coastal flooding.
- 5.2.33. While existing coastal defences are expected to provide a high level of protection, ongoing maintenance and potential upgrades will be essential to manage future risks under all options.

### **Conclusion**

- 5.2.34. Overall, the potential for adverse effects relating to flooding and coastal change generally increases with the scale of growth proposed. Options 3 and 1a / 1b performs most favourably, as their lower growth assumptions reduce exposure to flood risk and coastal change while limiting the loss of greenfield land. Options 6, and 7 perform least favourably, as they involve the highest levels of development, which increases the likelihood of development in areas of flood risk and low-lying coastal zones, and could exacerbate cumulative impacts on drainage and surface water run-off. Mid-range options (Options 2, 4 and 5) perform moderately. All options present opportunities to integrate climate change adaptation measures, but the extent and nature of these opportunities will depend on the scale and location of development. Strategic planning and robust application of the sequential test will be important to mitigating significant effects under all scenarios.

## Population, Health, and Wellbeing

**Table 5-7: Appraisal Findings for the Population, Health, and Wellbeing SA Theme**

	Options 1a and 1b: Constraint adjusted growth scenarios	Option 2: Constraint adjusted growth plus opportunity areas	Option 3: Increase densification at Hastings Central & St Johns Road opportunity sites	Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area	Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane	Option 6: 100% LHN	Option 7: 110% LHN
Rank	3	2	4	1	5	6	7
Likely significant effects?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes – positive and adverse	Yes - positive and adverse

- 5.2.35. All options have the potential to deliver significant positive effects by providing new homes, including a mix of types, sizes, and tenures, with a proportion of affordable housing. This will help meet existing and future housing needs and support improvements in health and wellbeing through better living conditions. However, the significance of these effects depends not only on the quantum of growth but also on its location. Options that concentrate development in accessible areas with good links to services and amenities are likely to perform more favourably, while options that focus growth in peripheral or disconnected locations have the potential to limit these benefits.
- 5.2.36. **Options 3, 1a and 1b**, which assume the lowest levels of development, are likely to perform least favourably as they provide the most limited contribution to addressing housing need. **Options 2 and 4** perform better by introducing additional growth opportunities, particularly in accessible locations in Hastings Central and St Johns Road, which can support regeneration and improve access to services. **Option 4** offers additional benefits through densification in the town centre, which is the most accessible part of the town to services, facilities and borough-wide public transport networks.

- 5.2.37. **Option 4** performs more favourably than Option 5 because it includes further densification across the urban areas of the borough. This urban focussed distribution of development has the potential to improve access to services and facilities, support regeneration, and deliver a wider range of housing types and tenures in the existing built-up area. However, the higher quantum of growth will also place greater pressure on infrastructure, requiring significant investment to avoid adverse effects. **Option 5** increases the proportion of growth which will be located at peripheral locations (including Breadsell) with limited access to existing services and amenities. Option 5 also has the potential to impact on employment opportunities through supporting co-location at the Ivyhouse Lane employment site. This is discussed in more detail under the Employment and Economic Development SA theme below.
- 5.2.38. **Options 6 and 7**, which seek to deliver 100% and 110% of LHN, respectively, will contribute the most to meeting housing needs and supporting regeneration. However, given the scale of growth proposed, the options would also be likely to place significant pressures on existing services and facilities, requiring substantial investment in infrastructure to avoid adverse effects on the quality of life of residents and health and wellbeing. While developer contributions and planning obligations can help mitigate these pressures, the scale of growth proposed under these options introduces uncertainty around timely delivery of supporting infrastructure. A further drawback of delivering this level of growth is the likelihood that development at this scale will have significant adverse effects on the quality and liveability of existing neighbourhoods. This includes through the likely delivery of inappropriately scaled and sited development, and delivery of development of unsuitable types and tenure for specific locations. This has the potential to lead to significant negative effects which outweighs the benefits of enhanced housing delivery.

### **Conclusion**

- 5.2.39. In summary, all options are likely to deliver significant positive effects for this SA theme through the delivery of housing growth, with the magnitude of benefits broadly reflecting the level of growth proposed.
- 5.2.40. In this respect Options 6 and 7, followed by Options 4, 2 and 5 perform favourably due to their contribution to meeting housing needs and supporting regeneration, while Options 2 and Options 1a / 1b perform least favourably given their more limited contribution to meeting housing needs.

- 5.2.41. However, Options 6 and 7, whilst they have the potential to meet housing needs (at least in terms of numbers), also have the potential to lead to significant adverse effects on the quality and liveability of existing neighbourhoods. Given the scale of growth proposed through these options, and the extensive physical and environmental constraints present across the borough, these options have the potential to lead to a large number of significant adverse effects relating to this SA theme.
- 5.2.42. Options 2, 3 and 4 would support the vitality of core areas of the borough in the town centre and St Leonards through facilitating growth in these locations. Given the wider range of amenities and public transport links in these locations, they would also support accessibility to services, facilities and opportunities. Option 5 is however likely to facilitate an increased proportion of development in the less accessible locations on the periphery of the built-up area of the borough.

## Heritage

**Table 5-8: Appraisal Findings for the Heritage SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	1	3	4	5	2	6	7
Likely significant effects?	Uncertain	Yes - adverse	Yes - adverse	Yes - adverse	Yes - adverse	Yes - adverse	Yes - adverse

- 5.2.43. Hastings has a rich historic environment, including a large number of listed buildings, scheduled monuments, conservation areas and areas of archaeological interest. The town centre, central St Leonards and the seafront are particularly sensitive due to their concentration of heritage designations and historic character. Development in these locations, especially through densification, has the potential to lead to adverse effects not only through direct impacts but also indirectly by altering the setting and character of heritage assets. In this respect increased development intensity and taller buildings could affect the key components of heritage significance, including the fabric and setting of heritage assets, and views, townscape character and sense of place.

- 5.2.44. While the significance of effects will ultimately depend on detailed design and layout, a higher level of housing growth generally increases the likelihood and potential magnitude of negative effects on heritage assets. Options that deliver lower levels of growth and avoid the most constrained areas are likely to perform most favourably. **Option 1a/1b**, which assumes the lowest level of development, is based on a constraint-led approach, meaning heritage sensitivities will already be considered in determining site suitability and capacity. As a result, these options are expected to avoid the most sensitive locations and minimise potential impacts on the historic environment.
- 5.2.45. **Option 3**, whilst delivering less growth than Option 1a/1b, increases densification at Hastings Central and St Johns Road opportunity sites. Given the significant heritage resource of these locations, and impacts from increased densification and associated cumulative effects, the option is less likely to support the historic environment. Similarly, Option 4 also directs growth to these locations through densification (as well as other locations in the urban area), and therefore has the potential for significant negative effects.
- 5.2.46. **Option 2** also delivers additional growth at Hastings Central and St Johns Road, although the scale of growth in these locations is less than for Option 4. It also delivers growth at and in the vicinity of the former convent site at Magdalen Road in St Leonards (Convent of Holy Child Jesus). This has the potential to impact on the fabric and setting of the Grade II\* and Grade II listed buildings associated with the former convent. However, it should be noted that the restoration and reuse of the listed convent buildings and other buildings on the site could secure the longer-term viability and management of these heritage assets, with the potential for long term positive effects.
- 5.2.47. **Option 5** introduces higher growth through intensification at the borough's edge, at locations that are disconnected from the historic core and seafront and are not rich in heritage assets. This means that while the option delivers more homes, its potential for adverse heritage impacts is likely to be lower than **Option 4**, which concentrates growth in central and urban areas.
- 5.2.48. **Options 6 and 7**, which seek to deliver 100% and 110% of LHN, respectively, are likely to perform least favourably overall. These options assume that every suitable hectare of land identified for housing is utilised, which markedly increase the potential for significant direct and indirect adverse effects on heritage assets and their settings, particularly in sensitive town centre and St Leonards locations. This includes through densification and wholesale changes in townscape character.

## Conclusion

- 5.2.49. Options 6 and 7 perform least favourably due to the scale of growth and likely requirement for significant growth to be delivered in sensitive locations for the historic environment. Options 3 and 4 also perform relatively poorly because they direct growth to the historic core of Hastings and St Leonards, which is highly constrained in heritage terms. Option 2, whilst delivering less growth in the sensitive locations of Hastings Central and St Johns Road, facilitates development at the sensitive former convent site at Magdalen Road in St Leonards. The option though also offers the potential to rejuvenate the key heritage assets at this location. Option 1a / 1b performs most favourably given the more limited growth requirements and potential to avoid the most sensitive areas. All options however have the potential for significant negative effects without appropriate avoidance, mitigation, and enhancement measures; in this respect robust heritage-led planning will be important to minimise harm and maximise opportunities for enhancement.

## Land And Water Quality

**Table 5-9: Appraisal Findings for the Land and Water Quality SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	2	4	1	3	5	6	7
Likely significant effects?	No	<b>Yes – adverse</b>	No	No	<b>Yes – adverse</b>	<b>Yes – adverse</b>	<b>Yes - adverse</b>

- 5.2.50. The efficient use of land is an important consideration for sustainable development. Options that focus growth within the existing urban area and on previously developed land are likely to perform most favourably, as they minimise the loss of greenfield land and reduce potential impacts on soil quality and agricultural resources. In this respect, **Option 1a/1b**, which applies a constraint-led approach and delivers the lowest quantum of growth, is likely to lead to the most limited impacts, with Option 3 and Option 4 also having a focus on brownfield sites in the urban area.
- 5.2.51. Options that focus on additional town centre opportunities (**Options 2 and 4**) also perform relatively well, as they continue to prioritise brownfield regeneration. However, Option 2 still involves some greenfield development, meaning there remains potential for adverse effects on soil and water quality.

- 5.2.52. **Options 2 and 5** direct a greater proportion and scale of development to greenfield land on the settlement edge, increasing the potential for soil disturbance and the loss of agricultural land. While the majority of land surrounding Hastings is of lower agricultural quality, some areas are classified as Grade 3 (including Breadsell), meaning there is potential for the loss of productive land under these options.
- 5.2.53. **Options 6 and 7**, which seek to deliver 100% and 110% of LHN, respectively, perform least favourably in relation to this SA theme. These options assume that every suitable hectare of land identified for housing is utilised, and therefore have the greatest potential to result in increased loss of open space and increased pressure on soils resources.
- 5.2.54. In relation to water resources, Hastings is located in an area of high water stress. All options will increase demand for water supply, but the scale of impact will correspond to the level of growth proposed. Lower growth options (**Options 3 and Options 1a/1b**) are likely to have the least impact, while higher growth options (**Options 6 and 7, and to a lesser extent Options 2, 4 and 5**) have the potential to place greater pressure on water resources. However, it is anticipated that Water Resource Management Plans will help address long-term supply issues.
- 5.2.55. Waste generation is an inevitable consequence of development and will broadly align with the scale of growth. While higher growth options will generate more waste, they also present opportunities to incorporate innovative waste management practices. Lower growth options will generate less waste overall but offer fewer opportunities for strategic waste solutions.

### Conclusion

- 5.2.56. Overall, the potential for adverse effects on land and water quality increases proportionally with the scale of growth proposed. Options that focus development within the existing urban area and on previously developed land, such as Option 1a/1b and Options 3 and 4 perform most favourably as they minimise the loss of greenfield land, reduce soil disturbance, and limit pressure on water resources. Options 2 and 5 perform less favourably due to their inclusion of the Breadsell greenfield site, which increases the risk of losing agricultural land and places greater demand on water supply. Options 6 and 7 perform least favourably, as delivering 100% and 110% of LHN introduces the greatest potential for widespread open space loss, soil degradation, and water stress, despite offering opportunities for strategic waste management and brownfield reuse.

## Natural Landscape

**Table 5-10: Appraisal Findings for the Natural Landscape SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	1	4	3	2	5	6	7
Likely significant effects?	No	Yes - adverse	No	No	Yes - adverse	Yes - adverse	Yes - adverse

- 5.2.57. The northern and eastern edges of Hastings adjoin the High Weald National Landscape (NL), which is a nationally designated area valued for its scenic quality and distinctive character. Development within or close to this designation has the potential to adversely affect its special qualities, particularly where growth is directed to greenfield land on the settlement edge. The extent of potential impacts will depend on the scale and distribution of development, as well as the design and mitigation measures applied.
- 5.2.58. Options that focus growth within the existing urban area and on previously developed land are likely to perform most favourably in relation to this theme, as they have the potential to limit encroachment into sensitive landscapes and reduce effects on the setting of the NL. In this respect, **Option 1a / 1b**, which apply a constraint-led approach and deliver a lower quantum of growth, is likely to lead to the more limited impacts on landscape character. Similarly, **Option 3** which focusses on Hastings Central and St Johns Road opportunity sites, and **Option 4** which also focusses on housing renewal areas and sites in the wider urban area, will help limit impacts on the special qualities of the National Landscape. Increased densification offered by these options however have the potential to impact on townscape at certain locations.
- 5.2.59. **Options 2 and 5** are likely to perform less favourably. These options introduce increased densities on the settlement edge and new locations, which have the potential to significantly alter the character of surrounding landscapes and affect the setting of the High Weald NL. In particular, the inclusion of the Breadsell Lane site under these options, which adjoins the National Landscape (with additional densification at this location under Option 5) may lead to significant changes to landscape character, although the significance of effects will depend on detailed design and mitigation.

- 5.2.60. **Options 6 and 7**, which seek to deliver 100% and 110% of LHN, respectively, perform least favourably in relation to the Natural Landscape theme. These options assume that every suitable hectare of land identified for housing is utilised, and therefore have the greatest potential to result in widespread and significant changes to the character and quality of Hastings's landscapes and townscapes. This includes increased pressure on the setting of the High Weald NL and the urban fringes, where landscape sensitivity is high.

### Conclusion

- 5.2.61. Options that focus development within the existing urban area and on brownfield land, such as Options 1a/1b, 3 and 4 perform most favourably as they are likely to minimise encroachment into sensitive landscapes and reduce impacts on the High Weald NL. Options 2 and 5 perform less favourably due to increased densities and development at the settlement edge, which could significantly alter surrounding landscape character, including associated with the National Landscape. Options 6 and 7 perform least favourably, as delivering 100% and 110% of LHN introduces the greatest potential for widespread landscape and townscape change.

## Skills, Employment and Economic Development

**Table 5-11: Appraisal Findings for the Skills, Employment and Economic Development SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	6	2	7	1	5	4	3
Likely significant effects?	<b>Yes - beneficial</b>	<b>Yes - beneficial</b>	<b>Yes - beneficial</b>	<b>Yes - beneficial</b>	<b>Yes - beneficial</b>	<b>Yes – positive and adverse</b>	<b>Yes – positive and adverse</b>

- 5.2.62. Hastings has a lower employment rate compared to the South East average, and unemployment remains a key issue.<sup>4</sup> Growth in housing has the potential to support economic development by increasing the working-age population, stimulating local spending, and improving the vitality of town and district centres. Accessibility to employment opportunities is an important consideration, as locations well connected to public transport and active travel networks can help reduce barriers to work.
- 5.2.63. **Option 4** is likely to perform most favourably as it focuses growth in the key employment areas of Hastings town centre and St Leonards and applies higher densities, which could strengthen town centre vitality and support economic activity. **Option 2** also performs strongly, offering similar benefits to Option 4, but with a slightly lower quantum of delivery. **Option 3**, whilst increasing densification at Hastings Central and St Johns Road opportunity sites, delivers the lowest level of growth of the options. The option is therefore least likely to support borough-wide economic regeneration.
- 5.2.64. **Option 2** and **Option 5** also perform well in terms of elevated levels of growth supporting borough-wide economic vitality. Their reliance on peripheral growth and the associated infrastructure challenges mean that benefits are less certain. While these options could enable new employment floorspace and skills initiatives, and economic vitality their performance depends on effective integration of growth with the main built-up area. Option 5 however seeks to deliver some growth through co-location of housing and economic uses at Ivyhouse Lane employment site. Given this is a key employment area for the borough, the reconfiguration of uses for housing has the potential to undermine the economic and employment offer of the area; this is more significant given the employment and regeneration needs of the borough.
- 5.2.65. **Options 6 and 7 deliver significant growth across the borough.** Their very high level of growth offers significant economic potential through scale, including construction activity and increasing demand for local services. However, the options include a high level of peripheral growth, which introduces uncertainty around integration with existing employment areas, and densification. The scale of growth would likely have significant impacts on local neighbourhoods, the historic environment and local distinctiveness. This has the potential to undermine the key economic attractors of the borough, including associated with the visitor and tourism economy.

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<sup>4</sup> ONS (2024): 'Employment, unemployment and economic inactivity in Hastings', [online] available to access via [this link](#)

- 5.2.66. In this respect it is also worth noting that tourism, a key contributor to the local economy, is likely to benefit from investment and regeneration under all options, particularly where growth supports the vitality of the town centre and St Leonards and enhances the quality of the public realm. Conversely, over-densification or poor design could adversely affect town centre character and heritage, tempering potential gains to the visitor economy. Mitigation through design quality, townscape enhancement and place-making is likely to be important to secure positive effects.
- 5.2.67. The relatively limited scales of growth taken forward through Options 1a and 1b offer only modest economic benefits compared to other options (with the exception of Option 3, which delivers less growth). These are though likely to be more certain and easier to deliver due to better spatial integration and lower delivery risk.

### Conclusion

- 5.2.68. Overall, Option 4 and Option 2 are likely to perform most favourably as they direct growth in the key employment areas of Hastings town centre and St Leonards and apply higher densities, which could strengthen town centre vitality and support economic activity. Option 2 and Option 5 also perform well in terms of elevated levels of growth supporting borough-wide economic vitality. Option 5 however has the potential to undermine employment provision at the key Ivyhouse Lane employment site.
- 5.2.69. Options 6 and 7 deliver significant growth across the borough, which will support economic growth and vitality. However, the scale of growth has the potential to undermine the key economic attractors of the borough.
- 5.2.70. Options 1a/1b and Option 3's limited scale of growth has the potential to offer more modest economic benefits.

## Transport

**Table 5-12: Appraisal Findings for the Transport SA Theme**

	<b>Options 1a and 1b: Constraint adjusted growth scenarios</b>	<b>Option 2: Constraint adjusted growth plus opportunity areas</b>	<b>Option 3: Increase densification at Hastings Central &amp; St Johns Road opportunity sites</b>	<b>Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area</b>	<b>Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane</b>	<b>Option 6: 100% LHN</b>	<b>Option 7: 110% LHN</b>
Rank	2	4	1	3	5	6	7
Likely significant effects?	<b>Yes - positive</b>	Uncertain	<b>Yes - positive</b>	<b>Yes - positive</b>	Uncertain	Uncertain	Uncertain

- 5.2.71. Hastings benefits from a good public transport network, including four railway stations providing regional and London connections, and a comprehensive bus network. Active travel opportunities are supported by local and regional cycle routes and a well-established rights of way network. This provides opportunities to deliver growth in locations that support sustainable travel and reduce reliance on private cars.
- 5.2.72. The options that focus on sites in the town centre and St Leonards, including **Option 3** and **Option 4** will support accessibility to services, facilities and employment opportunities via sustainable transport modes such as walking, cycling, bus and rail. This is given these locations are the most accessible by these modes of transport. **Options 1a and 1b** also avoids significant peripheral growth and focuses on sites that are generally well integrated with existing transport networks. These options are therefore likely to limit car dependency and pressure on the highways network, while making best use of existing infrastructure. However, the lower overall quantum of development through Options 1a/1b and Option 3 means there may be limited opportunities to deliver significant new transport improvements in the borough alongside new development.
- 5.2.73. **Option 2** also performs relatively well, concentrating additional development in highly accessible locations in the town centre near rail and bus services, supporting sustainable travel patterns. However, it is noted that this option, along with **Options 5, 6 and 7** include an allocation in a peripheral location without existing comprehensive public transport links (Breadsell), which could increase reliance on the private car for trips. In this respect these options could increase car dependency and place greater pressures on the road network particularly as peripheral areas generally offer more limited access to rail and bus services. While higher growth options may provide opportunities to deliver new transport infrastructure, such as improved bus services or active travel links, this is uncertain at this stage and would depend on the scale and design of development. It is likely though that elevated densities at Breadsell through Option 5, 6 and 7 would help facilitate such delivery.
- 5.2.74. On a borough-wide basis, the scale of development proposed through **Options 6 and 7** has the potential to lead to significant negative impacts on traffic and congestion across the town, including on key routes.

### **Conclusion**

- 5.2.75. Overall, Options 2, 3 and 4 perform well in relation to transport and accessibility through directing a significant proportion of growth to the most accessible locations in the borough by sustainable modes of transport. Options 1a and 1b are also likely to perform favourably because they avoid peripheral growth and focus on accessible locations, minimising car dependency and pressures on the road network.

- 5.2.76. Options 2, 5, 6 and 7 include an allocation at Breadsell, which is currently poorly connected by public transport. Impacts on traffic and accessibility will depend on the extent to which new transport infrastructure and services are delivered alongside development here and other peripheral areas of the borough.
- 5.2.77. The scale of development proposed through Options 6 and 7 has the potential to lead to significant negative impacts on traffic and congestion across the borough.
- 5.2.78. Uncertainty remains across Options 2-7, as significant effects will depend on the extent to which new transport infrastructure and services are delivered alongside development, particularly in peripheral areas.

## Summary of Assessment Rankings

**Table 5-13: Summary of Assessment Rankings (1 = performs most favourably; 7 = performs least favourably)**

SA Theme		Options 1a and 1b: Constraint adjusted growth scenarios	Option 2: Constraint adjusted growth plus opportunity areas	Option 3: Increase densification at Hastings Central & St Johns Road opportunity sites	Option 4: Option 3 + increased densification assumptions and Housing Renewal Areas in urban area	Option 5: Elevated density at Breadsell and co-location at Ivyhouse Lane	Option 6: 100% LHN	Option 7: 110% LHN
Air Quality	Rank	2	4	1	3	5	6	7
	Likely significant effects?	No	No	No	No	No	Yes - adverse	Yes - adverse
Biodiversity	Rank	1	4	2	3	5	6	7
	Likely significant effects?	No	Yes - adverse	Yes - adverse	Yes - adverse	Yes - adverse	Yes – adverse	Yes - adverse
Energy and Water Consumption	Rank	2	4	1	5	3	6	7
	Likely significant effects?	No	No	No	No	No	No	No
Climate Change Adaptation, Flooding, and Coastal Change	Rank	1	3	2	4	5	6	7
	Likely significant effects?	No	No	No	No	No	Uncertain	Uncertain
Population, Health, and Wellbeing	Rank	3	2	4	1	5	6	7
	Likely significant effects?							

	Likely significant effects?	<b>Yes – positive</b>	<b>Yes – positive and adverse</b>	<b>Yes – positive and adverse</b>				
Heritage	Rank	1	3	4	5	2	6	7
	Likely significant effects?	<b>Uncertain</b>	<b>Yes - adverse</b>	<b>Yes - adverse</b>				
Land And Water Quality	Rank	2	4	1	3	5	6	7
	Likely significant effects?	No	<b>Yes – adverse</b>	No	No	<b>Yes – adverse</b>	<b>Yes – adverse</b>	<b>Yes - adverse</b>
Natural Landscape	Rank	1	4	3	2	5	6	7
	Likely significant effects?	No	<b>Yes - adverse</b>	No	No	<b>Yes - adverse</b>	<b>Yes - adverse</b>	<b>Yes - adverse</b>
Skills, Employment and Economic Development	Rank	6	2	7	1	5	4	3
	Likely significant effects?	<b>Yes - beneficial</b>	<b>Yes – positive and adverse</b>	<b>Yes – positive and adverse</b>				
Transport	Rank	2	4	1	3	5	6	7
	Likely significant effects?	<b>Yes – positive</b>	<b>Uncertain</b>	<b>Yes – positive</b>	<b>Yes – positive</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>

## 6. Meeting Additional Needs in Hastings

- 6.1.1. Growth strategy Options 6 and 7 considered the delivery of LHN through delivering additional densification on the available sites in Hastings, including at Breadsell. It also, from a broad perspective, explored what the likely implications of the delivery of higher levels of growth in the borough would be in relation to the SA Framework.
- 6.1.2. Whilst it is recognised that the LHN figure comprises an unconstrained assessment of the number of homes needed in the area, and is intended to be the first step in the process of deciding how many homes need to be planned for through the Local Plan, it is useful to consider how LHN could potentially be delivered in the borough in full.
- 6.1.3. In this context, in addition to additional densification (which has already been considered through Options 6 and 7), there are a number of possible further approaches which could help contribute to the delivery full LHN in the borough. These are as follows:
- Land reclamation
  - Development on publicly accessible open spaces and playing fields
  - Urban extensions into the borough's hinterland.
- 6.1.4. Each of these elements has been considered in turn below.

### 6.2. Land reclamation

- 6.2.1. In terms of land reclamation, given the long-term timescales required in the planning and implementation of such an approach, significant delivery in the current plan period would be unlikely through this mechanism. In addition, given its cost, the viability of such an approach is doubtful, particularly in the context of land values in the borough and the need to deliver a range of housing types and tenures to meet the borough's needs.
- 6.2.2. There are also significant issues relating to this approach's likely impacts on coastal processes and flood risk, biodiversity (including Beachy Head East Marine Conservation Zone) and geodiversity assets (including Hastings Cliffs Special Area of Conservation), and the historic environment and seascape resource of the seafront.
- 6.2.3. For this reason, consideration of land reclamation as an alternative for this current plan period is not reasonable.

## 6.3. Development on open spaces and playing fields

- 6.3.1. Hastings has significant areas of publicly accessible open space and playing fields. Whilst these are important assets for community use and residents' health and wellbeing, these areas offer an opportunity for alternative uses, including housing and employment uses.
- 6.3.2. Due to the significant local housing and employment need in the borough, there is the potential for the SA to consider the relative merits of different approaches to playing pitches and publicly accessible open space as reasonable alternatives. This is with a view to exploring the implications of re-configuring areas of open space and playing pitches for housing, mixed and employment uses.
- 6.3.3. In light of the above, the following three options have been considered through the SA process:
- **Option OS1:** Ensure no net loss of playing pitches and publicly accessible natural and semi natural greenspace for residential, mixed use and employment.
  - **Option OS2:** Enable release of playing pitches for residential, mixed use and employment uses.
  - **Option OS3:** Enable a 10% release of publicly accessible natural and semi natural greenspace for residential, mixed use and employment uses (recognising it is the greenspace typology the borough has the most of).
- 6.3.4. **Table 6-1** presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes and use the SA Framework.
- 6.3.5. For each SA theme, a commentary on the likely significant 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. In addition, whether the option is likely to lead to significant negative or positive effects is highlighted.

**Table 6-1: Appraisal of options relating to sports pitches and open space**

SA theme	Discussion of potential significant effects and relative merits of options	Ranking and significant effects:		
		OS1	OS2	OS3
Air Quality	<p>The borough's green infrastructure networks, including natural and semi-natural open space and playing fields, are key contributors to good air quality. In this respect trees and vegetation provide a role in filtering atmospheric pollutants such as nitrogen dioxide and sulphur dioxide. They are also particularly effective at removing particulate matter through dispersion and dilution, and through deposition, as well as providing a barrier to dust and similar airborne pollutants. High quality green infrastructure also has indirect effects on air pollution through lowering temperatures, decreasing the risk of pollutants such as ground level ozone. Option OS2 and OS3 therefore, through facilitating the loss of key green key infrastructure assets in the borough, have the potential to lead to significant negative effects on air quality. This is likely to particularly affect locations with poorer air quality, such as adjacent to main roads. Given natural and semi-natural open space tends to perform an increased role in supporting good air quality when compared to playing pitches (due to an increase in vegetation and trees within these typologies) an additional focus</p>	1	2	3
		N	Y (negative)	Y (negative)

on natural and semi-natural open space through Option OS3 has the potential to lead to additional significant negative effects.

Biodiversity	<p>High quality green infrastructure brings a range of benefits for habitats and soils, species and ecological networks. This includes: increased habitat area and diversity; increased populations of species, including rare and protected species; increased opportunities for longer-distance movement of species; improved ecological connections increasing the resilience of biodiversity networks, including to climate change; and indirect benefits related to aspects such as water purification, air quality enhancements, climate change mitigation and improved management of recreational activities. Through these approaches, if designed well, green infrastructure can help deliver local biodiversity and geodiversity objectives.</p> <p>Natural and semi natural open space is a key contributor the borough's biodiversity networks. In this respect the loss of this typology to housing, mixed use and employment uses through Option OS3 has the potential to have significant negative effects. This is particularly pertinent given many of the areas of publicly accessible natural and semi-natural open space are also nationally and internationally designated biodiversity and geodiversity sites, for example a large proportion of Hastings Country Park is covered by the Hastings Cliffs SAC and the Hastings Cliffs to Pett Beach SSSI. To the west of the Borough, Combe Haven is an SSSI that interacts with the footprint of the Combe Valley Countryside Park. A number of other areas are SSSIs and/or contain significant areas of important habitats such as ancient woodland (such as Marline Valley Woods in the west). In addition, many areas of publicly accessible open space are designated as Local Wildlife Sites, for example St Helens Woods, Castle Hill and Summerfields Woods.</p>	1	2	3
		N	Y	Y
			(negative)	(negative)

Whilst playing pitches are typically less biodiverse than natural and semi-natural open space, the loss of these areas can have adverse impacts on habitats and species. This includes through contributing to cumulative and synergistic impacts on biodiversity networks, such as for example along floodplains when many playing fields are located.

Climate Change Adaptation, Flooding and Coastal Change	Green infrastructure in the borough, including natural and semi natural open space and playing fields, is of key importance to helping adapt to and manage the risks of climate change, including increased flood risk and extreme heat events.	1 N	2 Y (negative)	3 Y (negative)
	Green infrastructure supports flood risk management through the provision of permeable surfaces and helping to reduce localised flooding by capturing and absorbing stormwater into the ground. Alluvial soils (e.g., floodplains) make a valuable and sustainable contribution to carbon sequestration as they accumulate depth with each flood event. GBI can also support climate change adaptation through shading and temperature regulation. The increased shade and evaporative cooling (evapotranspiration) provided by trees and vegetation can lower ambient temperatures and the surface temperatures of impervious areas. This is particularly effective in more built-up urban areas where it can limit the urban heat island effect where urban areas have higher temperatures compared to surrounding rural areas. In addition, green infrastructure supports climate change mitigation through enhancing natural features which act as carbon sequesters and carbon sinks.			
	Many playing pitches and public open spaces in the borough overlap with fluvial flood zones and surface water pathways; in this respect they play a key role in flood risk management. Controlling the flow and permeation of water in the borough also makes a valuable contribution to protecting the			

integrity of soft, wet and weak soils and preventing unwanted ground movement.

As key components of green infrastructure networks in the borough, the loss of playing pitches (Option OS2) and natural and semi-natural greenspace (Option OS3) therefore has the potential for significant negative effects on climate adaptation and flooding.

Energy and Water Consumption	The options are unlikely to directly impact on energy and water consumption.	N/A N	N/A N	N/A N
Heritage	Natural and semi natural greenspace is an important component of the borough's townscapes which support the fabric and setting of the historic environment. In this regard open space can be an integral component of the historic setting of localities and the historic significance of important assets and areas of heritage interest present locally. In areas of significant heritage interest, it helps reinforce the significance of localities as important heritage resources, and complements the setting of key features of heritage interest, for example, those in distinctive historic townscapes. In addition, many areas of open space are themselves also important heritage assets for the borough. For example, Alexandra Park is a Grade II* listed Registered Park and Garden, St Leonard's Gardens is a Grade II listed Registered Park and Garden, and a number of open spaces are locally listed, such as White Rock Gardens. In this respect, the loss of open space through Option OS3 has the potential to have significant impacts on the fabric and setting of both designated and undesignated heritage assets. Whilst the loss of playing pitches will be less significant than the loss of natural and semi-natural open space, such provision can also contribute to	1 N	2 Y (negative)	3 Y (negative)

the setting of the historic environment. As such OS2 has the potential to have some significant negative effects.

Land and Water Quality	Natural and semi-natural open spaces, and to a lesser extent, playing pitches, deliver a range of ecosystem services which will support soil and water resources. This includes through soil formation (including alluvial), flood and erosion protection and soil and water quality regulation. Many pitches and natural and semi-natural greenspaces are close or adjacent to pollution-sensitive receptors. The loss of natural and semi-natural open space through Option OS3, and playing pitches through Option OS2 therefore has the potential to have significant negative effects relating to soil and water quality.	1 N	2 Y (negative)	3 Y (negative)
Natural Landscape	Natural and semi natural open space is an important contributor to landscape character in the borough, including its special qualities and sense of place. For example, key habitats (including areas that show greater diversity and abundance of vegetation) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. Green infrastructure can also play a role in contributing positively towards local distinctiveness and a sense of place, both in urban areas and more rural areas, particularly if it shows key local features such as those associated with local geodiversity. In this respect the loss of natural and semi natural open space through Option OS3 has the potential to lead to a range of significant effects on landscape character. In addition, whilst contributing less to landscape character, the loss of playing pitches to development can also lead to adverse impacts on setting and a sense of place, which are important components of landscape character. For example, the playing pitches at Bulverhythe contribute to the setting of the Coombe Valley Countryside	1 N	2 Y (negative)	3 Y (negative)

Park, and those at Tackleway at Barley Lane and Sandhurst Recreation Ground contribute to the setting of the National Landscape. As such, negative effects also have the potential to take place through Option OS2, although these are anticipated to be less significant than Option OS3.

Population, Health and Wellbeing	<p>The reconfiguration of open space and playing pitches for alternative uses through Options OS2 and OS3 has the potential to support the additional delivery of housing and employment in the borough. This will bring benefits relating to this SA theme. However, in the Hastings context, this is likely to be outweighed by the potential impacts on the health and wellbeing and quality of life of residents by these options. This is given Hastings is the most deprived lower tier local authority in Sussex and the 3<sup>rd</sup> most deprived in England.<sup>5</sup> Residents within deprived communities experience higher rates of long-term illness, disability, cancer, lung disease, heart problems, lower overall life expectancy and significant health inequalities compared with the rest of England.</p> <p>Attractive multifunctional green spaces enhance the quality of neighbourhoods, often supporting a high-quality public realm. ‘Green’ neighbourhoods are also more desirable places to live, with access to open space found to markedly increase the quality of life and health and wellbeing of residents. Green infrastructure, whether found in urban or more semi-rural greenspaces in the borough, can also bring substantial socio-economic value through leisure and tourism.</p> <p>With regards to publicly accessible open space in the borough, these are often multifunctional, and operate as locations for informal recreation, act as amenity buffers, provide forest school locations to deliver against</p>	1 N	3 Y (mixed, but negative overall)	2 Y (mixed, but negative overall)
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<sup>5</sup> [East Sussex in Figures](#)

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curriculum for local education providers and community groups, and act as locations for both formal and informal sports and play. Publicly accessible, local open spaces are also free to access, removing financial and physical access barriers to recreational spaces for the most deprived communities. In this respect the loss of such space through Option OS3 has the potential to lead to significant impacts on health and wellbeing and the quality of life of residents.

Similarly, the loss of playing pitches through option OS2 has the potential to lead to significant impacts. Playing pitches within the borough are often multifunctional. Examples include operating as school pitches within school grounds during school hours and formal sports pitches outside of these times. A number of schools in the borough do not currently meet the recommended minimums for access to outdoor PE space set out in national guidelines for mainstream schools, and some school playing pitches are in addition shared between multiple schools (despite being in the formal ownership of only one, for example at Sacred Heart Catholic Primary School). Due to the compact size of the borough, spaces identified as playing pitches may provide pitches across a range of sports. For example, a single site could operate as two 11-a-side football pitches, one rugby pitch, three hockey pitches, one American football pitch and a cricket pitch within the same year. Hastings' playing pitches also provide facilities for clubs and teams from neighbouring Rother District. Given the limited availability of playing pitches in the borough, the loss of pitches to development would be significant for the physical and mental health and wellbeing and the quality of life of residents; these impacts have the potential to be more significant than for Option OS2.

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Skills, Employment and Economic Development	Options OS2 and 3 have the potential to deliver additional housing and employment land. This will support the economic vitality of the borough, and help increase employment opportunities. The facilitation of additional growth therefore has the potential to bring significant positive effects in relation to this SA theme.	1	2	3
	However publicly accessible natural and semi-natural open space are important economic attractors for the borough, including associated with the visitor and tourism economy. For example, the open space at the West Hill and East Hill are key components of the tourism offer of the area, and Hastings Country Park Nature Reserve is a key attractor for visitors from both within and outside of the borough. More broadly, natural and semi-natural greenspace are important contributors to what makes the borough special, including in terms of local distinctiveness. As such, the loss of natural and semi natural open space through Option OS3 has the potential undermine key economic attractors of the borough.	N	Y	Y
	The loss of playing pitches through Option OS2 also has the potential to impact on the quality of life and health and wellbeing of residents. This has the potential to indirectly impact on the wider economic vitality of the borough, particularly given existing poor levels of health in the area. In addition, the loss of playing pitches through the option has the potential to lead to the loss of paid sports coaching roles in the borough, with implications for employment in this sector.		(mixed)	(mixed)
Transport	Open spaces and playing pitches can form important components of the public rights of way network. The loss of these spaces through Options OS2 and OS3 therefore has the potential to impact on active travel networks. The significance of these impacts however has the potential to be	1	2	3
		N	N	N

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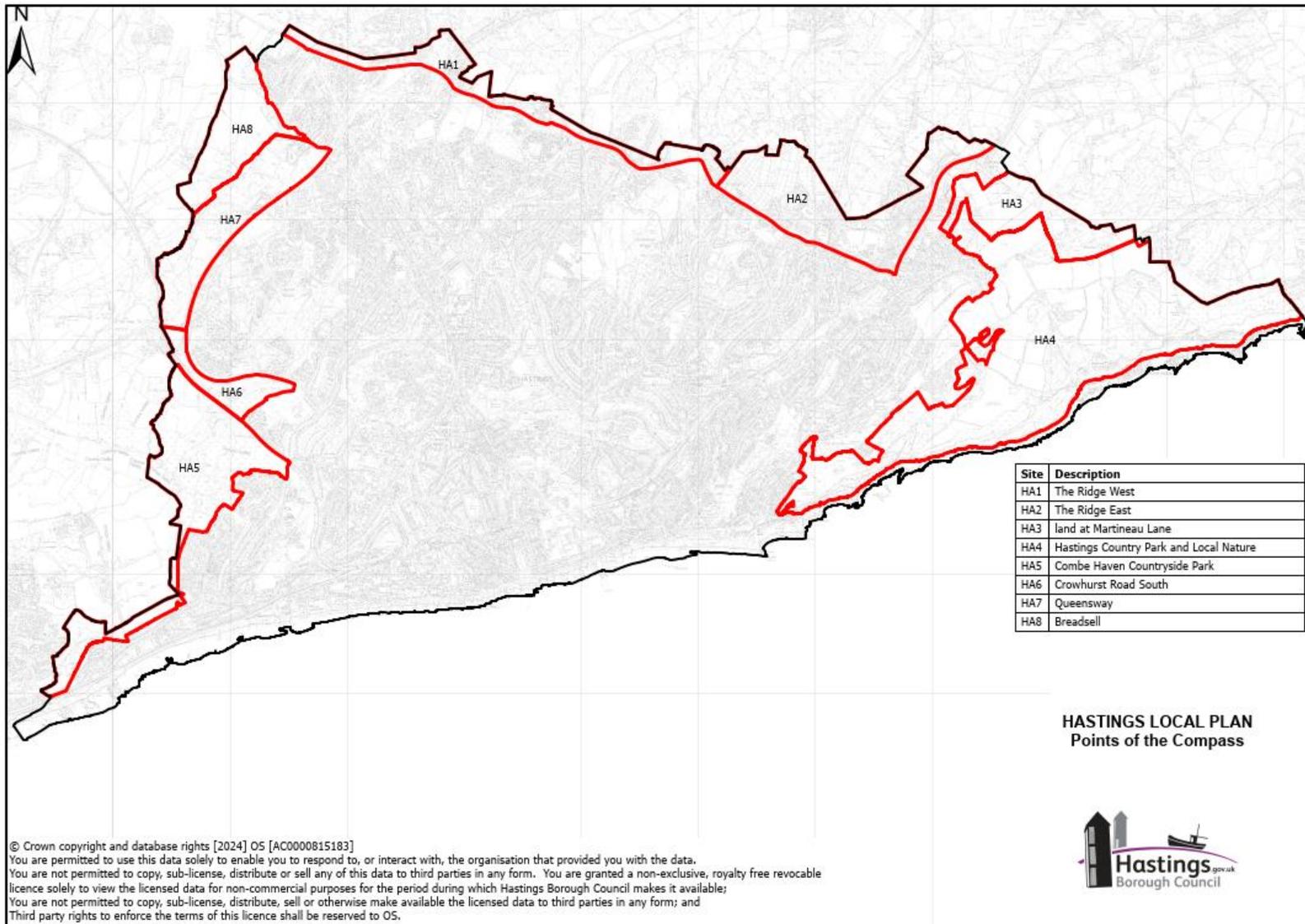
limited if replacement footpaths and cycle paths are provided within new development. As such, impacts are unlikely to be significant.

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## 6.4. Urban extensions

- 6.4.1. A further possibility for delivering the homes required to meet LHN is through one or more urban extensions of a significant size. In response to this, the SA process has undertaken a 'Points of the Compass' appraisal. The appraisal evaluates the relative sustainability merits of promoting larger strategic scale development at eight broad areas in the Borough's urban hinterland.
- 6.4.2. The eight broad areas are as follows (see **Figure 6-1**).
- HA1: The Ridge West
  - HA2: The Ridge East
  - HA3: Land at Martineau Lane
  - HA4: Hastings Country Park and Nature Reserve
  - HA5: Combe Valley Countryside Park
  - HA6: Crowhurst Road South
  - HA7: Queensway
  - HA8: Breadsell
- 6.4.3. The analysis evaluates the key environmental constraints present in each of the broad areas proposed, including related to: biodiversity; flood risk; the historic environment; landscape quality; water; and agricultural land quality. The analysis also considers from a broader perspective socio-economic and accessibility issues.
- 6.4.4. Whilst a number of the eight broad areas identified in the 'Points of the Compass' appraisal include sites that are being taken forward within the draft Plan (including a cross boundary approach with Rother District Council), the Local Plan call for sites and SHELAA process has not identified land which could be assembled for urban extension purposes. Nonetheless, given it is a longer-term possibility for meeting LHN in full, the SA process has sought to further consider what the likely significant effects of such an approach might be.
- 6.4.5. **Appendix A** presents the Points of the Compass appraisal.

**Figure 6-1: Points of Compass Appraisal Areas**



## 7. Developing the Preferred Approach

- 7.1.1. The following presents an overview of HBC's reasons for selecting the preferred approaches for the Hastings Local Plan.
- 7.1.2. Strategic Policy 1 in the emerging Local Plan outlines HBC's approach to their spatial strategy:

*'Growth in the first instance is directed to locations which are well supported by existing or planned sustainable transport infrastructure and other services. This approach will help minimise carbon emissions from travel and allow significantly increased development densities in appropriate locations. This in turn can also help to deliver much needed housing, alongside spaces for businesses to grow. This increased demand from new occupants can help bolster local shops and services and may help justify greater investment in infrastructure such as increased bus services and other sustainable transport initiatives.*

*The council has set an ambitious target for the town to work towards becoming carbon neutral ahead of the UK target of 2050. This target is consistent with and informs our development strategy for accommodating growth and change. Managing the pattern of development in this way, ensures it is sustainable, will lessen encroachment on the natural environment - including protecting soil, water, and vegetation that have an important role in carbon mitigation.*

*Hastings also has significant levels of flood risk in different parts of the borough, and this risk will grow with climate change. We have sought to avoid allocating sites in areas with elevated flood risk where this cannot be mitigated. New Windfall development is not expected within these locations or in areas strictly protected for their natural environmental benefits, unless it can be evidenced that the use is compatible, risk can be mitigated and is aligned with other policies in the Local Plan.*

*Hastings is tightly constrained. To the north, east and west is largely bounded by the borough boundary, and nationally or sub-regionally important environmental designations with the English Channel to the south. There is therefore limited opportunity for outward growth and expansion of the Town as a whole.*

*As a result, our growth strategy must focus on prioritising development on Previously Developed Land (brownfield sites) within the urban area, through renewal, regeneration and densification and lastly through suitable greenfield site development in order to maximise the number of new homes which can be delivered...'*

## **Part 2: What are the SA findings at this current stage?**

## 8. Approach to the Assessment of the Hastings Local Plan

### 8.1. Overview

- 8.1.1. **Chapters 9 and 10** present an appraisal of the Local Plan, as currently published under Regulation 18 of the Planning Regulations.

### 8.2. Methodology

- 8.2.1. The appraisal identifies and evaluates the ‘likely significant effects’ of the Hastings Local Plan on the baseline, drawing on the ten SA objectives identified through scoping (see **Table 3-1**) as a methodological framework.
- 8.2.2. Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Hastings Local Plan in more general terms.
- 8.2.3. Within the appraisal narrative below specific policies are referred to only as necessary and relevant to each SA theme (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).
- 8.2.4. Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

## 8.3. Policies

8.3.1. There are 88 policies in the draft Local Plan, which are listed in **Table 8-1**.

**Table 8-1: Policies in the Hastings Local Plan**

<b>Policy Reference</b>	<b>Policy Name</b>
<b>Strategic Policies</b>	
SP1	Directing Growth – a Spatial Strategy
SP2	New and Affordable Housing
SP3	Business Development – Office and Industrial
SP4	Business Development – Town Centres
SP5	Meeting the Challenge of Climate Change
SP6	Renewable and Low Carbon Technologies
SP7	Protecting and Enhancing the Historic Environment
SP8	Conserving and Enhancing the Natural Environment
SP9	Managing Coastal Erosion and Flood Risk
SP10	Transport Infrastructure
SP11	Healthy and Safe Communities
<b>Development Potential Areas and Regeneration Areas</b>	
D1	Land at Breadsell
R1	Hastings Central
R2	Former Convent of Holy Child Jesus, Magdalen Road
R3	St Johns Road
<b>Site Allocation Policies</b>	
HA1	Applications for Housing and Mixed-Use Proposals
HS1	Land adjacent to Sandrock Park, The Ridge
HS2	Seaside Road, West St Leonards
HS3	Former Westerleigh School, Hollington Park Close

<b>Policy Reference</b>	<b>Policy Name</b>
HS4	Former Malmesbury House, 123-125 West Hill Road
HS5	Former West St Leonards Primary School, Bexhill Road
HS6	Ore Valley (Former Power Station)
HS7	Former Post Office and University of Brighton building
HS8	Mayfield E, Bodiam Drive
HS10	Land at Rock Lane
HS11	Cinque Ports Way
HS12	Gambier House, 111 West Hill Road and West House, 115 West Hill Road
HS13	Land North-West of Winchelsea Lane
HS15	190 Bexhill Road
HS16	Site of former 12-19 Braybrooke Terrace
HS17	Hastings Garden Centre, Bexhill Road
HS18	Land at Tilekiln Farm
HS19	107 The Ridge (Simes and Sons)
HS20	Former West Hill Road Reservoir
HS21	Land East of Rock Lane
HS23	Land East of Beaney's Lane, The Ridge
HS24	Land at Graystone Lane
HSS2	309-311 Harold Road
HSS3	Land adjacent 142 Bexhill Road
HSS5	Land at Chiltern Drive
GT1	Land South of Crowhurst Road
<b>Employment Allocations</b>	
EA1	Employment Sites and Allocations
ES1	Queensway North, Queensway
ES2	Site PX, Churchfields

<b>Policy Reference</b>	<b>Policy Name</b>
ES3	NX2, Sidney Little Road, Churchfields Estate
ES4	NX3, Sidney Little Road, Churchfields Estate
ES5	Adjacent Unit C, 1-8 Brook Way
ES6	UK Power Networks, Hastings Main, The Ridge/ Ivyhouse Lane
ES7	Ivyhouse Lane, Northern Extension
ES8	Land at the junction of The Ridge West and Queensway
ES9	Land at Whitworth Road
ES10	Marline Fields, Enviro21 Business Park, Land West of Queensway
<b>Housing</b>	
H1	Specialist Housing for Older People
H2	Shared Housing
H3	Conversion of Existing Dwellings
H4	Self build and Custom Housebuilding
H5	Accommodation for Traveller Communities
H6	Housing Renewal
H7	Temporary Residential Uses
<b>Economic Development</b>	
E1	Protecting and Enhancing Employment Land and Premises, areas and allocations
E2	Skills, Employment and Supply Chain
E3	Primary Shopping Areas
E4	Food, Drink, Entertainment and the Night-time Economy
E5	The Visitor Economy
E6	Outdoor Visitor Accommodation
<b>Sustainable Communities</b>	

<b>Policy Reference</b>	<b>Policy Name</b>
SC1	Key Design Principles
SC2	Housing Mix, Accessibility and Adaptability
SC3	Sustainable Design and Construction
SC4	Alteration and Extension of Dwellings
SC5	Proposals Affecting the Significance and Setting of Heritage Assets
SC6	Sustainable Development and Heritage Protection
SC7	Changes to building elevations and roofs in Conservation Areas
SC8	Shopfronts, Advertisements and Commercial Frontages
SC9	The High Weald National Landscape and Other Areas of Landscape Value
SC10	Habitat Protection, Biodiversity and Net Gain
SC11	Trees and Woodland
SC12	Green and Blue Infrastructure
SC13	Urban Greening Factor
SC14	Provision, Enhancement and Retention of Sports and Recreation Facilities
SC15	Ground Behaviour, Geodiversity and Land Stability
SC16	Flood Risk and Drainage
SC17	Coastal Change Management
SC18	Pollution and Hazards
SC19	Environmental Nuisance
SC20	Community Facilities
<b>Infrastructure and Delivery</b>	
ID1	Planning Obligations
ID2	Access, Services and Parking
ID3	Open space, Sports and Recreation

## 9. Appraisal of the Local Plan

### 9.1. Local Plan Overview

- 9.1.1. The draft Local Plan guides future development across the borough up to 2041. The vision of the plan is as follows:

*“Our vision is for Hastings by 2041 to be a town that is a great place to live, work and visit. Hastings will be a town which is taking responsibility for tackling the climate and nature crises; where housing is available, affordable, energy-efficient and secure; where everyone can live healthy, fulfilling lives; and which has a thriving, sustainable economy attracting greater investment from businesses and organisation as well as strengthening its cultural and destination offer. Hastings will protect and enhance its natural and historic environment”*

- 9.1.2. The plan aims to deliver 3,141 - 3,373 new homes during the plan period. However, the nationally calculated local housing need (LHN) for Hastings of 697 homes a year, equating to 12,546 net new homes over the plan period.
- 9.1.3. The Council views that there is potential to deliver more homes through mixed-use regeneration opportunities in Hastings Town Centre. In this respect, the housing target of 3,141 - 3,373 is an ‘at least’ target. The plan identifies one Development Potential Area and three regeneration areas.
- 9.1.4. The three Regeneration Areas are Hastings Central Regeneration Area, which is a location identified for large-scale regeneration; the Former Convent of Holy Child Jesus Regeneration Area, which is an area identified for heritage-led regeneration; and Land at St John’s Road Regeneration Area, which is identified for rationalisation and enhancement of the existing railway access and play space while potentially incorporating other uses.
- 9.1.5. The Development Potential Area, Land at Breadsell, is a location that straddles the boundary with neighbouring Rother to be investigated to understand its potential.
- 9.1.6. Alongside new development, the Local Plan emphasises the importance of housing renewal, supporting the upgrading and reconfiguration of the existing social housing stock, helping to ensure that existing homes remain suitable, efficient and capable of meeting future needs.

- 9.1.7. The plan identifies a need for 51,297sqmbusiness floorspace and 4,150 full time equivalent jobs by 2041. Approximately 41,000sqm of floorspace will be delivered through employment allocations totalling 18.31 ha. located within the Strategic Industrial Employment Areas (SIEAs). Approximately 30,000sqm will be delivered on allocated sites within SIEA1 (Queensway Corridor) and approximately 11,000sqm will be delivered on allocated sites within SIEA2 (Ivyhouse Lane). The remaining need will be met through mixed-use development as outlined above.
- 9.1.8. The policies in the draft Local Plan (as listed in **Table 8-1**) will deliver against the forecasted housing and employment needs of the borough whilst protecting the borough's key assets and improving its infrastructure provisions. These are discussed in more detail below under each SA theme.

## **9.2. Commentary on Proposed Local Plan Spatial Strategy**

### **Air Quality**

- 9.2.1. There are no Air Quality Management Areas (AQMAs) within the borough. In addition, there is generally good accessibility within the borough, with four railway stations and numerous bus services serving different parts of the town. This provides opportunities for delivering growth in locations which facilitates travel by public transport.
- 9.2.2. Hastings contains two primary roads: the A259, which largely runs parallel to the coastline, and the A21, which runs north to south through the centre of the borough. Development that is located in immediate proximity to these roads is likely to be impacted by more localised air quality issues caused by pollution from traffic and congestion. The following sites are in immediate proximity (<50 m) to a primary road:
- Priory Street Car Park and ESK, which is adjacent to the A21.
  - Queensbury House, Havelock Road, which is adjacent to the A21.
  - Muriel Matters House, Breeds Place, which is adjacent to the A259. Land adjacent 142 Bexhill Road, which is adjacent to the Bexhill Road part of the A259.
  - Station Approach Car Park and Royal Mail Delivery Office, which is adjacent to the A21.
  - Land rear of 419 to 447 Bexhill Road, which is adjacent to the Bexhill Road part of the A259.
  - 190 Bexhill Road, which is adjacent to Bexhill Road part of the A259.

- Seaside Road, West St Leonards, which is adjacent to the Bexhill Road part of the A259.
- Former West St Leonards Primary School, Bexhill Road, which is adjacent to the Bexhill Road part of the A259.
- Cinque Ports Way (former Stamco timber yard and TA centre), which is adjacent to the Bexhill Road part of the A259.
- 1st to 3rd floors, 29-30 Kings Road, which is 18 m from the A2102.
- Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place, which is 22 m from the A259.
- St Johns Road, which is 32 m from the A2101.
- Former Post Office and University of Brighton building, Cambridge Road, which is 32 m from the A21.
- Former Malmesbury House, 123-125 West Hill Road, which is 34 m from the A259.
- Gambier House, 111 West Hill Road and West House, 115 West Hill Road, which is 44 m from the Bexhill Road part of the A259.
- Priory Meadow, which is 46 m from the A21.
- Land North-West of Winchelsea Lane, which is 47 m from the A259.

9.2.3. In this respect, the spatial strategy takes forward sites that have the potential to be affected by pollution from traffic and congestion on primary roads in the borough. Notably, some of these sites are located adjacent to Bexhill Road, which is part of the A259 and where historically there have been significant air quality issues (including before the Bexhill to Hastings Link Road was on line).

9.2.4. However, it is recognised though that the allocations are unlikely to lead to increased exposures to air pollutants beyond national objectives for air quality. Therefore, no significant adverse effects are anticipated for the Air Quality SA theme.

## Biodiversity

9.2.5. In terms of internationally designated sites for biodiversity, Hastings contains the Hastings Cliffs Special Area of Conservation (SAC). In terms of nationally designated sites for biodiversity, Hastings contains the Hastings Cliffs to Pett Beach; Combe Haven; and Marline Valley Woods Sites of Special Scientific Interest (SSSIs). It is also in proximity to, and within the Impact Risk Zone of, the Maplehurst Wood SSSI in Westfield Civil Parish. With a focus on marine designations, the southwest of the borough overlaps with the Beachy Head East Marine Conservation Zone (MCZ). In addition, Hastings contains several areas of ancient woodland, as well as Biodiversity Action Plan (BAP) priority habitats maritime cliff and slope; coastal vegetated shingle; good quality semi-improved grassland; wet woodland; lowland meadows; coastal and floodplain grazing marsh; purple moor grass and rush pastures; lowland heathland; lowland fens; reedbeds; traditional orchards; and deciduous woodland. There are also several Local Wildlife Sites (LWSs) and Local Nature Reserves (LNRs) in the borough.

### Internationally and Nationally Designated Sites

9.2.6. The following the sites are within 1 km of Hastings Cliffs SAC:

- 309-311 Harold Road, which is 450 m from the SAC.
- Land at Tilekiln Farm, which is 642 m from the SAC.
- Land at Graystone Lane, which is 870 m from the SAC.
- 381-391 Old London Rd, which is 898 m from the SAC.

9.2.7. It is noted that these sites (with the exception of Land at Tilekiln Farm) are within the built-up part of the borough, and therefore are unlikely to lead to significant impacts on the SAC. In addition, for these allocations, the requirement to prepare Ecological Constraints and Opportunities Plans (ECOPs) will ensure that site-specific ecological sensitivities are identified early and that appropriate avoidance and mitigation measures are embedded in scheme design, further reducing the potential for adverse effects on the SAC.

9.2.8. Several allocations are also located within proximity of the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA). However, these sites are all situated within the existing built-up area of Hastings and therefore have limited potential to give rise to functionally-linked land or disturbance pathways to the SPA. As such, significant adverse effects are unlikely.

- 9.2.9. Whilst several sites are within, adjoining or in proximity to (<1 km) a SSSI, only the following sites are in proximity (<250 m) to an SSSI:
- Queensway North, Queensway, which is adjacent to Marline Valley Woods SSSI.
  - Land at Breadsell, which is adjacent to Marline Valley Woods SSSI.
  - Marline Fields, Enviro21 Business Park, Land West of Queensway, which is adjacent to Marline Valley Woods SSSI.
  - PX, Churchfields, which is 118 m from Marline Valley Woods SSSI.
  - NX2, Sidney Little Road, Churchfields, which is 144 m from Marline Valley Woods SSSI.
  - NX3, Sidney Little Road, Churchfields, which is 160 m from Marline Valley Woods SSSI.
  - Mayfield E, Bodiam Drive, which is 161 m from Marline Valley Woods SSSI.
- 9.2.10. SSSI Impact Risk Zones (IRZs) are a GIS tool / dataset which map zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The following sites are within a SSSI IRZ for the type and scale of development likely to be proposed:
- 309-311 Harold Road.
  - Cinque Ports Way (former Stamco Timber Yard and TA Centre).
  - 190 Bexhill Road
  - Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place.
  - Former West St Leonards Primary School, Bexhill Road.
  - Former Westerleigh School, Hollington Park Close.
  - Land adjacent 142 Bexhill Road.
  - Land at junction of The Ridge West and Queensway.
  - Land at Whitworth Road.
  - Land at Breadsell.
  - Land at Graystone Lane.
  - 381-391 Old London Rd (former Hare & Hounds & adjacent garage).

- 153-154 Queens Road, 0.02 Residential 5 Hastings.
- Land at Tilekiln Farm.
- Land rear of 419 to 447 Bexhill Road.
- Marline Fields.
- Mayfield E, Bodiam Drive.
- Clifton Court, Holmesdale Gardens.
- 43 Earl Street.
- Muriel Matters House, Breeds Place.
- NX2, Sidney Little Road, Churchfields.
- NX3, Sidney Little Road, Churchfields.
- Priory Meadow.
- PX, Churchfields.
- Queensway North, Queensway.
- Seaside Road, West St Leonards.

9.2.11. While some of these sites are brownfield, which reduces the likelihood of direct habitat loss, this does not in itself rule out significant effects (particularly where the proposed use changes to residential). Residential development can introduce new pathways for disturbance, such as increased recreational pressure, lighting, noise and the presence of domestic pets. However, because most sites are within the existing built-up area of Hastings and are physically separated from SSSIs by established development and infrastructure (the notable exception to this is Land at Breadsell), the potential for direct effects remains limited. Any remaining risks (including those relating to recreational disturbance or domestic pets) will be considered at the project level and addressed through appropriate mitigation.

9.2.12. Notably, many of the site allocation policies require potential impacts on biodiversity to be mitigated. For example, Policies HS18, ES1 and ES10, outline that proposals for development should include an Ecological Constraints and Opportunities Plan (ECOP) and incorporate appropriate conservation and mitigation measures as recommended by the ECOP. The ECOP must make specific reference to the presence of the adjacent SSSI and to other areas of wildlife sensitivity nearby.

- 9.2.13. The following sites are within, adjoining or in proximity (<100 m) to the Beachy Head East MCZ:
- Seaside Road, West St Leonards, which is 23 m from the MCZ.
  - Cinque Ports Way (former Stamco timber yard and TA centre), which is 31 m from the MCZ.
  - Land rear of 419 to 447 Bexhill Road, which is 36 m from the MCZ.
  - 60-61 Eversfield Place, which is 47 m from the MCZ.
- 9.2.14. In this respect, the spatial strategy takes forward sites that have the potential to impact this designation. It will be important that this is taken into consideration during site design.
- 9.2.15. The following sites contain, adjoin or are in proximity (<50 m) to a BAP priority habitat:
- Queensway North, Queensway, which contains deciduous woodland.
  - PX, Churchfields, which contains deciduous woodland.
  - Adjacent Unit C, 1-8 Brook Way, which contains deciduous woodland.
  - Ivyhouse Lane, Northern Extension, which contains deciduous woodland.
  - Land at Graystone Lane, which contains deciduous woodland.
  - Former West St Leonards Primary School, Bexhill Road, which contains coastal and floodplain grazing marsh.
  - Ore Valley (Former Power Station), which contains deciduous woodland.
  - NX2, Sidney Little Road, Churchfields, which adjoins deciduous woodland.
  - Land at Breadsell, which adjoins deciduous woodland.
  - Land at junction of The Ridge West and Queensway, which adjoins deciduous woodland.
  - Land at Whitworth Road, which adjoins deciduous woodland.
  - Marline Fields, Enviro21 Business Park, Land West of Queensway, which adjoins lowland meadows.
  - Land rear of 419 to 447 Bexhill Road, which adjoins coastal and floodplain grazing marsh.
  - The Four Courts, Stonehouse Drive, which adjoins deciduous woodland.

- Land adjacent to Sandrock Park, The Ridge, which is 6 m from deciduous woodland.
- Land adjacent 142 Bexhill Road, which is 8 m from coastal and floodplain grazing marsh.
- Land at Chiltern Drive, which is 9 m from deciduous woodland.
- Former Malmesbury House, 123-125 West Hill Road, which is 10 m from deciduous woodland.
- Hastings Garden Centre, Bexhill Road, which is 14 m from lowland fens.
- Land at Rock Lane, which is 17 m from deciduous woodland.
- Former Westerleigh School, Hollington Park Close, which is 46 m from good quality semi-improved grassland.

9.2.16. In this respect, the spatial strategy takes forward sites that have the potential to lead to impacts on BAP priority habitats. Impacts include loss of habitat or disturbance to the habitat from factors such as noise, light pollution or trampling from enhanced access.

#### **Locally Designated Sites for Biodiversity**

9.2.17. The following sites contain part of, adjoin, or are in proximity (<50 m) to a LWS and/or LNR:

- Land at the junction of The Ridge West and Queensway, which contains part of Hollington Valley LWS.
- Land at Whitworth Road, which contains part of Hollington Valley LWS.
- Former Malmesbury House, 123-125 West Hill Road, which contains part of Caves Road Cliffs LWS.
- Queensway North, Queensway, which adjoins Marline Valley Woods LWS and LNR.
- 1-7 Wellington Place, which adjoins Castle Hill LWS.
- Hastings Castle, the Collegiate Church of St Mary and the Ladies'
- Land adjacent 142 Bexhill Road, which adjoins South Saxons LWS.
- Land at Breadsell, which adjoins Marline Valley Woods LWS and Marline Valley LNR.
- Marline Fields, Enviro21 Business Park, Land West of Queensway, which adjoins Marline Valley Woods LWS and LNR.
- The Four Courts, Stonehouse Drive, which adjoins Ponds Wood LNR.

- Former West St Leonards Primary School, Bexhill Road, which is within South Saxons LWS.
- Ore Valley (Former Power Station), which adjoins Broomgrove LWS.
- Cinque Ports Way (former Stamco Timber Yard and TA Centre), which adjoins Bulverhythe Shingle Beach and Cliffs LWS.
- Gambier House, 111 West Hill Road and West House, 115 West Hill Road, which adjoins Caves Road Cliffs LWS.
- Land adjacent 142 Bexhill Road, which is 1 m from South Saxons LWS.
- Muriel Matters House, Breeds Place, which is 3 m from Castle Hill LWS.
- Ivyhouse Lane, Northern Extension, which is 6 m from Hastings Cemetery LWS.
- Land adjacent to Sandrock Park, The Ridge, which is 7 m from St Helens Wood LWS and LNR.
- Land at Chiltern Drive, which is 9 m from Broomgrove LWS.
- Hastings Garden Centre, Bexhill Road, which is 12 m from Glyne Gap.
- Land rear of 419 to 447 Bexhill Road, which is 21 m from Bulverhythe Shingle Beach and Cliffs LWS.
- NX3, Sidney Little Road, Churchfields, which is 22 m from Wainwright Close LWS.
- Former West Hill Reservoir, which is 40 m from Caves Road Cliffs LWS.
- 309-311 Harold Road, which is 48 m from Clive Vale LWS.

9.2.18. In this respect, the spatial strategy takes forward sites that have the potential to lead to impacts on LWSs and LNRs.

9.2.19. More broadly speaking, it is noted that larger developments can offer opportunities to deliver landscape-scale biodiversity enhancement measures such as habitat creation and enhancements in ecological connections and networks. As such, larger sites (for example Land at Tilekiln Farm, Land at Breadsell, Queensway North, Queensway and Ivyhouse Lane, Northern Extension) provide significant opportunities in this regard.

## Energy and Water Consumption

- 9.2.20. By delivering growth the spatial strategy will ultimately lead to an increase in energy and water consumption. However, it is noted that the sustainability performance of development partially depends on energy and water efficiency during operation. This could include the inclusion of elements such as energy efficient design (i.e. positioning development to maximise solar gain), the provision of renewable energy on-site, and water-saving measures such as rainwater harvesting and greywater recycling. Whilst it is considered that this can only be assessed on a site-by-site basis, it is noted that there are generally more opportunities to integrate low carbon and renewable energy into large-scale developments. For example, large-scale photovoltaic systems can be combined with community heating schemes to support renewable energy and increased energy efficiency. In this respect, larger sites (for example Land at Tilekiln Farm, Land at Breadsell, Queensway North, Queensway and Ivyhouse Lane, Northern Extension) could lead to additional opportunities.

## Climate Change Adaptation, Flooding and Coastal Change

### Flooding

- 9.2.21. Hastings largely has a relatively low risk of fluvial flooding due to the majority of watercourses confinement to ghyll valleys. However, the borough still contains some areas within Flood Zone 2 / 3 associated with the network of current and former waterbodies that intersect with the borough, as well as the coast. The following sites intersect with Flood Zone 2 / 3:
- Priory Meadow (over 50%).
  - Seaside Road, West St Leonards (over 50%).
  - Land rear of 419 to 447 Bexhill Road (over 50%).
  - 153-154 Queens Road, 0.02 Residential 5 Hastings (over 50%).
  - Cinque Ports Way (former Stamco Timber Yard and TA Centre) (over 50%).
  - Land at Whitworth Road (under 50%).
  - Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place (under 50%).
  - Land adjacent 142 Bexhill Road (under 50%).
  - Land at Breadsell (under 50%).
  - Queensway North, Queensway (under 50%).

- Land at Tilekiln Farm (under 50%).
- Hastings Garden Centre, Bexhill Road (under 50%)
- Former West St Leonards Primary School, Bexhill Road (under 50%).

9.2.22. In this respect, the spatial strategy takes forward sites that have the potential to exacerbate existing fluvial flood risk at these locations. However, it is noted that the site allocation policies take into account this risk. For example, Policies HS2, HS11, and HS18, which cover Seaside Road, West St Leonards and Cinque Ports Way (former Stamco timber yard and TA centre), and Land at Tilekiln Lane, respectively, outline that proposals should be supported by a Flood Risk Assessment and detailed drainage strategy that incorporate measures to address flood risk.

9.2.23. Surface water flood risk is more widespread across Hastings and certain areas in the town centre are particularly prone to surface water flooding. The following sites contain areas of high or medium surface water flood risk:

- 12-19 Braybrooke Terrace.
- 107 The Ridge (Simes and Sons).
- Cinque Ports Way (former Stamco Timber Yard and TA Centre).
- St Johns Road.
- Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place.
- Former Convent of Holy Child Jesus, Magdalen Road.
- Former Hall and Yard, Ore Station.
- Former Post Office and University of Brighton building.
- Former West St Leonards Primary School, Bexhill Road.
- Former Westerleigh School, Hollington Park Close.
- 43 Earl Street.
- Clifton Court, Holmesdale Gardens.
- The Four Courts, Stonehouse Drive.
- Ivyhouse Lane, Northern Extension.
- Hastings Garden Centre, Bexhill Road.
- Land adjacent 142 Bexhill Road.
- Land at Breadsell

- Land at junction of The Ridge West and Queensway.
- Land at Whitworth Road.
- Land rear of 419 to 447 Bexhill Road.
- Marline Fields, Enviro21 Business Park, Land West of Queensway.
- Mayfield E, Bodiam Drive.
- 1st to 3rd floors, 29-30 Kings Road.
- 60-61 Eversfield Place.
- 7 - 11 Chapel Park Road.
- Land at Tilekiln Farm.
- 153-154 Queens Road, 0.02 Residential 5 Hastings.
- Land at Greystone Lane.
- Ore Valley (Former Power Station).
- Priory Meadow.
- Priory Street Car Park and ESK.
- Queensbury House, Havelock Road.
- Queensway North, Queensway.
- Seaside Road, West St Leonards.
- Station Approach car park and Royal Mail Delivery Office.

9.2.24. In this respect, the spatial strategy takes forward sites that have the potential to exacerbate existing surface water flood risk at these locations. However, similar to the above, the site allocation policies (supported by Policy SC16) take into account this risk and outline appropriate mitigation measures.

### **Coastal Change**

9.2.25. The South Foreland to Beachy Head Shoreline Management Plan (SMP) (2006)<sup>6</sup>, which covers the stretch of coastline in Hastings, outlines that a long history of intervention has resulted in a heavily managed shoreline protecting the almost continuously developed coast.

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<sup>6</sup> South East Coastal Group (2006): 'South Foreland to Beachy Head SMP', [online] available to access via [this link](#)

- 9.2.26. Hastings is described as a dense urban area that is developed to the edge of the low coastal slope and fronted by a shingle beach of amenity and tourism importance. The coastline here has been protected since the 14th Century and the SMP seeks to continue protecting the frontage of this regionally important town. This will include maintenance of the harbour arms that provide a base and protection for the beach launched local fishing fleet and build the beach to the west, where it impedes longshore drift, thereby assisting in the maintenance of the beach here. It will prevent erosion of the seafront and its associated assets and will aim to reduce the flooding risks. Ongoing sea level rise is likely to result in a significant narrowing of intertidal areas unless beaches are artificially built up. This has the potential to impact upon the tourism economy of the town, as beaches along this section of the coast are an important asset.
- 9.2.27. Between Fairlight Cove and Hastings is area of undefended cliffs of international environmental, geological and ornithological importance, with high landscape value, and no significant cliff top developments. The SMP seeks to allow natural cliff retreat, which will maintain the landscape and environmental quality of the frontage, part of which includes the Hastings Country Park. Maintenance of shoreline access associated with the Country Park should be acceptable provided it does not impact upon the environmental value of the site. There will be some loss of agricultural land, along with part of the Country Park (which also includes the scheduled 'Iron Age Cliff Castle' site'). In the long term, there will also be a need to re-route sections of the coastal footpath. This approach will maintain an input of beach forming sediment to the shoreline which will benefit this area and the coast to the east.
- 9.2.28. In relation to the above, whilst none of the sites are located between Fairlight Cove and Hastings, some of the sites are near the coastline in Hastings. Specifically, the following sites are within 100 m of the coastline:
- Seaside Road, West St Leonards, which is 23 m from the coastline.
  - Land rear of 419 to 447 Bexhill Road, which is 45 m from the coastline.
  - 60-61 Eversfield Place, which is 45 m from the coastline.
  - Cinque Ports Way (former Stamco timber yard and TA centre), which is 51 m from the coastline.
- 9.2.29. It is also noted that some of the sites located further from the coastline are in areas of low elevation (<20 m) and therefore are also at risk of coastal flooding. These sites are:
- Land adjacent 142 Bexhill Road, which is 3 m above sea level.
  - Former West St Leonards Primary School, which is 4 m above sea level.

- Priory Meadow, Queens Road, which is 7 m above sea level.
- Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place, which is 9 m above sea level.
- Former Post Office and University of Brighton Building, which is 11 m above sea level.
- Priory Street Car Park and ESK, which is 11 m above sea level.
- 153-154 Queens Road, 0.02 Residential 5 Hastings, which is 11 m above sea level.
- Site of former 12-19 Braybrooke Terrace, which is 12 m above sea level.
- 60-61 Eversfield Place, which is 14 m above sea level.
- Former Malmesbury House, 123-125 West Hill Road which is 16 m above sea level.
- Former Hollingsworth Garage, Braybrooke Road, which is 18 m above sea level.
- Clifton Court, Holmesdale Gardens, which is 18 m above sea level.
- 190 Bexhill Road, which is 20 m above sea level.
- St Johns Road, which is 20 m above sea level.

9.2.30. In this respect, the spatial strategy takes forward sites that are at risk of coastal flooding. However, it is noted that the site allocation policies take into account this risk. For example, Policies HS2 and HS11, which cover Seaside Road, West St Leonards and Cinque Ports Way (former Stamco timber yard and TA centre) respectively, outline that proposals should be supported by a Flood Risk Assessment and detailed drainage strategy that incorporate measures to address flood risk. With regard to Seaside Road, West St Leonards, this should include improvements to the sea wall and contributions to ongoing maintenance in light of tidal and fluvial flood risk (Zone 3) which should be secured by Section 106.

### **Climate Change Adaptation**

9.2.31. More broadly, growth presents an opportunity to support adaptation to the potential effects of climate change through providing improvements to green infrastructure networks. This is because green infrastructure contributes to climate change adaptation by reducing the impacts of flooding and extreme heat events and provides connections which increase the resilience of the borough to the effects of climate change.

- 9.2.32. Larger sites (such as Land at Tilekiln Farm, Land at Breadsell, Queensway North, Queensway and Ivyhouse Lane, Northern Extension) offer greater potential to incorporate strategic green infrastructure that can contribute to climate change adaptation, for example through multifunctional open space, ecological corridors and SuDS. However, development at these locations would also entail substantial greenfield land loss, which reduces existing natural resilience and limits the ability of these areas to absorb climate impacts. On balance, the opportunities for new green infrastructure provision partially offset these concerns, but the overall effect is mixed and will depend on the extent to which adaptation measures are integrated into site design.

## **Population, Health and Wellbeing**

### **Housing and Location of Growth**

- 9.2.33. As noted at the start of this chapter, the housing target of 3,141 - 3,373 is around a quarter of the LHN figure. The Council views that there is potential to deliver more homes through mixed-use regeneration opportunities in Hastings Town Centre. In this respect, the housing target of 3,141 - 3,373 is an 'at least' target. The plan identifies three regeneration areas, the first being Hastings Central (Policy R1). Here, six opportunity sites are identified across the Station Area and Hastings Central Plaza. Policy R1 provides supports a variety of land uses in Hastings Central to encourage a mixed-use vibrant town centre.
- 9.2.34. The second regeneration area is the Former Convent of Holy Child Jesus, Magdalen Road (Policy R2). Here, the repair, restoration, active reuse, and on-going care and maintenance of the former Convent buildings is supported. Whilst the policy sets out that a variety of uses may be acceptable regarding the conversion and re-use of the existing listed buildings, it gives preference to uses / mixes of uses that best achieve the retention of the listed buildings' significance.
- 9.2.35. The third regeneration area is St Johns Road (Policy R3), which comprises land in and around Warrior Square Station. The policy supports residential led, mix-use development, which will also incorporate improvements to the accessibility, capacity and design of Warrior Square Station.

- 9.2.36. In light of the above, whilst the spatial strategy does not meet the identified housing need for the borough, it will still deliver a significant number of new homes (including a mix of types, sizes and tenures, with a proportion of affordable housing), with the potential for significant positive effects. In addition to new development, the plan also seeks to maximise the contribution of the existing housing stock through Policy H6 (Housing Renewal), which supports the upgrading, reconfiguration and more efficient use of existing social housing areas. Furthermore, the delivery of housing and other growth will be supported by Policy D9, which sets out how planning obligations will ensure that the necessary infrastructure is secured and delivered at the right time. Together, these approaches recognise that the borough is highly constrained (being largely built-up with much of the undeveloped land covered by biodiversity, landscape or heritage designations) while still providing opportunities to increase housing supply and improve existing neighbourhoods in a sustainable manner.
- 9.2.37. In terms of the distribution of growth, the spatial strategy delivers growth over a wide area, and performs positively in this respect. By focusing a significant proportion of growth in the central areas, the spatial strategy supports development in the part of the borough with the best access to services and facilities, employment opportunities and key transport links.

#### **Index of Multiple Deprivation**

- 9.2.38. According to the Index of Multiple Deprivation (IMD) (2025), Hastings is more deprived than 99% of local authority districts nationally. The following sites overlap, either fully or partially, with a Lower Super Output Area (LSOA) amongst the 10% most deprived neighbourhoods in the country:
- PX, Churchfields.
  - NX2, Sidney Little Road, Churchfields.
  - NX3, Sidney Little Road, Churchfields.
  - Adjacent Unit C, 1-8 Brook Way.
  - UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane.
  - Land at Chiltern Drive.
  - 153-154 Queens Road, 0.02 Residential 5 Hastings.
  - 1st to 3rd floors, 29-30 Kings Road.
  - 60-61 Eversfield Place.
  - The Four Courts, Stonehouse Drive.
  - Clifton Court, Holmesdale Gardens.

- 43 Earl Street.
- 7 - 11 Chapel Park Road.
- Ivyhouse Lane, Northern Extension.
- 107 The Ridge (Simes and Sons).
- Station Approach car park and Royal Mail Delivery Office.
- St Johns Road.
- Queensbury House, Havelock.
- Former Post Office and University of Brighton building, Cambridge Road.
- Priory Meadow.
- Priory Street Car Park and ESK.
- Former Convent of Holy Child Jesus, Magdalen Road.
- Land at Chiltern Drive.
- Car Park, 35 Shepherd Street.
- Land at Rock Lane.
- Ore Valley (Former Power Station).
- Land North-West of Winchelsea Lane.

9.2.39. In this respect, the spatial strategy will deliver housing and employment growth, and the associated benefits, in the most deprived parts of the borough. This will have positive implications for equalities.

### **Access to Schools**

9.2.40. Hastings contains a total of 25 schools, which are relatively well distributed across the borough. Despite this, the following sites are not within walking distance (<800 m) of a school:

- Land at Breadsell, which is 1.6-1.7 km from Churchwood Primary Academy.
- Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place, which is 1.2-1.3 km from Ark Castledown Primary Academy, St Mary Star of the Sea Catholic Primary School, and Torfield School.
- Muriel Matters House, Breeds Place, which is 1.2-1.3 km from Torfield School.

- Priory Meadow, which is 1.1-1.2 km from St Mary Star of the Sea Catholic Primary School, Ark Castledown Primary Academy, and Torfield School.
- Land rear of 419 to 447 Bexhill Road, which is 1.1-1.2 km from Pebsham Primary Academy.
- Former Post Office and University of Brighton building, which is 1-1.1 km from St Mary Star of the Sea Catholic Primary School.
- Former Hollingsworth Garage, Braybrooke Road, which is 1-1.1 km from Ark Castledown Primary Academy.
- 12-19 Braybrooke Terrace, which is 1-1.1 km from St Paul's Church of England Academy, and St Mary Star of the Sea Catholic Primary School.
- Queensbury House, Havelock Road, which is 900-1000 m from St Mary Star of the Sea Catholic Primary School.
- Former Westerleigh School, Hollington Park Close, which is 900-1,000 m from Christ Church C.E. Primary and Nursery Academy.
- Cinque Ports Way (former Stamco Timber Yard and TA Centre), which is 900-1,000 m from St Leonards Church of England Primary Academy and Saxon Mount School.
- Car Park, 35 Shepherd Street, which is 800-900 m from St Mary Star of the Sea Catholic Primary School.
- Hastings Garden Centre, Bexhill Road, which is 800-900 m from Pebsham Primary Academy.
- 190 Bexhill Road, which is 800-900 m from Saxon Mount School.

9.2.41. In light of the above, the spatial strategy takes forward sites that are not within walking distance of a school. However, it is recognised that all of the sites (with the exception of Land at Breadsell) are within walking distance (<800 m) of a bus stop.

### **Access to Health Facilities**

- 9.2.42. Hastings contains several doctor / health centres and the Conquest Hospital on the Ridge. The following sites are not within walking distance (<800 m) of a doctor / health centre:
- Land adjacent to Sandrock Park, The Ridge, which is 1.7-1.8 km from Little Ridge Surgery.
  - Land at Breadsell, which is 1.5-1.6 km from Churchwood Medical Practice.
  - Gambier House, 111 West Hill Road and West House, 115 West Hill Road, which is 1.3-1.4 km from St Johns Road Surgery.
  - Former Westerleigh School and Playing Fields, which is 1.2-1.3 km from Sedlescombe House.
  - Former Malmesbury House, 123-125 West Hill Road, which is 1.2-1.3 km from High Glades Surgery and Carisbrooke Surgery.
  - Land at Chiltern Drive, which is 1.1-1.2 km from Beaconsfield Road Surgery.
  - Former West Hill Reservoir, which is 1.1-1.2 km from St Johns Road Surgery.
  - Land North-West of Winchelsea Lane, which is 1.1-1.2 km from Shankhill Surgery.
  - Land East of Rock Lane, which is 1.1-1.2 km from Shankhill Surgery.
  - 107 The Ridge (Simes and Sons), which is 1.0-1.1 km from Ore Village Primary Academy.
  - Land rear of 419 to 447 Bexhill Road, which is 900-1,000 m from Pebsham Surgery.
  - 107 The Ridge (Simes and Sons), which is 900-1,000 m from Shankhill Surgery.
  - Seaside Road, West St Leonards, which is 900-1,000 m from Carisbrooke Surgery and High Glades Surgery.
  - Cinque Ports Way (former Stamco Timber Yard and TA Centre), which is 800-900 m from Carisbrooke Surgery and High Glades Surgery.
- 9.2.43. In light of the above, the spatial strategy takes forward sites that are not within walking distance of a doctor / health centre. However, it is recognised that all of the sites (with the exception of Land at Breadsell) are within walking distance (<800 m) of a bus stop.

### **Demand on Existing Services and Facilities**

- 9.2.44. Although dependent on existing pressures on services and facilities, the spatial strategy has the potential to place increasing demands on services and facilities, with potential to affect the quality of services and facilities used by existing residents. On the other hand, due to the requirements for developers to support infrastructure and services, through Section 106 agreements / payments, there is also potential for the spatial strategy to support the provision of new and enhanced services and facilities, as well as transport links. This will support accessibility to services and facilities in Hastings.

### **Potential Loss of Existing Services and Facilities**

- 9.2.45. None of the sites will result in the loss of existing services and facilities, and the spatial strategy performs well in this respect.

### **Potential Loss of Local Open Space**

- 9.2.46. The following site will result in the loss of local open space:
- Seaside Road, West St Leonards, which if mitigations are not in place will lead to the loss of the playground.
- 9.2.47. In light of the above, the spatial strategy will lead to the loss of local open space. However, it is noted that Policy HS2, which covers Seaside Road, West St Leonards, sets out that proposals for development should provide new public open space land above the underground tank in the north of the site with informal opportunities for 'play' integrated into the design of the site.

## **Heritage**

- 9.2.48. Hastings contains over 900 listed buildings (comprising one grade I listing; 23 grade II\* listings and 545 grade II listings); six scheduled monuments; one protected wreck; and two parks and gardens (one grade II\* and one grade II). Note that whilst there are over 900 listed buildings in the borough, there only 569 listings, owing to the fact that many listings comprise more than one building. The borough also contains 18 conservation areas. The potential impacts of the spatial strategy on features of cultural, built and archaeological heritage assets is discussed below.

## Listed Buildings

9.2.49. The following sites contain, adjoin or are in proximity (<50 m) to a listed building:

- Former Convent of Holy Child Jesus, Magdalen Road, which contains 'Chapel To The Former Convent Of The Holy Child Jesus', 'Former Convent Building To The North West Of Chapel At The Former Convent Of The Holy Child Jesus', 'Gate Lodge And Gateway To The Former Convent Of The Holy Child Jesus', 'Priory At The Former Convent Of The Holy Child Jesus, Training College', and 'Former Convent Of The Holy Child Jesus'.
- Mayfield Farm, which is within or adjoining 'Mayfield Farmhouse'.
- Priory Meadow, which is 8 m from 'The Town Hall'.
- Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place, which is 13 m from '3, York Buildings'.
- 381-391 Old London Rd, which is 16 m from 'Ore War Memorial'.
- Priory Street Car Park and ESK, which is 24 m from 'United Reformed Church Formerly Congregational Church'.
- Mayfield E, Bodiam Drive, which is 24 m from 'Mayfield Farmhouse'.
- 7 - 11 Chapel Park Road, which is 30 m from 'Church of St Leonard (Baptist)'.
- Former Post Office and University of Brighton building, which is 34 m from 'United Reformed Church, Formerly Congregational Church'.
- Ore Valley (Former Power Station), which is 34 m from 'United Reformed Church, Formerly Congregational Church'.
- Muriel Matters House, Breeds Place, which is 37 m from '3, Castle Street'.
- 1st to 3rd floors, 29-30 Kings Road, which is 39 m from 'Renaissance House'.
- St Johns Road, which is 40 m from 'Church of St Leonard (Baptist)'.

9.2.50. In this respect, the spatial strategy takes forward sites that have the potential to impact the setting of listed buildings. However, the level of impact will depend on the detailed design, scale and positioning of new development, and the extent to which it respects or avoids intrusion into the setting of the listed buildings.

- 9.2.51. Former Convent of Holy Child Jesus, Magdalen Road is evidently one of the most constrained sites from a heritage standpoint. However, it is recognised that many of the listed buildings on the site have been underused for many years and have lacked regular maintenance and repair. Of key concern is the grade II\* listed chapel which is on Historic England's national Heritage at Risk Register. In this respect, development provides an opportunity to improve the condition of the listed buildings on this site. This will require well thought out and sympathetic design.
- 9.2.52. In relation to the above, Policy R2, which supports the repair, restoration, active reuse, and on-going care and maintenance of the former Convent buildings, gives preference to uses / mixes of uses that best achieve the retention of the listed buildings' significance. In addition, new development is acceptable within the former playing fields area on the north side of the existing complex subject to the development minimising any harm to the significance of the listed buildings; the character and appearance of the surrounding conservation area and listed buildings within it; or to wider townscape views. The policy also requires that any new development is informed by a clear understanding of the site's significance and is designed to be locally distinctive and of high quality. Proposals must minimise harm to the listed buildings, the character and appearance of the conservation area, and wider townscape views, and should integrate landscaped green spaces and pedestrian and cycle connections to the surrounding area.
- 9.2.53. Furthermore, three sites (HS1; HS17; HS19) include policy requirements for a 'watching brief' to be implemented during any development works, owing to their location within an Archaeological Notification Area. This measure will help ensure that any previously unrecorded archaeological remains are identified, documented and, where necessary, appropriately mitigated.

### **Registered Parks and Gardens**

- 9.2.54. Only one of the sites adjoins or is in proximity (<50 m) to a registered park or garden; this is Former Hollingsworth Garage, Braybrooke Road, which is 22 m from Alexandra Park. In this respect, the spatial strategy takes forward a site that has the potential to impact the setting of a registered park or garden.

### **Conservation Areas**

- 9.2.55. The following sites are within, adjoining or in proximity (<50 m) to a conservation area:
- Priory Street Car Park and ESK, which is within Hastings Town Centre.
  - Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place, which is within Hastings Town Centre.

- Former Convent of Holy Child Jesus, Magdalen Road, which is within Magdalen Road.
- 60-61 Eversfield Place, which is within Eversfield Place Conservation Area.
- Car Park, 35 Shepherd Street, which is within St. Leonards East (Gensing).
- Former Malmesbury House, 123-125 West Hill Road, which is within Grosvenor Gardens Conservation Area.
- Former West Hill Reservoir, which is within Grosvenor Gardens Conservation Area.
- Former Post Office and University of Brighton building, which is within Hastings Town Centre.
- St Johns Road, which is within King's Road Conservation Area.
- 1st to 3rd floors, 29-30 Kings Road, which is within King's Road Conservation Area.
- Queensbury House, Havelock Road, which is within Hastings Town Centre Conservation Area.
- Gambier House, 111 West Hill Road and West House, 115 West Hill Road, which is within Grosvenor Gardens Conservation Area.
- Land adjacent to Sandrock Park, The Ridge, which is adjoining Ore Place Conservation Area.
- Muriel Matters House, Breeds Place, which is adjoining Old Town.
- Clifton Court, Holmesdale Gardens, which is adjoining Cornwallis Gardens Conservation Area.
- Priors Meadow, which is adjoining Hastings Town Centre Conservation Area.
- Former Hollingsworth Garage, Braybrooke Road, which is 7 m from Blacklands Conservation Area.
- Seaside Road, West St Leonards, which is 10 m from Grosvenor Gardens Conservation Area.
- Station Approach car park and Royal Mail Delivery Office, which is 17 m from Cornwallis Gardens.
- 7 - 11 Chapel Park Road, which is within 45 m of King's Road Conservation Area.

- 9.2.56. In this respect, the spatial strategy includes several sites that have the potential to affect the setting and character of conservation areas. However, many of these sites currently accommodate uses or buildings that detract from the significance of the conservation area, meaning redevelopment may offer opportunities for improvement. The site allocation policies also require proposals to demonstrate how harm will be avoided or minimised; for example, Policy R2 specifies that any new development must preserve the character and appearance of the Magdalen Road Conservation Area.
- 9.2.57. More broadly, for the Hastings Town Centre Conservation Area, Policy R1 recognises the high concentration of heritage assets and requires development to conserve, and where appropriate enhance, their significance and setting. This provides an important policy safeguard against potential adverse effects arising from increased development pressure in the town centre.

### **Scheduled Monuments**

- 9.2.58. Two sites are within, adjoining or in proximity (<50 m) to a scheduled monument;
- 1-7 Wellington Place, which adjoins 'Hastings Castle, the Collegiate Church of St Mary and the Ladies' LWS.
  - Muriel Matters House, Breeds Place, which is 19 m from 'Hastings Castle, the Collegiate Church of St Mary and the Ladies' Parlour'.
- 9.2.59. Therefore, the spatial strategy takes forward a site that has the potential to disturb archaeological remains associated with a nearby scheduled monument. This though is likely to be limited by the existing uses associated with the Council buildings on the site.

### **Archaeological Notification Area**

- 9.2.60. The following sites are within or adjoining an Archaeological Notification Area (ANA):
- UK Power Networks, which is within an ANA.
  - Priory Street Car Park and ESK, which is within an ANA.
  - Corner of Wellington Place, Albert Road and Sports Direct; Cinema, Queens Road; and 1-7 Wellington Place, which is within an ANA.
  - Muriel Matters House, Breeds Place, which is within an ANA.
  - Priory Meadow, which is within an ANA.
  - Former Post Office and University of Brighton building, which is within an ANA.

- Clifton Court, Holmesdale Gardens, which is within an ANA.
- Queensbury House, Havelock Road, which is within an ANA.
- Hastings Garden Centre, Bexhill Road, which is within an ANA.
- Land rear of 419 to 447 Bexhill Road, which is within an ANA.
- 60-61 Eversfield Place, which is within an ANA.
- Land at Tilekiln Farm, which is within an ANA.
- Land adjacent to Sandrock Park, The Ridge, which is within an ANA.
- Former Convent of Holy Child Jesus, Magdalen Road, which is adjoining an ANA.
- Seaside Road, West St Leonards, which is adjoining an ANA.

9.2.61. In this respect, the spatial strategy includes sites that could disturb archaeological remains within AAIs. However, with appropriate investigation, evaluation and mitigation secured through the development management process, effects can be managed, and development may in some cases enable the recording and better understanding of archaeological interest.

## **Land and Water Quality**

### **Previously Developed Land**

9.2.62. The majority of the borough comprises the urban area of Hastings. Nevertheless, the following sites are either wholly or partially greenfield land:

- Queensway North, Queensway, which is wholly greenfield land.
- Site PX, Churchfields, which is wholly greenfield land.
- NX2, Sidney Little Road, Churchfields Estate, which is wholly greenfield land.
- NX3, Sidney Little Road, Churchfields Estate, which is wholly greenfield land.
- Ivyhouse Lane, Northern Extension, which is wholly greenfield land.
- Land at the junction of The Ridge West and Queensway, which is wholly greenfield land.
- Land at Whitworth Road, which is wholly greenfield land.
- Marline Fields, Enviro21 Business Park, Land West of Queensway, which is wholly greenfield land.

- Land adjacent 142 Bexhill Road, which is wholly greenfield land.
- Land rear of 419 to 447 Bexhill Road, which is wholly greenfield land.
- Land adjacent to Sandrock Park, The Ridge, which is wholly greenfield land.
- Mayfield E, Bodiam Drive, which is wholly greenfield land.
- Land at Rock Lane, which is wholly greenfield land.
- Land at Breadsell, which is wholly greenfield land.
- Land North-West of Winchelsea Lane, which is wholly greenfield land.
- Land East of Beaney's Lane, The Ridge, which is wholly greenfield land.
- Land East of Rock Lane, which is wholly greenfield land.
- Land at Chiltern Drive, which is a mixture of greenfield and previously developed land.
- Land at Tilekiln Farm, which is a mixture of greenfield and previously developed land.
- Land at Graystone Lane, which is a mixture of greenfield and previously developed land.
- 190 Bexhill Road, which is a mixture of greenfield and previously developed land.
- Former Westerleigh School and Playing Fields, which is a mixture of greenfield and previously developed land.
- Former West St Leonards Primary School, Bexhill Road, which is a mixture of greenfield and previously developed land.

9.2.63. In this respect, the spatial strategy takes forward sites that will likely result in the loss of greenfield land. However, it is recognised that this is largely unavoidable given the limited number of brownfield sites in the borough and the high housing and employment requirement figures. In addition, the site allocation policies largely include the provision of green infrastructure and require publicly accessible open space be secured on larger sites, including Land at Tilekiln Farm, Land adjacent to Sandrock Park and Seaside Road.

### **Mineral Resources**

- 9.2.64. According to the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)<sup>7</sup>, there are currently four active clay sites in East Sussex, one of which – Hastings Brickworks – is just outside of the borough in Guestling. This is designated as a Minerals Safeguarding Area (MSA). However, none of the sites overlap with this MSA.

### **Agricultural Land**

- 9.2.65. The key considerations in terms of supporting the efficient use of land in the borough are the need to avoid unnecessary loss of the highest quality ‘best and most versatile’ (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus ‘non-agricultural’ and ‘urban’), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Not all locations in Hastings have had recent detailed ALC undertaken; due to this, there is a reliance on less detailed pre-1988 national classifications for agricultural land. Under this older classification, subdivision of Grade 3 agricultural land into 3a (BMV land) and 3b (poorer quality land) is not available.
- 9.2.66. In relation to the above, the majority of the land surrounding the built-up area of Hastings is underlain by Grade 4 (‘poor’) agricultural land, with some Grade 3 (‘good to moderate’) agricultural land. The only sites underlain by Grade 3 agricultural land are Land at Breadsell and Ivyhouse Lane, Northern Extension. Hence, development at these locations could lead to the loss of productive agricultural land.

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<sup>7</sup> East Sussex County Council (2017): ‘East Sussex, South Downs and Brighton & Hove Waste Minerals Local Plan – Waste and Minerals Sites Plan’, [online] available to access via [this link](#)

## **Waste**

- 9.2.67. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)<sup>8</sup> identifies Hastings as an 'Area of Focus' for strategic waste recycling and recovery facilities. Waste generation is an inevitable consequence of development, including both waste generated by construction and waste generated during occupation. The management of waste, including the minimisation of waste generation in the first instance and the encouragement of the re-use, recycling and recovery of waste materials, would all be undertaken on a site-by-site basis. It is therefore considered that individual development is unlikely to have a significant negative impact on waste generation. In this context, it is reasonable to assume that the level of waste generated will correspond to the scale of development. However, it is recognised that larger schemes can present an opportunity to incorporate innovative waste management practices and technologies. Therefore, it is noted that larger sites (such as Land at Tilekiln Farm, Land at Breadsell, Queensway North, Queensway and Ivyhouse Lane, Northern Extension), have the most potential to support sustainable waste management within new development areas.
- 9.2.68. In addition, two sites within the borough (Land at Whitworth Road and the Land at the junction of Ridge West and Queensway) lie within a Waste Consultation / Notification Area associated with existing and planned waste management facilities. Residential development in these locations could be sensitive to potential amenity issues such as noise, odour and vehicle movements associated with waste operations. As a result, these sites have been allocated for employment rather than residential use, ensuring greater compatibility with the operational characteristics of nearby waste infrastructure.

## **Water Resources**

- 9.2.69. Hastings is within the supply area of Southern Water and is located in an area of severe water stress. It will be important to consider the emerging Local Plan's effects on water resources. In this respect, it is considered that growth through the spatial strategy will place a greater demand upon the already stressed supply. However, this will be partly addressed through Water Resources Management Plans (WRMPs), which set out long-term strategies for maintaining supply. In addition, the Local Plan includes design-led requirements to reduce consumption (such as the 100 litres per person per day water efficiency standard in Policy SC3) and the emphasis on SuDS, recycling and reuse within Policy SC16 (which will help to moderate increased demand arising from new development).

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<sup>8</sup> East Sussex County Council (2017): 'East Sussex, South Downs and Brighton & Hove Waste Minerals Local Plan – Waste and Minerals Sites Plan', [online] available to access via [this link](#)

- 9.2.70. Source Protection Zones (SPZs) are zones which show the level of risk to groundwater sources from contamination. There are no SPZs within the borough. However, the majority of the borough falls within the Pevensey and Cuckmere Levels Water Management Board area. This means that surface water drainage, water level management and the operation of local drainage infrastructure are important considerations for development within this catchment, and proposals will need to accord with the requirements and guidance of the Board to ensure effective and sustainable water management.

## Natural Landscape

### National Landscapes

- 9.2.71. The northern boundary and eastern extent of Hastings overlap with the High Weald National Landscape. The following sites are within, adjoining or in proximity (<500 m) to the High Weald National Landscape:
- Ivyhouse Lane, Northern Extension, which is within the National Landscape.
  - Land at Rock Lane, which is within the National Landscape.
  - Land East of Beaney's Lane, The Ridge, which is within the National Landscape.
  - Land at Tilekiln Farm, which is within the National Landscape.
  - Land North-West of Winchelsea Lane, which is within the National Landscape.
  - Land East of Rock Lane, which is within the National Landscape.
  - Land at the junction of The Ridge West and Queensway, which is adjacent to the National Landscape.
  - Adjacent Unit C, 1-8 Brook Way, which is adjacent to the National Landscape.
  - Land adjacent to Sandrock Park, The Ridge, which is adjacent to the National Landscape.
  - Land at Whitworth Road, which is 222 m from the National Landscape.
  - UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane, which is 234 m from the National Landscape.
  - 381-391 Old London Rd, which is 259 m from the National Landscape.
  - 309-311 Harold Road, which is 259 m from the National Landscape.
  - 301 Harold Road, which is 265 m from the National Landscape.

- 107 The Ridge (Simes and Sons), which is 275 m from the National Landscape.
- Land at Graystone Lane, which is 394 m from the National Landscape.
- Marline Fields, Enviro21 Business Park, Land West of Queensway, which is 482 m from the National Landscape.

9.2.72. In this respect, the spatial strategy takes forward sites that have the potential to lead to impacts on the High Weald National Landscape, either directly through development within the National Landscape or indirectly through impacting the setting of the National Landscape. However, it is noted that some of these are brownfield sites within the built-up part of the borough, and therefore these sites are unlikely to lead to any significant impacts on the National Landscape.

9.2.73. The site allocation policies consider impacts on the National Landscape. For example, Policy ES7, which covers Ivyhouse Lane, Northern Extension, states that proposals for development on this site should include a) an ECOP which makes specific reference to the presence of the High Weald National Landscape; b) a landscape impact assessment, taking into account both the site's setting and long-range views across the National Landscape; and c) a lighting plan to minimise light spill within the National Landscape.

9.2.74. In addition, Policy HS10, which covers Land at Rock Lane, states that proposals for development on this site should relate well to the frontage along Rock Lane and demonstrate the conservation and enhancement of the National Landscape showing how adverse impacts will be avoided. Policy HS18, which covers Land at Tilekiln Farm, states that land should be retained as open space and boundary landscaping retained which reflects the character and purpose of its inclusion in the National Landscape. Finally, Policy HS13, which covers Land North-West of Winchelsea Lane, states that proposals for development on this site should propose a lower density development owing to the sensitive surrounding landscape.

## Landscape Character Areas

- 9.2.75. East Sussex County Council's Landscape Character Assessment<sup>9</sup> shows that the land to the north of the built-up area of Hastings falls within the Brede Valley Landscape Character Area (LCA). The key landscape characteristics of this LCA include a) to the south west of the main valley a belt of undulating countryside extends to the Battle to Hastings ridge; and b) urban fringe intrusions around the edges of Battle and Hastings including pylons, industrial units, housing and horticultural developments. It is highlighted that "pressures for expansion of Battle and Hastings may impact on the parts of the character area which border the towns" and that "a priority should be to identify opportunities to enhance the degraded and poorly managed parts of the character area on the Hastings urban fringes". The sites that fall within this LCA are Ivyhouse Lane, Northern Extension, Land East of Rock Lane, Land at Rock Lane and Land North-West of Winchelsea Lane.
- 9.2.76. The land to the east of the built-up area of Hastings falls within the High Wealden Coast LCA. The key landscape characteristics of this LCA include a) the Hastings to Battle Ridge, which reaches the sea to form a distinctly unique coastline; b) Hastings Country Park with internationally important wildlife designations; c) the urban fringes of Hastings, including the dominating masts at North Seat, which form the western boundary to the area; d) the A259 between Hastings and Rye, which follows the ridge and forms the boundary on the North West side of the area; and e) virtually continuous ribbon development along Pett Road from Hastings to Cliff End. It is highlighted that "pressures for the expansion of Hastings may impact on the part of the character area which borders the town", and that "the priority will be to identify opportunities to enhance the degraded and poorly managed parts of the character area on the Hastings urban fringes". Land at Tilekiln Lane falls within this LCA.
- 9.2.77. The land to the west of the built-up area of Hastings falls within the Combe Haven Valley LCA. The key landscape characteristics of this LCA include a) urban fringe intrusions around the edges of Bexhill and Hastings; and b) the Hastings to London railway line, which cuts across the eastern part of the area. It is highlighted that "a priority should be to identify opportunities to enhance the degraded and poorly managed parts of the character area on the Hastings urban fringes". The only sites that fall within this LCA are Land at Breadsell and Marline Fields, Enviro21 Business Park, Land West of Queensway.

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<sup>9</sup> East Sussex County Council (2016): 'East Sussex Landscape Character Assessment', [online] available to access via [this link](#)

- 9.2.78. Several of the site allocations also fall within the local Landscape Character Context Areas (LCCAs) identified in the Landscape Sensitivity to Residential, Commercial and Solar Development within Hastings (2024). These areas include a range of sensitivity ratings to development. Sites within areas of high sensitivity include Land at Breadsell, while Land at Tilekiln Farm is identified as having moderate–high sensitivity to development. However, the policy framework provides important mitigation at these locations: Policy D1 for Land at Breadsell requires landscape buffer zones and a landscape-sensitivity analysis, while Policy HS18 for Tilekiln Farm includes the preparation of an Ecological Constraints and Opportunities Plan (ECOP) and landscape-led design measures. These site-specific requirements will help ensure that development responds appropriately to local landscape character and reduces the potential for adverse effects.
- 9.2.79. Overall, while the spatial strategy takes forward several sites that have the potential to affect the Brede Valley and Combe Haven Valley LCAs, its focus on directing most growth to brownfield land within the built-up area of Hastings helps to limit wider landscape impacts. Several allocations also fall within the local LCCAs, which confirms high sensitivity at Land at Breadsell and moderate–high sensitivity at Land at Tilekiln Farm. Taken together, these findings highlight the need for development to be landscape-led, with careful attention to siting, design and the retention of valued landscape features. While the overall spatial approach performs relatively well, localised effects on landscape and townscape remain possible, and the extent of these will ultimately depend on detailed design and layout at the application stage.

## **Skills, Employment and Economic Development**

- 9.2.80. According to data from the Office for National Statistics<sup>10</sup>, 77.4% of people aged 16-64 in Hastings are employed; this represents a decrease compared with the previous year (78.5%). Notably, Hastings' employment rate was lower than across the South East as a whole (79.3%) in the year ending 2023. Around 2,000 people aged 16 and over in Hastings were unemployed in the year ending 2023. This represents a rate of 4.0%. Comparatively, across the South East the unemployment rate was only 2.9%, indicating that unemployment is a key issue in Hastings.

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<sup>10</sup> ONS (2024): 'Employment, unemployment and economic inactivity in Hastings', [online] available to access via [this link](#)

- 9.2.81. Policy SP1 (Directing Growth) outlines that the supply of industrial floorspace will be increased and delivered through the development of new floorspace on allocated sites and through the effective use of existing employment land and premises in the Council's Strategic and Local Industrial Employment Areas (SIEAs and LIEAs). In these locations intensification and renewal of existing industrial premises will be promoted. The policy also states that the primary location for a range of uses including larger scale office functions, leisure offers, visitor accommodation, cultural and retail development, and education facilities will be Hastings Town Centre. Smaller scale development, appropriate to its context and the character of area, will be directed to District and Local Centres.
- 9.2.82. As noted at the start of this chapter, the plan identifies a need for 51,297sqm business floorspace and 4,150 full time equivalent jobs by 2041. Policy SP3 (Business Development – Office and Industrial) outlines that approximately 41,342sqm of floorspace will be delivered through employment allocations totalling 18.31ha located within the SIEAs. Policy EA1 (Employment Allocations) sets out that approximately 29,878sqm of this floorspace will be delivered on allocated sites within SIEA1 (Queensway Corridor), whilst the remaining 11,464sqm will be delivered on allocated sites within SIEA2 (Ivyhouse Lane). A total of 10 sites are allocated for business (office / industrial) use through Policy EA1; these are detailed in Policy ES1-10. A further three sites are allocated for mixed-use development. The spatial strategy performs well in this respect.

### **Accessibility**

- 9.2.83. One contributing factor to unemployment is accessibility; if residents who rely on public transport and / or active travel cannot access employment opportunities via these modes then it can act as a barrier to employment. The following residential / mixed-use sites are not within walking distance (<800m) of the nearest town, district or local centre, which are often hubs for employment or contain key transport links that can be used to access employment opportunities further afield, including the industrial estates across the borough:
- Mayfield Farm, which is 2-2.5 km from Battle Road.
  - Mayfield E, Bodiam Drive, which is 2-2.5 km from Battle Road.
  - Land at Breadsell, which is 2-2.5 km from Battle Road.
  - Land East of Beaney's Lane, The Ridge, which is 1.9-2.0 km from Battle Road.
  - Land adjacent to Sandrock Park, The Ridge, which is 1.8-1.9 km from Ore Village.

- Hastings Garden Centre, Bexhill Road, which is 1.7-1.8 km from West St Leonards (Bexhill Road).
- Land rear of 419 to 447 Bexhill Road, which is 1.6-1.7 km from West St Leonards (Bexhill Road).
- Former Westerleigh School and Playing Fields, which is 1.1-1.2 km from Bohemia, Silverhill.
- Land North-West of Winchelsea Lane, which is 900-1,000 m from Ore Village.
- Land East of Rock Lane, which is 900-1,000 m from Ore Village.
- 190 Bexhill Road, which is 800-900 m from West St Leonards (Bexhill Road).

9.2.84. In light of the above, the spatial strategy takes forward sites that are not in proximity to the nearest town, district or local centre. However, it is recognised that the borough contains a substantial bus network, and all of the sites (with the exception of Land at Breadsell) are within walking distance (<800 km) of a bus stop.

### **Tourism**

9.2.85. A large contributor to the borough's economy is tourism and the visitor economy. The spatial strategy will deliver housing growth to the borough, which has the potential to lead to infrastructure improvements locally, which in turn has the potential to support tourism. Tourism may also be supported through enhancing the vitality of the town centre and wider borough. In addition, high quality development has the potential to improve the visual amenity of a locality, including that associated with the town's rich and diverse heritage resource, thereby supporting tourism. However, it is also recognised that inappropriate development or over densification may have the opposite effect.

## Transport

- 9.2.86. Hastings contains four railway stations (Hastings, St Leonards St Johns Road, West St Leonards and Ore). These link London Charing Cross, London Cannon Street and London Victoria; Battle, Tunbridge Wells, Tonbridge and Sevenoaks to the north; Bexhill, Eastbourne, Lewes and Brighton to the west; and Rye, Ashford and HS1 to the east. It is also served by a comprehensive bus network providing connections both within and outside of the borough. The borough contains two primary roads: the A259 linking Bexhill, Eastbourne and Rye, which largely runs parallel to the coastline, and the A21, which runs north to south through the centre of the borough and links Tunbridge Wells, Tonbridge, Sevenoaks, the M25 and London. In terms of active travel, Hastings overlaps with several local / regional cycle network and rights of way networks.
- 9.2.87. Policy SP1 (Directing Growth) of the draft Local Plan outlines that development will be directed to locations which are well supported by existing or planned sustainable transport infrastructure.

### Access to Public Transport

- 9.2.88. The following sites are not in walking distance (<800 m) of a railway station:
- Queensway North, Queensway, which is 4-5 km from West St Leonards and St Leonards St Johns Road Railway Stations.
  - Land at Breadsell, which is 4-5 km from West St Leonards, Battle, and St Leonards St Johns Road Railway Stations.
  - Land at junction of The Ridge West and Queensway, which is 4-5 km from West St Leonards, St Leonards St Johns Road, and Ore Railway Stations.
  - Land at Whitworth Road, which is 4-5 km from Hastings, West St Leonards, Ore, and St Leonards St Johns Road Railway Stations.
  - Marline Fields, Enviro21 Business Park, Land West of Queensway, which is 4-5 km from St Leonards St Johns Road and West St Leonards Railway Stations.
  - PX, Churchfields, which is 3-4 km from West St Leonards and St Leonards St Johns Road Railway Stations.
  - NX2, Sidney Little Road, Churchfields, which is 3-4 km from West St Leonards and St Leonards St Johns Road Railway Stations.
  - NX3, Sidney Little Road, Churchfields, which is 3-4 km from West St Leonards and St Leonards St Johns Road Railway Stations.
  - Mayfield E, Bodiam Drive, which is 3-4 km from St Leonards St Johns Road and West St Leonards Railway Stations.

- Land North-West of Winchelsea Lane, which is 2.5-3 km from Ore and Three Oaks Railway Stations.
- Land East of Rock Lane, which is 2.5-3 km from Ore and Three Oaks Railway Stations.
- Land East of Beaney's Lane, The Ridge, which is 2.5-3 km from Ore and Three Oaks Railway Stations.
- Adjacent Unit C, 1-8 Brook Way, which is 2-2.5 km from Ore Railway Station.
- Hastings Garden Centre, Bexhill Road, which is 2-2.5 km from West St Leonards Station.
- Land adjacent to Sandrock Park, The Ridge, which is 2-2.5 km from Ore Railway Station.
- Land at Rock Lane, which is 2-2.5 km from Ore Railway Station.
- Land rear of 419 to 447 Bexhill Road, which is 1.9-2 km from West St Leonards Railway Station.
- Ivyhouse Lane, Northern Extension, which is 1.8-1.9 km from Ore Railway Station.
- 309-311 Harold Road, which is 1.8-1.9 km from Ore Railway Station.
- The Four Courts, Stonehouse Drive, which is 1.7-1.8 km from St Leonards Warrior Square Railway Station.
- UK Power Networks, Hastings Main, The Ridge / Ivyhouse Lane, which is 1.4-1.5 km from Ore Railway Station.
- Land at Tilekiln Farm, which is 1.5-1.6 km from Ore Railway Station.
- Former Westerleigh School and Playing Fields, which is 1.4-1.5 km from St Leonards St Johns Road Railway Station.
- 381-391 Old London Rd (former Hare & Hounds & adjacent garage), which is 1.3-1.4 km from Ore Railway Station.
- 190 Bexhill Road, which is 1.2-1.3 km from West St Leonards Railway Station.
- Land at Graystone Lane, which is 1.0-1.1 km from Ore Railway Station.
- 5 The Green, which is 0.9-1.0 km from St Leonards Warrior Square Station.
- Land adjacent 142 Bexhill Road, which is 800-900 m from West St Leonards Railway Station.

9.2.89. In this respect, the spatial strategy takes forward sites not in proximity to a railway station. However, it is noted that all but one of the sites are within walking distance (<800 m) of a bus stop. Therefore, residents should be able to access railway stations via local bus services. The exception to this is Land at Breadsell, which is 1.0-1.1 km from the nearest bus stop on Stainer Road.

### **Access to Active Travel Infrastructure**

9.2.90. The following sites are not connected to the local / regional cycle network:

- Land at junction of The Ridge West and Queensway, which is 4-5 km from the local / regional cycle network.
- Land at Whitworth Road, which is 1.7-1.8 km from the local / regional cycle network.
- Land at Breadsell, which is 1.4-1.5 km from the local / regional cycle network.
- Former Westerleigh School and Playing Fields, which is 1-1.1 km from the local / regional cycle network.
- Queensway North, Queensway, which is 900-1,000 m from the local / regional cycle network.
- Marline Fields, Enviro21 Business Park, Land West of Queensway, which is 900-1,000 m from the local / regional cycle network.
- Land adjacent to Sandrock Park, The Ridge, which is 800-900 m from the local / regional cycle network.
- 190 Bexhill Road, which is 700-800 m from the local / regional cycle network.
- Adjacent Unit C, 1-8 Brook Way, which is 500-600 m from the local / regional cycle network.
- 7 - 11 Chapel Park Road, which is 500-600 m from the local / regional cycle network.
- 5 The Green, which is 500-600 m from the local / regional cycle network.
- 309-311 Harold Road, which is 500-600 m from the local / regional cycle network.
- Land adjacent 142 Bexhill Road, which is 400-500 m from the local / regional cycle network.
- Hastings Garden Centre, Bexhill Road, which is 400-500 m from the local / regional cycle network.

- Ivyhouse Lane, Northern Extension, which is 300-400 m from the local / regional cycle network.
- St John Road, which is 300-400 m from the local/regional cycle network.
- Land rear of 419 to 447 Bexhill Road, which is 300-400 m from the local / regional cycle network.
- Land at Tilekiln Farm, which is 300-400 m from the local / regional cycle network.
- Car Park, 35 Shepherd Street, which is 300-400 m from the local / regional cycle network.
- Former Convent of Holy Child Jesus, Magdalen Road, which is 200-300 m from the local / regional cycle network.
- Former Malmesbury House, 123-125 West Hill Road, which is 200-300 m from the local / regional cycle network.
- Former West St Leonards Primary School, Bexhill Road, which is 200-300 m from the local / regional cycle network.
- Land at Rock Lane, which is 200-300 m from the local / regional cycle network.
- 12-19 Braybrooke Terrace, which is 200-300 m from the local / regional cycle network.
- 1st to 3rd floors, 29-30 Kings Road, which is 200-300 m from the local / regional cycle network.
- Former West Hill Reservoir, which is 200-300 m from the local / regional cycle network.
- Land East of Rock Lane, which is 100-200 m from the local / regional cycle network.
- PX, Churchfields, which is 100-200 m from the local / regional cycle network.
- 153-154 Queens Road, 0.02 Residential 5 Hastings, which is 100-200 m from the local / regional cycle network.
- 381-391 Old London Rd (former Hare & Hounds & adjacent garage), which is 100-200 m from the local / regional cycle network.
- Muriel Matters House, Breeds Place, which is 100-200 m from the local / regional cycle network.

- Gambier House, 111 West Hill Road and West House, 115 West Hill Road, which is 100-200 m from the local / regional cycle network.
- Land North-West of Winchelsea Lane, which is 100-200 m from the local / regional cycle network.
- Land East of Beaney's Lane, The Ridge, which is 100-200 m from the local / regional cycle network.
- Land at Graystone Lane, which is 50-100 m from the local / regional cycle network.
- Priory Street Car Park and ESK, which is 50-100 m from the local / regional cycle network.
- Station Approach car park and Royal Mail Delivery Office, which is 50-100 m from the local / regional cycle network.
- Ore Valley (Former Power Station), which is 50-100 m from the local / regional cycle network.
- Former Post Office and University of Brighton building, which is 50-100 m from the local / regional cycle network.

9.2.91. In this respect, the spatial strategy includes a number of sites that currently have limited or no connection to the local and regional cycle network, which could reduce opportunities for active travel unless mitigation is secured. Some sites (particularly those located on the northern and western fringes of the borough) would require new or upgraded cycling links to enable safe and direct access to key destinations. While larger sites (such as Land at Tilekiln Farm, Land at Breadsell, Queensway North, Queensway and Ivyhouse Lane, Northern Extension) may be better placed to deliver such infrastructure, improvements will also be necessary at smaller and more centrally located sites to ensure that active travel is a viable option across the wider network.

9.2.92. Hastings has a comprehensive rights of way network given it is a largely built-up borough. The draft Local Plan sets out that where possible, new development will be linked to the rights of way network. Notably, the site allocation policies seek to preserve and where possible, improve, existing rights of way within the sites.

## 9.3. Commentary on the Local Plan as a Whole

### Air Quality

- 9.3.1. Air quality is primarily addressed through Policy SC18, which sets out that development will minimise and mitigate pollution and improve air quality during both the construction and operation phases of development. The policy states that an Air Quality Impact Assessment (AQIA) must be provided alongside proposals for major development; development within or with the potential to impact on an AQMA; and in areas close to exceeding the air quality objectives (note, there are currently no AQMAs in the borough, however the policy accounts for the potential for them to be identified in the future).
- 9.3.2. The draft Local Plan also places a strong emphasis on sustainable transport through Policy SP10 (Transport Infrastructure), which prioritises active travel and public transport, as well as Policy SC1 (Key Design Principles), which supports development that maximises opportunities for active travel. Policy ID2 also supports low car development where possible, and encourages the use of car clubs where private vehicle use is necessary. The exception to this is disabled parking. These policies will have knock-on positive effects for air quality.
- 9.3.3. Notably, all future development will need to conform to these policy provisions, including at the sites proposed through the draft Local Plan. With most growth focused in the most accessible areas of the borough (e.g. the town centre), opportunities to maximise access to sustainable transport modes are bolstered through the draft Local Plan. Given most of the borough is relatively well served by public transport, it is considered that development has good potential to avoid significant effects arising in relation to air quality.
- 9.3.4. Overall, growth across the borough as a result of the spatial strategy will ultimately lead to an increase in traffic and congestion. However, existing air quality issues are currently being managed in the borough, and air quality will be supported by housing and employment delivery taking place in locations accessible by public transport and active travel. In addition, the policy framework sets out air quality mitigation requirements and measures, including the requirement for an AQIA alongside certain types of development and support for sustainable transport. Hence, the draft Local Plan is predicted to lead to broadly neutral to minor positive effects under this SA theme.

## Biodiversity

- 9.3.5. Biodiversity is a focus throughout the policy framework of the draft Local Plan. To begin with, Policy SC10 (Biodiversity, Habitat Protection and Net Gain) outlines that development proposals will be expected to, amongst other things, demonstrate BNG and be accompanied by appropriate ecological appraisals showing the potential impact of the proposed development on habitats and species.
- 9.3.6. With regard to BNG, the Environment Act 2021 places a legal requirement on sites to deliver at least 10% BNG. This will help mitigate potential negative effects and facilitate enhancements to ecological networks. It also has the potential to deliver net positive effects for biodiversity in the longer term, depending on the sensitivity of the site, the habitats and species present, and success in application of BNG.
- 9.3.7. With a focus on green infrastructure, Policy SC12 (Green and Blue Infrastructure) sets out that all major development will be expected to identify, protect, and enhance existing green and blue infrastructure on-site to deliver benefits to wildlife, habitats, and ecosystem services. In addition, Policy SC13 (Urban Greening Factor) outlines that major development must demonstrate that a) the proposal will meet or exceed an Urban Greening Factor of 0.4 (for residential) or 0.3 (for commercial development); and b) there is no net loss against the baseline undeveloped site score.
- 9.3.8. Trees, woodland and hedgerows are protected through Policy SC11 (Trees and Woodland), including where they are protected by a Tree Preservation Order (TPO), ancient woodland, or within an area recognised for its biodiversity importance. Policy SC12 and SC13 also incentivise the retention of existing mature trees and hedgerow due to their contribution to the wider GBI network and their high-value contribution to meeting the Urban Greening Factor (UGF) minimum score. Management plans are also a requirement of these policies, ensuring that trees, woodland and hedgerow on development sites are appropriately managed once development is occupied.
- 9.3.9. Policy SP8 (Conserving and Enhancing the Natural Environment) sets out the Council's plan to protect and enhance the town's distinctive landscape character and natural environment. This includes by protecting and enhancing the soils, sites or habitats designated or identified of local, national and international importance for biodiversity or geodiversity and providing net gains for biodiversity, including by establishing coherent ecological networks, amongst other things.

- 9.3.10. More broadly, Policy SC19 (Environmental Nuisance) states that development should minimise and mitigate environmental nuisance during both the temporary and permanent condition of development. To achieve this, development will be required to control and mitigate noise and vibration and minimise and mitigate light intrusion. In addition, Policy SP1 (Directing Growth) seeks to protect and enhance areas that have been designated for their natural environment.
- 9.3.11. Policy SC16 and SC18 seek to prevent harm through pollution or contamination of water, soils and air and seek to protect sensitive receptors.
- 9.3.12. Some site policies, such as HS18 Land at Tilekiln Farm, seek to improve on existing levels of pollution, in this instance through the use of interceptors or similar to prevent polluted surface waters entering the Bourne Stream.
- 9.3.13. Overall, the draft Local Plan is predicted to lead to broadly neutral to minor positive effects under this SA theme. It is noted that development has the potential to result in direct effects on biodiversity, such as from land take, disturbance or the loss of key features of ecological value. There is also potential for indirect effects, such as from a reduction of ecological connectivity and changes in land use patterns. However, the risk of significant negative effects is reduced by the spatial strategy, which prioritises the reuse of previously developed land and limits growth in areas that could adversely affect designated biodiversity sites at the international, national, or local level. This strategic approach, combined with a policy framework requiring the protection, enhancement and long-term management of habitats and green and blue infrastructure, provides a strong safeguard against potential impacts. As a result, while some localised effects on habitats and species may still arise, the plan-wide policy measures are expected to offset these and support opportunities for ecological enhancement across the borough.

## **Energy and Water Consumption**

- 9.3.14. Policy SP6 (Renewable and Low Carbon Technologies) outlines the Council's support for decentralised energy generation and distribution and community led initiatives; low and zero carbon technologies (e.g. roof mounted solar and air source heat pumps); area-wide low carbon heating solutions; and the enhancement of existing energy infrastructure to increase network capacity.

- 9.3.15. Focusing on design, Policy SC3 (Sustainable Design) sets out that all development should be supported by a sustainability statement which sets out, amongst other things, a) how energy demand is minimised through energy efficiency measures following the energy hierarchy and a 'fabric first' approach; and b) where new homes are provided, how a water use limit per person per day of 100 litres will be achieved. In addition, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it ensures that climate adaptation measures have been incorporated into the design.
- 9.3.16. More broadly, Policy SP5 (Meeting the Challenge of Climate Change) sets out that all development within the borough will recognise the Climate Emergency and be supportive of the Council's aim to make Hastings carbon neutral by 2030. This will in part be achieved by effective spatial planning (e.g. reducing the need to travel) and implementing proactive policy on climate change mitigation (e.g. low carbon design and construction) and adaptation (e.g. improving the efficiency of water use).
- 9.3.17. Of relevance to water consumption, Policy SC16 (Flood Risk) sets out that proposals should follow the discharge hierarchy, with the preference being to store rainwater close to the point of collection, ideally in conjunction with urban greening interventions, either for reuse onsite or attenuation.
- 9.3.18. Policy SC3 and E2 also encourage the use of Local Labour and materials, to ensure that the overall energy consumption embodied in the delivery of schemes is as low as possible.
- 9.3.19. Overall, the draft Local Plan is predicted to lead to broadly neutral effects with regard to this SA theme. Close engagement with energy and water providers will be required to ensure that network capacity keeps pace with new development. The policy framework promotes reductions in energy demand, supports low-carbon technologies, and sets clear expectations for water efficiency, including the 100-litre per person per day standard for new homes. Collectively, these measures provide a strong basis for ensuring that future development is resource-efficient and resilient to climate change.

## **Climate Change Adaptation, Flooding and Coastal Change**

- 9.3.20. Flooding is primarily addressed through Policy SC16 (Flood Risk), which states that a Flood Risk Assessment will be required as part of a planning application for any development in Flood Zone 2 or 3. Sequential and exception tests may also be applied. The policy also outlines that development should incorporate SuDS and manage surface water run off to ensure there is no increase to runoff rates and flood risk is not increased elsewhere either during construction or after development, and includes management responsibilities for drainage assets.
- 9.3.21. In addition, Policy SP9 (Managing Coastal Erosion and Flood Risk) supports the development and improvement of flood defence infrastructure and drainage assets in Hastings. In line with Policy SP1 (Directing Growth), major growth and change will be directed away from areas with the highest flood risk, and in areas of lesser flood risk, development will only be permitted where this risk can be mitigated or suitable adaptations provided, considering all sources of flooding. The policy states that within the Fairlight Cliff (east of Coastguard Lane) to Glyne Gap Coastal Change Management Area (CCMA), development proposals must be able to demonstrate mitigation and adaptation strategies to manage risk associated with coastal change.
- 9.3.22. In relation to the above, Policy SC17 (Coastal Change Management) outlines that new residential development, including changes of use, will not be permitted in the CCMA. However, essential infrastructure may be permitted in the CCMA provided that there are clear plans to a) manage any impact on coastal change arising from the development; and b) ensure it is safe over its planned lifetime. Other development may be permitted in the CCMA where it is supported by an agreed coastal change vulnerability assessment.
- 9.3.23. More broadly, Policy SP5 (Meeting the Challenge of Climate Change) sets out that all development within the borough will recognise the Climate Emergency and be supportive of the Council's aim to make Hastings carbon neutral by 2030. This will in part be achieved by implementing proactive policy on climate change adaptation (e.g. the use of SuDS). In addition, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it ensures that climate adaptation measures have been incorporated into the design.
- 9.3.24. Also of relevance, Policy SC12 (Green and Blue Infrastructure) sets out that all major development, and where feasible other forms of development, will be expected to identify, protect, and enhance existing green and blue infrastructure on-site to support climate change adaptation.

- 9.3.25. Where relevant, site policies such as HS18 (Land at Tilekiln Farm) and HS24 (Land at Graystone Lane) include site-specific requirements to reduce the overall risk of flooding to residential areas downstream in comparison to the undeveloped state of the site.
- 9.3.26. Overall, the draft Local Plan is predicted to lead to minor positive effects with regard to this SA theme. While growth through the spatial strategy will introduce additional hard surfaces and therefore increase potential surface-water run-off, the combined effect of the plan's policies (particularly SC16) is to improve drainage capacity and reduce flood risk over time. Requirements for SuDS, surface-water management, and long-term maintenance and management plans mean that new development will be expected to deliver drainage systems that perform better than the existing baseline and can be adaptively managed if conditions change. By maximising the use of previously developed land, applying the sequential test, and largely avoiding areas at greatest flood risk, the spatial strategy further reduces the likelihood of increased flooding. Taken together, these measures support the delivery of development that is more resilient to climate change and, in many locations, results in a net improvement in local drainage and flood-risk conditions.

## **Population, Health and Wellbeing**

- 9.3.27. In terms of affordable housing, Policy SP2 (New and Affordable Housing) sets out that brownfield delivering 20 or more units will need to deliver 25% affordable housing (the percentage requirement for sites of 19 or fewer units is to be confirmed). Greenfield sites delivering 10 or more units will be required to deliver 40% affordable housing. In these circumstances, the Council will expect the following tenure mix: 70% affordable rent / social rent and 30% affordable home ownership.
- 9.3.28. Policy SC2 (Housing Mix, Accessibility and Adaptability) requires new residential development to make provision for a mix of housing types and tenures to support a range of household sizes, ages and incomes to meet both current and projected housing needs. In addition, the policy sets out that affordable housing should be well-integrated with market housing in terms of site layout, appearance, detailed design, build quality and materials. The policy also states that development should ensure that it is accessible and adaptable for occupiers at different life stages, allowing ease of access to everyone including those with disabilities and mobility impairments. This will contribute to inclusivity, and the policy framework performs well in this respect.

- 9.3.29. Specialist housing for older people is addressed through Policy H1 (Specialist Housing for Older People), which states that development proposals should have regard to meeting the housing needs of older people, ranging from accessible and adaptable general needs housing to specialist housing with high levels of care and support. The policy proposes to increase the supply and range of housing and accommodation suitable for older people (use class C3) and supports proposals for new residential care homes and nursing homes, as well as extensions to existing care homes (use class C2). Where specialist housing is brought forward as private provision, including within a residential care setting, Policy SP2 outlines that the Council will take into account the characteristics of the scheme when determining proposals to ensure that the type, tenure and level of care offered align with identified local need and contribute to creating a balanced housing offer for an ageing population.
- 9.3.30. With regard to Gypsy and Traveller need, Policy SP2 outlines that a net need for 10 pitches is required over the plan period, which will be met through windfall proposals. Policy GT1 (Land South of Crowhurst Road) allocates 'Land South of Crowhurst Road' as a permanent site for Gypsies and Travellers. Adding to this, Policy H5 (Accommodation for Traveller Communities) supports proposals that address the permanent pitch need set out in the most recent Gypsy and Traveller Accommodation Assessment, providing it meets the criteria set out within the policy.
- 9.3.31. Housing in multiple occupation is address through Policy H2 (Housing in Multiple Occupation), which seeks to support mixed and balanced communities and maintain an appropriate housing mix within the borough. The policy sets out criteria for houses in multiple occupation (class C4), including communal living space and cooking and bathroom facilities appropriate in size to the expected number of occupants.
- 9.3.32. Policy H7 (Temporary Residential Uses) sets out the circumstances in which temporary residential accommodation may be appropriate on underused or vacant sites, including where development is phased, where sites are waiting for redevelopment, or where short-term accommodation needs arise. The policy outlines requirements to ensure that temporary residential uses provide suitable living conditions, including appropriate management arrangements, access to essential services such as water, waste facilities and heating, and measures to mitigate impacts on amenity, safety and the surrounding community. The policy also seeks to ensure that proposals do not prejudice the lawful use of open spaces, recreation grounds or other community facilities, and sets out considerations relating to site access, flood risk, ground conditions and transport.

- 9.3.33. Other policies relevant to housing include Policy H3 (Conversion of Existing Dwellings), which supports conversions providing it meets the criteria set out within the policy; Policy H4 (Self Build and Custom Housebuilding), which supports proposals for self and custom housebuilding on residential development sites in locations where there is demonstrable demand for plots and other relevant planning policies are satisfied; and Policy H6 (Housing Renewal), which supports proposals for estate regeneration providing they do not result in a net loss in affordable housing.
- 9.3.34. Health and wellbeing is primarily addressed through Policy SP11 (Healthy and Safe Communities), which outlines that development should help to create healthy, inclusive, and safe places which reduce health inequalities, and help to address the social and physical determinants of health and create prosperity. The policy sets out several ways in which the Council will achieve this, including by providing affordable and specialist housing; enabling access to education, training and jobs; improving access and ease of mobility for all in new and existing neighbourhoods; and supporting the social, economic and environmental regeneration of deprived areas and communities.
- 9.3.35. Also of relevance, Policy SP1 (Directing Growth) seeks to protect and enhance areas that have been designated for their sporting, recreation and amenity value. The policy outlines that the Council will support innovative design that makes a positive contribution to the quality, accessibility, safety, character, local distinctiveness and sense of place in Hastings. Similarly, Policy SC14 (Provision, Enhancement and Retention of Sports and Recreation Facilities) supports development which seeks to maintain or enhance existing sports and recreation spaces. Finally, Policy ID3 (Open Space, Sports and Recreation) sets out that development will be required to contribute to the capacity, quality, usability and accessibility of existing open space, sports and recreation facilities where development will increase demand.
- 9.3.36. Access to green infrastructure is addressed through Policy SP8 (Conserving and Enhancing the Natural Environment), which supports projects that improve public access to the network of green infrastructure across the borough, including publicly accessible open spaces and 'urban fringe' areas. Also of relevance, Policy SC12 (Green and Blue Infrastructure) sets out that all major development will be expected to identify, protect, and enhance existing green and blue infrastructure on-site to support the health and wellbeing of the local community.

- 9.3.37. Accessibility is covered under Policy SC1 (Key Design Principles), which outlines that the Council will support high quality development providing that it provides people-friendly streets and public spaces which enable people, including wheelchair users, those with pushchairs / buggies and those with disabilities and mobility impairments, to move around safely and comfortably. This is in addition to ensuring good accessibility is provided for all, especially for people with a physical or sensory impairment and those with dementia.
- 9.3.38. Community facilities are addressed through Policy SC20 (Community Facilities), which supports proposals for the provision of new community facilities or enhancement and/or extension of existing facilities provided that the development is acceptable in terms of location, design, access and impact on the locality.
- 9.3.39. Planning obligations are covered by Policy ID1 (Planning Obligations), which outlines the Council's intention to ensure that the right infrastructure is in place at the right time to provide the additional infrastructure capacity required to support new development. This includes through Section 106 agreements.
- 9.3.40. Overall, the draft Local Plan is considered likely to lead to long-term significant positive effects under this SA theme. This is because the spatial strategy delivers growth relatively evenly across Hastings, including in the most deprived areas of the borough. In addition, the policy framework seeks to deliver a suitable mix of housing, including provision for affordable housing, specialist housing for older people and gypsy and traveller accommodation. It also seeks to improve health and wellbeing by reducing health inequalities, improving accessibility, and protecting and enhancing sporting and recreational facilities, access to green infrastructure, and community facilities.

## **Heritage**

- 9.3.41. The draft Local Plan supports development that further reveals and celebrates the built heritage of Hastings, protects the significance of heritage assets, and promotes the history of the town through Policy SP7 (Protecting and Enhancing the Historic Environment). It also encourages owners and developers to restore and reuse historic buildings and seeks to protect the significance and setting of both designated and non-designated heritage assets.

- 9.3.42. One of the focuses for heritage is Policy SC5 (Proposals Affecting the Significance and Setting of Heritage Assets), which sets out criteria which proposals that would affect the significance or setting of designated or non-designated heritage assets will be assessed against. This includes historic context, street patterns, scale, height, massing, materials and finishes, and topography. Archaeology is also considered through this policy.
- 9.3.43. In addition to the above, Policy SC6 (Sustainable Development and Heritage Protection) supports the on-going use, care, maintenance, repair and where necessary, the re-purposing of heritage assets. The policy supports proposals involving climate change mitigation and adaptation measures in relation to heritage assets providing they meet the criteria set out within the policy.
- 9.3.44. With a focus on conservation areas, Policy SC7 (Changes to Building Elevations and Roofs in Conservation Areas) seeks to maintain the form and appearance of original features in conservation areas, including windows, doors and roof lights where this contributes to the character of the building and the significance of the wider conservation area.
- 9.3.45. With a focus on design, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it preserves and enhances existing heritage assets, including protecting their setting and key historic views across the borough. In addition, the policy expects development impacting heritage assets to be in harmony with and sympathetic to local historic character and be of an appropriate scale and siting, of high-quality design, and use appropriate materials and finishes.
- 9.3.46. Policy SC1 also considers the impact of taller buildings on heritage assets. Specifically, the policy sets out that proposals for taller buildings should avoid negative impacts on the skyline and any views to and from heritage assets or on the setting of heritage assets.
- 9.3.47. More broadly, Policy SC8 (Shopfronts and Commercial Frontages) requires a high standard of commercial frontage design, particularly for proposals in conservation areas and/or affecting listed buildings. In addition, alterations and extension of dwellings is covered by Policy SC4 (Alteration and Extension of Dwellings), which states that they should reflect the scale, proportions, materials, roof line and detailing of the original building.
- 9.3.48. Finally, Policy SP1 (Directing Growth) sets out that development should relate well to the character of the area and enhance visibility of and access to historic assets. The policy also seeks to conserve, enhance and sustain the special historic and architectural character of Hastings over the long-term.

- 9.3.49. Overall, it is difficult to predict effects with regard to the draft Local Plan as impacts on heritage are largely dependent on the detailed design and layout of development, which is unknown at this stage. Due to this, uncertainty is noted under this SA theme. Whilst the spatial strategy directs a significant level of growth to the town centre, which is the most constrained part of the borough from a heritage standpoint, it is also recognised that development has the potential to better reveal the special qualities of heritage assets. In addition, the policy framework seeks to mitigate adverse impacts on heritage assets as a result of development and secure enhancements.

## **Land and Water Quality**

- 9.3.50. With regard to land quality, Policy SC15 (Ground Behaviour, Geodiversity and Land Stability) sets out that development proposals for major and minor applications will be supported in areas with suspected poor ground conditions, where the proposal meets the criteria set out within the policy.
- 9.3.51. With regard to both land and water quality, Policy SC18 (Pollution and Hazards) sets out that development is required to:
- a) improve water quality and incorporate appropriate pollution control measures where necessary to protect ground and surface waters; and
  - b) incorporate appropriate measures where necessary to remediate or protect land from pollution or contamination.
- 9.3.52. In addition, the policy sets out that development proposals should undertake site investigation for contaminants in all cases, except where there is unlikely to be contamination or pollution and the development associated environment is not sensitive. To prevent contamination of watercourses and local drainage infrastructure, development proposals must provide detailed foul and surface-water drainage strategies, clearly identifying flow routes and demonstrating that contaminated materials, including any wash-waters generated during construction or operation, will not enter the drainage system.
- 9.3.53. Related provisions in Policy SC16 (Flood Risk) further reinforce these requirements by ensuring that construction-phase drainage, temporary SuDS and pollution-prevention measures are in place to protect water quality, and by requiring the design of surface-water systems that avoid the risk of polluted or inappropriate flows entering surface-water sewers. Policy SC3 (Sustainable Design and Construction) further helps manage water resources by requiring water-efficient development, helping to limit additional demand on local water supplies and reducing pressure on water infrastructure.

- 9.3.54. Additionally, several allocation policies set out water-quality-specific requirements. Policies HS18, HS24 and HS5 all include measures to protect nearby watercourses, including hydrological monitoring, provision of buffer zones, careful design of SuDS, and controls to ensure that polluted runoff cannot enter sensitive streams or groundwater pathways. These allocations also require appropriate drainage strategies to safeguard water quality during construction and operation.
- 9.3.55. Overall, the draft Local Plan is predicted to lead to minor negative effects under this SA theme as it will ultimately place a growing demand on land and water resources. Whilst the spatial strategy maximises the use of previously developed land, it will still result in the loss of greenfield, and potentially BMV land. However, it is recognised that this is largely unavoidable given the high housing and employment need figures for Hastings and the largely built-up nature of the borough. In mitigation, the policy framework (including SC3, SC16, SC18, SC15 and the site-specific requirements of HS18, HS24 and HS5) provides a comprehensive set of measures to protect and conserve land and water quality, reduce pollution risks, and manage water resources more efficiently.

## **Natural Landscape**

- 9.3.56. The natural landscape is primarily addressed through Policy SP8 (Conserving and Enhancing the Natural Environment), which sets out the Council's plan to protect and enhance the town's distinctive landscape character and natural environment. This includes by a) recognising the intrinsic character and beauty of the countryside; b) protecting and enhancing the town's distinctive landscapes, including woodlands, open green space, the undeveloped coastline, the High Weald National Landscape, and the Combe Valley Countryside Park; and c) supporting projects that protect and enhance the network of green and blue infrastructure across the borough.
- 9.3.57. Also of relevance is Policy SC9 (The High Weald National Landscape and Other Areas of Landscape Value), which seeks to protect the inherent visual qualities and distinctive character of the High Weald National Landscape and other areas of landscape value, including the Combe Valley Countryside Park. The policy outlines that development affecting these areas should be limited in scale and extent, in terms of the proposed footprint, height and massing, and appropriate in terms of its nature and location.

- 9.3.58. Policy SC9 outlines that within the High Weald National Landscape specifically, the scale and extent of development should be limited and designed in a way that reflects its nationally designated status as landscape of the highest quality. In addition, development should conserve and enhance the landscape and scenic beauty of the area, with reference to the components of natural beauty set out in the High Weald National Landscape Management Plan. Finally, development proposals should be supported by a Landscape Assessment demonstrating how the scheme makes a positive contribution to the objectives set out within the Management Plan.
- 9.3.59. In terms of design, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it responds to a) the existing character; b) has regard to the complex topography of Hastings considering the impact from key viewpoints; and c) enhances the landscape character of the area.
- 9.3.60. Policy SC1 also considers the impact of taller buildings on landscape character. Specifically, the policy sets out that proposals for taller buildings should avoid negative impacts on the skyline and any landscape views.
- 9.3.61. Important landscape or town trees are protected through Policy SC11 (Trees and Woodland). The policy states that the removal of trees and hedges will only be considered acceptable where it is in the interests of good arboriculture practice, or the proposed development outweighs the landscape and amenity value of trees or hedges affected. Policy SC12 and SC13 also incentivise the retention of existing mature trees and hedgerow due to their contribution to the wider GBI network and their high-value contribution to meeting the UGF minimum score. Management plans are also a requirement of these policies, ensuring that trees, woodland and hedgerow on development sites are appropriately managed once development is occupied.
- 9.3.62. Policy SC14 (Provision, Enhancement and Retention of Sports and Recreation Facilities) also plays a role in protecting the natural landscape by safeguarding existing public open spaces, parks, and recreation areas unless alternative provision is secured. This contributes to maintaining the openness, character and recreational value of key landscape areas across the borough.
- 9.3.63. Policy SP1 (Directing Growth) sets out that development should relate well to the character of the area and enhance visibility of and access to natural assets. The policy also seeks to protect and enhance areas that have been designated for their landscape character.

- 9.3.64. More specifically, Policy E6 (Outdoor Visitor Accommodation) sets out that proposals for the expansion of or improvement to existing lawful caravan, chalet and camping sites and other forms of outdoor visitor accommodation will be supported providing they have an acceptable impact on landscape character, particularly in relation to the impact on the High Weald National Landscape.
- 9.3.65. Overall, the draft Local Plan is considered likely to lead to minor negative effects with regard to this SA topic. Whilst it is recognised that impacts on the natural landscape are largely dependent on the design and layout of development, which is unknown at this stage, ultimately the spatial strategy directs growth to sites within and in proximity to the High Weald National Landscape, as well as the Brede Valley and Haven Valley LCAs. In doing so, it has the potential to adversely impact the special qualities of the National Landscape and the landscape character of the LCAs. Nevertheless, it is recognised that intrusion into the National Landscape is limited, and the policy framework seeks to mitigate adverse impacts on landscape character as a result of development, and secure enhancements.

### **Skills, Employment and Economic Development**

- 9.3.66. Policy SP3 (Business Development – Office and Industrial) sets out that within SIEAs and other sites currently or last in employment use, the Council will support development that maintains, and where appropriate, intensifies or expands industrial floorspace to accommodate a) industrial processes; b) storage or distribution; c) waste management uses; d) vocational training facilities; and e) office uses.
- 9.3.67. Policy SP3 also outlines that Hastings Town Centre is the primary location for new office development and renewal, including affordable, flexible and shared workspace. In relation to this, Policy SP4 (Business Development – Town Centres) sets out the hierarchy of town centres, placing places Hastings Town Centre at the top of the hierarchy above district and local centres. The policy outlines that Hastings Town Centre should be the focus for larger scale development. Meanwhile, proposals which diversify the provision of facilities in district and local centres will be supported where they are of an appropriate scale in relation to the role of the centre.
- 9.3.68. Policy E1 (Protecting and Enhancing Employment Land and Premises) seeks to protect and enhance employment land and premises, including SIEAs, by only supporting development proposals which would result in the retention, intensification, conversion, redevelopment and/or extension of employment generating uses. In addition, in areas that will accommodate mixed use development, development proposals will be supported which promote the successful integration of residential, commercial and employment space.

- 9.3.69. Policy E2 (Skills, Employment and Supply Chain) sets out that proposals incorporating 1,000sqm or more gross new commercial floorspace and/or 40 dwellings or bed spaces should include a) local labour and procurement agreements setting out how local employment and goods will be secured where possible; b) a local skills development plan; and c) a project completion statement for a) and b). Hence, the draft Local Plan supports local employment and upskilling and performs well in this respect.
- 9.3.70. Primary Shopping Areas are defined for all town centres under Policy E3 (Primary Shopping Areas). Within the Primary Shopping Areas, the Council will support proposals for retail and main town centre uses and commercial, business and services falling within Planning Use Class E, providing that they a) maintain and enhance the vitality of these centres; and b) enable the interchange between town centre uses and uses falling within Use Class E where they would not harm the vitality and range of uses.
- 9.3.71. More specifically, Policy E4 (Food, Drink, Entertainment and the Night-Time Economy) supports development proposals for new cafes, restaurants, drinking establishments and hot food takeaways in Town, District and Local Centres provided amenity and safety criteria can be met, including relating to the use of delivery services. In addition, Policy E5 (The Visitor Economy) supports new and extended serviced visitor accommodation, including hotels and bed and breakfast. Finally, Policy E6 (Outdoor Visitor Accommodation) supports proposals for the expansion of or improvement to existing lawful caravan, chalet and camping sites and other forms of outdoor visitor accommodation.
- 9.3.72. Overall, the draft Local Plan is considered likely to lead to long-term significant positive effects under this SA theme. This is because the delivery of new employment floorspace, alongside mixed-use development, supported through the spatial strategy will stimulate the economy and provide new jobs locally. In addition, the policy framework supports the protection and enhancement of employment land; the provision of local job opportunities and upskilling opportunities; and the ongoing vitality of the town centres.

## **Transport**

- 9.3.73. Transport is primarily addressed through Policy SP10 (Transport Infrastructure), which outlines that over the lifetime of the plan, the Council will deliver infrastructure which supports development growth, economic connectivity, and the prioritisation of active travel and public transport.

- 9.3.74. The Council supports enhancements that will enable increased rail capacity and high-speed services to London, as well as increased rail capacity on all routes, through Policy SP10. This is in addition to railway station improvements that support inclusive journeys and enable better integration with bus services, cycle and pedestrian networks.
- 9.3.75. In terms of bus services, Policy SP10 sets out that the Council supports bus service improvements and infrastructure as identified in the county's Bus Service Improvement Plan, including enhanced routes to connect to new development where these will lead to more sustainable transport patterns.
- 9.3.76. Policy SP10 also outlines that walking, wheeling and cycling infrastructure will be prioritised. This includes through the delivery of a network of walking, wheeling and cycling improvements identified in East Sussex County Council's Local Cycling and Walking Infrastructure Plan, and, subject to the County Council and their partners securing funding, through implementation of the County Council's transport strategy, Local Transport Plan (LTP4).
- 9.3.77. Whilst Policy SP10 focuses on public transport and active travel provision, it also supports local and strategic road improvements; measures that minimise car parking; and the uptake of ultra-low and zero-emission vehicles. This is in addition to protecting SP10 also provides for the protection of existing coach parking and drop-off points.
- 9.3.78. Policy ID2 (Access, Services and Parking) states that all development should ensure access, car parking and servicing has been efficiently and creatively integrated into the scheme, minimising land occupancy and ensuring a safe and attractive pedestrian environment. The policy states that car parking provision should not dominate or unduly shape the design of new development, and also introduces heightened restrictions in the Low Car Parking Area and supports the use of Car Clubs
- 9.3.79. Also of relevance to design, Policy SC1 (Key Design Principles) outlines that the Council will support high quality development providing that it maximises opportunities for active travel that supports and encourages walking and cycling where development is at a scale that allows this.

- 9.3.80. Overall, the draft Local Plan is predicted to lead to broadly neutral to minor positive effects under this SA theme. While it is recognised that overall growth will increase private car use to some extent, the spatial strategy generally focuses new development in locations with comparatively good access to public transport, services, and employment opportunities. It is noted that a small number of sites (such as those on the edge of the urban area – like Land at Breadsell) have more limited sustainable transport accessibility; however, the policy framework places strong emphasis on improving public transport and active travel connections, which will help to mitigate these location-specific constraints. Taken together, the strategy and supporting policies are expected to encourage a gradual shift towards more sustainable travel behaviours.

## 9.4. Conclusions

- 9.4.1. **Long-term significant positive effects** are considered likely across the population, health and wellbeing and skills, employment and economic development SA themes. With regard to population, health and wellbeing, this is because the spatial strategy delivers growth relatively evenly across Hastings, including in the most deprived areas of the borough. In addition, the policy framework seeks to deliver a suitable mix of housing, including provision for affordable housing, specialist housing for older people and gypsy and traveller accommodation. It also seeks to improve health and wellbeing by reducing health inequalities, improving accessibility, and protecting and enhancing sporting and recreational facilities, access to green infrastructure, and community facilities. With regard to skills, employment and economic development, this is because the promotion of new employment floorspace, alongside mixed-use development, through the spatial strategy will stimulate the economy and provide new jobs locally. In addition, the policy framework supports the protection and enhancement of employment land; the provision of local job opportunities and upskilling opportunities; and the ongoing vitality of the town centre.
- 9.4.2. **Minor positive effects** are predicted under the climate change adaptation, flooding and coastal change SA themes. Whilst growth through the spatial strategy will likely increase flood risk both on new and existing development, due to an increase in hard surfaces and associated increase in surface water flood risk, significant effects are not considered likely due to the requirement for sequential testing. In maximising the use of previously developed land and largely avoiding the areas of the borough at greatest risk of flooding, the spatial strategy further minimises the likelihood of flooding at new development areas. Moreover, the policy framework seeks to ensure that future development is resilient to the impacts of climate change, such as increasing flooding.

- 9.4.3. **Broadly neutral to minor positive** effects are considered likely across the air quality, biodiversity and transport SA themes. With regard to air quality, this is because existing air quality issues are currently being managed in the borough, and air quality will be supported by housing and employment delivery taking place in locations accessible by public transport and active travel. In addition, the policy framework sets out air quality mitigation requirements and measures, including the requirement for an AQIA alongside certain types of development and support for sustainable transport. With regard to biodiversity, the spatial strategy maximises the use of previously developed land and largely directs development away from internationally, nationally, and locally designated sites. This is further strengthened by the policy framework, which seeks to protect and enhance biodiversity and supports delivery of the borough's green-infrastructure network. Where some allocations lie closer to sensitive habitats, including Hastings Cliffs SAC, the requirement for Ecological Constraints and Opportunities Plans (ECOPs) provides additional safeguards, helping to ensure that ecological sensitivities are identified early and that development incorporates appropriate avoidance, mitigation, and enhancement measures. With regard to transport, this is because the spatial strategy primarily directs growth to areas with the best access to public transport, services and facilities, and employment opportunities. In addition, the policy framework focuses on delivering enhancements to the existing public transport and active travel network.
- 9.4.4. **Neutral effects** are predicted under the energy and water consumption SA theme. Energy and water companies will need to be consulted at the planning application stage to ensure that energy and water infrastructure is sufficient to accommodate new development. In addition, the policy framework seeks to ensure that future development is energy and water efficient through the use of low carbon technologies and sustainable design.
- 9.4.5. **Neutral to minor negative effects** are predicted under the land and water resources SA theme. While growth will increase demand on land and water resources and lead to some loss of greenfield and potentially BMV land, this is largely unavoidable given local constraints. Mitigation provided through policies SC3, SC16, SC18, SC15, and site allocation-specific water-quality requirements helps to limit impacts, improve drainage performance, and ensure development incorporates appropriate water-efficiency, pollution-prevention and remediation measures.

- 9.4.6. **Minor negative effects** are predicted under the natural landscape SA theme. The spatial strategy directs growth to locations within or near the High Weald National Landscape and the Brede Valley and Haven Valley LCAs, creating potential for adverse impacts on landscape character and the special qualities of designated areas. However, intrusion into the National Landscape is limited and the policy framework seeks to mitigate adverse effects and support landscape enhancement.
- 9.4.7. **Uncertainty** is noted under the heritage SA theme as impacts on heritage are largely dependent on the design and layout of development, which is unknown at this stage. Whilst the spatial strategy directs a significant level of growth to the town centre, which is the most constrained part of the borough from a heritage standpoint, it is also recognised that development has the potential to better reveal the special qualities of heritage assets. In addition, the policy framework seeks to mitigate adverse impacts on heritage assets as a result of development and secure enhancements.

## 9.5. Cumulative Effects

- 9.5.1. Cumulative effects arise where the combined impacts of multiple policies, proposals or activities act on the same environmental or community receptors. In the context of the SA, they can occur through in-combination effects (where separate proposals add to one another) or synergistic effects (where impacts interact to create a greater overall effect).
- 9.5.2. Cumulative effects may occur not only within the Local Plan itself, but also through the interaction of the Local Plan with other plans, programmes and projects. This includes development proposals, infrastructure projects and strategies being brought forward by neighbouring authorities or other organisations.
- 9.5.3. Although the Local Plan covers only Hastings Borough, growth and infrastructure delivered in Rother District (through its adopted and emerging Local Plan) has the potential to combine with new development in Hastings, giving rise to cross-boundary cumulative effects.
- 9.5.4. Other strategic plans across East Sussex, such as the East Sussex Local Transport Plan 2024–2050 and the Waste and Minerals Plans, may introduce proposals that overlap spatially or thematically with Local Plan policies, again generating potential cumulative impacts.
- 9.5.5. In addition, wider initiatives and projects in the surrounding area may interact with Local Plan growth. For example, rail network enhancements (including Network Rail’s work exploring improved connectivity along the East Coastway and options for high-speed services between Ashford and Eastbourne) may alter travel patterns and development pressures, contributing to in-combination effects.

- 9.5.6. Potential cumulative effects arising from these interactions may include:
- Transport impacts, where growth and infrastructure schemes combine to increase traffic flows, congestion, and associated noise and air quality pressures. Conversely, enhancements to public transport, walking and cycling networks may help counterbalance these effects.
  - Effects on ecological networks, where development and new infrastructure could lead to the incremental loss or fragmentation of habitats and biodiversity corridors.
- 9.5.7. However, the Local Plan's emphasis on green infrastructure, alongside similar initiatives in neighbouring areas, has the potential to support and strengthen ecological networks at a wider spatial scale.
- 9.5.8. Wider transport initiatives across East Sussex (including junction upgrades, highway improvements and corridor-based strategies) may also contribute to cumulative effects. These schemes could improve accessibility and reduce congestion, but in combination with Local Plan growth may increase pressure on sensitive routes or receptors if not supported by appropriate design and mitigation.
- 9.5.9. Minerals extraction sites and related transport activity identified in the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan may also contribute to cumulative effects. Although located outside Hastings, their traffic, landscape and ecological impacts may combine with development in the borough, particularly along shared transport corridors or cross-boundary environmental assets.
- 9.5.10. Strategic initiatives to enhance the visitor economy (such as cultural investments, seafront improvements and heritage-led regeneration) could generate positive economic effects. Nevertheless, increased visitor numbers may cumulatively increase pressure on transport networks, coastal environments and heritage assets, particularly during peak seasons.
- 9.5.11. Cumulative effects may also arise in relation to housing demand, especially where unmet needs in neighbouring areas place additional development pressure on Hastings.
- 9.5.12. In relation to flood risk, cumulative effects may occur through the combined impacts of new development and other planned growth. Measures provided through the NPPF and relevant Local Plan policies will, however, help reduce the significance of these impacts.
- 9.5.13. Positive cumulative effects may also result from combined investment in sustainable transport, improving accessibility through enhanced public transport, walking and cycling networks.

- 9.5.14. Overall, while a number of cumulative effects may arise from in-combination activities, the Local Plan's policy framework is designed to reduce or mitigate many of these impacts. Ongoing monitoring will remain essential to identify any unforeseen adverse effects and allow for corrective action where possible.

## 10. Overall Conclusions

- 10.1.1. The appraisal indicates that the draft Local Plan performs strongly across several SA themes, with significant long-term positive effects anticipated for population, health and wellbeing, and for skills, employment and economic development. This reflects the provision of new homes, including affordable and specialist accommodation, and the potential for regeneration in areas of deprivation. The delivery of new employment floorspace and mixed-use development is expected to stimulate the local economy and broaden access to job opportunities. Growth is largely directed to sustainable and accessible locations, particularly within and around the town centre where access to services, facilities, public transport and employment opportunities is greatest. The main exception to this is Land at Breadsell, which performs less favourably in accessibility terms due to its more isolated location and limited sustainable transport connectivity.
- 10.1.2. Minor positive effects are expected for climate change adaptation, flooding and coastal change due to strong policy requirements for flood risk management, SuDS, and climate-resilient design, alongside a focus on previously developed land. Broadly neutral to minor positive effects are likely for air quality, biodiversity and transport, supported by policies on sustainable transport, biodiversity net gain and integrated green and blue infrastructure. Neutral effects are expected for energy and water consumption, neutral or minor negative effects are predicted for land and water resources, and minor negative effects are predicted for the natural landscape owing to the unavoidable loss of greenfield land and development near sensitive areas. Effects on heritage remain uncertain as impacts are dependent on future design proposals, although the policy framework seeks to minimise harm and secure enhancements.
- 10.1.3. Overall, the draft Local Plan is assessed as capable of delivering sustainable, balanced growth for Hastings, provided that policy safeguards are robustly applied and monitored.

## **Part 3: What happens next?**

# 11. Next Steps

## 11.1. Steps Following Regulation 18 Consultation

- 11.1.1. This Interim SA Report accompanies the Regulation 18 Preferred Options consultation on the Draft Local Plan.
- 11.1.2. Following the Regulation 18 consultation, all responses will be reviewed and considered in refining the draft Hastings Local Plan and accompanying SA. The revised draft will then be published for further consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 11.1.3. The Regulation 19 consultation version of the Local Plan will be accompanied by a full SA Report. This will include the information required by the SEA Regulations, including measures envisaged concerning monitoring.
- 11.1.4. After the Regulation 19 stage, the Local Plan will be submitted to the Secretary of State for Independent Examination. At Examination, the Plan will be assessed for legal compliance and whether it meets the tests of soundness set out in the NPPF.
- 11.1.5. If the Examination concludes that the Local Plan is sound, subject to any necessary modifications, Hastings Borough Council will proceed to formally adopt the Local Plan.

# Appendix A Points of Compass Appraisal

# Appendix A: Points of the Compass Appraisal

February 2026

# 1. Introduction

## 1.1. The Points of Compass Appraisal

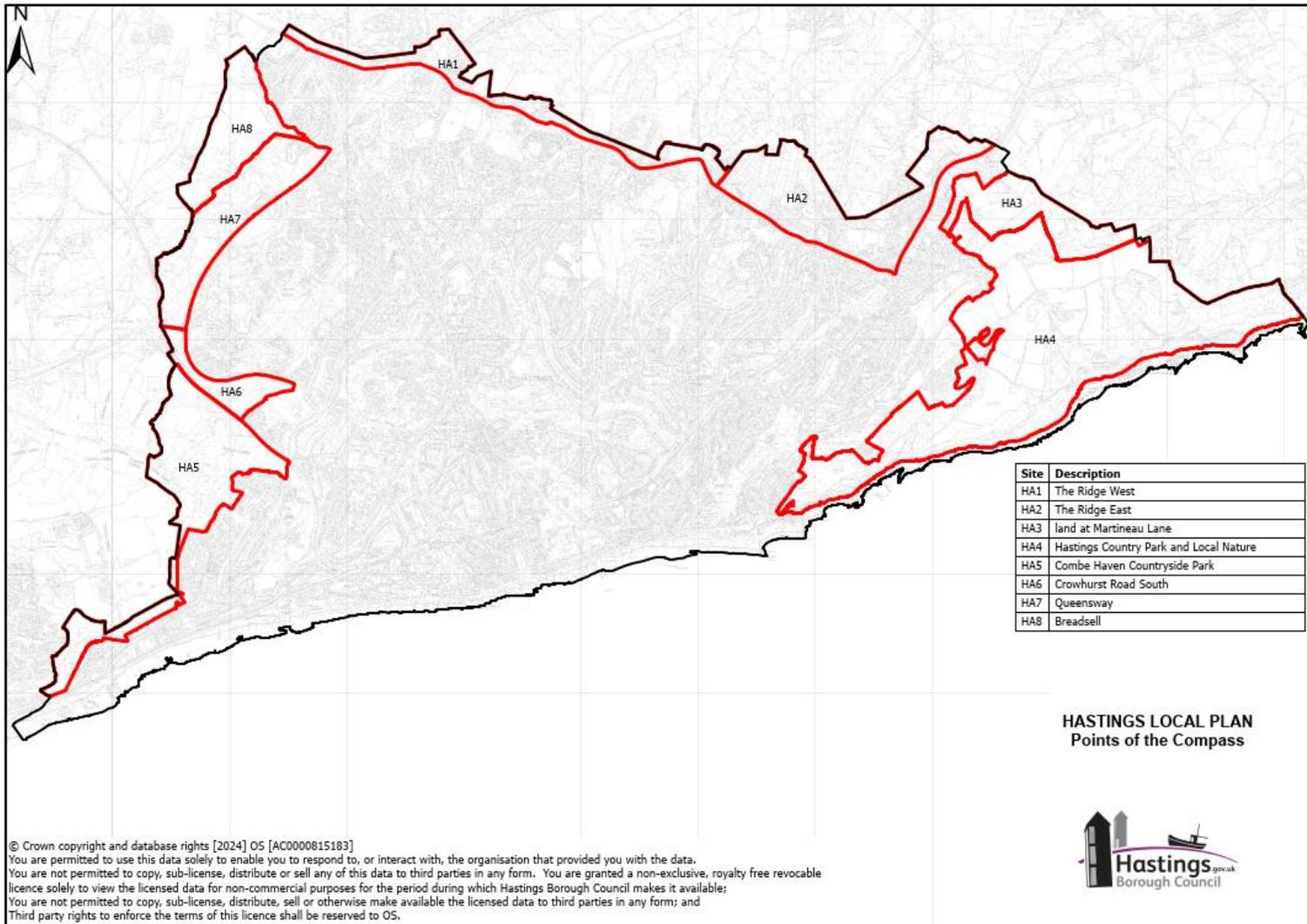
- 1.1.1. To inform the development of the Hastings Local Plan, HBC is considering potential locations for allocating sites for housing, employment, and mixed uses through the Local Plan.
- 1.1.2. As discussed in the main body of the Interim SA Report, to meet full local housing need (as established through the proposed changes to the NPPF), there would likely be a need for significant strategic scale growth in the vicinity of Hastings through urban extensions. Whilst the call for sites and SHELAA process has not identified land which could be assembled for this purpose, the SA process has undertaken a Points of the Compass appraisal.
- 1.1.3. The Points of the Compass appraisal presented in this appendix has therefore considered the likely implications of larger strategic scale development at eight broad areas in the Borough's urban hinterland. This seeks to provide an overview of the relative merits of promoting development at various broad areas, should land become available for strategic extensions to the town.

## 1.2. Approach to the Appraisal

- 1.2.1. Eight broad areas have been proposed by Hastings Borough Council. Loosely reflecting the various 'points of the compass', these broad areas represent potential locations for development in the vicinity of the following:
- HA1: The Ridge West
  - HA2: The Ridge East
  - HA3: Land at Martineau Lane
  - HA4: Hastings Country Park and Nature Reserve
  - HA5: Combe Valley Countryside Park
  - HA6: Crowhurst Road South
  - HA7: Queensway
  - HA8: Breadsell

- 1.2.2. The analysis evaluates the key environmental constraints present in each of the broad areas proposed, including related to: biodiversity; flood risk; the historic environment; landscape quality; water; and agricultural land quality. In addition, accessibility to key facilities and services are considered.
- 1.2.3. **Figure A-1** represents the locations of the broad areas

**Figure A-1: Appraisal Areas**



## 1.3. Glossary of constraints

1.3.1. Table A-1 provides a glossary of the constraints considered through this analysis.

**Table A-1: Glossary**

<b>Term</b>	<b>Definition</b>
Agricultural Land Classification	The Agricultural Land Classification (ALC) classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' land.
BAP Priority Habitat	UK BAP priority habitats are those that have been identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). They cover a wide range of semi-natural habitat types.
Conservation Area	Conservation areas are designated at the local level to protect the special architectural and historic interest of an area through protecting the features that make it unique and distinctive.
Flood Zone 3	Flood zone 3s are classified as functional floodplains and are deemed to be the most at-risk land of flooding from rivers or the sea. Local planning authorities have classified areas at significant risk of flooding to be within flood zone 3. This classification is usually classified as land which had a 5% probability of flooding/a 1:20 chance. Flood Zones are used to apply the sequential test, which seeks to steer new development to areas with the lowest probability of flooding.
Landscape Character Area	Landscape Character Areas (LCA) are geographically defined parts of the landscape that display a recognisable and consistent combination of natural and human-made features. They are identified through landscape character assessment and are used as a descriptive framework to understand how different elements (such as landform, vegetation, settlement patterns, and land use) combine to create distinctive landscape patterns.
Marine Conservation Zone	A Marine Conservation Zone (MCZ) is a type of marine protected area designated to protect nationally important, rare, or threatened habitats and species within UK waters. These zones aim to conserve the biodiversity of marine ecosystems and can include features of geological or geomorphological interest.

<b>Term</b>	<b>Definition</b>
National Landscape	<p>A National Landscape (NL) is an area of high scenic quality which has statutory protection in order to conserve and enhance the natural beauty of its landscape. NLs are designated solely for their landscape qualities, for the purpose of conserving and enhancing their natural beauty (which includes landform and geology, plants and animals, landscape features and the history of human settlement over the centuries).</p> <p>Since November 2023 all protected landscapes previously designated as Areas of Outstanding Natural Beauty (AONBs) have been referred to National Landscapes. This change was initiated by the Government to reflect the national importance of these areas, with a view to highlighting their equal place alongside National Parks in helping to achieve wider aims associated with health and wellbeing, sustainable public access, climate change and nature recovery.</p> <p>The Countryside and Rights of Way Act (2000) confirmed that NLs have the same status as National Parks in terms of landscape and scenic beauty. The Act places responsibility on local authorities to ensure protection for designated landscapes.</p>
Scheduled Monuments	A historic building or site that is included in the Schedule of Monuments kept by the Secretary of State for Culture, Media and Sport. The regime is set out in the Ancient Monuments and Archaeological Areas Act 1979.
Site of Special Scientific Interest	Sites of Special Scientific Interest (SSSI) are those areas considered to best represent the UK's natural heritage, such as through the site's diversity of plants, animals and habitats, rocks, and landforms, or through combinations of such natural features. Nationally designated, SSSIs are deemed to be the UK's best wildlife and geological sites.

## 1.4. Constraints analysis findings

1.4.1. This analysis provides the following for each of the eight broad areas:

- A map denoting biodiversity designations. These include SPAs, SACs, SSSIs, Priority Habitats and LNRs.
- A map denoting built environment designations. These include scheduled monuments, conservation areas, registered parks and gardens and listed buildings.

- A map denoting other significant constraints: Agricultural land classification and flood zones.
- A map denoting doctors surgeries, schools, railway stations, key roads, and bus stops.
- An analysis of the constraints and opportunities present in the vicinity of the broad areas.

# 1.5. HA1: The Ridge West area assessment

Figure A-2: Ecological Constraints

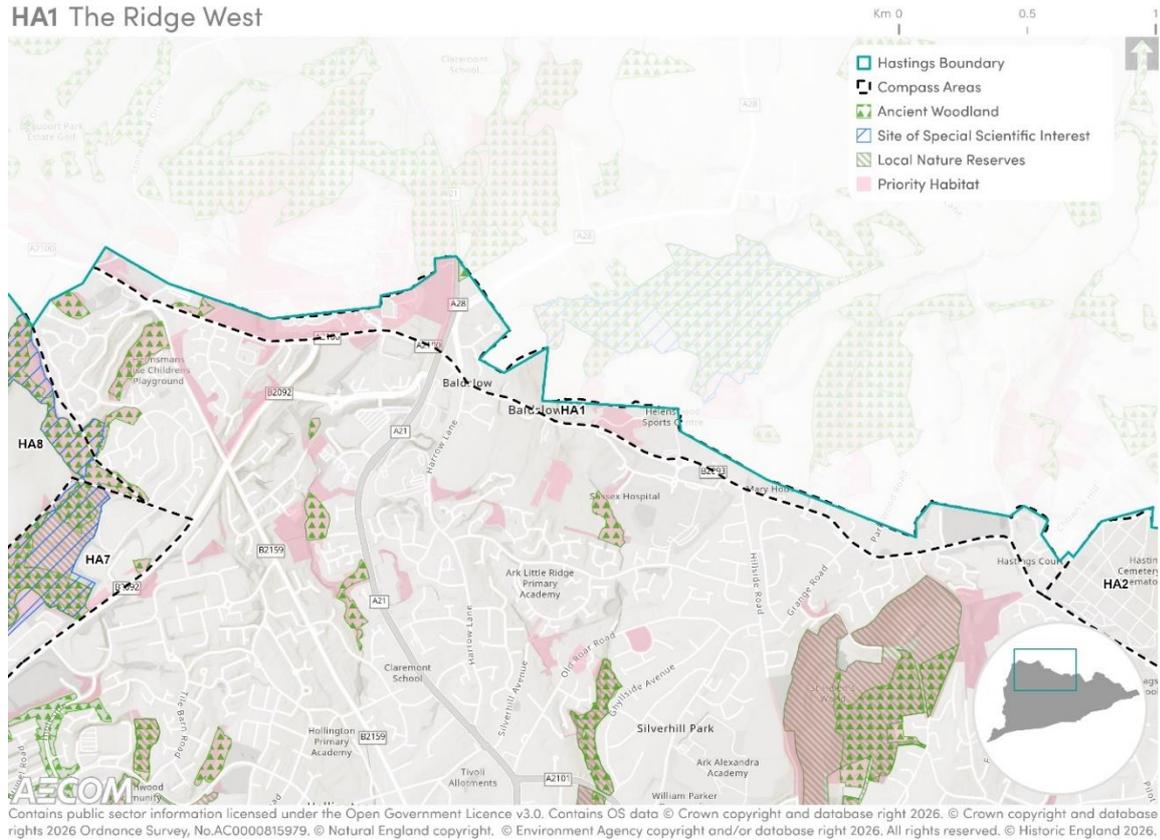
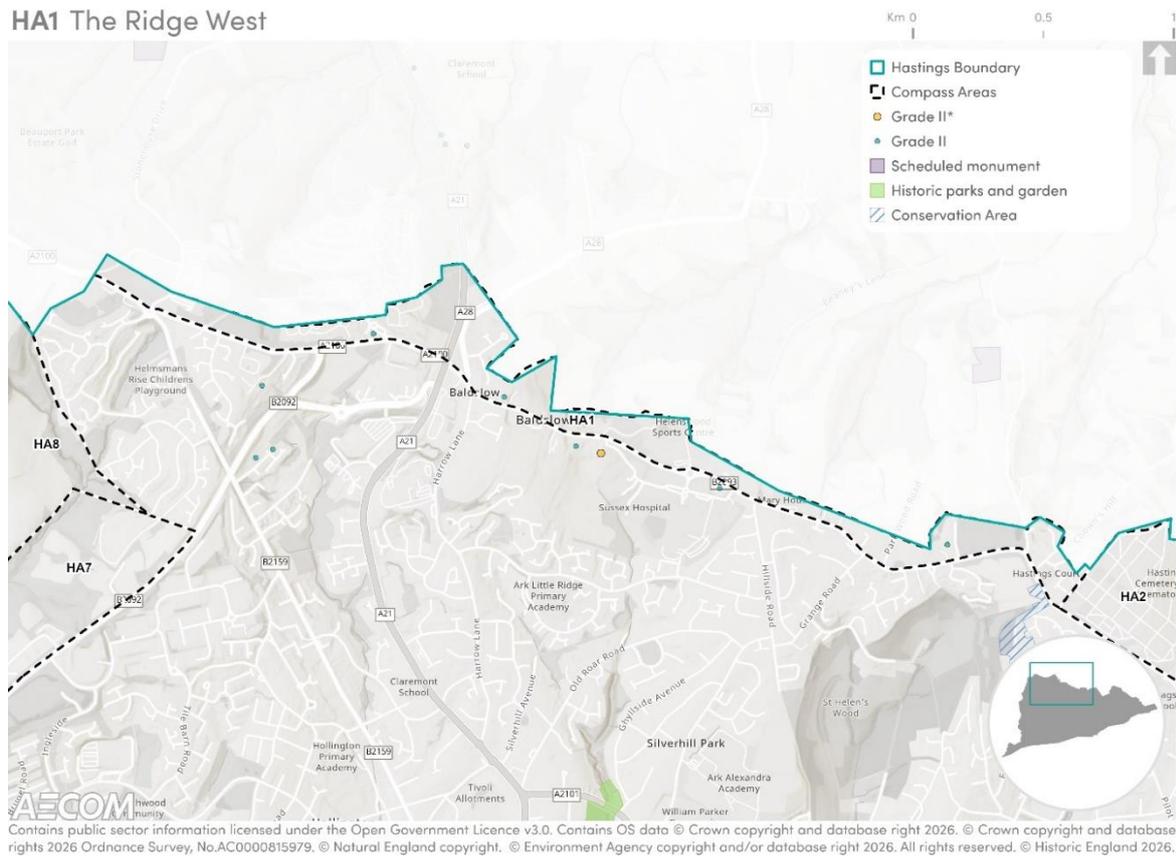
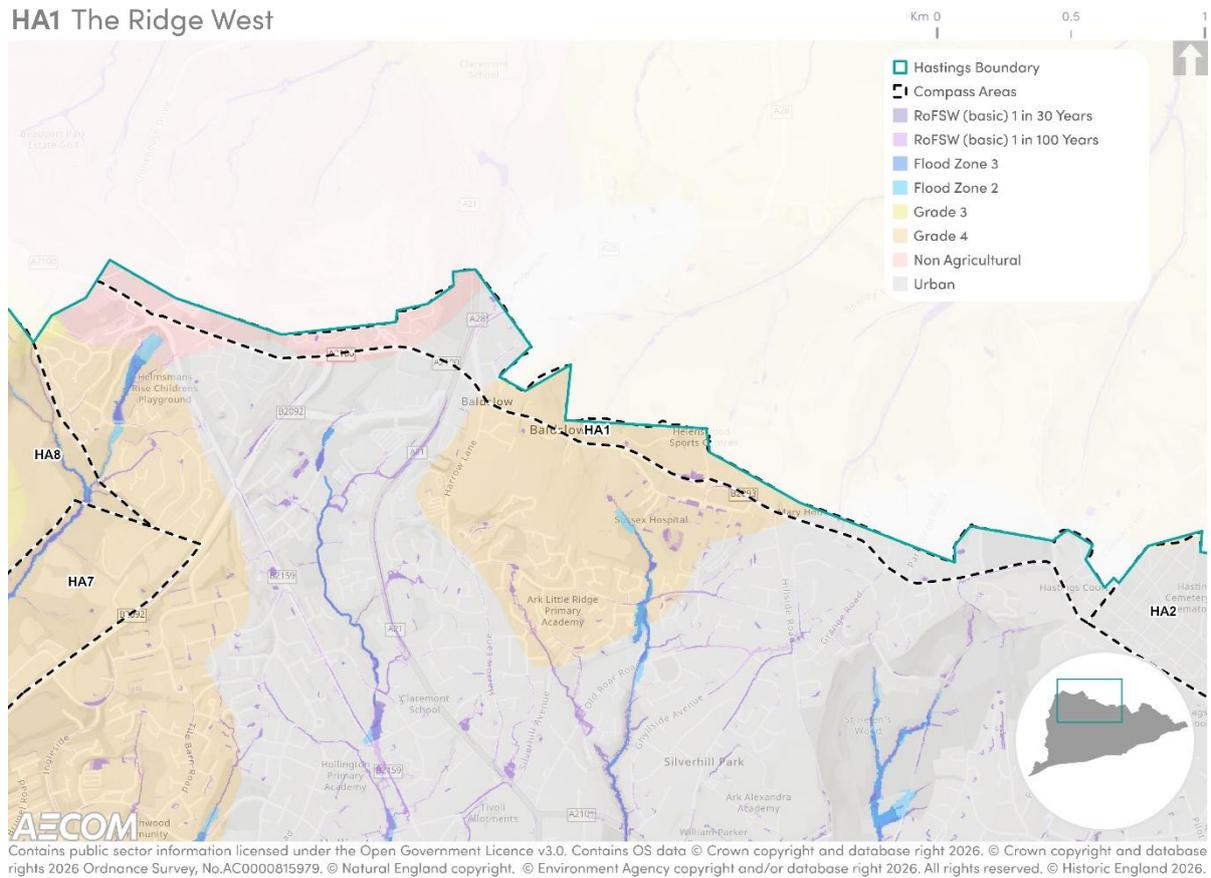


Figure A-3: Heritage Constraints



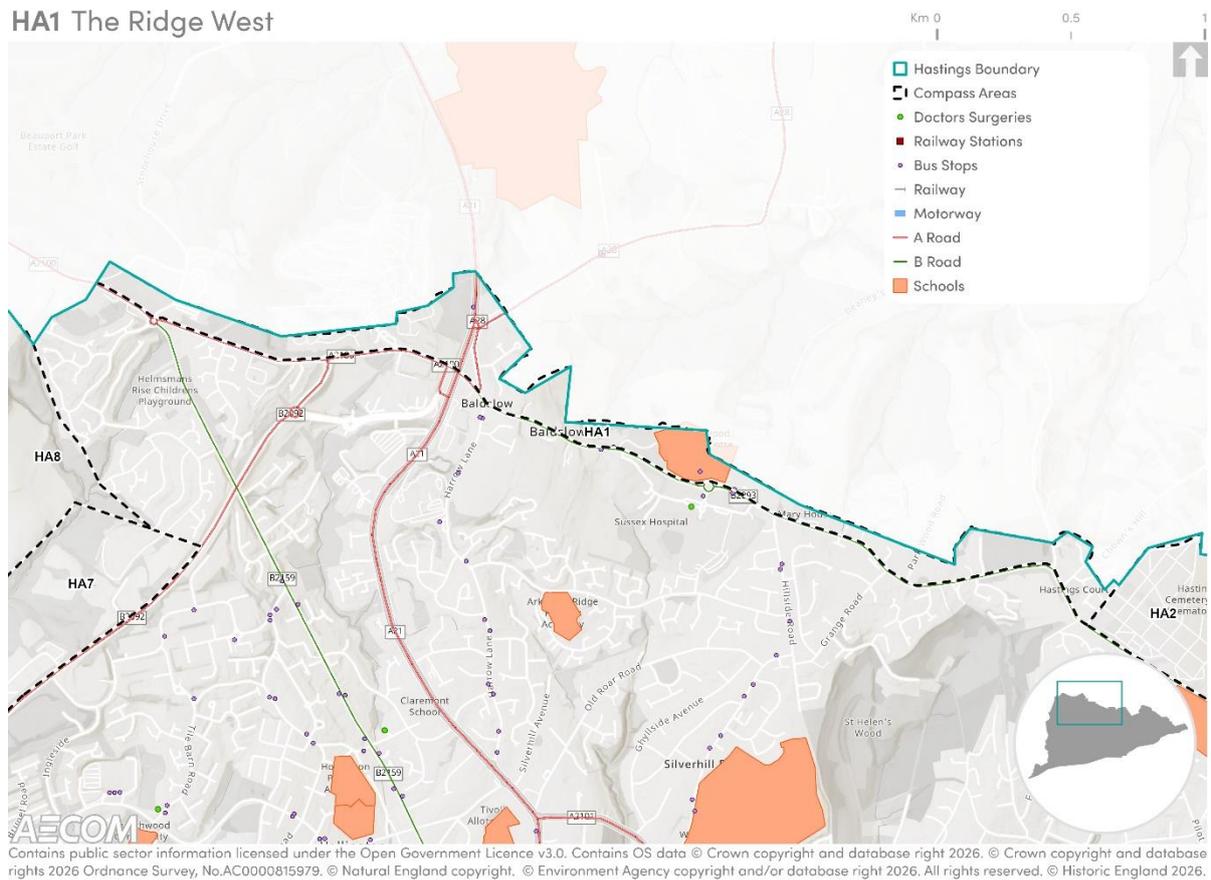
**Figure A-4: Flooding and Soil Constraints**

HA1 The Ridge West



**Figure A-5: Local Facilities and Amenities**

HA1 The Ridge West



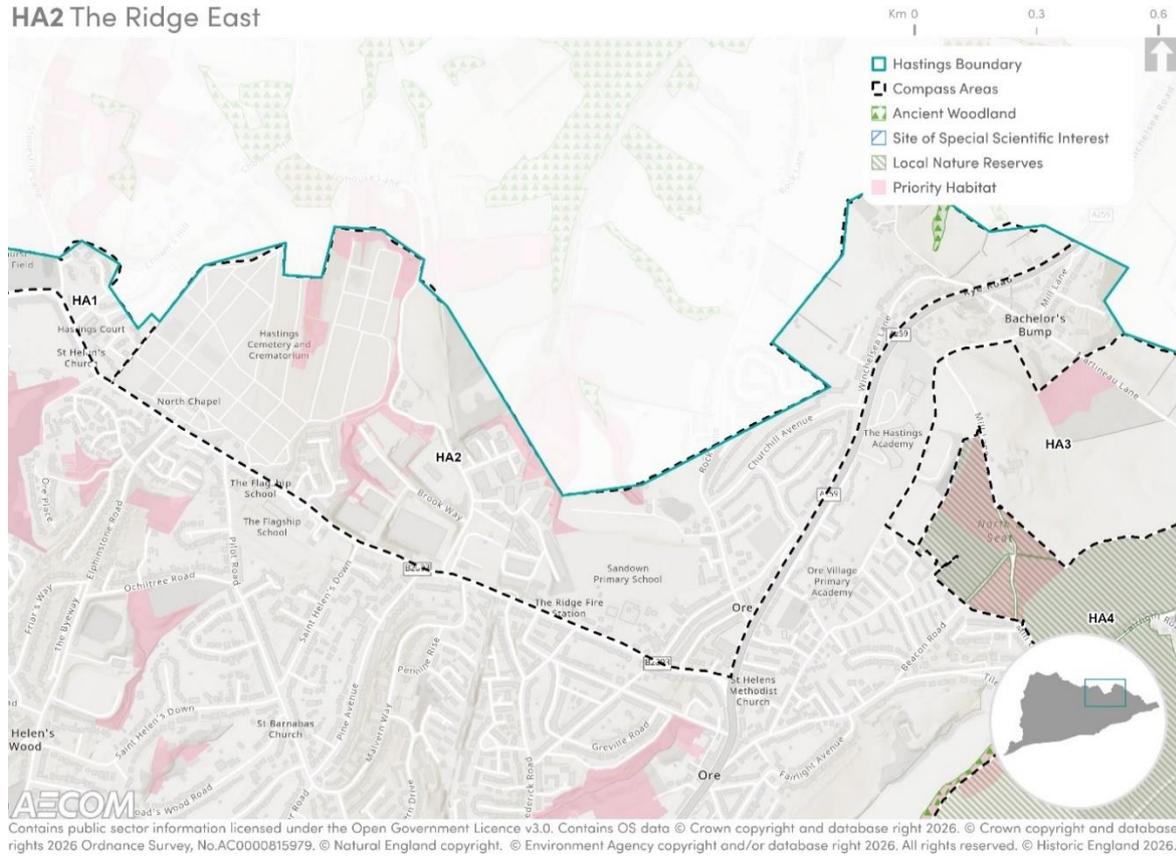
## Analysis: HA1, The Ridge West area

### Category      Key constraints and opportunities

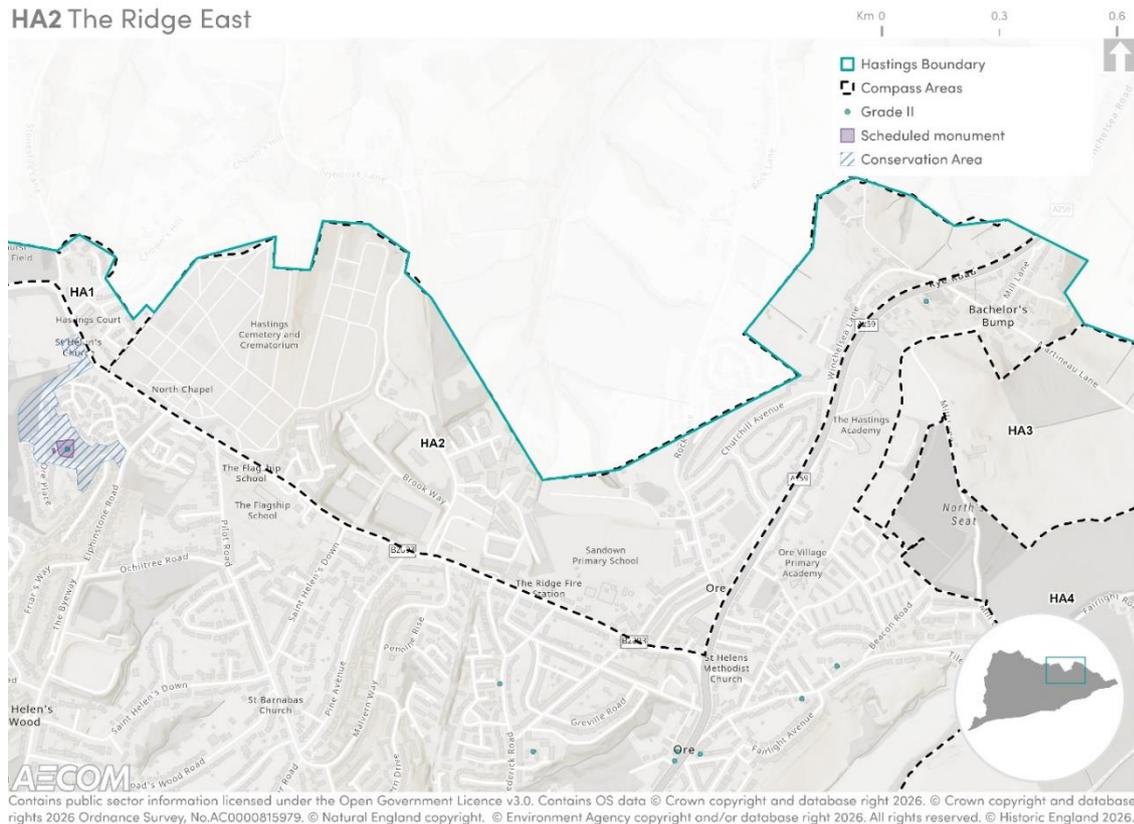
Biodiversity	HA1 is not significantly constrained with regard to statutorily designated biodiversity sites. However a large proportion of the western third of the broad area is covered by deciduous woodland BAP Priority Habitat, with a smaller area in the centre. There is also a small area ancient woodland in the west of the area.
Historic Environment	There are no significant historic environment constraints in this area. A small part of the eastern edge of the area however adjoins the Ore Place Conservation Area.
Landscape	The majority of HA1 lies within the High Weald NL, largely covering the east and centre of the area. HA1 sits within the East Sussex LCA 11: Brede Valley. The LCA is defined by a broad, flat valley floor bordered by steep, well-wooded slopes. The area is tranquil, with wide vistas from the ridges overlooking the river and marshes, which are crisscrossed by reed-lined ditches. Historic villages, farmsteads, and orchards dot the landscape, along with notable features such as Powdermill Reservoir and ancient woodlands. The valley retains much of its rural character, although some areas have been impacted by suburban expansion, agricultural change, and tourism developments
Soils	HA1 is made up of urban land, 'poor' quality Grade 4 land (located in the centre of the broad area) and non-agricultural land (located in the west).
Water	There is no fluvial or coastal flood risk within the area. There are some very limited areas of medium level surface water flood risk, which are not associated with the drainage pattern of the area.
Accessibility to Services and Facilities	<p>The Ark Alexandra Academy (Helenswood Campus) is within the HA1 area. Ark Little Ridge Primary School and The Flagship School are within 1km. The Ark Alexandra Academy William Parker Campus is 1.2km away and Silverdale Primary Academy and Sandown Primary are 1.3 km away. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services.</p> <p>The Conquest Hospital is located directly adjacent to HA1; however other than this, the closest doctors surgery (high Glades Medical Centre) is approximately 2 km away.</p> <p>Hastings railway station is located 5.3 km from the area, with Ore railway station located marginally closer at approximately 4.4 km. The HA1 area is located directly adjacent to the B2093 and A2100, with a number of bus stops adjacent to area. These bus stops are served by a range of services, which link the town centre and run through to Bexhill. These include services 73, 328, and 359.</p>

# 1.6. HA2: The Ridge East area assessment

Figure A-6: Ecological Constraints

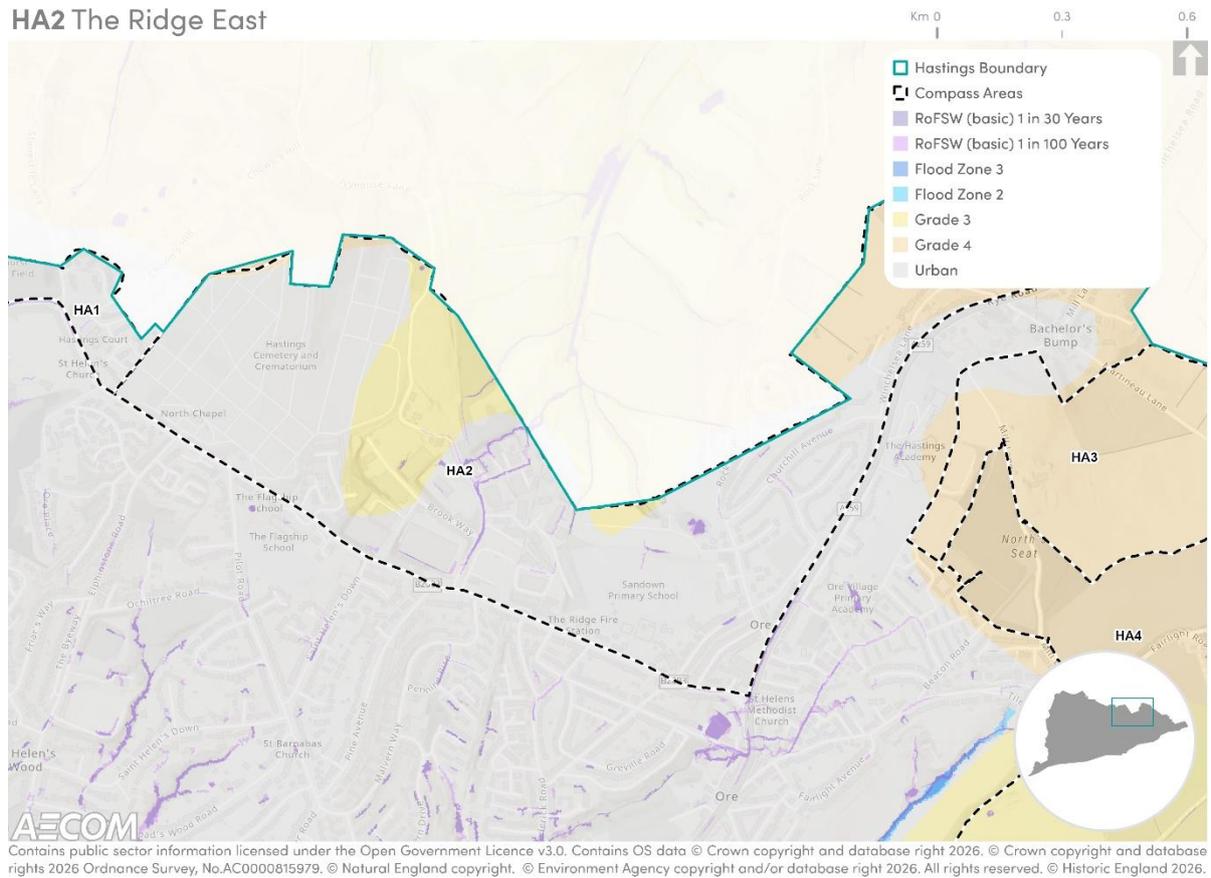


FigureA-7: Heritage Constraints



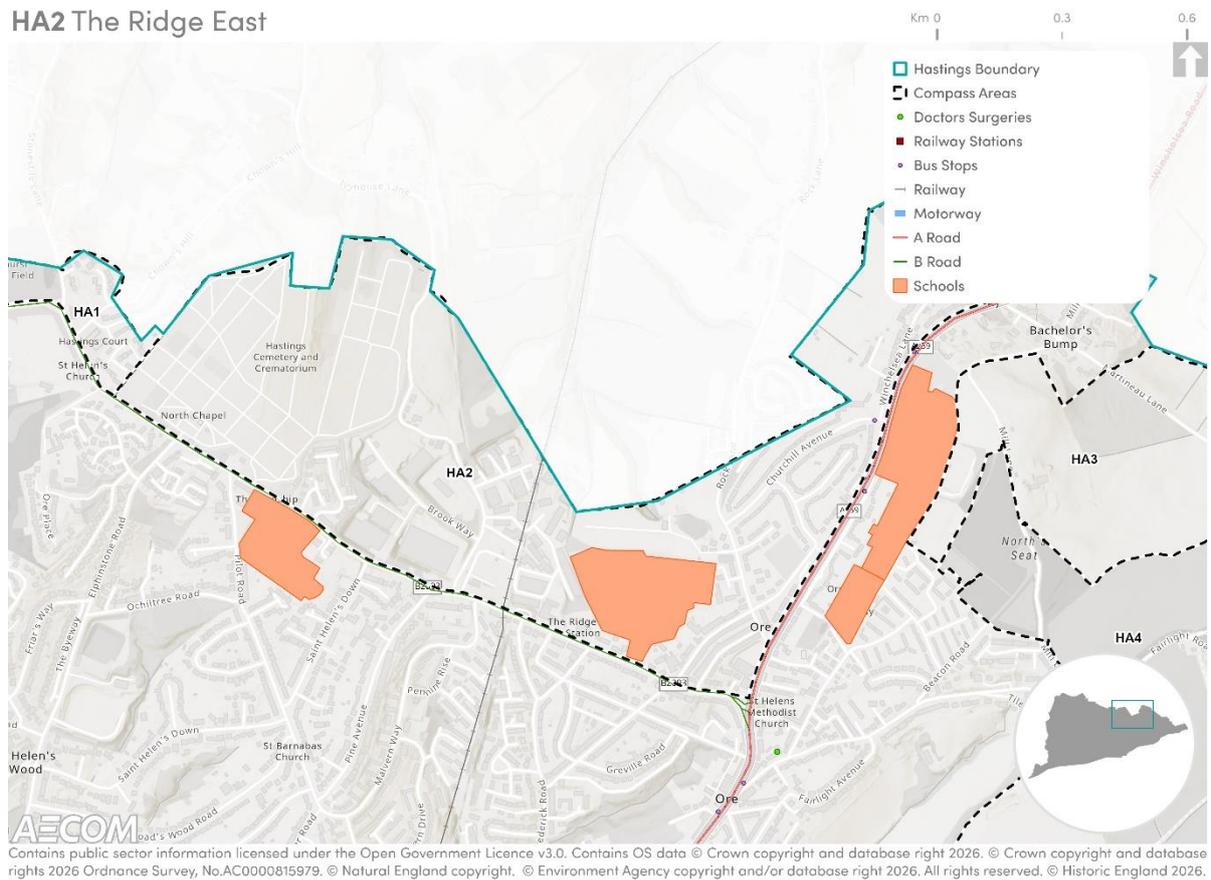
**Figure A-8 : Flooding and Soil Constraints**

HA2 The Ridge East



**Figure A-9 : Local Facilities and Amenities**

HA2 The Ridge East



## Analysis: HA2, The Ridge East area

Category	Key constraints and opportunities
Biodiversity	HA2 is not significantly constrained with regard to statutorily designated biodiversity sites. There are small areas of deciduous woodland BAP Priority Habitat. There is also a small part of ancient woodland in the northeast of the area, which extends further outside the boundary.
Historic Environment	There are no historic environment constraints in this area.
Landscape	HA2 lies partially within the High Weald NL. This is specifically in the north of the area, and more largely in the northeast of HA2. HA2 sits within East Sussex LCA 11: Brede Valley. Brede Valley LCA is defined by the broad, flat valley of the River Brede, enclosed by steep, wooded slopes. The landscape is tranquil and largely unspoilt, featuring scattered farmsteads, reed-fringed marshes, and ancient woodlands. Historic villages such as Brede and Udimore overlook the valley, with oast houses and orchards contributing to the rural character. Despite modern pressures like suburbanisation and development, the area retains its distinctiveness with wide vistas across the floodplain and significant biodiversity.
Soils	HA2 primarily has been classified as urban land, however there is some Grade 3 agricultural land in the eastern half of the area. It is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken. There is also a limited area of Grade 4 agricultural land in the north east of the area, adjacent to the northern boundary, which is classified as poor quality.
Water	There is no fluvial or coastal flood risk within the area. There are however some very small areas of surface water flood risk in the central part of the area, as well as some surface water flood risk associated with the drainage pattern of the area.
Accessibility to Services and Facilities	HA2 is located well with regards to accessibility. Sandown Primary School and Nursery are present within the HA2 area, and the Flagship School, Ore Village Primary Academy and the Hastings Academy are all within walking distance of HA2. Additional educational facilities in central Hastings such as East Sussex College (accessible via the 321 bus service) and in Rye such as Rye College (accessible via the 100 bus service) can be reached easily by car or by direct public transport.

In terms of doctors surgeries, Beaconsfield Road Surgery (Ore site) is located within walking distance, and the Conquest Hospital and Harold Road Surgery are within relative proximity to the area.oHo

Ore railway station is located 1.5km away and Hastings station is also easily accessible from the HA2 area. HA2 has bus stops directly adjacent to the area, and these buses service Ore, through to Bexhill, and Hastings centre – these services including but not exclusive to the 324, 328, 331 and 359.

# 1.7. HA3: Land at Martineau Lane

Figure A-10 : Ecological Constraints

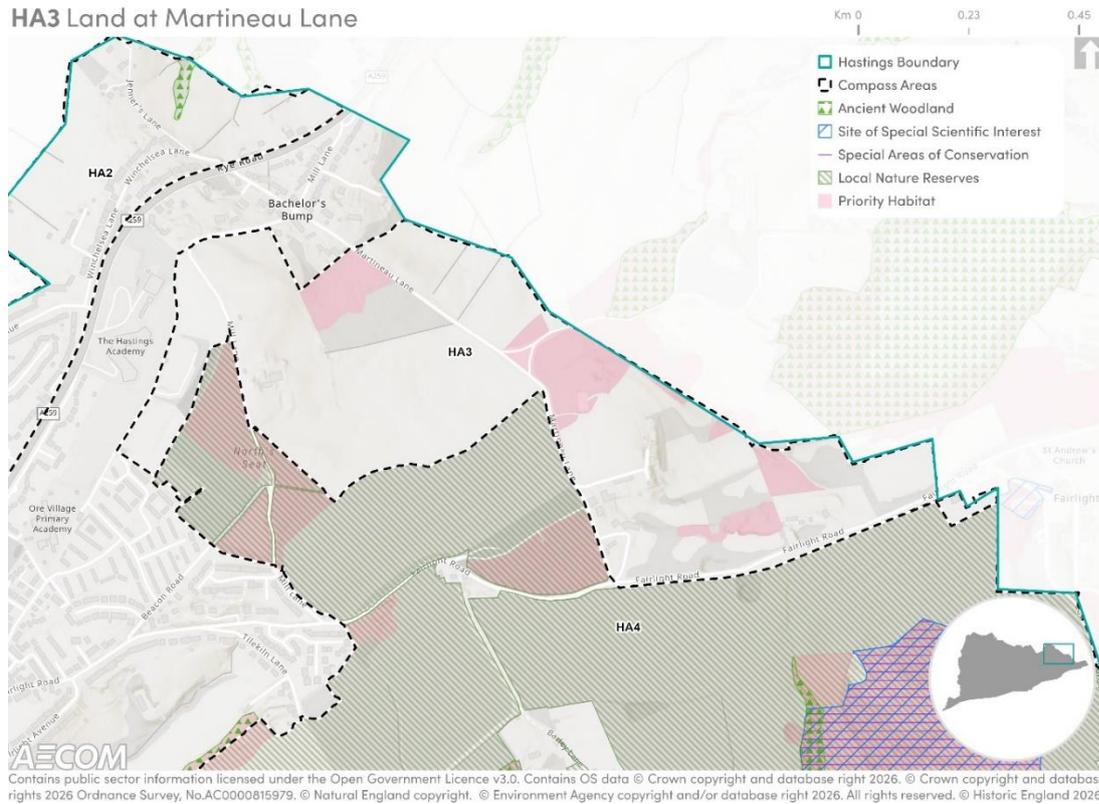
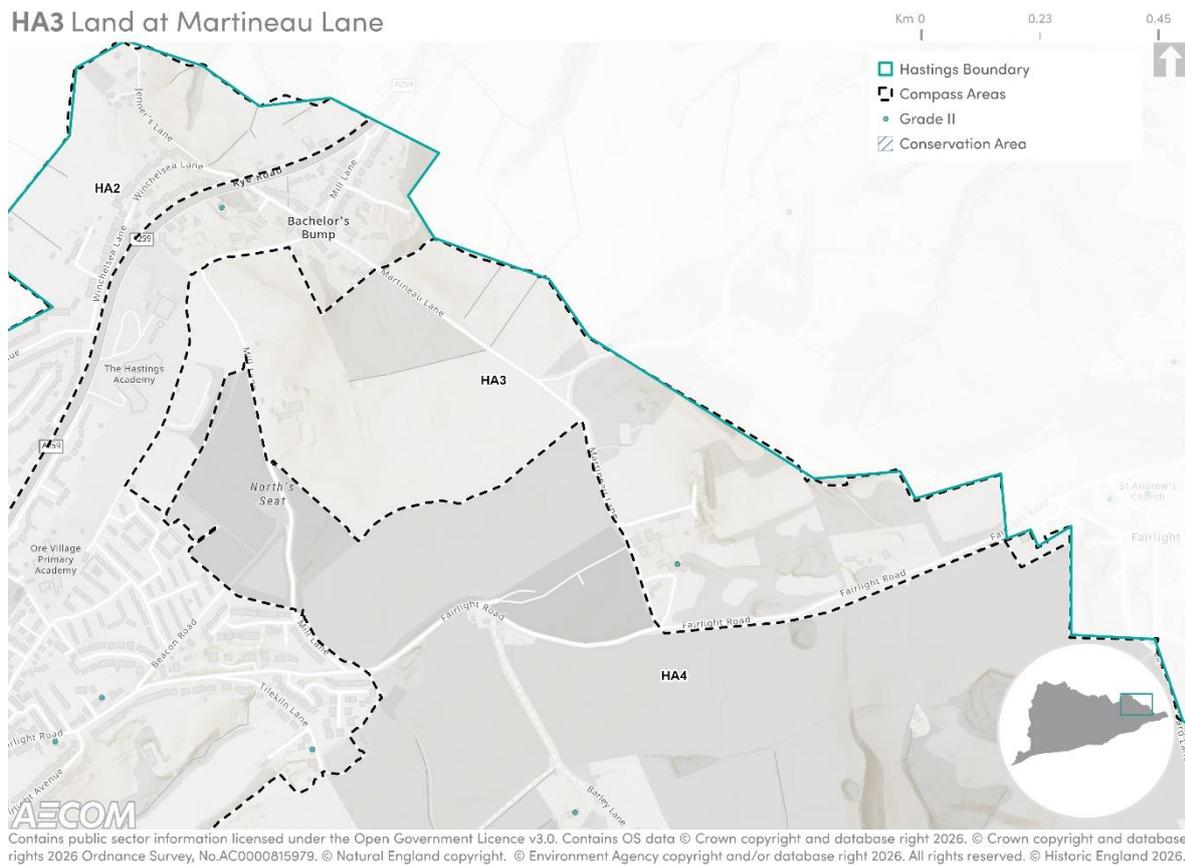
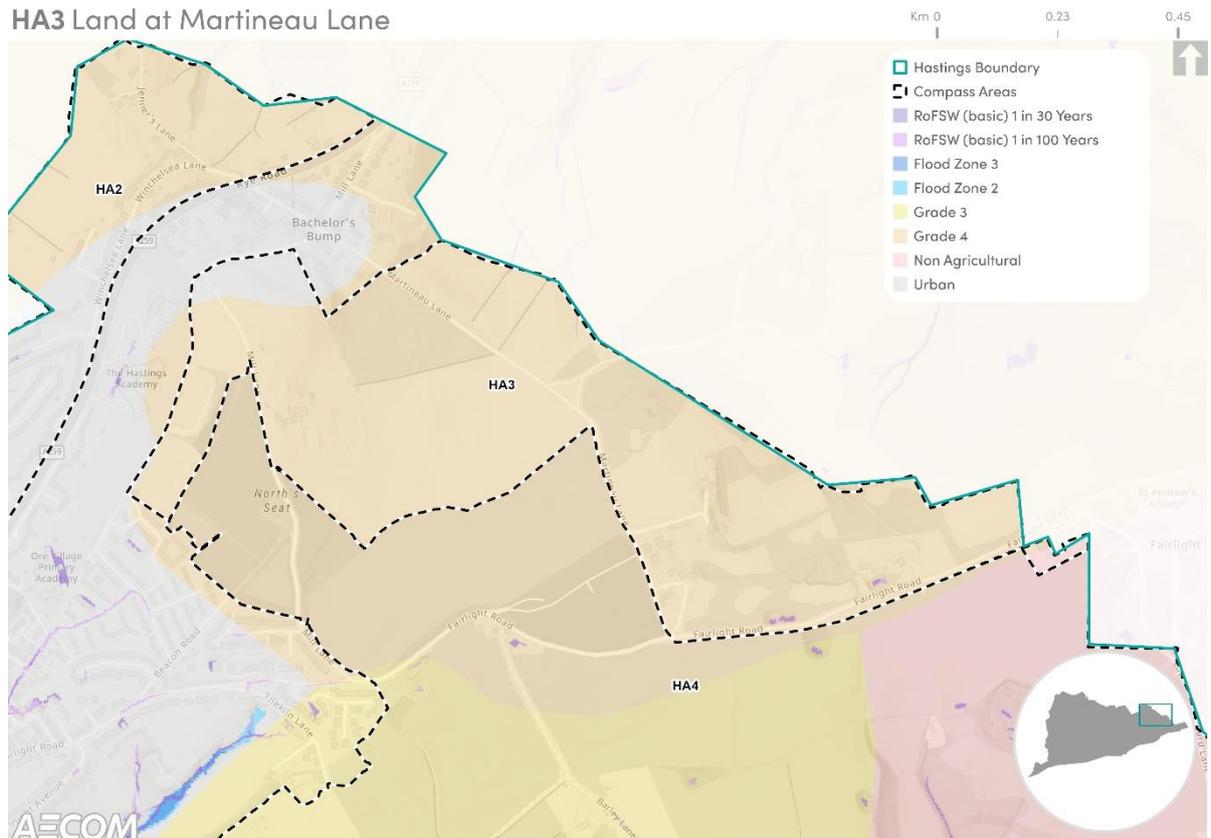


Figure A-11 : Heritage Constraints



**Figure A-12: Flooding and Soil Constraints**

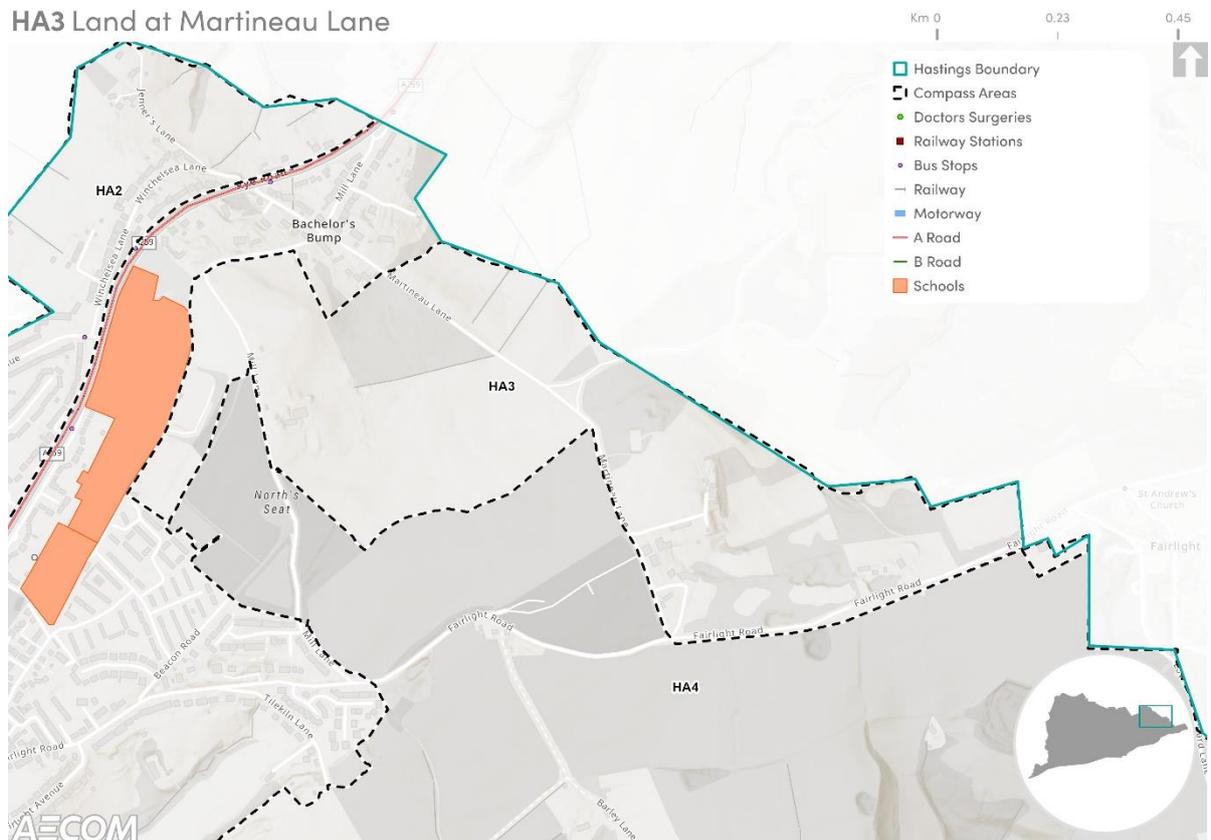
HA3 Land at Martineau Lane



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**Figure A-13 : Local Facilities and Amenities**

HA3 Land at Martineau Lane



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## Analysis: HA3, Land at Martineau Lane

Category	Key constraints and opportunities
Biodiversity	<p>HA3 is located directly adjacent to the Hastings Country Park Nature Reserve.</p> <p>There are a number of areas of BAP Priority Habitat in HA3 including a larger area of deciduous woodland located centrally in the area to the south of Martineau Lane with smaller sections in the western and eastern part of the area. The area also adjoins an extensive area of woodland to the east, linking to Mallydams Wood, which is a Local Nature Reserve.</p>
Historic Environment	<p>There is one Grade II listed buildings in HA3. This is the Fairlight Lodge Hotel (located in the south of the area). The area is also within the setting of the Grade II listed Belswaine's Lodge, located just outside of the area to the north east.</p>
Landscape	<p>HA3 lies entirely within the High Weald NL. HA3 also sits within East Sussex LCA 12: High Wealden Coast. The LCA features a dramatic coastline of crumbling sandstone cliffs, deep ghylls, and a hinterland typical of the High Weald. The area includes ancient woodlands, wind-sculpted fields, and historic farmsteads, with long views across the Brede Valley and beyond. While largely rural and tranquil, the LCA in this area faces pressures, expanding suburban development, and increasing tourism.</p>
Soils	<p>HA3 is underlain by Grade 4 (poor quality) agricultural land.</p>
Water	<p>There is a generally low risk of both fluvial flooding and surface water flooding across the HA3 area.</p>
Accessibility to Services and Facilities	<p>HA3 has relatively good access to primary and secondary schools. The Hastings Academy is directly adjacent to the west of the area, while the neighbouring Ore Village Primary Academy is within walking distance. In terms of doctors' surgeries, the Ore Clinic site is approximately 0.6km away from the area. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services.</p> <p>Ore railway station is located 3.5km from the HA3 area, with Hastings and Three Oaks railway stations slightly further distances. Bus routes which serve the area include the 70, running from Rye, through Hastings town centre, to Bexhill College and Rye College; the 100, which runs from Conquest Hospital through the town centre through Rye and up to New Romney in the east; and the 347 that runs from Pett to Hastings. These services provide access to the town centre, as well as surrounding settlements.</p>

# 1.8. HA4 Hastings Country Park and Nature Reserve

Figure A-14 : Ecological Constraints

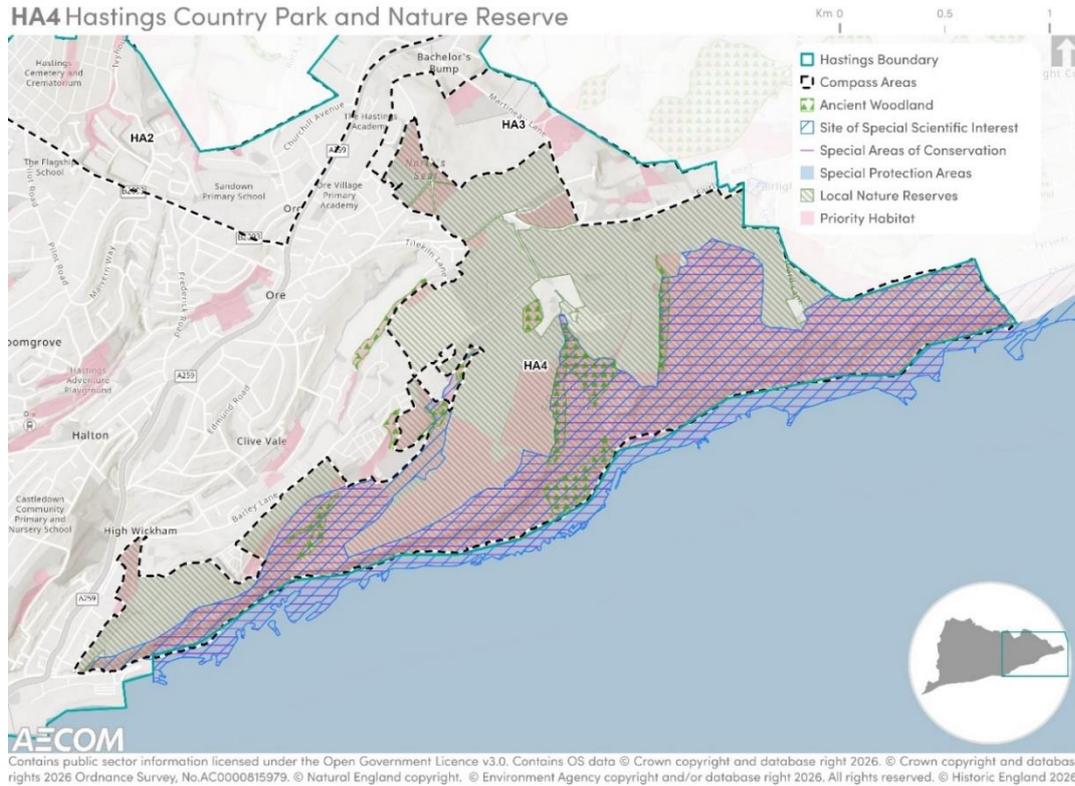
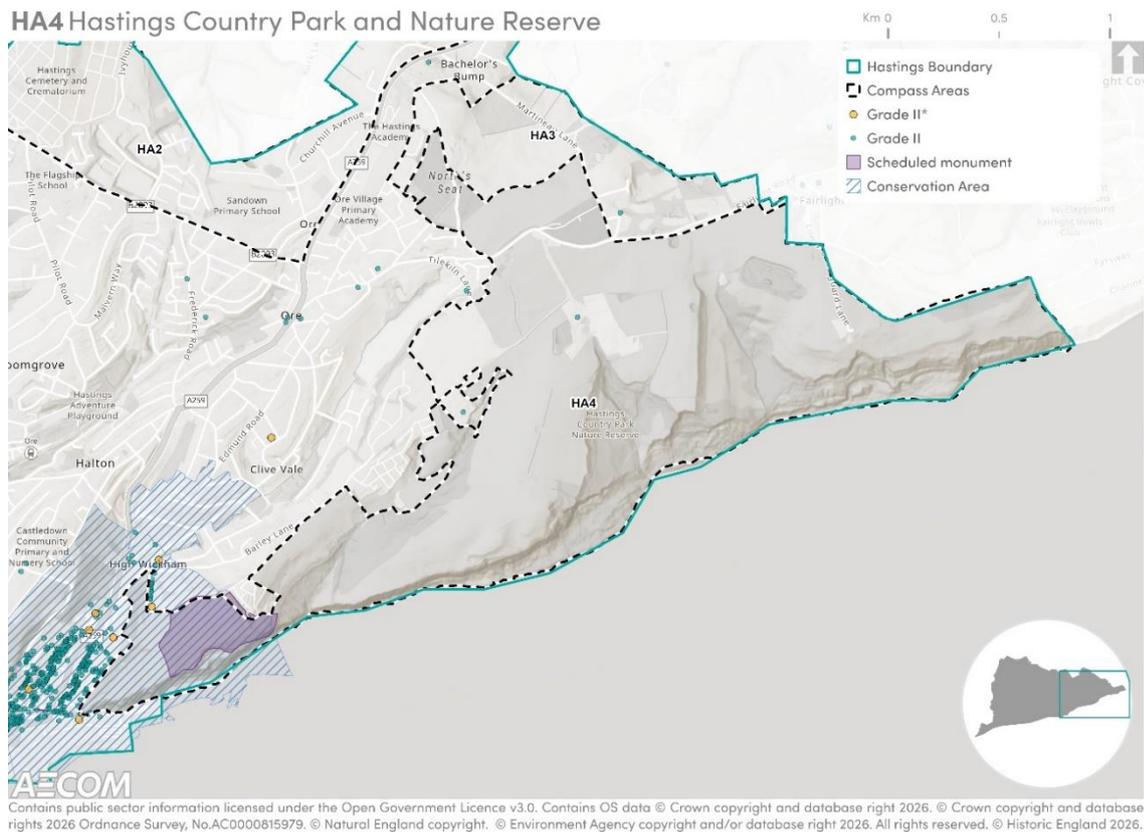
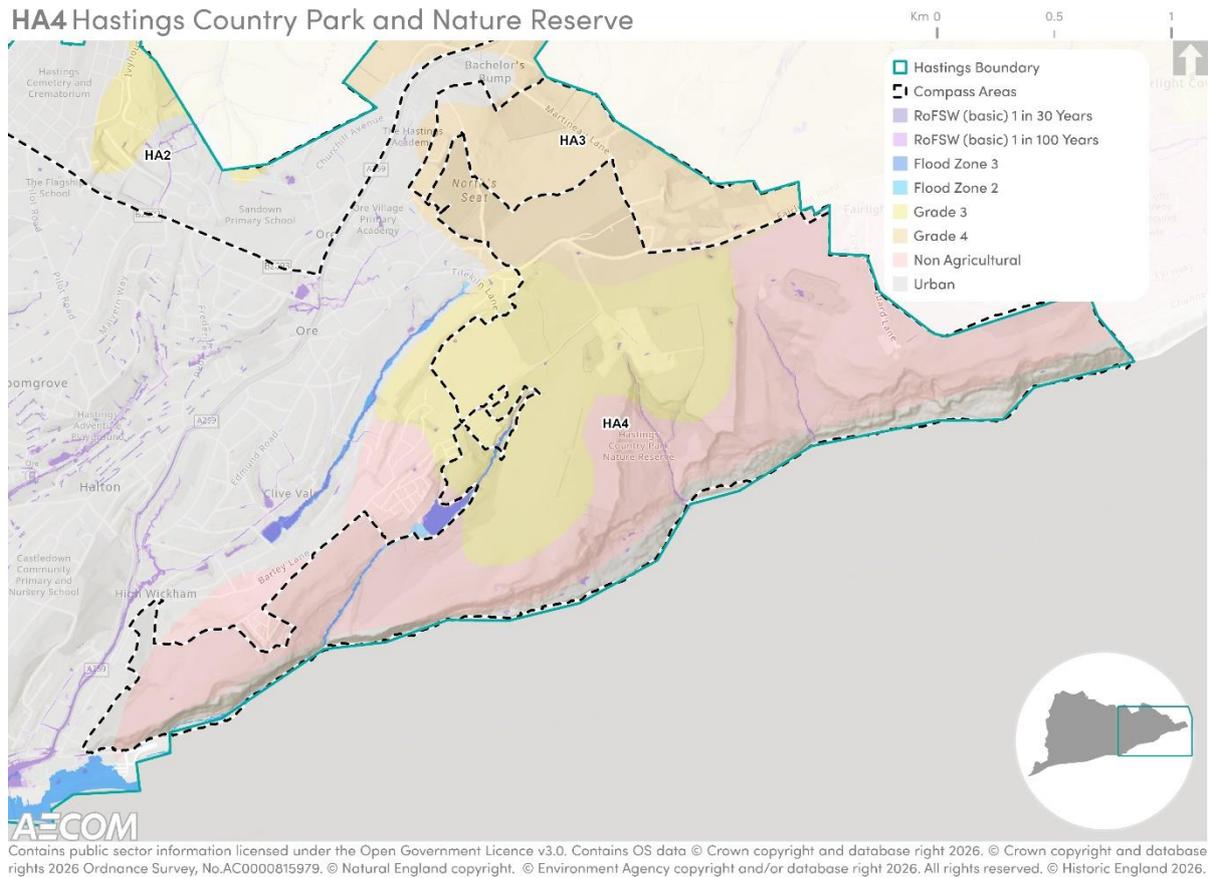


Figure A-15 : Heritage Constraints



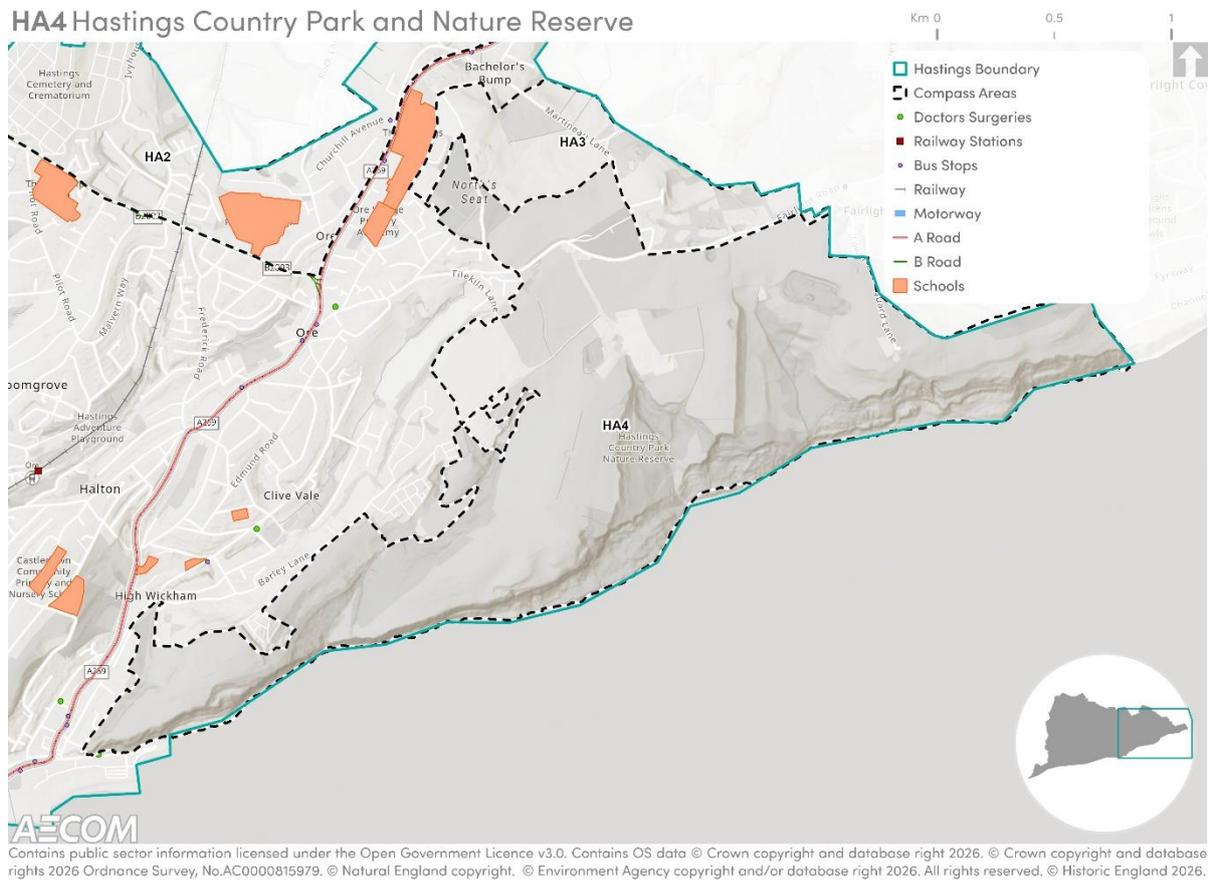
**Figure A-16 : Flooding and Soil Constraints**

HA4 Hastings Country Park and Nature Reserve



**Figure A-17 : Local Facilities and Amenities**

HA4 Hastings Country Park and Nature Reserve



## Analysis: HA4, Hastings Country Park and Nature Reserve

Category	Key constraints and opportunities
Biodiversity	<p>HA4 is highly constrained with regards to biodiversity.</p> <p>The land adjacent to the southern boundary, and much of the east of the area is designated as part of the Hastings Cliffs SAC. The area is also directly adjacent to the Dungeness, Romney Marsh and Rye Bay SPA to the south. Much of the area is also part of the designated Hastings Cliffs and Petts Beach SSSI. The entire HA4 area is within a designated LNR, Hastings Country Park.</p> <p>Much of the area is constrained by BAP Priority Habitat, especially across the south of the area. The majority of this is maritime cliffs and slopes Priority Habitat, however there are also some smaller sized areas of good quality semi-improved grassland adjacent to this. There are also multiple areas of ancient woodland in HA4, the two largest of which are in the centre of the area, with one adjacent to the southern boundary.</p>
Historic Environment	<p>There is a large scheduled monument at the southwestern tip of the area. This is the Iron Age cliff castle and site of St George's churchyard on East Hill and is entirely within the HA4 area. There are also various listed buildings (Grade II and Grade II*) adjacent to the HA4 area boundary. HA4 is also partially within the Hastings Old Town Conservation Area in the southwest of the area.</p>
Landscape	<p>HA4 lies entirely within the High Weald NL. The broad area sits within East Sussex LCA 12: High Wealden Coast. The LCA is defined by its distinctive coastline where the Hastings-Battle Ridge meets the sea, featuring crumbling sandstone cliffs and steep ghylls. Inland, the area is a mix of fields, woodlands, and historic ridge-top villages such as Pett and Fairlight. The landscape is largely rural and tranquil, but coastal erosion, suburban expansion, and recreational pressures pose challenges. The area includes important natural habitats, such as ancient woodlands and wetlands, and offers long coastal views, making it a significant location for both biodiversity and recreation.</p>
Soils	<p>The majority of the land in HA4 is considered to be non-agricultural land. The land in the centre of HA4 is Grade 3; however it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken. The northern tip of HA4, adjacent to the northern boundary, has been evaluated to be Grade 4 'poor' agricultural land.</p>

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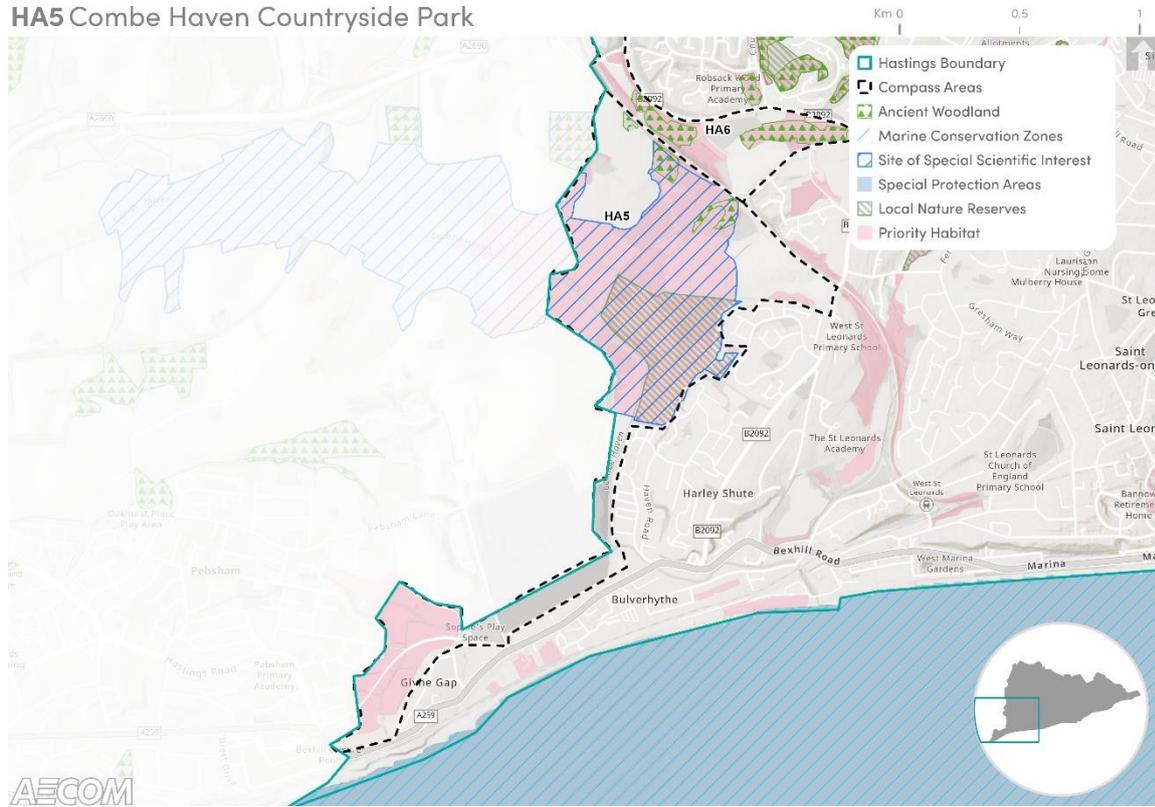
Water	Overall, HA4 is not constrained by fluvial flood risk. There is limited flood risk from fluvial flooding adjacent to a small tributary in the southwest of the area that runs to the sea. There are also two very small areas of surface water flood risk in the south of the area, associated with drainage to the sea. The coastline of the area is subject to coastal erosion.
Accessibility to Services and Facilities	<p>There are a number of schools within walking distance to parts of HA4, including Ore Village Primary Academy, Sandown Primary School and Nursery, All Saints Church of England Junior Academy, Dudley Infant Academy, and Sacred Heart Catholic School. The Hastings Academy is within walking distance of the northern part of the area. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services.</p> <p>There are a number of doctors surgeries within proximity of the area. These include Hastings Old Town Surgery to the west of HA4, with Harold Road Surgery, Beaconsfield Road Surgery (Ore site), Roebuck House Practice all within walking distance to the western part of the area.</p> <p>Ore railway station is the closest station to HA4, approximately 900m from the area, with Hastings railway station approximately 1.6km distant. There are also various bus stops in walking distance to the area, with buses such as the 321, which services the Ore area, through to the town centre and up to Conquest Hospital. Other buses include the 70, servicing Rye through to Bexhill College and Rye College, and the 100, running from Conquest Hospital through to Rye, Lydd, and New Romney.</p>

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# 1.9. HA5: Coombe Haven Countryside Park

Figure A-18 : Ecological Constraints

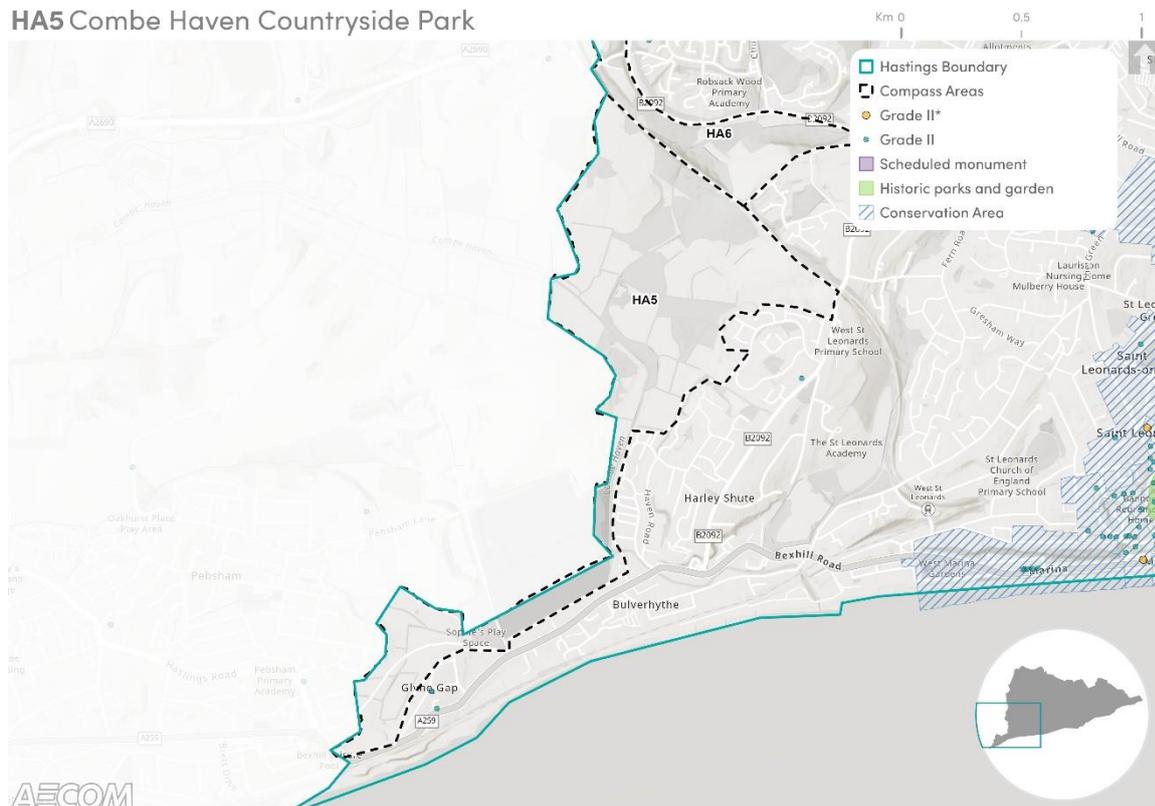
HA5 Coombe Haven Countryside Park



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Figure A-19 : Heritage Constraints

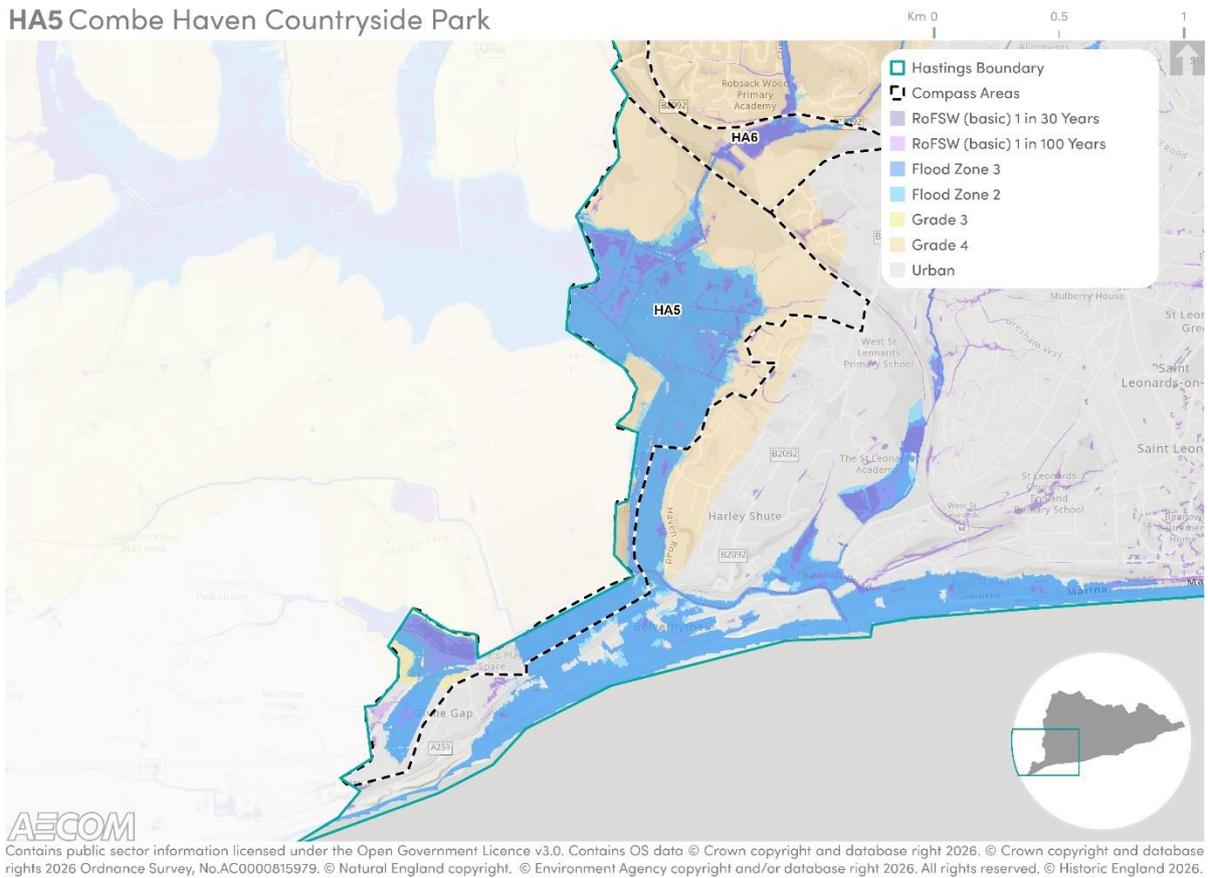
HA5 Coombe Haven Countryside Park



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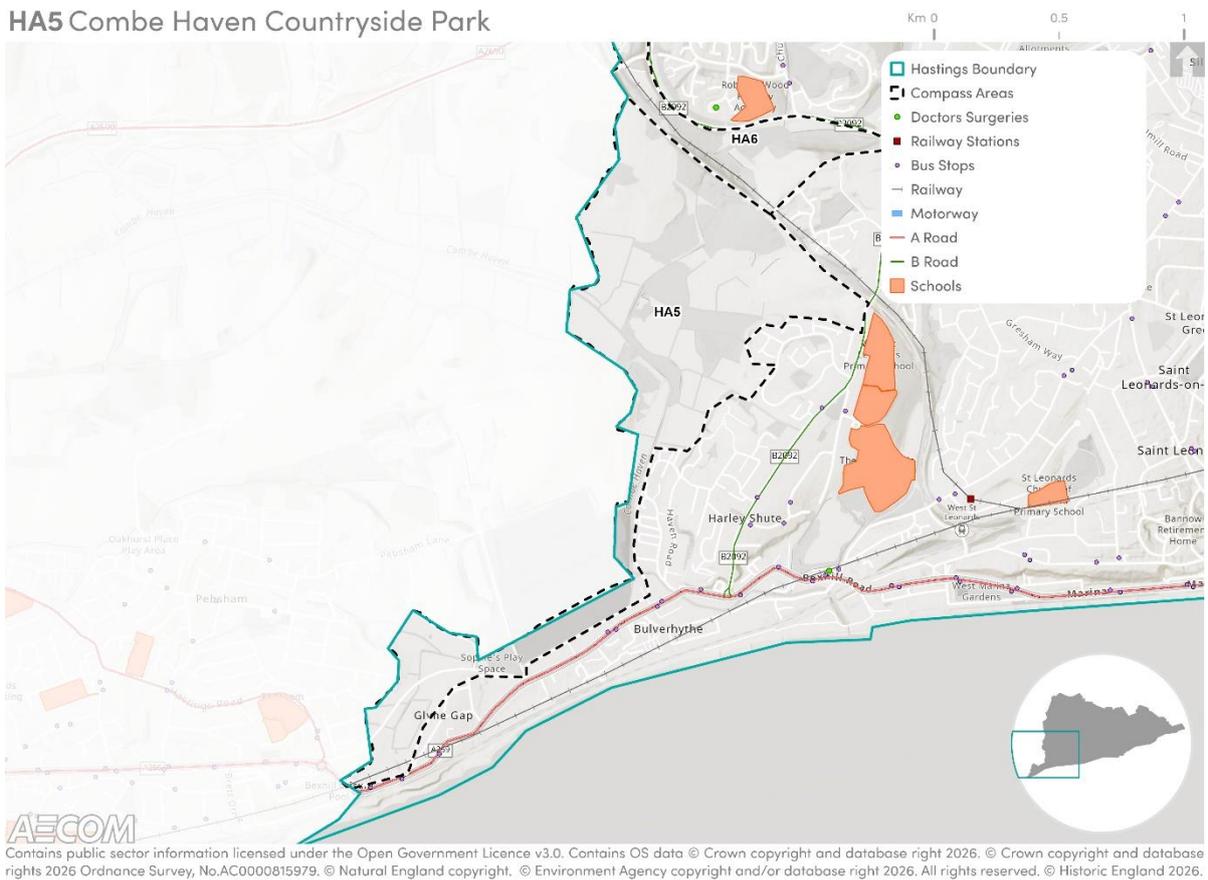
**Figure A-20 : Flooding and Soil Constraints**

HA5 Combe Haven Countryside Park



**Figure A-21 : Local Facilities and Amenities**

HA5 Combe Haven Countryside Park



## Analysis: HA5, Combe Haven Countryside Park

Category	Key constraints and opportunities
Biodiversity	<p>The HA5 area is relatively constrained with regards to biodiversity. The Combe Haven SSSI is partially within the area, covering a large section of the north west of HA5. The area that is within the SSSI is also partially covered by the Filsham Reed Bed LNR. The LNR covers the southeastern part of the SSSI and lies centrally to the HA5 area. There are also small areas of ancient woodland in the north of the area, close to the boundary and some within the SSSI area. The southern part of the HA5 area is also in proximity to the Beachy Head East MCZ.</p> <p>The SSSI and LNR area also comprises BAP Priority Habitat, with reedbeds making up the LNR area. There are also small areas of purple moor grass and rush pastures directly adjacent to this area to the north, as well as a small area of this on the north western part. The rest of the SSSI is made up of primarily lowland heathland, but also some areas of coastal and floodplain grazing marsh closer to the HA5 boundary, as well as to the north of the SSSI. There is also a small area of good quality semi-improved grassland adjacent to the LNR to the west. Other areas of BAP Priority Habitat cover the HA5 area, with smaller, however more frequent areas of deciduous woodland in the east of the area. There are also some smaller areas of coastal and floodplain grazing marsh in the far south of the area, as well as some lowland heathland at the tip of the area.</p>
Historic Environment	<p>HA5 is relatively less constrained with regard to the historic environment, however in the south western tip of the area is a scheduled monument, the remains of St Mary's Chapel, and two Grade II listed buildings, the Bull Inn and the Ruin of St Mary's Chapel.</p>
Landscape	<p>HA5 is located within East Sussex LCA 10: Combe Haven Valley. This area is defined by its small, winding High Weald valleys, ancient woodlands, and a central wetland in the Combe Haven Basin. Bordered to the north by the Battle Ridge, it features the Filsham reed beds and historic farmsteads. Despite some urban fringe development, the area maintains a tranquil and remote character.</p>
Soils	<p>The majority of HA5 is underlain by Grade 4 Agricultural Land, which is considered to be poor quality land for agriculture. This area is in the north and west of HA5, with the land adjacent to the eastern border being urban land, and a small area of the land at the southern tip of HA5 being Grade 3 agricultural land. It is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken.</p>

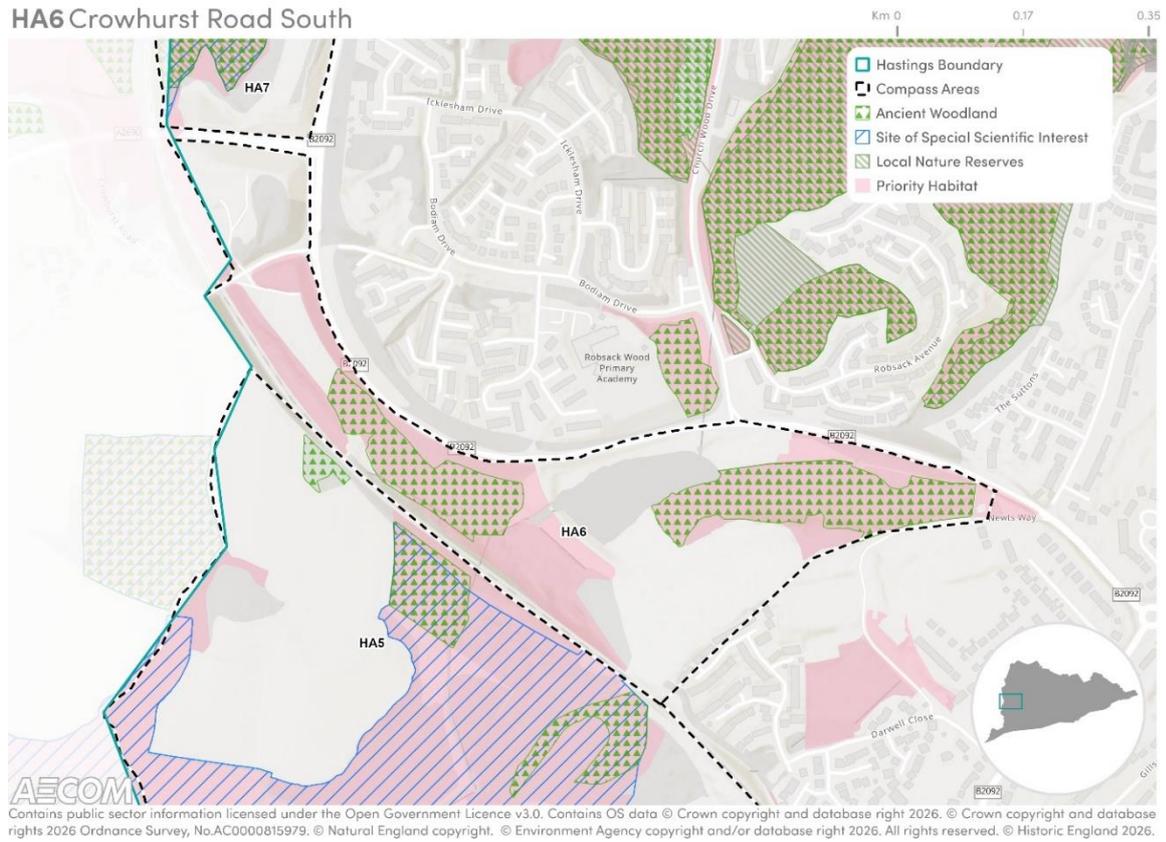
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Water	<p>With regards to flooding in the area, the Combe Haven River runs through the west of the area, adjacent to the boundary and then through the area to the coast. This means that a large proportion of the HA5 area is at a high level of flood risk. The majority of the east of the area is in Flood Zone 3 for river and sea flood risk, as well as a large part of the south of the area, and centrally in the north of HA5. There is also a large area of surface water flood risk at the southern tip of the area, as well as centrally in the north.</p>
Accessibilities to Services and Facilities	<p>HA5 is a large area, with good accessibility to services and facilities. There are four schools within walking distance of the HA5 area, with West St. Leonards Primary Academy, and Robsack Wood Primary Academy being the primary school options. There are also two secondary schools, Saxon Mount School and the St. Leonards Academy. There are also a number of other schools within walking distance. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services.</p> <p>There are two doctors surgeries in close proximity of the area, South Saxon House Surgery and Carisbrooke Surgery.</p> <p>The area is relatively well served by public transport, with Bexhill railway station located 2.3 km from the area, and West St Leonards railway station located 3.3km from HA5. There are a number of bus services and bus stops in close proximity of the area, with various buses servicing the area. These include, but are not limited to, the 70, 360 and 361 which run through to Bexhill College, the 98 running from Sidley through to Eastbourne. These buses mean that the HA5 area has relatively good public transport connections, and is fairly accessible, particularly if services were expanded.</p>

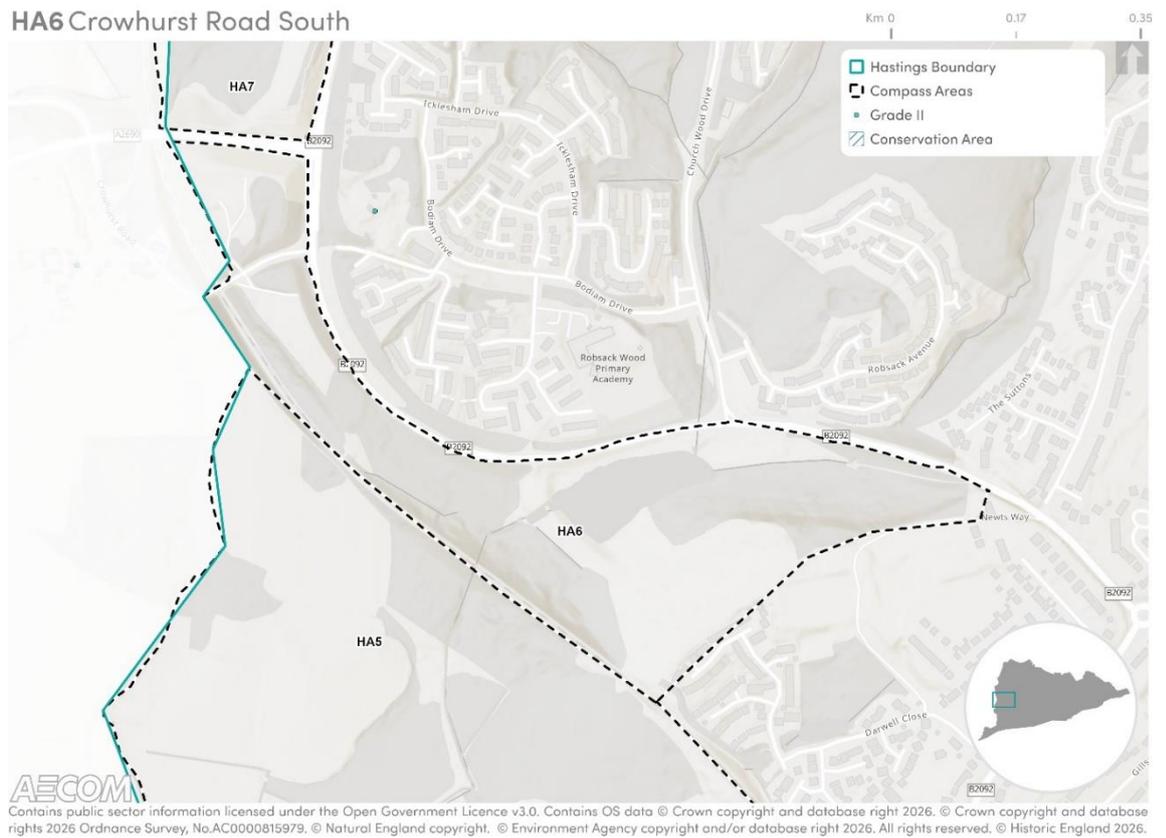
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# 1.10. HA6: Crowhurst Road South area assessment

**Figure A-22 : Ecological Constraints**

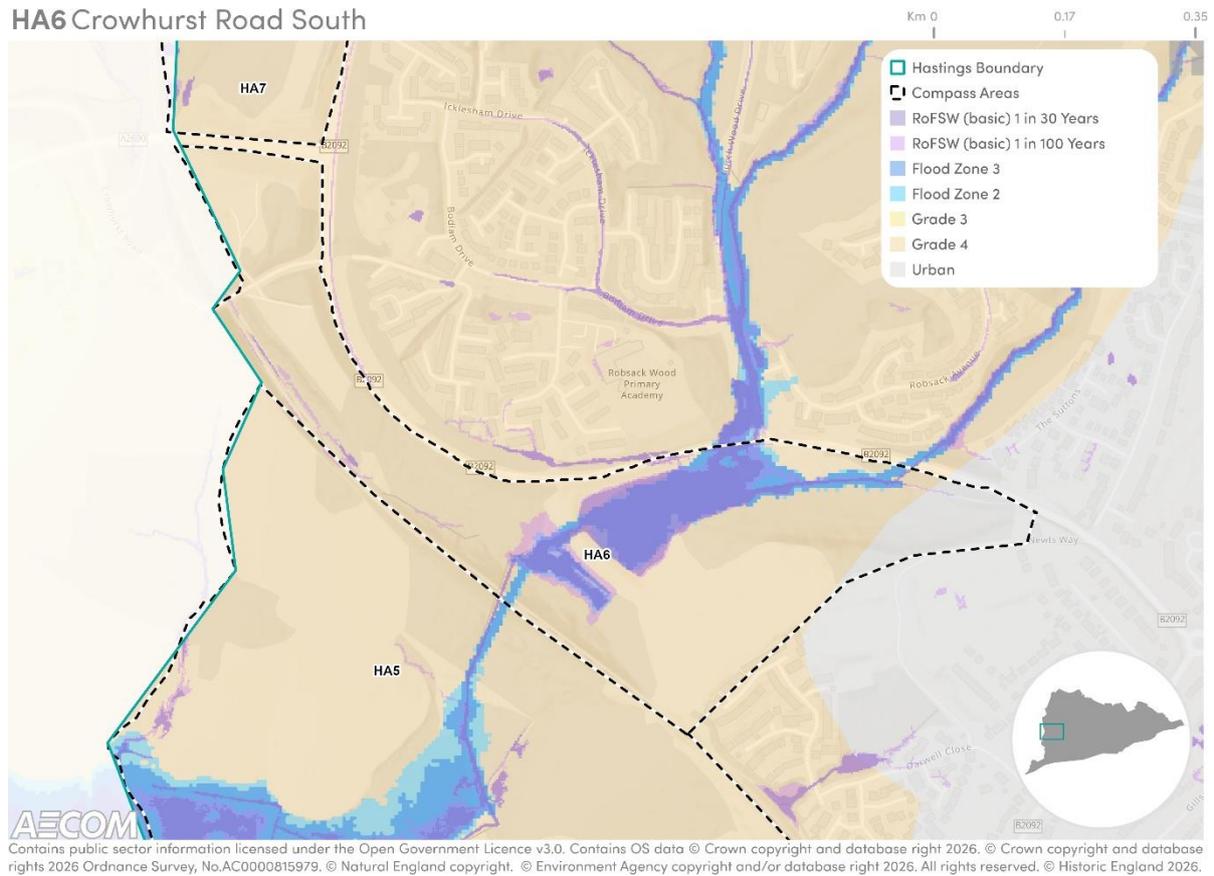


**Figure A-23 : Heritage Constraints**



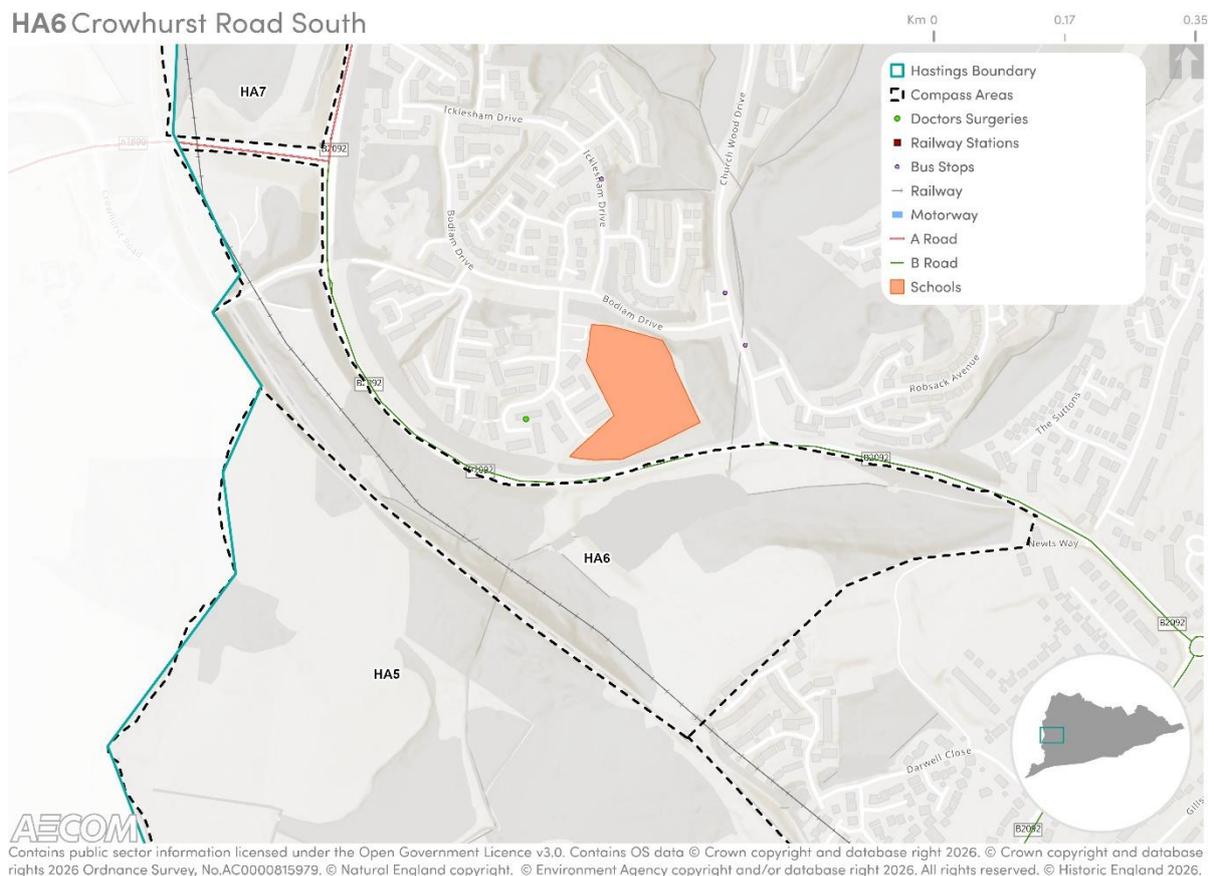
**Figure A-24 : Flooding and Soil Constraints**

HA6 Crowhurst Road South



**Figure A-25 : Local Facilities and Amenities**

HA6 Crowhurst Road South



## Analysis: HA6 Crowhurst Road South

Category	Key constraints and opportunities
Biodiversity	<p>HA6 has significant biodiversity constraints. Priority habitat comprises over half of the area, and there are significant areas of ancient woodland present in the western and eastern parts of the area.</p> <p>The area is also adjacent to the Coombe Haven SSSI, and the habitats within the area connect to the areas of biodiversity interest associated with the SSSI.</p>
Historic Environment	There are no designated historic environment constraints in this area.
Landscape	<p>The HA6 area sits within East Sussex LCA 10: Combe Haven Valley. This LCA features small, winding High Weald valleys, ancient woodlands, and a central wetland within the Combe Haven Basin. Bordered by the Battle Ridge to the north, it also includes the Filsham reed beds and historic farmsteads.</p> <p>Despite some urban fringe areas, the landscape maintains a peaceful and remote atmosphere. The area comprises an important component of landscape and townscape character in the area.</p>
Soils	The HA6 area is entirely underlain by Grade 4 agricultural land, which is considered to be poor quality.
Water	The Wishing Tree Reservoir is present in the central north of the area. Fluvial flood risk areas are associated with the streams feeding the reservoir from the north and east. There are very limited area of 'low' surface water flood risk adjacent to the railway line.
Accessibility to Services and Facilities	<p>The area has good access to services and facilities and public transport networks.</p> <p>The Robsack Wood Primary Academy is within walking distance of HA6. The closest secondary school is the St. Leonards Academy, which is approximately 1.6km.</p> <p>Bexhill High is located further afield, but within driving distance or via direct bus services to Bexhill. Additionally, education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services.</p> <p>Doctors surgeries in proximity include South Saxon House Surgery, which is within walking distance from the area.</p> <p>West St Leonards railway station is located approximately 1.8km from HA6. The closest bus stops are on Church Wood Drive to the north, approximately 300m away, with services linking Hastings town centre and railway station, Conquest Hospital, Silverhill, Harley Shute and Bexhill.AHA</p>

# 1.11. HA7: Queensway area assessment

Figure A-26 : Ecological Constraints

HA7 Queensway

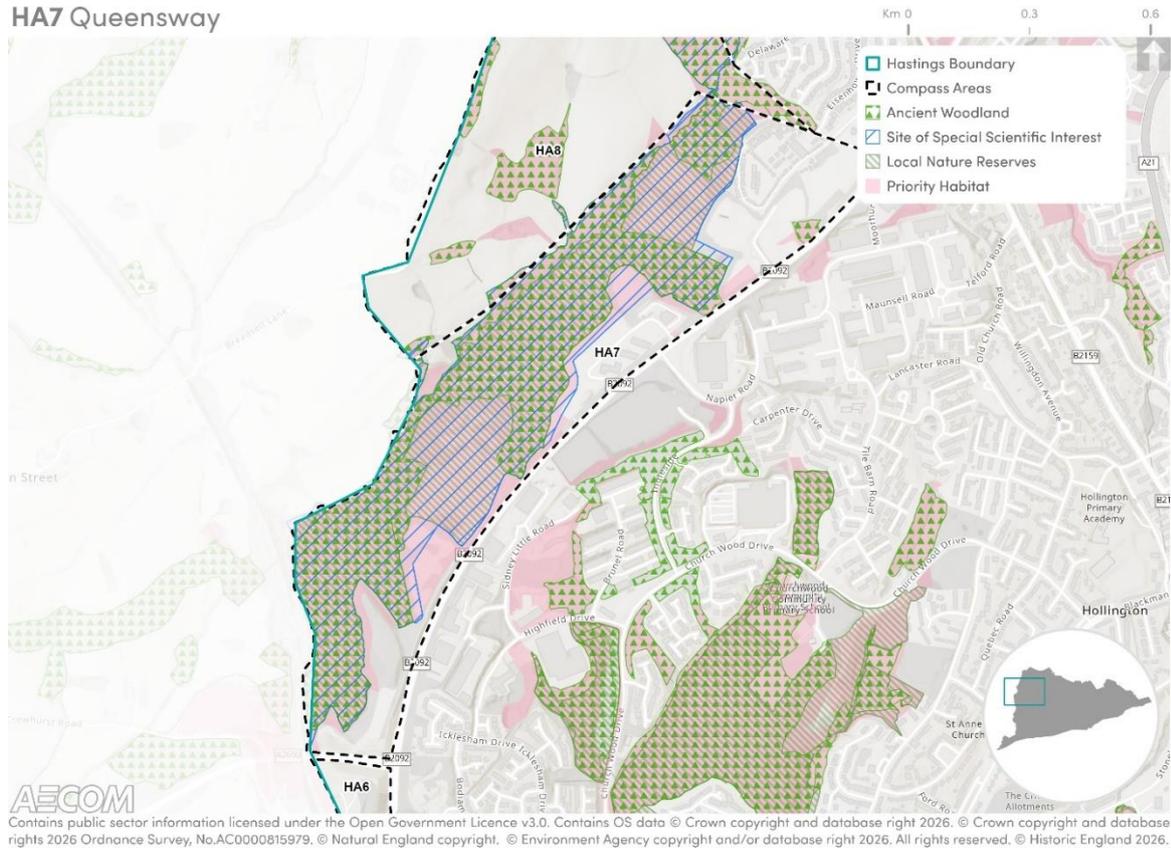
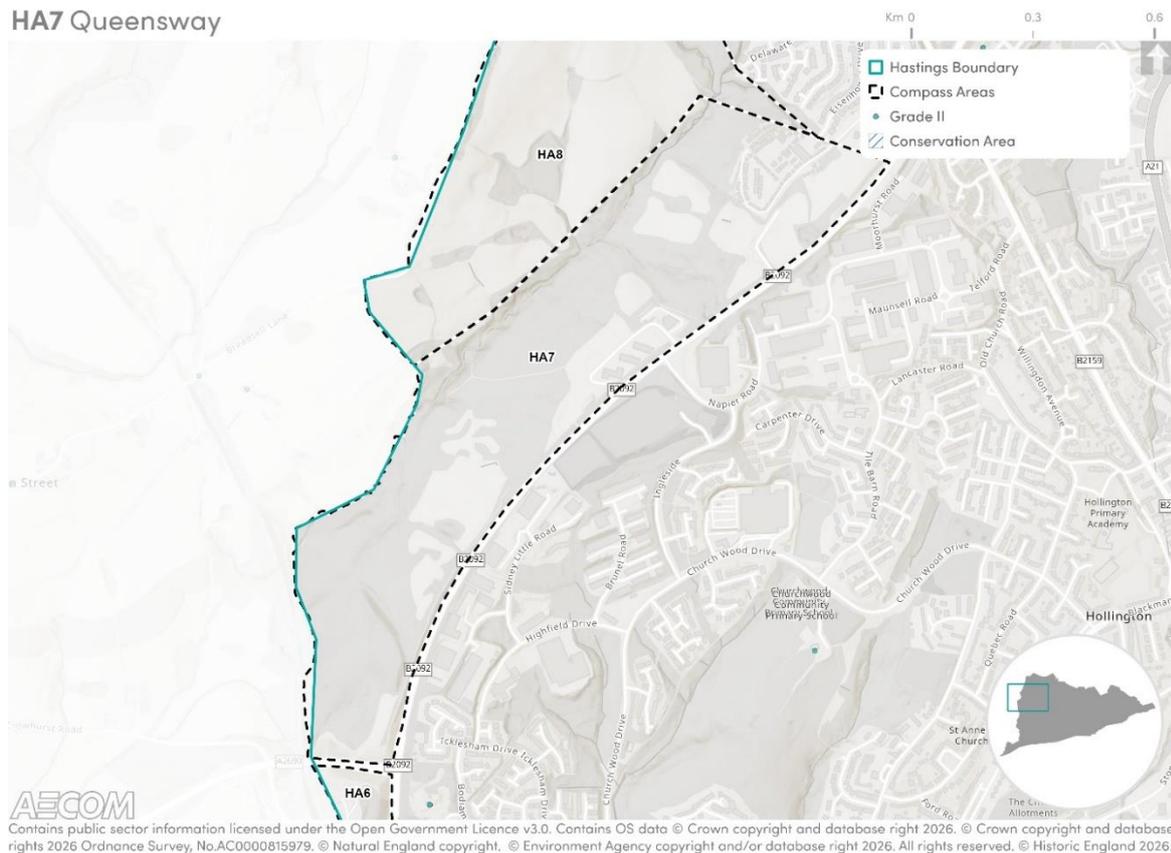


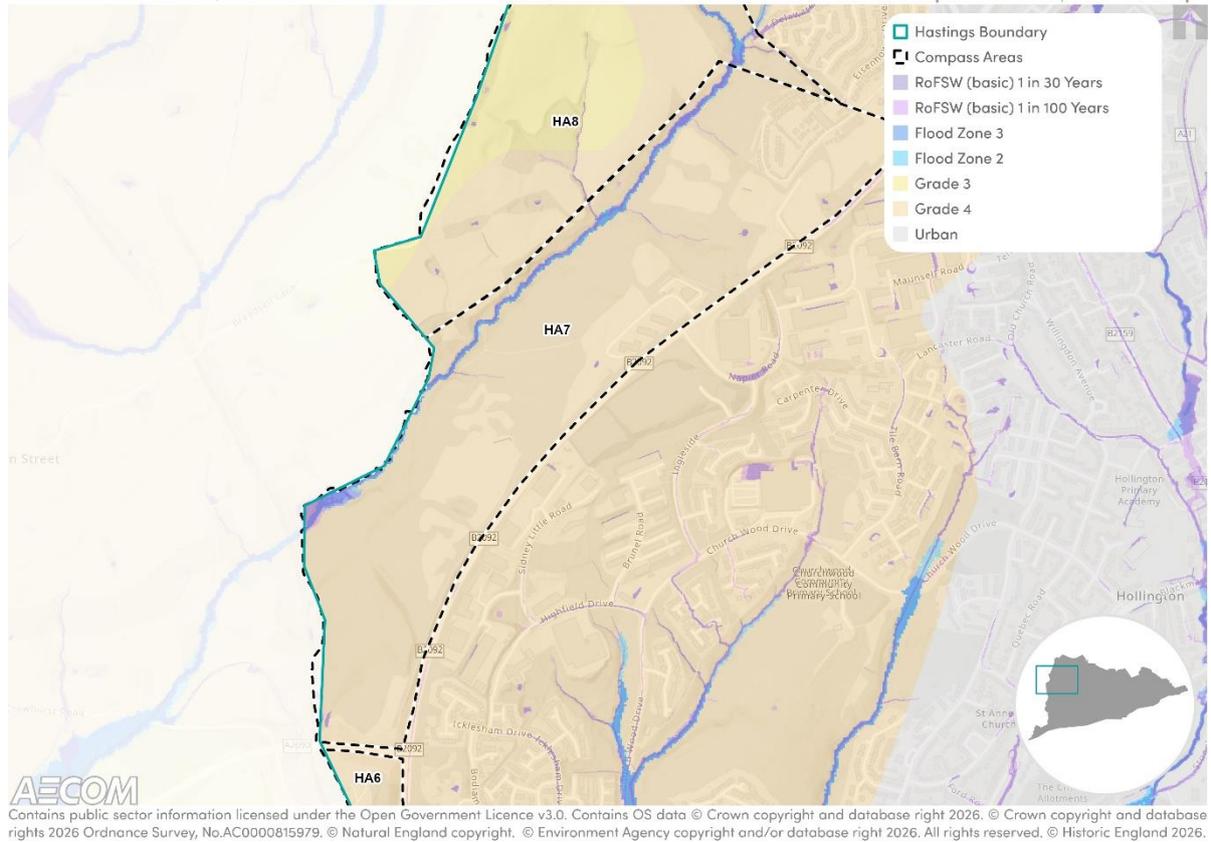
Figure A-27 : Heritage Constraints

HA7 Queensway



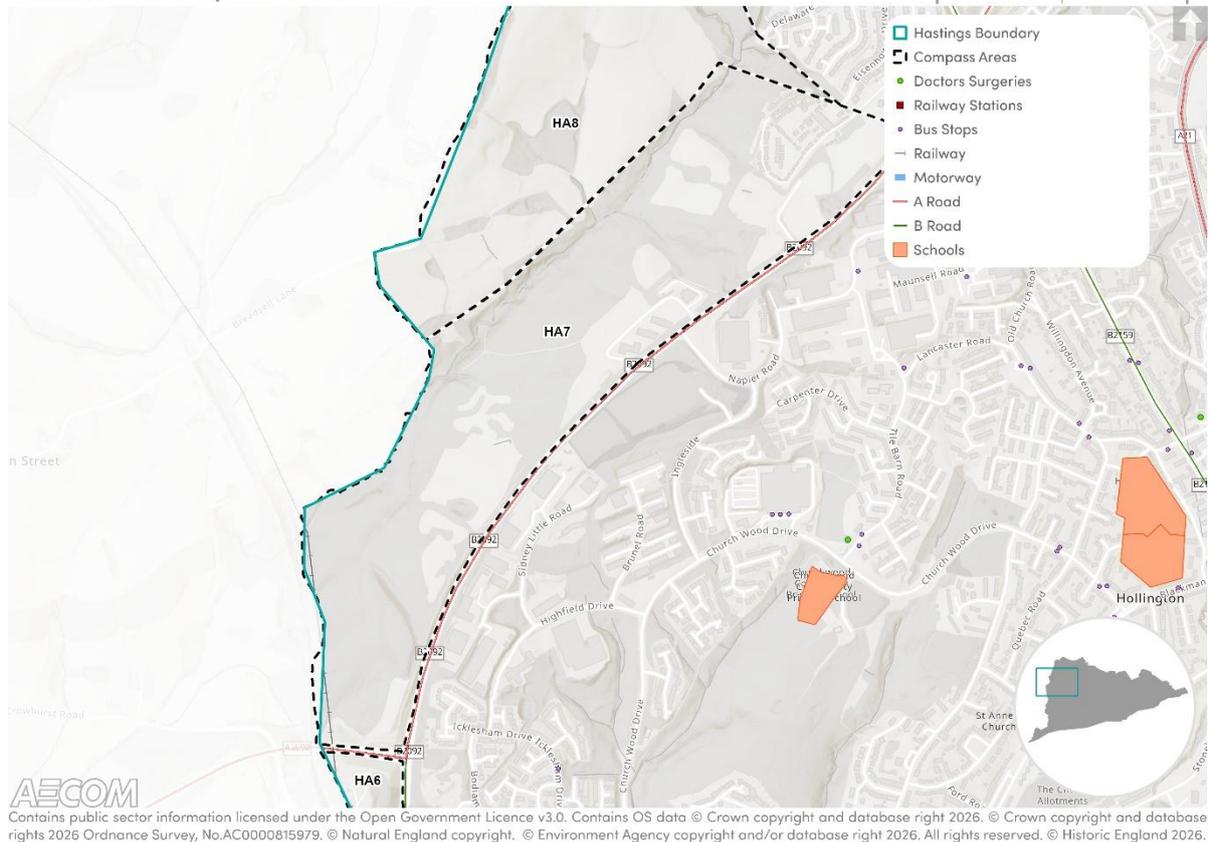
**Figure A-28: Flooding and Soil Constraints**

HA7 Queensway



**Figure A-29 : Local Facilities and Amenities**

HA7 Queensway



## Analysis: HA7, Queensway area

Category	Key constraints and opportunities
Biodiversity	<p>The HA7 area is very constrained with regard to biodiversity. The majority of the area covers the designated SSSI of Marline Valley Wood SSSI, in particular in the north and west of the area. Much of this area also makes up the Marline Wood LNR, which covers most of HA7.</p> <p>Most of the area is designated as BAP Priority Habitat, primarily deciduous woodland, as well as ancient woodland. There are also three areas of lowland meadows in the HA7 area. These are located within the SSSI/LNR, directly adjacent to the ancient woodland, central to HA7.</p>
Historic Environment	There are no key historic environment constraints in this area.
Landscape	HA7 is located within East Sussex LCA 10: Combe Haven Valley. This LCA features small, winding High Weald valleys, ancient woodlands, and a central wetland in the Combe Haven Basin. Bordered by the Battle Ridge to the north, the area includes the Filsham reed beds and historic farmsteads, maintaining a tranquil and remote atmosphere despite some urban fringe areas.
Soils	The HA7 area is entirely underlain by Grade 4 Agricultural Land, which is considered to be poor quality.
Water	The north of HA7 has high levels of fluvial and surface water flood risk associated with a watercourse that runs directly alongside the northern boundary, inside the area. This runs from the northeast edge of HA7 to the southwest border.
Accessibility to Services and Facilities	<p>HA7 is adjacent to the A2690 (Queensway). The northern section of HA7 is in close proximity of the B2159, which allows for access by road to schools such as Hollington Primary School and New Horizons School. These are located approximately 1.8km from the northern section of the broad area. Churchwood Primary School is also accessible from HA7, approximately 1km from the area. Claverham Community College is also within driving distance of HA7. From the south of HA7, there is Robsack Wood Primary School within walking distance of the area. Education facilities in central Hastings, such as East Sussex College, are also easily accessible by car or via direct bus services.</p> <p>The High Glades Medical Centre is located 1.7km from HA7, and Churchwood Medical Practice is approximately 1.6km from the area, so both are in proximity.</p> <p>Whilst HA7 is located directly adjacent to an A-Road, this location is not served by any bus stops. Hastings railway station is an approximately 5.5 km drive from the site and can be reached by bus, providing rail access. Crowhurst railway station, located 6.8 km</p>

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to the northwest, is not accessible via bus. Bus stops on the B2159, approximately 800 meters from the site, offer good connectivity. Key routes include the 74, which travels through Harley Shute and St Helens Road to Hastings Centre, and the 1066, providing service from Hastings Centre through Hawkhurst to Tunbridge Wells.

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# 1.12. HA8: Breadsell area assessment

Figure A-30 : Ecological Constraints

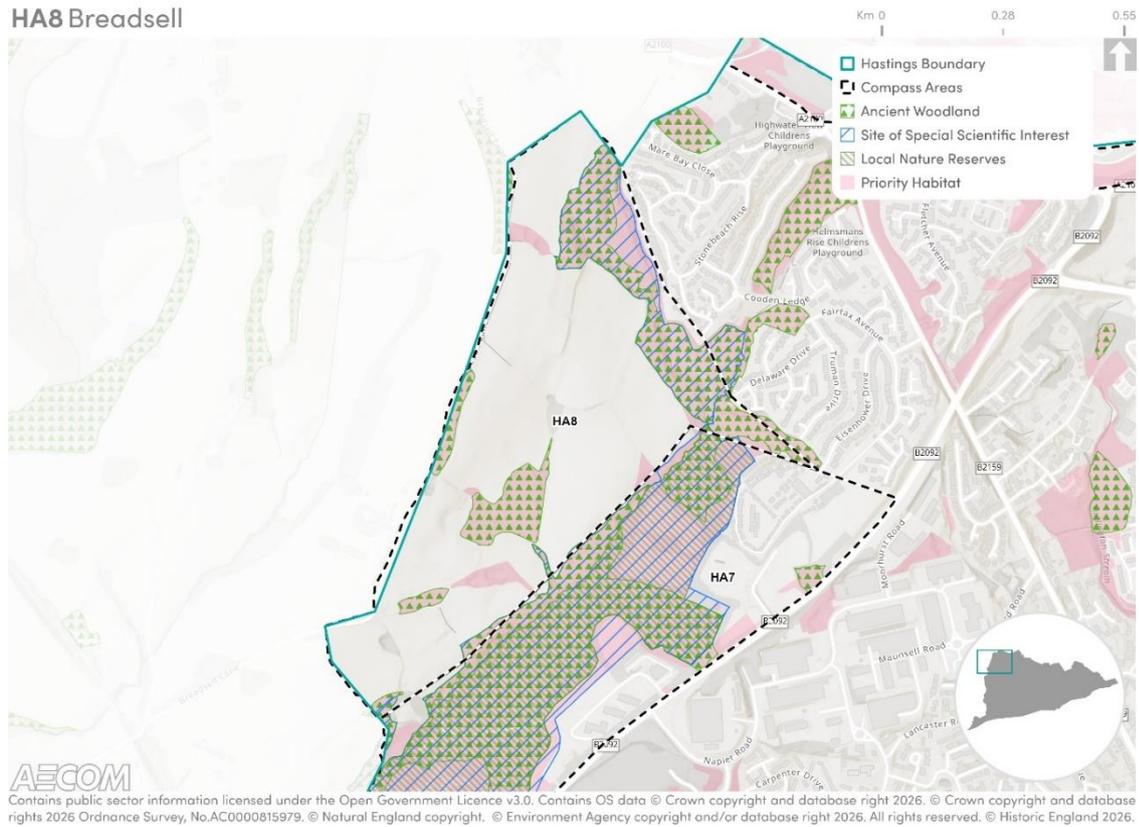
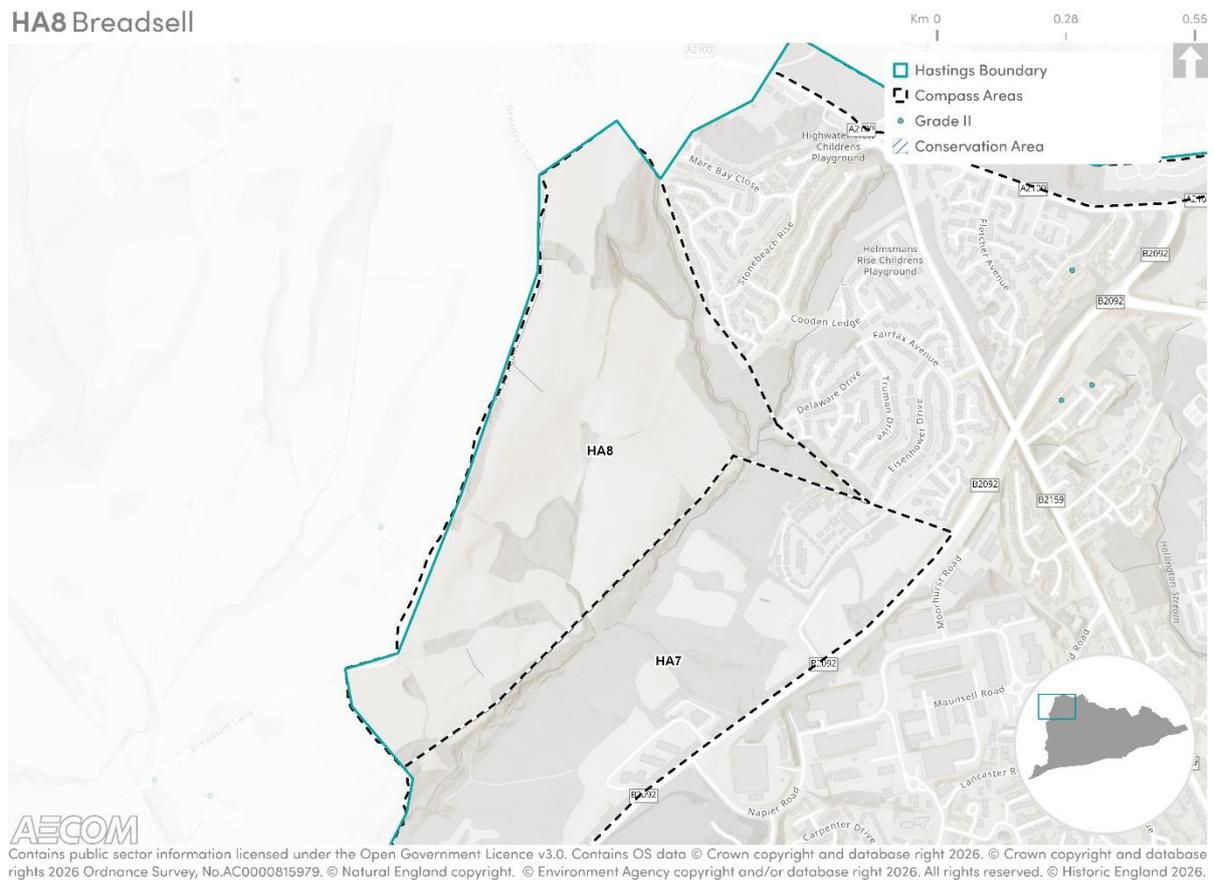
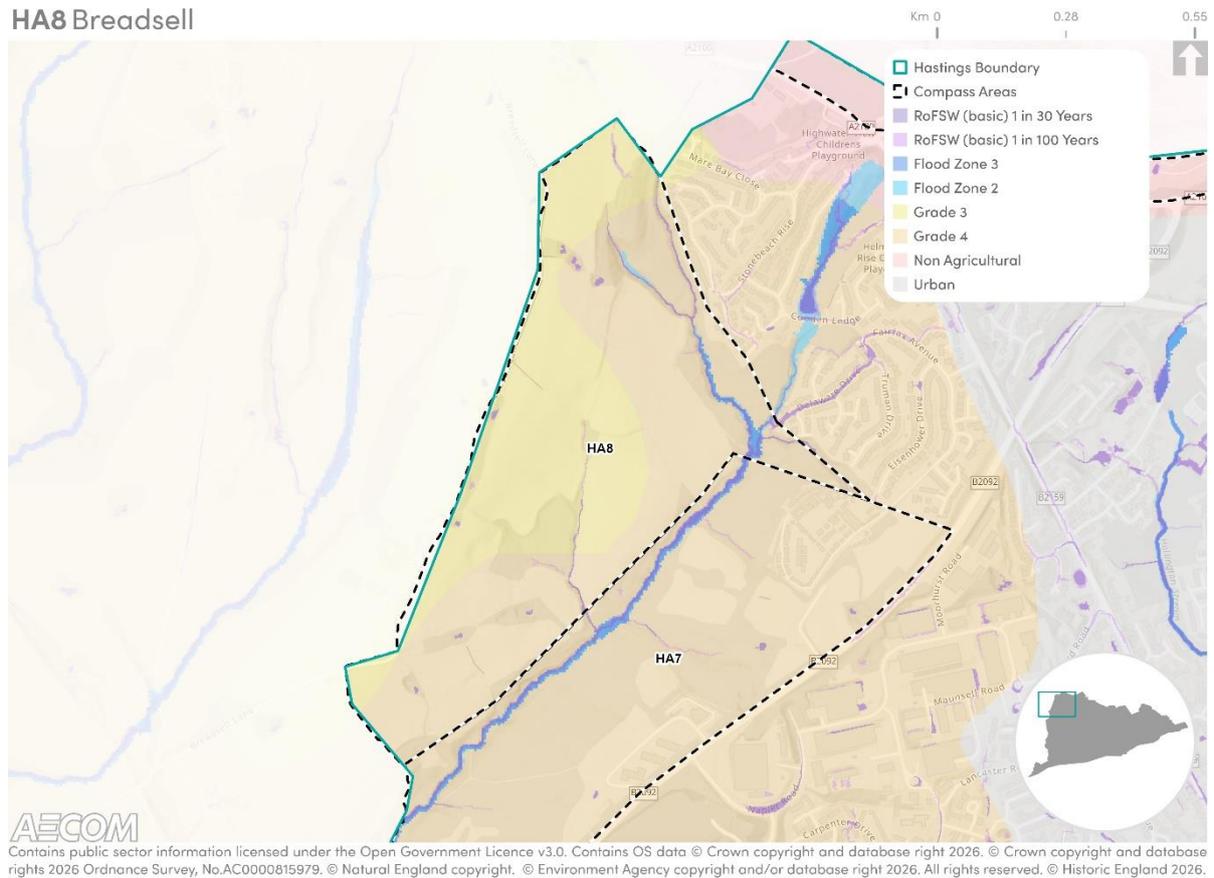


Figure A-31 : Heritage Constraints



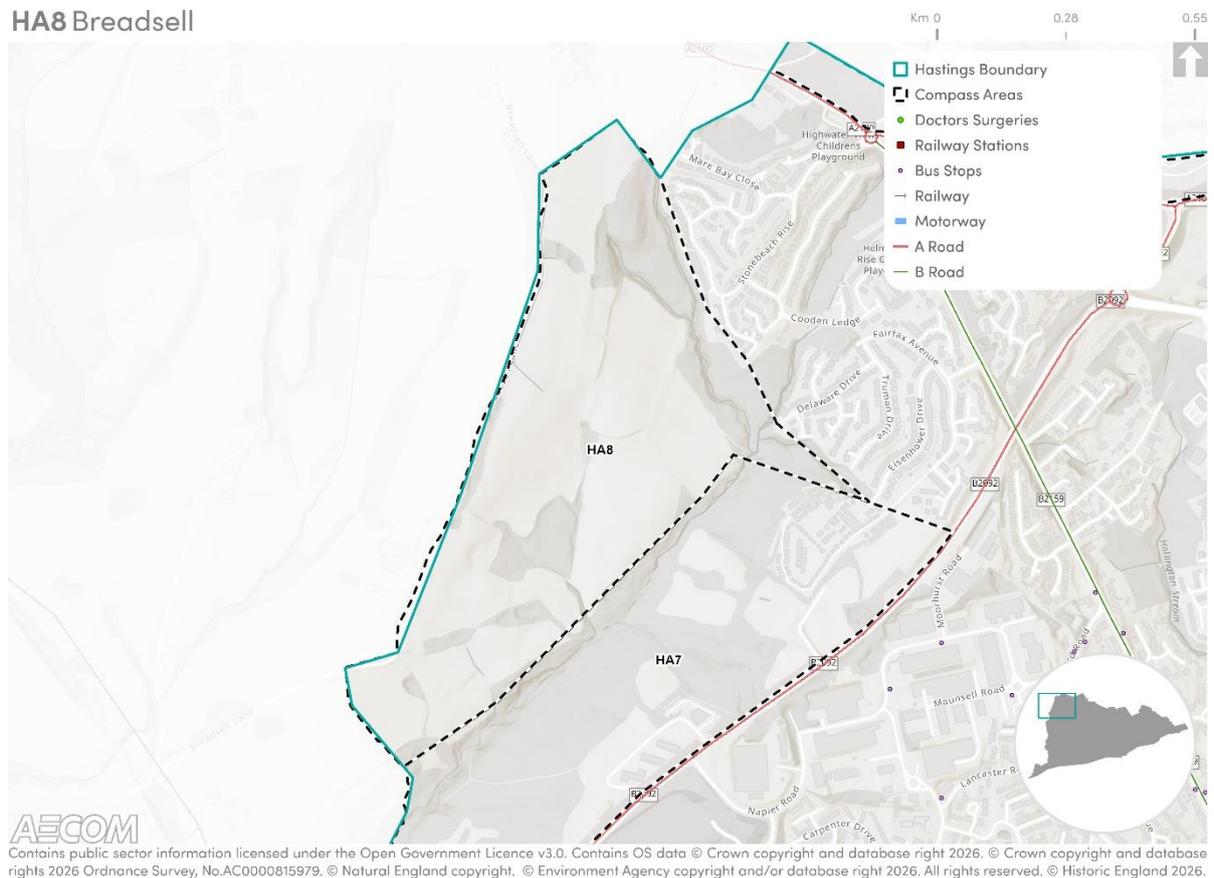
**Figure A-32 : Flooding and Soil Constraints**

HA8 Breadsell



**Figure A-33 : Local Facilities and Amenities**

HA8 Breadsell



## Analysis: HA8, Breadsell area

Category	Key constraints and opportunities
Biodiversity	<p>The Marline Valley Wood SSSI is partially within the HA8 area. A large part of the SSSI can be found along the northeast boundary, as well as directly adjacent to the southeast boundary, with some small areas being found within the HA8 area along the border. These same areas are also covered by the Marline Wood LNR, which covers the majority of the part of the SSSI that is adjacent to HA8.</p> <p>These areas are also designated as BAP Priority Habitat (Deciduous woodland), with a medium sized area of this in the southern half of the broad area. This medium sized area is also designated as ancient woodland, as well as the area close to the northeast boundary that makes up the SSSI and LNR. There is a small area of Priority Habitat/ancient woodland along the northeast border, as well as in the southeast part of HA8.</p>
Historic Environment	There are no key constraints in this area for this category.
Landscape	<p>The area is directly adjacent to the High Weald NL to the western boundary. According to the Hastings Landscape Sensitivity to Residential, Commercial and Solar Development study from 2024, the majority of the Breadsell area has a moderate-high or high sensitivity to residential development.</p> <p>The area sits within East Sussex LCA 10: Combe Haven Valley. The Combe Haven Valley LCA is characterized by small, winding High Weald valleys, ancient woodlands, and a central wetland in the Combe Haven Basin. Enclosed by the Battle Ridge to the north, it includes the Filsham reed beds and scattered historic farmsteads. The area retains a tranquil, remote feel, though there are some urban fringe areas.</p>
Soils	In terms of ALC, land within HA8 is mainly classified as Grade 3 agricultural land, which covers the east of the area, to both the south and the north. However, it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken. Land to the west, where the deciduous woodland and SSSI can be found, is classified as Grade 4 Agricultural Land, which is considered to be poor quality.
Water	A watercourse runs adjacent to the southern boundary of HA8. Whilst this is mainly outside of the area, this runs through the western point of HA8. This means that the area drains into this watercourse and therefore has some small areas of flood risk. This includes areas of Flood Zone 2 and 3, as well as areas at medium

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surface water flood risk. This also extends up the northeastern part of HA8, adjacent to the boundary but on the inside of the area.

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**Accessibility to Services and Facilities** The broad area is located approximately 2 km by road from the nearest primary school, Hollington Primary School, which is also directly adjacent to New Horizons School, a special school for children up to 16. The area is located approximately 3.3 km from the closest secondary school, Ark Alexandra Academy.

The St Leonards Academy is accessible via car or bus, however, is further away at approximately 5 km. Claverham Community College is also within driving distance of the area.

Medical services are relatively accessible, with the High Glades Medical Centre 1.8 km away. These are all accessible via the B2159 (Battle Road) which is in close proximity to the broad area.

For public transport, Hastings railway station is situated a 5.6 km drive from the site, providing rail access – and is accessible via bus. Crowhurst Station is located 6.7 km northwest of the area and is not accessible via bus. Additionally, there are bus stops on the B2159 that provide good services approximately an 800m walking distance from the area. The buses that service these bus stops include the 74, which runs through key local routes such as Harley Shute and St Helens Road to Hastings Centre, and the 1066, offering a connection from Hastings Centre through Hawkhurst to Tunbridge Wells.

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