

Appendix 5-A Policy References

5-A.1 Introduction

5-A.1.1 This volume sets out the policy references considered relevant to this application, and which have been subject to assessment in Volume 1 of this chapter.

5-A.2 Agriculture and Forestry

Scope

5-A.2.1 The implications of the Scheme for land use policies and plans are largely dealt with elsewhere under specific environmental topic areas – e.g. landscape, biodiversity, cultural heritage and community effects. The only other land use policy effects which need to be considered in this section relate to agriculture and forestry.

5-A.2.2 However, forestry as a consideration in this context is minor as woodland creation and management relates more to biodiversity and recreation than the production of timber. The primary focus of this section is on the impact of the Scheme upon local agriculture.

National Land Use Policies and Plans for Agriculture and Forestry

Our Countryside: The Future - A Fair Deal for Rural England (November 2000)

5-A.2.3 The White Paper (Cm 4909) contains clarification of Government policy on the development of agricultural land:

“We believe that planning decisions should consider the overall value of the land in deciding what countryside should have the greater protection. Agricultural quality should be treated only as one factor. The quality of landscapes, wildlife and habitats, recreational amenity and our historic and cultural heritage are equally important and must be weighed in planning decisions. We need effective ways to identify which are important to any particular decision and how they should be taken into account. It would be wrong to protect an area simply because of its agricultural quality at the expense of another that offers much greater countryside character.” (paragraph 9.3.4)

5-A.2.4 With regard to forestry the White Paper (4909) states that:

“It is often assumed that trees are planted just for their timber. But woodlands and forests are also immense assets in terms of landscape, nature conservation and recreation. We want forestry in future to be an investment in the beauty and prosperity of the countryside, as well as a commercial asset.” (paragraph 9.7.1)

5-A.2.5 The White Paper goes on to state that the Government is determined to reverse this decline in line with the requirements of the forestry strategy *A New Focus for England's Woodlands* published in December 1998.

5-A.2.6 *“We want a significant increase in woodland cover across England; and we want to encourage tree planting whose main priorities are visual, environmental and recreational as well as commercial.”* (page 115)

5-A.2.7 The White Paper goes on to examine the future of forestry in England which reinforces the statements made in *A Better Quality of Life* with regard to rural development, economic regeneration, recreation, access and tourism, and environment and conservation.

Planning Policy Statement 7 Sustainable Development in Rural Areas (2004)

5-A.2.8 In the context of this section the Government's relevant objectives for rural areas are:

- iii) *"Promoting the development of the English regions by improving their economic performance so that all are able to reach their full potential – by developing competitive, diverse and thriving rural enterprise that provides a range of jobs and underpins strong economies.*
- iv) *To promote sustainable, diverse and adaptable agriculture sectors where farming achieves high environmental standards, minimising impact on natural resources, and manages valued landscapes and biodiversity; contributes both directly and indirectly to rural economic diversity; is itself competitive and profitable; and provides high quality products that the public wants."* (page 6)

"Planning policies should provide a positive framework for facilitating sustainable development that supports traditional land-based activities and makes the most of new leisure and recreational opportunities that require a countryside location." (paragraph 15)

5-A.2.9 When preparing policies for Local Development Documents (LDDs) and determining planning applications for development in the countryside, local planning authorities should (inter alia):

- i) *"Support development that delivers diverse and sustainable farming enterprises; and,*
- ii) *Support other countryside-based enterprises and activities which contribute to rural economies, and/or promote recreation in and the enjoyment of the countryside."* (paragraph 16)

"The Government recognises the important and varied roles of agriculture, including in the maintenance and management of the countryside and most of our valued landscapes. Planning policies in RSS (Regional Spatial Strategy) and LDDs should recognise these roles and support development proposals that will enable farming and farmers to:

- i) *Become more competitive, sustainable and environmentally friendly;*
- ii) *Adapt to new and changing markets;*
- iii) *Comply with changing legislation and associated guidance;*
- iv) *Diversify into new agricultural opportunities (e.g. renewable energy crops); or*
- v) *Broaden their operations to 'add value' to their primary produce."* (paragraph 27)

5-A.2.10 *"The presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations... when determining planning applications. Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except*

where this would be inconsistent with other sustainability considerations... If any undeveloped agricultural land needs to be developed, any adverse effects on the environment should be minimised.” (paragraph 28)

5-A.2.11 *“Whilst forestry operations mostly lie outside the scope of planning controls, the planning system is the principal means for regulating the rate at which land is transferred from woodlands to other rural and urban uses. The Government’s forestry policy, set out in the England Forestry Strategy (1999) has two main aims:*

- i) The sustainable management of existing woods and forests; and*
- ii) A continued steady expansion of woodland area to provide more benefits for society and the environment.” (paragraph 33)*

A New Focus for England’s Woodlands – England Forestry Strategy (December 1998)

5-A.2.12 The England Forestry Strategy describes how the Government will deliver its forestry policies in England and sets out the Government’s priorities and programmes for forestry for the next five to ten years. (page 1)

5-A.2.13 The strategy is based on four key programmes of which the following are most relevant to this section:

“Forestry for Rural Development covers forestry’s role in the wider countryside, including its contribution to the rural economy and timber and marketing opportunities. There will be a focus both on the role of new woodlands and on how existing woodlands can be managed to deliver more benefits to local economies, by creating jobs both upstream and downstream of the forest industry; and,

Forestry for Economic Regeneration outlines opportunities for woodlands to play a positive role in strategic land-use planning. These include restoring former industrial land and creating a green setting for future urban and urban fringe development.” (page 7)

Regional Land Use Policies and Plan for Agriculture and Forestry

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.2.14 The *Vision and Key Development Principles* (Chapter 3) of the Regional Planning Guidance (RPG) identify a sustainable agriculture and forestry role for the Region: *“...The life of the countryside and rural communities should be sustained through economic diversification which respects the character of different parts of the Region and enables sustainable agriculture and forestry” (paragraph 3.5).*

5-A.2.15 The *Rural Development* section of the RPG goes on to state that with regard to agriculture and forestry: *“Throughout the Region the countryside should fulfil a range of needs including recreation, farming, forestry, military uses and the local economy, while safeguarding landscape and biodiversity. Enhancement of the rural environment requires active countryside management as well as the maintenance of existing rural resources.” (paragraph 5.21)*

5-A.2.16 Rural development policy Q7, seeks a multi purpose countryside, but one which meets the social and economic needs of both residents and visitors. To this end it promotes farm based diversification. Policy E8 (b), in providing guidance to development plans, notes that the adoption of agri environment measures can help to secure diverse landscapes and biodiversity on agricultural land.

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.2.17 The Draft South East Plan does not contain specific policies dealing with agriculture.

Draft RES: The Regional Economic Strategy (November 2005)

5-A.2.18 The Draft RES provides objectives for the Rural Areas, its key objective for agriculture is to “...support the food and farming sectors to cope with new regulations, enabling them to develop new skills and to capitalise on opportunities for new products and processes resulting from Common Agricultural Policy (CAP) reform and new technology” (page 14)

County Policies and Plans for Agriculture and Forestry

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.2.19 Policy S5 (definition of development boundaries) provides guidance for local plans on the definition of development boundaries, and includes the specific objective to conserve landscape, character, natural resources, woodland and agriculture of the countryside in general. Policy S10 (The Countryside) goes on to state that outside defined development boundaries agriculture and woodland will remain the predominant land uses. Policy S12 supports woodland management and new planting proposals.

Local Policies and Plans Agriculture and Forestry

Hastings Local Plan (April 2004)

5-A.2.20 There are no policies on agriculture or forestry contained within the Hastings Local Plan.

Rother Local Plan (July 2006)

5-A.2.21 Rother District is primarily a rural district with a large proportion of its area designated as an Area of Outstanding Natural Beauty (AONB). Consequently, the management of the countryside and the continued viability of agriculture in the area is a concern of the local plan as explained at paragraph 4.49. That said the Local Plan contains few policies that are directly relevant to agriculture, rather the local plan seeks to maintain agriculture and forestry as the predominant land uses in the countryside by restricting the majority of development and change to built up areas.

5-A.2.22 “In determining whether development is appropriate in a particular location, proposals should accord with the following principles:... it respects the

importance of the countryside in terms of its distinct landscape character, natural resources, woodland and agriculture ...” (Policy DS1 ix)

5-A.2.23 On the use of agricultural land policy DG1 (xiv) states that “*where significant development of agricultural land is unavoidable, it makes use of poorer quality land (grade 3b, 4 and 5) in preference to that of higher quality except where this would be inconsistent with other sustainability considerations.*”

5-A.3 Geology, Soils and Waste

Scope

5-A.3.1 This section addresses the performance of the Scheme in terms of policies governing the use of construction materials and contaminated land issues.

5-A.3.2 A separate detailed Waste Management Strategy has been prepared in support of the Scheme; this will deal with the practical arrangements for minimising the volume of construction related waste going to landfill.

National Policies and Plans for Geology, Soils and Waste

The First Soil Action Plan for England: 2004-2006 (2004)

5-A.3.3 Although the First Soil Action Plan is aimed at policy makers, it does not contain definitive advice for developers or planners on soil policy or soil protection techniques. It provides a set of actions for the Department of Environment, Food and Rural Affairs (DEFRA) to promote good practice in various sectors of the economy. However, the Strategy’s vision should be noted as an expression of government intent and should be borne in mind in the development and planning processes.

5-A.3.4 The Strategy’s vision is: “*...to ensure that England’s soils will be protected and managed to optimise the varied functions that soils perform for society (e.g. supporting agriculture and forestry, protecting cultural heritage, supporting biodiversity, as a platform for construction), in keeping with the principles of sustainable development and on the basis of sound evidence.*” (paragraph 5)

A Better Quality of Life - A Strategy for Sustainable Construction (April 2000)

5-A.3.5 This Strategy builds on the framework and priorities for sustainable development set out in *A Better Quality of Life*. The construction industry can contribute to the achievement of sustainable development by:

- *“Being more profitable and more competitive;*
- *Delivering buildings and structures that provide greater satisfaction, well-being and value to customers and users;*
- *Respecting and treating its stakeholders more fairly;*
- *Enhancing and better protecting the natural environment; and*
- *Minimising its impact on the consumption of energy (especially carbon-based energy) and natural resources.”(paragraph 1.6)*

5-A.3.6 The objectives of this Strategy are:

- *“To promote awareness and understanding of sustainable construction;*
- *To set out how the Government expects the construction industry to contribute to sustainable development;*
- *To show how Government policies will help to bring about change; and*
- *To stimulate action by individual businesses to set and monitor their progress towards targets for more sustainable construction which require continuous improvement.”* (paragraph 1.3)

MPS1 – Planning and Minerals (November 2006)

5-A.3.7 The Government's objectives for minerals planning reflect the requirement to contribute to the achievement of sustainable development, as required by Section 39 of the Planning and Compulsory Purchase Act 2004. The most relevant to the Scheme are:

- *“to ensure, so far as practicable, the prudent, efficient and sustainable use of minerals and recycling of suitable materials, thereby minimising the requirement for new primary extraction;*
- *to prevent or minimise production of mineral waste;*
- *to secure closer integration of minerals planning policy with national policy on sustainable construction and waste management and other applicable environmental protection legislation; and*
- *to encourage the use of high quality materials for the purposes for which they are most suitable.* (paragraph 9)

5-A.3.8 MPS1 sets out the national policy objectives for the efficient use of construction materials. It states that development plans and development control decisions should:

- *“encourage the efficient use of all minerals and alternatives to them;*
- *encourage high quality materials to be used for appropriate purposes, but taking account of the need to avoid undue delays to site reclamation;*
- *maximise the potential for minerals waste to be used for recycling or in-site restoration, but if not required for these purposes and where practicable, identify a market for its potential use;*
- *ensure, so far as practicable, the use of acceptable substitute or recycled materials in place of primary minerals.”* (paragraph 18)

Planning Policy Statement 10 – Planning for Sustainable Waste Management (July 2005)

5-A.3.9 The guidance recognises that the fundamental aim of waste management is the protection of human health and the environment by producing less waste and by using it as a resource wherever possible.

5-A.3.10 The Planning Policy Statement (PPS) lays out key objectives for sustainable waste management planning. Regional planning bodies and all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver planning strategies that, inter alia:

“Ensure the design and layout of new development supports sustainable waste management.” (paragraph 3)

Waste Strategy 2000 for England and Wales (May 2000)

5-A.3.11 The vision laid out in the National Waste Strategy includes:

- *“Changing the way we manage waste and resources can make an important contribution to improving our quality of life;*
- *We need to tackle the amount of waste produced, breaking the link between economic growth and increased waste;*
- *Where waste is produced, we must put it to good use, through re-use, recycling, composting and recovering energy; and*
- *We have established a series of targets and indicators to ensure the necessary step change in waste management. We will set statutory performance standards for local authority recycling and composting, to ensure that these targets are met.” (page 13)*

5-A.3.12 The strategy emphasises the need for change, stating: *“We cannot continue to rely on landfill as we have done in the past. Landfilling wastes can be a wasted opportunity. If we are to deliver a more sustainable economy we must do more with less, and make better use of resources – and that means putting these materials to good use” (paragraph 1.5)*

5-A.3.13 The Government and the National Assembly have set the following target to encourage businesses to reduce waste, and to put any waste that is produced to better use: *“By 2005 to reduce the amount of industrial and commercial waste sent to landfill to 85% of that landfilled in 1998.” (paragraph 2.32)*

Planning Policy Statement 23 Planning and Pollution Control (November 2004)

5-A.3.14 PPS 23 sets out the Government’s policies for dealing with, amongst other things, development on contaminated land. The Government’s policies for contaminated land are to:

- *“Identify and remove unacceptable risks to human health;*
- *Seek to bring damaged land back into beneficial use; and*
- *Seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.” (paragraph 18)*

Regional Policies and Plans for Geology, Soils and Waste

Regional Planning Guidance for the South East (RPG 9, March 2001)

5-A.3.15 Whilst there are no specific policies on geology in RPG9 it contains policies on minerals, soil and land quality which are increasingly seen as important within the Regional context, RPG9 states: *“Soil has received little attention in the past despite its important role, including in the production of food, raw materials, and energy and in providing a filtering and buffering action to protect water and the food chain from potential pollutants. In addition, different soils are part of ecosystems which help contain archaeological evidence of our*

history...the protection of soils in the South East is important both in terms of supporting biodiversity and food production.” (paragraph 6.12)

5-A.3.16 Policy E8 entitled *Valuable Characteristic of soil and land should be protected* goes on to state: “...Development plans should...ensure that soils are protected so that they can perform a range of important functions, such as the support of diverse habitats and thus contribute to biodiversity...where soil and land have been degraded, local partners, with the assistance of the Government agencies, should maximise the opportunities for habitat restoration and habitat creation schemes.” (page 38)

5-A.3.17 The Government Office for the South East (GOSE) has published recent alterations to Waste and Minerals policies (June 2006); of particular relevance are :

- Policy W2: Sustainable Design, Construction and Demolition. Development Plan Documents should ensure development design, construction and demolition which minimises waste production and associated impacts through:
 - the re-use of construction and demolition materials; and,
 - the promotion of layouts and designs that provide adequate space to facilitate storage, re-use, recycling and composting. In particular development in the Region’s strategic growth areas should demonstrate and employ best practice in design and construction for waste minimisation and recycling.
- Policy M1: Sustainable Construction. The Regional Assembly, the South East England Development Agency (SEEDA), the construction industry, and other stakeholders will work to encourage the development of sustainable construction practices, and to promote good practice, reduce wastage and overcome technical and financial constraints, including identifying sustainable supply routes and seeking to reduce delivery distances. The long-term aspiration is that annual consumption of primary aggregates will not grow from the 2016 level in subsequent years. Local development documents should promote the use of construction materials that reduce the demand for primary minerals, by requiring new projects to include proportion of recycled and secondary aggregates wherever practicable.

Regional Economic Strategy for the South East of England 2002-2012 (July 2002)

5-A.3.18 The Strategy sets out a number of priorities. Priority 18 is concerned with Water, Waste and Energy: “Achieve sustainable management of water, waste and energy” (page 75) and to “Promote and demonstrate the economic value of ‘waste’ as a resource.”

Draft Regional Spatial Strategy “A Clear Vision for the South East: the South East Plan - March 2006 Draft Plan for submission to government

5-A.3.19 The draft South East Plan does not propose new or amended policies which are relevant to this application.

County Policies and Plans for Geology, Soils and Waste

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December, 1999)

5-A.3.20 The structure plan contains a number of policies on waste and minerals. The newly adopted Waste Local Plan supersedes the structure plan's waste policies. The minerals section remains extant, but relates to the locational issues surrounding minerals extraction and processing and the supply of minerals in the plan area.

East Sussex and Brighton and Hove Minerals Local Plan (November 1999)

5-A.3.21 “The key issue in the Local Plan is to balance, through its proposals, the essential need for minerals against the protection of the environment and local amenity.” (paragraph 1.2)

5-A.3.22 The most significant issue dealt with in the plan concerns construction aggregates. The plan seeks to supplement greater use of secondary aggregates and recycled material.

East Sussex and Brighton and Hove Waste Local Plan (February 2006)

5-A.3.23 “The Plan's objectives are as follows:

- *To progressively reduce the amount of waste disposed of to land;*
- *To provide an integrated waste management strategy;*
- *To increase recycling and recovery and achieve targets set by Government and this Plan;*
- *To treat and dispose of the Plan area's waste arisings;*
- *To minimise road traffic associated with the transportation of waste and encourage other modes of transport; and*
- *To protect the environment and avoid harm to communities and environmentally important and sensitive land uses.” (paragraph 5.5)*

5-A.3.24 Central to a strategy built upon these objectives, the waste local plan seeks to maximise the use of recycled building materials and minimise the waste arising from construction. Specifically, policy WLP11 (reduction, re-use and recycling during demolition, design, and construction of new developments) requires construction practices which minimise the use of raw materials and maximises the use of secondary aggregates and recycled materials.

Supplementary Planning Document – Construction and Demolition Waste (January 2006)

5-A.3.25 This planning brief constitutes a ‘supplementary planning document’. A Supplementary Planning Document (SPD) is one of the material considerations that can be taken into account when determining a planning application for development. It is intended to provide helpful guidance for a developer, consistent with the provisions of the Local Plan. It should be read in conjunction with the Structure Plan and Waste Local Plan for East Sussex and Brighton & Hove, and the Brighton & Hove Local Plan. It is intended that this SPD will form part of the Brighton & Hove Local Development Framework and the Waste

Development Framework, which will be jointly prepared by East Sussex County Council and Brighton & Hove and is intended to elaborate upon policies in the Development Plan Documents of both authorities.

Local Policies and Plans for Geology, Soils and Waste

Hastings Local Plan (April 2004)

5-A.3.26 The Hastings Local Plan supports Policy WLP12 in the (then) Draft Waste Local Plan which encourages local planning authorities to ensure that proposals for major development, or development employing or attracting a large number of people, makes provision for the installation of recycling facilities as an integral part of the development.

5-A.3.27 Policy DG34 (contaminated land) replicates national policy in that it requires developers to carry out site investigations where there is known or suspected contamination and propose necessary remedial measures to deal with the hazard.

Rother District Local Plan (July 2006)

5-A.3.28 On the issue of contaminated land the Rother District Local Plan states that development proposals should “...properly address any known or suspected contamination of the site, or threat from landfill gas, through site investigations and suitable remediation.” (policy GD1 (xiii))

5-A.4 Water Quality and Drainage

National Policies and Plans for Water Quality and Drainage

5-A.4.1 The study has been undertaken to ensure that current legislation is complied with. The key EU legislation covering the water environment which has a bearing on the Scheme includes:

- The Habitats Directive (92/43/EEC);
- Groundwater Directive (80/68/EEC as amended by 91/692/EEC); and
- The Water Framework Directive (2000/60/EC).

5-A.4.2 The EU legislation is implemented in the UK through various acts and regulations. The key UK legislation directly regulating the water environment in relation to new roads are:

- Groundwater Regulations 1998 (GR 1998);
- Water Resources Act 1991 (WRA 1991); and
- Highways Act 1980 (HA 1980).

5-A.4.3 The requirements set by this legislation and the implications they have for the Scheme are set out in Chapter 9: Water Quality and Drainage.

5-A.4.4 Under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 the Environment Agency is the competent body for overseeing the implementation of the Water Framework Directive. Central to implementation of the Directive's requirements is the River Basin Management

Plan (RBMP) for each Environment Agency region. The RBMP for the Southern Region will be published in draft form for consultation in December 2008. Until that date the Environment Agency will be assessing each development proposal on its merits and working with scheme promoters to ensure, where development is acceptable in principle, that the necessary mitigation measures are secured.

5-A.4.5 Detailed mitigation measures, following consultation with the Environment Agency, are set out in Chapter 9 of this document.

Working with the Grain of Nature: A Biodiversity Strategy for England (October 2002)

5-A.4.6 The Strategy lays out a vision for England: *“For a country – its landscapes and water bodies, coasts and seas, towns and cities – where wild species and habitats are part of healthy functioning ecosystems; where we nurture, treasure and enhance our biodiversity, and where biodiversity is a natural consideration of policies and decisions, and in society as a whole.”* (page 7)

5-A.4.7 The Strategy sets out a programme for the next five years for the main policy sectors including a Vision and Aims for water and wetlands:

Vision:

‘Healthy and biologically diverse rivers, lakes and wetlands in a landscape managed for the sustainable use of water. This means a holistic approach to land and water management, with active support from local communities, recognising and benefiting from the social, economic and environmental gains.’ (paragraph 5.1)

Aims:

- *“To promote policies that tackle the root cause of damage to water and wetlands, harness natural processes rather than resist them, and thus reverse historical habitat degradation and fragmentation and restore the functioning and quality of wetland ecosystems;*
- *To achieve a whole catchment approach to land use and water management, focusing efforts where environmental risks are greatest and actions are most likely to result in significant benefits; and,*
- *To promote the principle, established in the Water Framework Directive, that the ecological health of the water environment is a key test of its sustainable management.”* (paragraph 5.2)

Securing the Future – Delivering UK Sustainable Development Strategy – The UK Government Sustainable Development Strategy (March 2005)

5-A.4.8 The UK Sustainable Development Strategy contains guidance for tackling water pollution, water usage and conservation and the quality of river, lakes and oceans.

5-A.4.9 The UK Government will use indicators to measure progress in England. Two of the indicators for river quality include:

- Rivers of good biological quality; and,

- Rivers of good chemical quality.

Planning Policy Statement 25 - Development and Flood Risk (December 2006)

5-A.4.10 This PPS sets out the importance the Government attaches to the management and reduction of flood risk in the land-use planning process.

5-A.4.11 Paragraph 5 of the PPS states: “*The aims of planning policy on development and flood risk are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall*”.

“*In addition, LPAs should in determining planning applications:*

- *Have regard to the policies in this PPS and, as relevant, in the RSS for their region, as material considerations which may supersede the policies in their existing development plan, when considering planning applications for developments in flood risk areas before that plan can be reviewed to reflect this PPS;*
- *Ensure that planning applications are supported by site-specific flood risk assessments (FRAs) as appropriate;*
- *Apply the sequential approach at a site level to minimise risk by directing the most vulnerable development to areas of lowest flood risk, matching vulnerability of land use to flood risk;*
- *Give priority to the use of Sustainable Drainage Systems (SUDS); and,*
- *Ensure that all new development in flood risk areas is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed.” (paragraph 8)*

5-A.4.12 Paragraph 10 requires the use of FRAs: “*Flood risk assessment should be carried out to the appropriate degree at all levels of the planning process, to assess the risks of all forms of flooding to and from development taking climate change into account and to inform the application of the sequential approach.*”

“*If, following application of the Sequential Test in Annex D, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones of lower probability of flooding; the Exception Test can be applied as detailed in paragraphs D9–D14. The Test provides a method of managing flood risk while still allowing necessary development to occur.*” (paragraph 18)

“*The Exception Test is only appropriate for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary for wider sustainable development reasons, taking into account the need to avoid social or economic blight and the need for essential civil infrastructure to remain operational during floods.*” (paragraph 19)

“*Where use of the Exception Test is required, decision-makers should apply it at the earliest stage possible in planning, to all LDD allocations for development and all planning applications other than for minor development. All the three elements*

(see Annex D, paragraph D9) of the test will have to be passed for development to be allocated or permitted.” (paragraph 20)

5-A.4.13 The Scheme crosses a natural flood plain and therefore will need to pass the “exception test”.

“For the Exception Test to be passed:

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared. If the DPD has reached the ‘submission’ stage – see Figure 4 of PPS12: ‘Local Development Frameworks’ – the benefits of the development should contribute to the Core Strategy’s Sustainability Appraisal;

b) the development should be on developable previously-developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously-developed land; and

c) a FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.” (Annex D, paragraph D9).

Planning Policy Statement 23 Planning and Pollution Control (November 2004)

5-A.4.14 This PPS gives guidance on the relevance of pollution controls to the exercise of planning functions: *“The planning and pollution control systems are separate but complementary. Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health. The planning system controls the development and use of land in the public interest. It plays an important role in determining the location of development which may give rise to pollution, either directly or from traffic generated, and in ensuring that other developments are, as far as possible, not affected by major existing, or potential sources of pollution.” (paragraph 10)*

“The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. They should act to complement but not seek to duplicate it.” (paragraph 10)

5-A.4.15 The PPS explains that: *“The overall aim of planning and pollution control policy is to ensure the sustainable and beneficial use of land (and in particular encouraging reuse of previously developed land in preference to greenfield sites). Within this aim, polluting activities that are necessary for society and the economy should be so sited and planned, and subject to such planning conditions, that their adverse effects are minimised and contained to within acceptable limits.” (paragraph 26)*

5-A.4.16 Annex 1: Pollution Control, Air and Water Quality gives further guidance on the pollution control regimes that interact with the planning system

together with good practice in considering these issues in development plans and when determining applications.

Regional Policies and Plans for Water Quality and Drainage

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.4.17 The *Vision and Key Development Principles* (Chapter 3) of the Regional Planning Guidance (RPG) identifies a water quality role for the Region. “8 *Development should be located and designed to enable more sustainable use of the Region’s natural resources, in the supply of food, water, energy, minerals and timber, in the effective management of waste, the promotion of renewable energy sources and to assist in reducing pollution of air, land and water.*” (paragraph 3.5).

5-A.4.18 The RPG then identifies that the quality of the Region’s environment is underpinned by the key elements of air, water, land, soil and the extent to which the design of development is sensitive to the natural environment.

5-A.4.19 Within the South East region the RPG states: “*There are considerable pressures arising out of the demand for development on areas of flood plain, demand for domestic water and energy supplies and the management of waste. These are related to the size of the population and the scale of activity within the South East.*” (paragraph 10.1)

5-A.4.20 The RPG notes that: “*Demands for water and energy supplies and for land for disposal of waste could continue to increase significantly unless more sustainable alternative practices and development patterns can be achieved.*” (paragraph 10.2)

5-A.4.21 It also notes that “*consideration must be given to whether or not the existing infrastructure for water supply and quality, treatment and disposal of waste, and the provision of energy are sustainable in the longer term and how they might be modified. Wherever possible;*

- *resources should be conserved (resource conservation);*
- *demand for supplies should be managed (demand management);*
- *resources should be used as locally as possible (proximity principle); and,*
- *alternative options should be considered in order to identify the best practicable environmental option (BPEO).”* (paragraph 10.3)

5-A.4.22 The RPG then examines the issues of flooding and the supply and quality of water within the region.

5-A.4.23 On the issue of flooding Policy INF1 states: “*Development should be guided away from areas at risk or likely to be at risk in future from flooding, or where it would increase the risk of flood damage elsewhere ...*”

5-A.4.24 With regard to water supply and quality Policy INF2 states: “*New development should be located and its implementation planned in such a way as to allow for sustainable provision of water services and enable timely investment in sewage treatment and discharge systems to maintain the appropriate standard of water quality. Techniques which improve water efficiency and minimise adverse impacts on water resources, on the quality, regime, and ecology of*

rivers, and on groundwater, should be encouraged. Redevelopment should identify and make provision for rectification of any legacy of contamination and drainage problems.”

Regional Economic Strategy for the South East of England 2002-2012 (July 2002)

5-A.4.25 The Strategy sets out a number of priorities. Priority 18 is concerned with Water, Waste and Energy: “*Achieve sustainable management of water, waste and energy*” (page 75) and identifies a key action for water:

- “*Support the sustainable management of water resources including water saving:*

The work of the South East Water Resources Forum will be supported, and initiatives will be taken to embed a wider understanding and greater awareness of water resource issues in the region. Research will be undertaken to identify the economic benefits of improved management of water resources, for example in river catchments, and of increasing wetland for flood alleviation. Action will be supported to encourage individual businesses and other employers (particularly major public sector employers such as local authorities and health services) to achieve best practice in water management.” (page 75)

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.4.26 Policies on water management are contained with Section D5 of the South East Plan, *Sustainable Natural Resource Management*.

5-A.4.27 Policy NRM1 on sustainable water resources, groundwater and river water quality management states: “*Water supply, ground water and river water quality will be maintained and enhanced through avoiding adverse effects of development on the water environment. A twin-track approach of demand management and water resource development will be pursued, together with development of sewerage and waste water treatment infrastructure.*” (Policy NRM1)

5-A.4.28 Policy NRM3 (sustainable flood risk management) establishes the regional perspective on development and flood risk. It commends the use of the sequential approach to flood risk as applied in PPG25 and its anticipated successor PPS25. The use of FRAs (as required by PPG25) to fully understand the impact of development upon flood risk is recommended. Planning authorities in determining planning applications should take account of (where they are present) River Basin Management Plans and Catchment Flood Management Plans. They should also consider the use of a range of flood management techniques such as the use of SUDS and other water retention measures, to minimise direct surface run off.

County Policies and Plans on Water Quality and Drainage

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.4.29 The East Sussex and Brighton and Hove Structure Plan states, in the Explanatory Memorandum, that “*The provision of water is likely to become an*

increasingly important constraint in future, particularly as global warming has effect. It should be conserved where possible and its quality should be protected both for human consumption and use, but also so as not to reduce bio-diversity.” (paragraph 9.17)

5-A.4.30 Policy S1 (h) seeks to steer development away from land which is at risk to flooding or which would be likely to increase the risk of flooding elsewhere. Policy S1 (g) seeks to protect and enhance the quality of water and groundwater and river levels for the good society the economy and biodiversity.

5-A.4.31 Policy EN11 states: *“Proposals which would have a significant adverse effect on the quality and quantity of water resources which are important for human consumption and use, and biodiversity (including aquifers, groundwater sources, rivers, lakes, reservoirs, seawater and bathing water) will not be acceptable.”*

Cuckmere and Sussex Havens Catchment Flood Management Plan (draft)
(March 2006)

5-A.4.32 The Cuckmere and Sussex Havens Catchment Flood Management Plan (CFMP) identifies long –term policies for managing flood risks and actions that are required to deliver a more sustainable approach to development and flood risk management which works with nature.

5-A.4.33 The Scheme falls within two policy units (PU) described in the CFMP. Namely, PU10 The Levels (Pevensy Levels, Wallers Haven and Combe Haven) PU11 (Bexhill and Hastings). It also lies upstream of PU12 Bulverhythe and St Leonards. The policy approach adopted for:

- PU10 is *“to take action to increase the frequency of flooding to deliver benefits locally or elsewhere, which may constitute an overall flood risk reduction (e.g. for habitat inundation)”*; and
- PU11 and 12 is *“take further action to sustain the current scale of flood risk into the future (responding to the potential increases in flood risk from urban development, land use change and climate change).*

Local Policies and Plans on Water Quality and Drainage

Hastings Local Plan (April 2004)

5-A.4.34 The Hastings Local Plan states that: *“In the case of major new development which could have a significant surface water impact downstream, surface water drainage and retention facilities will be necessary.”* (paragraph 9.93)

5-A.4.35 Policy DG27 on surface water states: *“Planning permission for development that, as a result of increased surface water runoff, could increase the risk of flooding, will only be granted where the Council (in consultation with the Environment Agency) is satisfied that all appropriate alleviation and mitigation works (including the promotion of SUDS) have been investigated, designed and constructed before the start of development. Proposals for the long-term management of these works must be submitted at or before the planning application stage. Temporary means of dealing with silt and run-off from*

development sites will be required during the construction phase to prevent pollution.”

Rother District Local Plan (July 2006)

5-A.4.36 The Rother District Local Plan states: “*Surface water must be properly dealt with. The rate of run-off from developments will be carefully controlled to avoid any adverse impacts on watercourses and increasing the risk of flooding downstream. This may involve mitigation or alleviation measures. The use of appropriate ‘sustainable urban drainage systems’ will be encouraged in this respect, as would rainwater and grey water recycling.*” (paragraph 5.33)

5-A.4.37 Policy GD1 (x) states that all development should meet certain criteria including: “*...It provides adequate and appropriate means for foul and surface water drainage, with suitable alleviation and mitigation measures where necessary*”; and “*it promotes the efficient use of energy and water through the layout and design of buildings.*”

5-A.4.38 This is elaborated upon in policies GD1 (xv) and DS1 (xi) which both seek to direct development away from areas of flood risk.

5-A.5 Air Quality

National Policies and Plans on Air Quality

The National Air Quality Strategy (January 2000)

5-A.5.1 Following the requirements of the Environment Act 1995, a National Air Quality Strategy (NAQS) was prepared in January 2000. The Executive Summary of the strategy states: “*Clean air is an essential ingredient of a good quality of life. People have a right to expect that the air they breathe will not harm them. We have come a long way since the smogs of the 1950s, and air quality in the UK is generally very good. But there are still sometimes unacceptably high levels of pollution which can harm human health and the environment.*” (Executive Summary).

5-A.5.2 The Strategy describes the plans drawn up by the Government to improve and protect ambient air quality in the UK in the medium-term.

5-A.5.3 “*Our proposals aim to protect people’s health and the environment without imposing unacceptable economic or social costs. They form an essential part of our strategy for sustainable development ...*” (Executive Summary).

5-A.5.4 The Strategy sets out health-based standards for the main eight air pollutants (Benzene; 1,3- butadiene; carbon monoxide; lead; nitrogen dioxide; ozone; particles (PM10); and sulphur dioxide) and objectives for their achievement throughout the UK. The Environment Act 1995 also places duties on local authorities to carry out a staged ‘review and assessment’ of air quality. The review must assess whether it is likely that air quality objectives laid down in the NAQS will be complied with by the compliance date for each pollutant. If it is likely that one or more of the objectives will be breached, the local authority is required to designate the area where non-compliance is likely as an Air Quality Management Area (AQMA), with an action plan setting out the measures

required for the achievement of objectives. Designation of AQMA gives the authority additional powers to control sources of air pollution.

Air Quality Strategy for England, Scotland, Wales and Northern Ireland (January 2001)

5-A.5.5 The NAQS was replaced by the *Air Quality Strategy for England, Scotland, Wales and Northern Ireland* in January 2001 and an *Addendum to the Strategy* in February 2003. These revised strategies introduced new air quality objectives and a revised range of pollutants. Chapter 10: Air Quality addresses all those key pollutants and air quality objectives relevant to the Scheme.

Securing the Future – Delivering UK Sustainable Development Strategy – The UK Government Sustainable Development Strategy (March 2005)

5-A.5.6 “*The Government will tackle poor air quality in line with the outcomes of a review of the Air Quality Strategy and by advising local authorities to incorporate air quality action plans into their local transport plans where transport is a contributory factor.*” (chapter 6, page 134)

5-A.5.7 The UK Government will use indicators to measure progress in England. Two of the indicators for air quality and health include:

- Annual levels of particles and ozone; and
- Days when air pollution is moderate or higher.

Planning Policy Statement 23 Planning and Pollution Control (November 2004)

5-A.5.8 This PPS gives guidance on the relevance of pollution controls to the exercise of planning functions: “*The planning and pollution control systems are separate but complementary. Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health. The planning system controls the development and use of land in the public interest. It plays an important role in determining the location of development which may give rise to pollution, either directly or from traffic generated, and in ensuring that other developments are, as far as possible, not affected by major existing, or potential sources of pollution.*” (paragraph 10)

“*The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. They should act to complement but not seek to duplicate it.*” (paragraph 10)

5-A.5.9 The PPS explains that: “*The overall aim of planning and pollution control policy is to ensure the sustainable and beneficial use of land (and in particular encouraging reuse of previously developed land in preference to greenfield sites). Within this aim, polluting activities that are necessary for society and the economy should be so sited and planned, and subject to such planning conditions, that their adverse effects are minimised and contained to within acceptable limits.*” (paragraph 26)

5-A.5.10 Annex 1: Pollution Control, Air and Water Quality gives further guidance on the pollution control regimes that interact with the planning system together with good practice in considering these issues in development plans and when determining applications.

Regional Policies and Plans for Air Quality

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.5.11 The *Vision and Key Development Principles* (Chapter 3) of the RPG identifies the need for more sustainable use of the Region's resources to assist in reducing air pollution:

"... 8 Development should be located and designed to enable more sustainable use of the Region's natural resources, in the supply of food, water, energy, minerals and timber, in the effective management of waste, the promotion of renewable energy sources and to assist in reducing pollution of air, land and water." (paragraph 3.5)

5-A.5.12 RPG goes on to state: *"Air quality in the Region has improved over recent decades with respect to domestic sources. However, vehicle emissions, energy generation and industrial processes continue to contribute to air pollution. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets out measures for reducing the emissions of eight main pollutants and promotes the integration of land use planning and pollution control. Local authorities throughout the Region are working with the Environment Agency and other partners across local administrative boundaries, in monitoring air quality and devising management strategies. Local authorities have the opportunity to improve air quality both directly and as a result of other functions such as land use planning."* (paragraph 6.11)

5-A.5.13 Consequently, RPG states that: *"Local authorities should work with the Environment Agency and others to play a positive part in pollution control and encourage measures to improve air quality..."* (Policy E7).

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.5.14 Policies on air quality are contained within Section D5 of the South East Plan, *Sustainable Natural Resource Management*.

5-A.5.15 The Plan states: *"The primary driver for national, regional and local air quality management is the protection of human health, although the impact of certain pollutants on wildlife habitats and vegetation is also a concern. Air quality has generally improved over recent years although the region still contains some of the worst air pollution locations in the UK where action is needed. This is therefore an issue of regional significance."* (paragraph 9.1, section D5)

5-A.5.16 Policy CC2 identifies Climate Change as a major issue for the region over and beyond the lifetime of the South East Plan. In this it seeks development frameworks to adapt to climate and mitigate emissions of greenhouse gases.

5-A.5.17 The policy states that *"The strategy and policies of the Plan will promote measures to mitigate and adapt to the forecast effects of climate change and should be implemented through application of local planning policy and other*

mechanisms. Behavioural change will be essential in implementing this policy and the measures identified.”

5-A.5.18 In terms of mitigation the policy states that the reduction of greenhouse gas emissions will primarily be addressed through greater resource efficiency, this will include:

“Reducing the need to travel and ensuring good accessibility to public and other sustainable modes of transport...In addition, and in respect of carbon dioxide emissions, regional and local authorities, agencies and others shall include policies and proposals in their plans, strategies and investment programmes to help reduce the region’s carbon dioxide emissions by at least 20% below 1990 levels by 2010 and by at least 25% below 1990 levels by 2015. A target for 2026 will be developed and incorporated in the first review of the Plan (and no later than 2011).” (CC2)

5-A.5.19 Policy NRM7 relates specifically to air quality: *“Local authorities and other relevant bodies should seek an improvement in air quality in their areas so that there is a significant reduction in the number of days of medium and high air pollution by 2026. Local Development Documents and development control can help to achieve improvements in local air quality through:*

- *Ensuring consistency with Air Quality Management Plans;*
- *Reducing the environmental impacts of transport and congestion management, and support the use of cleaner transport fuels;*
- *Mitigating the impact of development and reducing exposure to poor air quality through design, particularly for residential development in areas which already, or are likely to, exceed national air quality objectives; and,*
- *Encouraging the use of best practice during construction activities to reduce the levels of dust and other pollutants.” (Policy NRM7)*

Integrated Regional Framework (IRF) for the South East

5-A.5.20 Pages 48 – 51 of the IRF provide objectives on air quality and the relevance of the issue to the region.

“Regional objective 11: To reduce air pollution and ensure air quality continues to improve - South East has few major industrial processes relative to its population and economy. However, there are pollution hotspots caused by industrial/energy generation emissions.

The high number of days when rural pollution is moderate or high indicates the importance of ozone pollution in the region. Ozone is not emitted directly to the atmosphere but is formed through a series of chemical reactions involving other pollutants (oxides of nitrogen and volatile organic compounds). These reactions especially occur in bright sunshine and low wind speeds. Precursor emissions from industrial and urban areas (including emissions from continental Europe) are destroyed by motor vehicle pollutants in urban areas, but this process does not happen in rural areas which means that air pollution levels for these are usually higher.” (pages 48–49)

“Regional objective 12: To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts Importance of this issue for the region.

While there remains much uncertainty about the extent of future climate change, our understanding of this is improving year by year. There is widespread consensus among climate experts, other scientists and national governments that human activities are adding to the natural causes of change and that we need to address the problems as a matter of urgency. Research for the UK has shown that any impacts will be more pronounced in the South East than in other parts of the UK. Decisions taken now will affect the conditions under which we live in the future and our ability to cope with these and to prosper; we therefore need to adopt an adaptive approach to planning.” (pages 50–51)

County Policies and Plans for Air Quality

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.5.21 The structure plan notes at paragraph 9.20 of the Explanatory Memorandum that: *“Increasing awareness of the importance of air quality to human health as well as the quality of the environment supports policies and measures to reduce air pollution and improve air quality. Initiatives to monitor air quality and to develop and introduce programmes to improve air quality to meet the best current standards and keep it within those standards will be supported (policy EN13). Policies in the plan to reduce the need to travel and encourage energy conservation and the use of renewable energy should assist air quality management by helping to reduce harmful emissions.”* (paragraph 9.20) This is expressed at S1 (i) which requires development to protect and enhance air quality including the reduction of air pollution and the emission of greenhouse gases.

5-A.5.22 The County’s EN13 policy places emphasis on monitoring air quality with the aim of continual improvement: *“Support will be given to the monitoring of air quality and the development of policies and action programmes to maintain air quality and, wherever possible, to improve it.”* (Policy EN13)

5-A.5.23 The Structure Plan also contains a policy on targets for meeting air quality: *“The setting of targets for limiting noise pollution and for meeting air and water quality standards will be supported, together with policies, programmes of action and regular monitoring to achieve them.”* (Policy EN16).

Local Policies and Plans for Air Quality

Hastings Air Quality Action Plan (October 2005)

5-A.5.24 Hastings Borough Council, at the 31st October 2005 meeting of its Cabinet approved the final draft of the Air Quality Management Plan (AQMP) for Bexhill Road (Glyne Gap) Hastings.

5-A.5.25 The adopted AQMP contains 17 proposed actions to be taken to help improve and monitor air quality in Hastings. These include air quality monitoring, bus service improvements and supporting workplace and school travel plans.

5-A.5.26 The actions relating directly to air quality are listed below:

- Construction of the Bexhill to Hastings Link Road;
- Monitor levels of resuspended matter;

- Maintain PM10 monitor; Install NOx monitor;
- Assess dust control measures;
- Enhanced road cleaning of Freshfields and the A259;
- Improved dust control at Bulverhythe depot; and,
- Improved dust control at the Household Waste recycling site and Pebsham landfill.

Local Policies and Plans for Air Quality

Hastings Local Plan (April 2004)

5-A.5.27 A concern stated in the Hastings Local Plan is that “*new development should not lead to increased air pollution within the AQMA on the A259 Bexhill Road in the west of the Borough*” (paragraph 9.109).

5-A.5.28 Policy DG33 looks at Environmental Pollution including air quality: “*Planning permission will not be granted for development which would be likely to cause unacceptable pollution of air, water or land. This includes development which will result in an unacceptable risk of pollution to the quality or potential yield of surface and groundwater resources. The Council may require that applicants carry out air quality monitoring and assessment into the likely effect of significant new developments alongside existing main roads which could lead to a substantial increase in traffic levels and consequent deterioration in air quality in the area.*”

Rother District Local Plan (July 2006)

5-A.5.29 The Rother District Local Plan has no specific policies on air quality, it refers to policies contained in the East Sussex and Brighton and Hove Structure Plan 1991-2011. The Rother District Local Plan promotes the use of renewable energy, stating that it will help reduce emissions of carbon dioxide, one of the main greenhouse gases contributing to climate change.

5-A.6 Noise and Vibration

National Policies and Plans for Noise and Vibration

Our Countryside: The Future - A Fair Deal for Rural England (November 2000)

5-A.6.1 Paragraphs 9.4.1 and 9.4.2 of this White Paper (Cm 4909) deal with promoting tranquillity and protecting the countryside from noise and visual intrusion due to the impact of “civilisation”. The White Paper also examines the value of national noise mapping, including major road and rail links in rural areas to enable policy to take account more accurately of the implications of noise sources for these areas, including “*major reservoirs of rural tranquillity and valued local pockets of tranquillity*” (page 111). The White Paper goes on to state that: “*There will always be sources of noise in the countryside, and many of these – such as noise from harvesting and livestock – are themselves representative of activities which have long been central to the rural way of life. But protecting the countryside from further intrusion of noise is not a luxury. It is about preserving and promoting a feature that is genuinely valued by residents and visitors alike.*”

Noise can also disturb the breeding of vulnerable species, and thereby undermine biodiversity.” (paragraph 9.4.2).

5-A.6.2 The White Paper identifies a number of specific measures that the Government is currently undertaking to reduce noise pollution, particularly from traffic movements in rural areas. The White Paper states: “*This together with other new techniques of road building ... can cut road noise by half – bringing significant relief to the many rural areas affected by road noise on busy roads*” (Pg. 111). [The Government’s] “*policies for road safety and reducing the impact of traffic in rural areas, including the Quiet Roads’ initiative will also contribute to promoting greater tranquillity in rural areas*” (page 111).

5-A.6.3 The Quiet Roads initiative is a Countryside Agency scheme designed to make minor rural roads safer and more attractive for those who are not in motor vehicles, and to make driving more pleasant for those who are in motor vehicles. Quiet Roads will enable all users to share the road and enjoy their journey at a relaxing pace.

Planning Policy Guidance note 24 - Planning and Noise (September 1994)

5-A.6.4 PPG 24 sets out the Government’s guidance to local authorities on the use of their planning powers to minimise the adverse impacts of noise. It establishes that noise is a material consideration in determining planning applications and requires that new noise generating development should be located away from noise sensitive land uses where possible.

5-A.6.5 The guidance recognises that noise can have “*a significant effect on the environment and on the quality of life enjoyed by individuals and communities*”, but at the same time is a consequence of modern life (paragraph 1). PPG 24 goes on to state that the planning system has an important role to play in setting standards of noise protection “*... to minimise the adverse impact of noise without placing unreasonable restrictions on development ...*” (paragraph 1).

5-A.6.6 Paragraph 10 with the ‘noisy development’ section goes on to state: “*Much of the development which is necessary for the creation of jobs and the construction and improvement of essential infrastructure will generate noise. The planning system should not place unjustifiable obstacles in the way of such development. Nevertheless, local planning authorities must ensure that development does not cause an unacceptable degree of disturbance.*”

5-A.6.7 Within the Designated Areas and the Countryside section, the opening paragraph states: “*Special consideration is required where noisy development is proposed in or near Sites of Special Scientific Interest (SSSIs) ... The effect of noise on the enjoyment of other areas of landscape, wildlife and historic value should also be taken into account.*” (paragraph 20).

Regional Policies and Plans for Noise and Vibration

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.6.8 Policy Q6 (Management and the Provision of Services) requires local planning authorities and other service providers to take into account a range of factors relating to quality of life issues when drawing up development plans in the region. In the context of noise and vibration RPG9 requires local authorities,

services providers, key agencies, and others throughout the region to improve the local environment, public health and safety through a number of measures including the reduction of the incidents of noise pollution (Q6(b)(iv))

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.6.9 Policies on noise are contained with Section D5 of the South East Plan, *Sustainable Natural Resource Management*. The Plan states; “Noise can have a serious effect on the quiet enjoyment of property and places, reducing quality of life. Changes in the economy, including reduction in heavy engineering, have reduced industrial noise impacts over recent decades. Conversely the growth in road, rail and air traffic has markedly increased noise pollution in urban and rural areas.” (Section D5, paragraph 10.1)

“Noise is of significance in this region because of the relative intensity and frequency of transport movements, and the region’s role as a gateway.” (Section D5, paragraph 10.5)

5-A.6.10 Policy NRM8 relates specifically to noise: “Measures to address and reduce noise pollution will be developed at regional and local level through means such as:

- Locating new residential and other sensitive development away from existing sources of significant noise or away from planned new sources of noise;
- Traffic management and requiring sound attenuation measures in major transport schemes; and,
- Encouraging high levels of sound-proofing and screening as part of sustainable housing design and construction.”

County Policies and Plans for Noise and Vibration

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.6.11 The Structure Plan’s general approach to noise and vibration is contained within the Explanatory Memorandum at paragraph 9.22, which states that: “Noise is a very intrusive aspect of modern living. At the strategic level, the Structure Plan can act to try and ensure that, where applicable, development proposals and transport schemes do not create unacceptable levels of noise, and to protect the diminishing resource of quiet and tranquil areas.”

5-A.6.12 Policy EN1 provides as an overarching policy objective of requiring development and change within the Structure Plan area to sustain, conserve and where possible, enhance the character, diversity and quality of the landscape, and natural and built environment.

5-A.6.13 Policy EN15 states the County’s stance on noise pollution; “Development proposals and transport schemes will be required, where applicable, to include measures to minimise noise.” (Policy EN15).

5-A.6.14 The Structure Plan also contains a policy on targets for noise pollution: “The setting of targets for limiting noise pollution and for meeting air and water

quality standards will be supported, together with policies, programmes of action and regular monitoring to achieve them.” (Policy EN16).

East Sussex Local Transport Plan 2006-2011 (March 2006)

5-A.6.15 The Second Local Transport Plan (LTP2) makes specific reference to noise, stating that: *“By reducing noise pollution, LTP2 can have a positive impact on people’s quality of life, promoting tranquillity that attracts visitors and tourists to an area, thereby contributing towards the vitality of the local economy.”* (Chapter 3, Pg. 59)

5-A.6.16 Its strategy seeks to mitigate the impact of noise on residents and businesses, through the introduction of low noise surfacing on the County’s roads, where appropriate, as part of its maintenance programme.

5-A.6.17 The LTP2 Strategy has also been influenced by the introduction of policies, through the Road Hierarchy and Freight Strategies, which manage the level and type of traffic on the network. These policies will reduce noise pollution by discouraging routing of traffic, in particular freight vehicles, through sensitive environments – residential streets and rural roads - except for access.

5-A.6.18 Encouraging the use of non-car ‘quiet’ modes of transport such as walking and cycling as described in section 4.5 – ‘Walking’ and ‘Cycling’ strategies – also have a role in reducing noise pollution. This will contribute towards the IRF objective of ‘effective protection of the environment’. (chapter 3 pg 59)

Local Policies and Plan on Noise and Vibration

Hastings Local Plan (April 2004)

5-A.6.19 Concerning noise the Hastings Local Plan states: *“Wherever possible, measures should be taken to reduce excessive levels of noise from new development of an industrial, commercial or entertainment nature. This is particularly important where the amenities of adjacent properties would be affected. Furthermore, new dwellings located adjacent to a major road should be designed to overcome problems from noise. Measures which can be taken include double glazing, the correct orientation of buildings and the design of individual dwellings so that habitable rooms do not face the source of noise.”* (paragraph 9.13)

5-A.6.20 Policy DG4 is on noisy activities: *“Planning permission will not be granted for proposals likely to result in unacceptable levels of noise. Where practicable, the Council will seek measures to attenuate noise levels, including:-*

- *Use of appropriate construction and insulating materials;*
- *Careful orientation of buildings and structures; and*
- *Measures to control noise at source.*

Where development is permitted, conditions restricting operating hours and levels of noise emission may be imposed.” (Policy DG4)

5-A.6.21 Policy DG5, on noise sensitive development, states;

- *“Planning permission will not be granted for noise sensitive development (such as housing, hospitals, schools, nursing homes and residential homes) in areas which are, or are expected to become, subject to unacceptably high levels of noise, unless satisfactory attenuation measures can be achieved.*
- *Where such development is proposed, applicants may be required to provide measurements of existing noise levels and other relevant information in support of their application.*
- *Where permission is granted, the Council may attach planning conditions to minimise the effect of noise on the new development.” (Policy DG5)*

Rother District Local Plan (July 2006))

5-A.6.22 Concerning noise the Rother District Local Plan states: *“The impact of development needs to be carefully considered in relation to issues such as loss of light and privacy, avoiding an overbearing presence and otherwise causing intrusion such as through noise, activity at unsocial hours, lighting, etc.”* (paragraph 5.7)

5-A.6.23 However, policy DS1 (vi) provides strategic guidance on environmental impacts in general, it states that in considering the location of development the following should be borne in mind; *“it avoids prejudicing the character and qualities of the environment, particularly the High Weald AONB and undeveloped coastline.”*

5-A.7 Nature Conservation and Biodiversity

National Policies and Plans for Nature Conservation and Biodiversity

Natural Environment and Rural Communities Act 2006

5-A.7.1 On 1st October 2006 the Section 40 of the Natural Environment and Rural Communities Act came into force in England and Wales, Section 40 of the Act states that: *“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”*

5-A.7.2 The purpose of the duty is to raise the profile of biodiversity in England and Wales, and to stimulate a cultural change in all parts of the public sector with the intended result being that biodiversity issues become second nature for public bodies when developing policies and making decisions. The duty affects over 900 public bodies, ranging from local authorities, fire, police and health bodies, to museums and transport authorities.

5-A.7.3 Section 40 replaces and extends a duty, from S74 of the Countryside and Rights Of Way Act 2000, on Ministers and Government which already requires them to have regard to the purpose of conserving biodiversity.

Countryside and Rights Of Way Act 2000 (Schedule 9 - Sites of Special Scientific Interest)

5-A.7.4 Section 28G imposes a duty on "public bodies" in exercising their functions to take reasonable steps, consistent with the proper exercise of those functions, to further conservation and enhancement of the special features on a SSSI. This applies where the public body is exercising its statutory functions on a SSSI or on land outside the SSSI where those functions affect a SSSI. Public bodies, referred to in the Act as section 28G authorities, are defined in subsection (3) to include Ministers, Government Departments, local authorities and statutory undertakers (whether in the public sector, or a privatised utility) and other public bodies.

Our Countryside - The Future – A Fair Deal for Rural England (November 2000)

5-A.7.5 The Countryside White Paper identifies that the biodiversity of the UK's countryside is increasingly under pressure due to changes in farming practices such as intensification leading to a decline in species diversity and numbers. In addition, many of the UK's important wildlife sites need extensive restoration or enhancement management. Maintaining wildlife diversity and the natural environment is therefore a key element of policy for the countryside.

"At the heart of our policy to conserve and enhance wildlife is the network of nationally designated wildlife sites, the SSSIs."(paragraph 10.2.1).

5-A.7.6 The Government has set a target for 95% of SSSIs to be in a favourable condition by March 2010 (page 121). At the species and habitat level Biodiversity Action Plans should be taken into account when determining land use and management practices.

5-A.7.7 Biodiversity Action Plans (BAPs) are strategies to conserve, protect and enhance biological diversity. The UK BAP sets priorities and targets for the whole country, but local BAPs have also been produced to address biodiversity issues specific to particular areas of the UK. The local BAP relevant to the Scheme is the Sussex BAP developed by various wildlife agencies including English Nature, Environment Agency, Sussex Farming and Wildlife Advisory Group, Royal Society for the Protection of Birds, East Sussex County Council, West Sussex County Council, and Brighton and Hove City Council, and was published by the Sussex Biodiversity Partnership.

Working with the Grain of Nature: A Biodiversity Strategy for England (October 2002)

5-A.7.8 The Strategy lays out a vision for England: *"For a country – its landscapes and water bodies, coasts and seas, towns and cities – where wild species and habitats are part of healthy functioning ecosystems; where we nurture, treasure and enhance our biodiversity, and where biodiversity is a natural consideration of policies and decisions, and in society as a whole."* (page 7)

5-A.7.9 The Strategy sets out a programme, including vision and aims for the next five years for the main policy sectors:

- Agriculture;
- Water and Wetlands;

- Woodland and Forestry;
- Towns, Cities and Development; and,
- The Coast and Seas, Local and Regional Action.

5-A.7.10 In order to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems rather than against them. It takes account of climate change as one of the most important factors affecting biodiversity and influencing our policies.

Securing the Future – Delivering UK Sustainable Development Strategy – The UK Government Sustainable Development Strategy (March 2005)

5-A.7.11 The UK Government Sustainable Development Strategy sets out priority areas for immediate action, including:

5-A.7.12 Natural Resource Protection and Environmental Enhancement – Natural resources are vital to our existence and that of communities throughout the world. We need a better understanding of environmental limits, environmental enhancement and recovery where the environment is most degraded to ensure a decent environment for everyone, and a more integrated policy framework.

A New Focus for England's Woodlands – England Forestry Strategy (December 1998)

5-A.7.13 Trees and woodlands play a critical role in our environment. They absorb carbon dioxide and release oxygen, filter pollution and noise, provide summer shade and winter shelter, provide habitats for a variety of wildlife, create distinctive landscapes and provide wood – a renewable and sustainable resource for so many of our everyday needs. Woodland habitats support a wide range of rare or endangered species, such as the red squirrel, and woodland management has a vital role to play in ensuring that these species and habitats continue to survive in our countryside. (page 22)

- Seek opportunities for encouraging the replacement of woodland lost to development with equivalent areas of new planting;
- Support research to improve understanding of the value of the environmental benefits of trees, woodlands and forests and the environmental processes that they perform, particularly in relation to aerial and waterborne pollution; and,
- Establish a framework for monitoring important woodland habitats and species linked to the National Biodiversity Network. (page 26)

Planning Policy Statement 9 – Biodiversity and Geological Conservation (August 2005)

5-A.7.14 PPS 9 gives guidance on how the Government's objectives for the conservation of our natural heritage are to be reflected in land use planning. The Government's vision for conserving and enhancing biological diversity in England includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible. In moving towards this vision, the Government's objectives for planning are:

- *“To promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development, so that policies and decisions about the development and use of land integrate biodiversity and geological diversity with other considerations;*
- *To conserve, enhance and restore the diversity of England’s wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support; and*
- *To contribute to rural renewal and urban renaissance by: enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people’s sense of well-being; and ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment.” (page 2)*

5-A.7.15 Key principles for planning authorities include the requirement that:

- *“Planning decisions should be based upon up-to-date information about the biodiversity and geological resources of the area;*
- *Decisions should aim to maintain, and enhance, restore or add to, biodiversity and geological conservation interests; and,*
- *The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less harm or no harm. In the absence of any such alternatives, local planning authorities should ensure that, before planning permission is granted, adequate mitigation measures are put in place. Where a planning decision would result in significant harm to biodiversity and geological interests which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.”(paragraph 1)*

5-A.7.16 The PPS makes clear the most important sites are those identified through international conventions and European Directives. These have statutory protection and do not need local policies. The Government however, wishes potential Special Protection Areas (SPAs) and candidate Special Areas of Conservation to be given the same consideration as the classified or designated international sites, along with Ramsar sites (paragraph 6).

5-A.7.17 SSSIs should be given a high degree of protection under the planning system. *“Where a proposed development on land within or outside an SSSI (individually or in combination with other developments) is likely to have an adverse effect, planning permission should not normally be granted. Where an adverse effect on the site’s special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national networks of SSSIs. Local authorities should use conditions and/or planning obligations to*

mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.” (paragraphs 7 and 8).

5-A.7.18 Sites of regional and local biodiversity interest have a fundamental role to play in meeting overall national biodiversity targets, contributing to the quality of life and the well-being of the community and in supporting research and education. *“Criteria based policies should be established in local development documents against which proposals for development on, or affecting, such sites will be judged.”(paragraphs 9)*

“Networks of natural habitats provide a valuable resource. They can link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. Local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development and, where possible, strengthened by or integrated within it.” (paragraphs 12)

5-A.7.19 Statutory protection of individual wildlife species is provided by legislation and not through planning policies. Planning authorities should ensure that these species are protected from the adverse effects of development, where appropriate, through the use of planning conditions or obligations. Planning authorities should refuse planning permission where harm to the species or their habitats would result from development unless the need for, and the benefits of, the development clearly outweigh that harm (paragraphs 15 and 16).

Regional Policies and Plans for Nature Conservation and Biodiversity

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.7.20 *The Vision and Key Development Principles (Chapter 3) of the RPG identify a nature conservation and biodiversity role for the Region*

5-A.7.21 *“... 9 There should be continued protection and enhancement of the Region's biodiversity, internationally and nationally important nature conservation areas, and enhancement of its landscape and built and historic heritage.” (paragraphs 3.5)*

5-A.7.22 The South East Region possesses a wide range of habitats, including heathland, downland, meadows, ancient semi-natural woodland, rivers and wetlands. The Government is signatory to international agreements and is committed to safeguarding biological diversity. This involves diversity within species, between species and of ecosystems. Within this context:

“The Government has endorsed the UK BAP containing specific action plans for some 400 priority species and 45 key habitats. The species and habitat plans set out the national priorities and targets, but the process is also being taken forward locally through Local Biodiversity Action Plans (LBAPs). These are being prepared across the Region by Steering Groups involving English Nature, other Government agencies, wildlife trusts, local authorities and other partners. They are important in setting strategic and local targets which should inform development plans and other strategies.” (paragraphs 6.4)

5-A.7.23 Policy E2 goes on to state: *“The Region’s biodiversity should be maintained and enhanced with positive action to achieve the targets set in national and local biodiversity action plans through planning decisions and other measures ... Development Plans should give priority to specific species and habitats of international, national and sub-regional importance as identified in BAPs and include policies and proposals to contribute to the achievement of targets set in BAPs by:*

- *Conserving and enhancing existing wildlife habitats in both urban and rural areas;*
- *Encouraging the identification and management of existing and potential land for nature conservation as part of development proposals, particularly where a connected series of sites can be achieved; and,*
- *Identifying locations and proposals for habitat management, restoration and creation schemes ...”* (Policy E2, pages 32-33)

5-A.7.24 Policy E5 then examines the role of woodland habitats in the Region as a nature conservation resource:

“Woodland habitats in the Region should be increased whilst protecting the biodiversity and character of existing woodland resources and other areas of established or potential nature conservation value ... Development Plans should:

- *Promote the retention, protection and extension of woodland and forest habitats, particularly ancient and semi-natural woodlands and also Community Forests ...*
- *Identify the scope for woodland creation, for example, in association with the restoration of degraded landscapes ...”* (Policy E5, page 35)

Regional Economic Strategy for the South East of England 2002-2012 (July 2002)

5-A.7.25 The Regional Economic Strategy sets a vision of: *“A prosperous region delivering a high quality of life and environment for everyone, now and in the future.”* (paragraph 1.1)

5-A.7.26 The Strategy sets out a number of priorities. Priority 16 is concerned with Environmental Capital: *“Invest in environmental capital to maximise its contribution to a sustainable regional economy”* (page 72)

5-A.7.27 Key actions include:

- *“Promote awareness and understanding of the environment as a key strength of the South East economy;*
- *Maintain the value of the environment as an economic asset;*
- *Secure investment in enhancing and restoring biodiversity, to generate better economic, environmental and social returns in the future; and,*
- *Promote and support sustainable tourism based on the quality of the natural, built and historic environment.”* (page 72)

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.7.28 In discussing biodiversity (Section D5-6) the Plan identifies a high quality environment, including rich and varied wildlife, as essential to the prosperity of the region and the quality of life of those who live and work in it (paragraph 6.2). The Plan recognises there have been major losses of habitat and species populations over recent decades due to inappropriate management, agricultural practice and fragmentation (paragraph 6.3).

5-A.7.29 The threats and opportunities from climate change are noted, in particular the need for species and habitats to be able to move if they are to survive. Further fragmentation of habitats would limit the ability to respond to the effects of climate change (paragraph 6.4).

5-A.7.30 The Plan's twin aims are to conserve and to improve biodiversity.

5-A.7.31 Conservation is focussed on: - designated conservation sites, especially international and nationally protected sites; the overall diversity and distribution of habitats and species; green networks within urban and suburban areas; and urban wildlife (paragraph 6.5).

5-A.7.32 In seeking to improve biodiversity the submitted Plan sets regional biodiversity targets for a number of regionally important habitats (Figure NRM2) and identifies Areas of Strategic Opportunity for Biodiversity Improvement (Map NRM4). The area immediately north of Bexhill and Hastings is not identified as a regionally significant Area of Strategic Opportunity (paragraph 6.6).

5-A.7.33 The Plan provides for the conservation and improvement of biodiversity through Policy NRM4. In respect of plans and strategies this requires local authorities and other bodies to avoid a net loss of biodiversity and to actively pursue opportunities to achieve a net gain across the region by:-

- *“Providing the highest level of protection for nationally and internationally designated sites;*
- *Ensuring damage to county wildlife sites and locally important wildlife and geological sites is avoided wherever possible;*
- *Ensuring that unavoidable damage to wildlife interest is minimised through mitigation, that any damage is compensated for, and that such measures are monitored; and,*
- *Ensuring appropriate access to areas of wildlife importance, identifying areas of opportunity for biodiversity improvement and setting targets reflecting those in Figure NRM2. Opportunities for biodiversity improvement, including large scale habitat restoration, enhancement and re-creation in the areas of strategic opportunity for biodiversity improvement (Map NRM4) should be pursued.”*

5-A.7.34 Policy NRM5 provides guidance on the need to protect and enhance woodland cover in the region including the high level of protection afforded to ancient woodland

5-A.7.35 The policy states that *“In the development and implementation of Local Development Documents and other strategies, local authorities and other bodies will support the implementation of the Regional Forestry and Woodland*

Framework, ensuring the value and character of the region's woodland are protected and enhanced. This will be achieved by:

- i) Protecting ancient woodland from damaging development and land uses;*
- ii) Promoting the effective management, and where appropriate, extension and creation of new woodland areas including, in association with areas of major development, where this helps to restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, helps mitigate climate change, and contributes to floodplain management;*
- iii) Replacing woodland unavoidably lost through development with new woodland on at least the same scale;*
- iv) Promoting and encouraging the economic use of woodlands and wood resources, including wood fuel as a renewable energy source; and,*
- v) Promoting the growth and procurement of sustainable timber products through application of the Forestry Stewardship Council certification scheme.” (policy NRM5)*

County Policies and Plans for Nature Conservation and Biodiversity

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.7.36 Chapter 6 (part B - Written Statement) of the Structure Plan sets out the County Council's strategic policies for protection of the valued environmental characteristics and assets of the County. However, the strategic principles for the protection of the environment are set out in Chapter 1 of the Explanatory Memorandum (Strategy for a More Environmentally Sustainable Future).

5-A.7.37 Policy S1 states that: *“In order to meet the needs for development and change in the plan area in a way that is more environmentally sustainable in the longer term, all planning activities and development decisions should take account of the following criteria. Where appropriate, local planning authorities may require proposals for development to demonstrate how far they contribute to the achievement of these criteria;*

(j) according with the objectives of and not causing damage to the Sussex Downs and High Weald AONB, Ashdown Forest, downland, wetland, open heathland, ancient woodlands, undeveloped coast (including Heritage Coast), SSSIs, SPAs, SACs, Ramsar sites, nature reserves, ancient monuments, conservation areas, historic parks and gardens, battlefields and other areas of designated or recognised important landscape, archaeological, geological, ecological or historical character and their settings;

5-A.7.38 The County Policy for nature conservation and biodiversity is contained in paragraphs 9.24 to 9.29 and Policy EN17, which states: *“The existing natural resource of species, habitats and geological features, including statutory sites of national and international importance and their settings, ancient woodland, and other sites of demonstrable geological, landscape or wildlife importance (including the active residence of specially protected species) will be protected from damage. Particular regard will be paid to the protection of river corridors and the special habitats of downland, wetland, open heathland, ancient woodland, meadows, salt marsh and shingle.”*

5-A.7.39 Policy EN20 states that where major development, for which there is an established need, would result in significant loss of an important habitat, measures to provide compensating and equivalent habitat will be required.

A Biodiversity Action Plan for Sussex (July, 1998)

5-A.7.40 The purpose of the BAP for Sussex is to set out proposed BAPs for the main habitats and species in Sussex. The overall aim of the Sussex BAP is to conserve and enhance the biological diversity of Sussex and contribute to the conservation and enhancement of both national and international biodiversity.

5-A.7.41 The objectives of the Sussex BAP are:

- To maintain, and where practicable enhance, the wildlife and habitats that give Sussex its character and natural diversity;
- To identify priority habitats and species which are important to us in Sussex and/or where we have a special responsibility to care for something which is important on a national or international scale;
- To set realistic, but ambitious, targets and timescales for priority habitats and species and to monitor progress of action plans against those targets;
- To ensure that biodiversity action continues as a joint initiative, evolving a dynamic framework for nature conservation; and,
- To raise public awareness and encourage involvement in biodiversity action.

Local Policies and Plans for Nature Conservation and Biodiversity

Hastings Local Plan (April 2004)

5-A.7.42 The Hastings area contains one SAC at Hastings Cliffs and three SSSIs at Marline Valley, Combe Haven Valley and the coastal area of the Country Park. These areas are internationally and nationally important in terms of habitats and wildlife species. The Hastings Local Plan contains policies that seek to protect and safeguard these sites.

5-A.7.43 Policy NC1 and NC2 promote the protection of SAC and SSSI.

5-A.7.44 Policy NC1 states: “*The Hastings Cliffs candidate SAC will be safeguarded and protected. Proposals for development not connected with or necessary to the management of the SAC and which are likely to have significant effects on the site (either individually or in combination with other plans or projects) will be subject to the most rigorous examination.*” (Policy NC1)

5-A.7.45 Policy NC2 states: “*Designated SSSIs will be safeguarded and protected. Proposals for development within SSSIs, or likely to have an adverse effect on them directly or indirectly, will be subject to special scrutiny.*” (Policy NC2)

Rother District Local Plan (July 2006)

5-A.7.46 Policy DS1 contains several principles to determine if a development is appropriate, including one for protecting nature conservation areas:

“In determining whether development is appropriate in a particular location, proposals should accord with the following principles...it protects sites of recognised nature conservation importance, particularly internationally and nationally important sites, as defined on the Proposals Map...” (Policy DS1)

5-A.7.47 The Plan states that: “In addition to protecting sites of recognised nature conservation value in accordance with Policy DS1, all new development may provide some wildlife habitats. This can be achieved by retaining features such as trees and hedgerows, ponds, small woodlands, streams and ditches, as well as by introducing features that provide new habitats. An ecological survey will be sought where a site is or is likely to be of ecological value.” (Policy 5.12)

5-A.8 Landscape and Visual Effects

Scope

5-A.8.1 This section describes the key policies relating to the protection and enhancement of both the natural and built environment. This relates both to the immediate impacts within or on designated areas/features and to their wider settings.

National Policies and Plans for Landscape and Visual Effects

Our Towns And Cities; The Future Delivering An Urban Renaissance - Urban White Paper - November 2000

5-A.8.2 Paragraph 4.35 explains that to achieve regeneration aims actions to do so need to recognise the different circumstances of different places and the reasons they are underused. It could involve:

- Encouraging businesses to move back into small brownfield plots or vacant buildings in a town centre;
- Bringing about the wholesale transformation of an area by rehabilitating old industrial land, developing new uses and building new communities; or,
- Bringing new services to a residential area to improve its popularity.

Our Countryside - The Future – A Fair Deal for Rural England (November 2000)

5-A.8.3 This White Paper (Cm 4909) sets out the vision for a “*living, working, protected and vibrant countryside*” (Page 5). In the introductory section of Chapter 9, entitled Conserving and Enhancing Our Countryside, a number of points are set out to address issues involving loss of countryside, including:

- *“A planning framework which continues to safeguard our countryside while allowing rural communities to thrive. Landscapes will continue to evolve but in ways that strengthen their character and value;*
- *There will be stronger protection for our most valued landscapes in National Parks and AONB through improved funding and management; and better understanding by all decision-makers of the distinctiveness and diversity of the wider countryside;*
- *Increased measures will be taken to promote tranquillity; and,*

- *Trees, woods and forests will have a more prominent place in the countryside ...* (Introduction, Chapter 9).

5-A.8.4 The Government's policy is that the countryside should be safeguarded for its own sake, and the Government will continue a policy of strict controls over development within the open countryside.

5-A.8.5 The White Paper goes on to consider the potential impact of transport infrastructure projects upon the tranquillity of the countryside, in particular the potential impact of road lighting. The White Paper states:

"Light pollution of the night sky is an increasing intrusion into the countryside at night, and it is an issue that we want all rural local authorities to take into account in their planning and other decisions. Local planning authorities have powers, for instance, to control many external lighting installations." (paragraph 9.4.4)

Planning Policy Statement 1 Delivering Sustainable Development

5-A.8.6 In setting the government's objectives for the planning system PPS1 explains that: planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by...protecting and enhancing the natural and historic environment, the character of the countryside and existing communities (paragraph 5).

5-A.8.7 The PPS goes on to state that the government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas (paragraph 17) and that the planning system should seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through policies on issues such as design, conservation and the provision of public space (paragraph 18).

5-A.8.8 In respect of planning decisions, PPS1 states that: *"Planning authorities should seek to enhance the environment as part of development proposals. Significant adverse impacts on the environment should be avoided and alternative options which might reduce or eliminate those impacts pursued. Where adverse impacts are unavoidable, planning authorities and developers should consider possible mitigation measures. Where adequate mitigation measures are not possible, compensatory measures may be appropriate."* (paragraph 19)

Planning Policy Statement 7 Sustainable Development in Rural Areas (2004)

5-A.8.9 The Government's objectives for the rural areas are established in this PPS. Page 6 outlines the principles upon which guidance and planning decisions should be based and includes *"the continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources."*

5-A.8.10 It also seeks to *"promote more sustainable patterns of development by: focusing most development in, or next to, existing towns and villages; preventing urban sprawl; discouraging the development of greenfield land, and, where such land must be used, ensuring it is not used wastefully; promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas; and, providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside."* (page 6)

5-A.8.11 Page 7 describes the key principles of guidance of which principle iv is most relevant, namely; “*New building development in the open countryside away from existing settlements, or outside areas allocated for development in development plans, should be strictly controlled; the Government’s overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all.*”

5-A.8.12 Paragraph 15 establishes that planning policies should ensure that the quality and character of the wider countryside is protected and where possible enhanced, with particular regard for the designated sites and landscapes. This is reinforced at paragraph 16 (v) which states that in the consideration of development applications “*local planning authorities should conserve specific features and sites of landscape, wildlife and historic or architectural value, in accordance with statutory designations.*”

5-A.8.13 The PPS goes on to provide advice on nationally designated areas at paragraph 21 emphasising the fact these areas have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas.

Regional Policies and Plans for Landscape and Visual Effects

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.8.14 The RPG states that a high quality environment is essential to the future prosperity of the South East of England. The RPG emphasises that effective protection of the environment and prudent use of natural resources are fundamental aspects of the vision for this Region which is highly urbanised and subject to development pressures. The RPG identifies that throughout the Region significant areas of land are statutorily designated in recognition of their intrinsic environmental, wildlife, landscape or cultural value.

5-A.8.15 Policy E1 of the RPG states: “Priority should be given to protecting areas designated at international or national level either for their intrinsic nature conservation value, their landscape quality or their cultural importance ... Development plans should ... accord with guidance in PPG 7 (The Countryside – Environmental Quality and Economic and Social Development)... in protecting and enhancing existing and new areas designated for their landscape value...” (pages 31-32)

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.8.16 The development strategy of the draft South East Plan can be summarised as being one which focuses the overwhelming majority of development on the existing urban areas and seeks to maximise the advantages of concentrating development close to regional, sub regional and local areas of economic activity, centres of service provision and transport nodes/interchanges. The development strategy seeks an urban renaissance in the region whilst seeking to secure a more bio-diverse environment.

5-A.8.17 Section D7 (Countryside and Landscape Management) of the draft plan recognises the wealth of diverse and high quality environments in the south-east and provides a suite of policies on designated landscapes, of which Policy

C2 establishes the general principles applied to designated landscapes in PPS7. Policy C3 seeks (through a variety of measures to actively manage countryside outside designated areas) to protect and enhance its distinct qualities, avoiding fragmentation of landscapes and habitats and encourage the linking of habitats.

5-A.8.18 Section D8 (Management of the Built and Historic Environment) provides policy guidance for an urban renaissance within the towns and cities of the South East region. Policy BE1 (Management for an Urban Renaissance) places a priority on the improvement of the urban environment if it is to be the focus for the region's development.

5-A.8.19 Policy BE4 (Managing the Urban Rural Fringe) requires development plans to identify opportunities for multifunctional fringe areas, to ensure better management of such areas, and for opportunities to enhance fringe areas through urban extensions to be identified by local authorities.

5-A.8.20 Policy BE7 (Management of the Historic Environment) requires local authorities in conjunction with key partners to adopt policies which support the conservation and where possible the enhancement of the historic environment. Bringing redundant or under used buildings or areas back into appropriate use as part of regeneration schemes should be encouraged.

County Policies and Plans for Landscape and Visual Effects

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.8.21 The County's policy on landscape requires development proposals to conserve, sustain and enhance local landscape character, and that of the built environment. This objective is expressed in a number of policies within the structure plan, namely S1 (b) (e) (f) (j) (m), EN7 (Urban Fringe areas) EN8 (Remote and Tranquil Areas), and EN26 (Built Environment).

5-A.8.22 Policy EN1 provides the overarching consideration for development plans and development control decisions in the structure plan area in terms of landscape and visual effects. It states: "Development and change will be required to sustain, conserve and, where possible, enhance the character, local diversity and quality of the landscape and natural and built environment of the plan area including, where appropriate, the creation of new, equally good and distinctive local character. Features contributing to landscape character will be protected..."

5-A.8.23 However, policy S1 (b) provides for exceptions to protective policies in order to meet other policies in the plan and where compensation is made.

5-A.8.24 Policy S5 (Definition of Development Boundaries) provides guidance for local plans on the definition of development boundaries, and includes the specific objective to conserve landscape character, natural resources, woodland and agriculture in general. Policy S10 (The Countryside) goes on to state that outside defined development boundaries agriculture and woodland will remain the predominant land uses. Exceptions to this will need to justify need for a countryside location.

5-A.8.25 Specifically, policies S24 (Hastings) and S25 (Bexhill) provide strategic objectives for the development of the two towns. Priorities are placed upon the

regeneration and improvement of the urban environment of Hastings, and the use of redundant or underused sites in both towns.

Local Policies and Plans for Landscape and Visual Effects

Hastings Local Plan (April 2004)

5-A.8.26 Policies on landscape are contained in Chapter 8 of the Hastings Local Plan (2004). The Borough contains the High Weald AONB, and the Council recognises the importance of protecting this landscape. Paragraph 8.64 and 8.65 identify landscape areas.

5-A.8.27 Paragraph 8.64 states: *“Eleven Landscape Character Areas within the Borough were identified as possessing character similarities or being defined by major topographic features or open spaces. They were defined on the basis of landscape character rather than history or architectural detail - for instance the seafront contains features of varying age and style, but can be identified as possessing a unity of space and landscape.”*

5-A.8.28 Paragraph 8.65 states: *“Within these areas, thirty smaller Landscape Tracts were identified as containing a ‘focus’ of character - e.g. an older built-up area, open space or strong feature, often influenced by the topography of the area.”*

5-A.8.29 Policy L1 places emphasis on conserving the town’s distinctive landscape character and the Council will give weight to this in assessing development proposals and will refuse permission for development which would substantially compromise the landscape character or setting of the town.

“Planning permission will not be granted for development which would substantially compromise the distinctive landscape setting of the town, particularly the landscape structure of gills, woods and open spaces, and the relationship and clear division between the unspoilt coastline of the Country Park and surrounding countryside and the built-up area.” (Policy L1)

Rother District Local Plan (July 2006)

5-A.8.30 Policy on landscape is contained within the general policy DS1: *“In determining whether development is appropriate in a particular location, proposals should accord with the following principles: ... it respects the importance of the countryside in terms of its distinct landscape character, natural resources, woodland and agriculture ...”* (Policy DS1 ix).

5-A.8.31 Policy BT1 (Planning Strategy for Battle) provides guidance for development proposals within Battle. However, paragraph 11.51 of the plan notes that the inadequacies of both the A259 and A21 mean that the *“net effect is regular traffic congestion, as well as harm to the historic character and environment of the town centre”*. Consequently its inclusion in this policy assessment is considered valid.

5-A.8.32 The policy requires: *“Proposals for development and change in Battle should be compatible with and, wherever practicable, contribute positively to the following objectives: (i) to maintain its historic, small town character; (ii) to protect the historic core and its setting; (iii) to conserve the AONB landscape setting; (iv) to enhance the commercial and tourism attractiveness of the town centre; (v) to*

minimise the demand for cross-town vehicular traffic; (vi) to maintain a substantial open countryside gap to Hastings” (policy BT1)

5-A.8.33 Policy BX1 which provides the general objectives for guiding development and change in Bexhill, BX1 (iv) requires that development proposals “*promote the regeneration of the town centre in a way that reflects its unique character and cultural assets*”.

5-A.9 Cultural Heritage

Scope

5-A.9.1 This section considers policy requirements in relation to the physical and cultural elements and features that collectively define the landscape and townscape character of the study area. As a result of this there is a significant overlap between the Cultural Heritage, and the Social and Community Effects sections.

National Policies, Plans and Legislation for Cultural Heritage

The Historic Environment: A Force for our Future (December 2001)

5-A.9.2 The Government looks to a future in which:

- *“Public interest in the historic environment is matched by firm leadership, effective partnerships, and the development of a sound knowledge base from which to develop policies;*
- *The full potential of the historic environment as a learning resource is realised;*
- *The historic environment is accessible to everybody and is seen as something with which the whole of society can identify and engage;*
- *The historic environment is protected and sustained for the benefit of our own and future generations; and,*
- *The historic environment’s importance as an economic asset is skilfully harnessed.” (paragraph 9)*

Power of Place (December 2000)

5-A.9.3 Power of Place is about the future of England’s historic environment, its role in people’s lives, and its contribution to the cultural and economic well-being of the nation.

5-A.9.4 Throughout the document there are a number of recommendations with actions for Government, Regional Development Agencies (RDA) and Local Government. There are a total of 18 recommendations.

5-A.9.5 Recommendation 1: *“Put conservation at the heart of renewal and regeneration”*

- *“Government Action – Require RDA and Local Strategic Partnerships to take full account of the historic environment in preparing economic and community strategies and implementing neighbourhood renewal;*

- *RDA Action – Use their investment programmes to promote conservation-led renewal as a catalyst for sustainable economic growth, enterprise and regeneration; and*
- *Local Government Action – Take full account of the historic environment in preparing the community strategies required by the Local Government Act 2000.”*

Planning (Listed Buildings and Conservation Areas) Act 1990

5-A.9.6 The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes the duties of local planning authorities in respect of protection of listed buildings and conservation areas. In relation to listed buildings Section 66 of the Act states that:

- 1) *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*
- 2) *Without prejudice to section 72, in the exercise of the powers of appropriation, disposal and development (including redevelopment) conferred by the provisions of sections 232, 233 and 235(1) of the principal Act, a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.”*

5-A.9.7 In respect of conservation areas section 72 of the Act states that:

- 1) *“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*
- 2) *“The provisions referred to in subsection (1) are the planning Acts and Part I of the [1953 c.49.] Historic Buildings and Ancient Monuments Act 1953.”*

Department of the Environment, Food and Rural Affairs 2002 (as amended) The Hedgerow Regulations 1997: A Guide to the Law and Good Practice

5-A.9.8 The Guide to the Law and Good Practice (DEFRA 2002) states: *“The Hedgerow Regulations 1997 were made under Section 97 of the Environment Act 1995 and came into operation on 1 June 1997. They introduced new arrangements for local planning authorities in England and Wales to protect important hedgerows in the countryside, by controlling their removal through a system of notification.”*

5-A.9.9 The guidance goes on to state: *“The Regulations set out criteria that must be used by the local planning authority in determining which hedgerows are important. The criteria relate to the value of hedgerows from an archaeological, historical, landscape or wildlife perspective. They exclude hedgerows that are less than 30 years old. If a hedgerow is at least 30 years old and qualifies under any one of the criteria, then it is important.”* (paragraph 1.7)

5-A.9.10 The criteria for determining which hedgerows are important in the context of archaeology and history are set out in Part II, paragraphs 1 to 5 of the Hedgerow Regulations 1997.

Ancient Monuments and Archaeological Areas Act 1979

5-A.9.11 Page 2 of *Scheduled Monuments: A guide for owners and occupiers* (English Heritage 2004) states that:

“Scheduling refers to the legal system for protecting nationally important archaeological sites in England. Its aim is to preserve significant examples of the archaeological resource for the educational and cultural benefit of future generations. Scheduled monuments are designated and added to a ‘Schedule’ by the Secretary of State for Culture, Media and Sport under powers contained in the 1979 Act. The Schedule derives its name from the original list of protected monuments attached to the first Ancient Monuments Act of 1882. In making decisions on scheduling, the Secretary of State is advised by English Heritage, which takes the leading role in identifying sites in England for designation.”

5-A.9.12 The guidance goes on to state: *“Once a site is scheduled, consent must be obtained from the Secretary of State for any works that affect it, with the exception of those noted under class consents. English Heritage regional offices play a central role in advising the Government and owners on individual applications for consent and can offer management advice.”*

Planning Policy Guidance note 15 - Planning and the Historic Environment
(September 1994)

5-A.9.13 This guidance note outlines the Government’s policies for the conservation of the historic environment, including for the listing of historic buildings and for the preservation and enhancement of conservation areas, historic parks and gardens and other elements of the historic environment. The guidance acknowledges the importance of protected cultural heritage to sustainable development, the quality of life and to the UK’s tourism and leisure industry.

5-A.9.14 Paragraph 1.1 states: *“It is fundamental to the Government’s policies for environmental stewardship that there should be effective protection for all aspects of the historic environment. The physical survivals of our past are to be valued and protected for their own sake, as a central part of our cultural heritage and our sense of national identity. They are an irreplaceable record which contributes, through formal education and in many other ways, to our understanding of both the present and the past. Their presence adds to the quality of our lives, by enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is such an important aspect of the character and appearance of our towns, villages and countryside. The historic environment is also of immense importance for leisure and recreation.”*

5-A.9.15 The guidance goes on to examine the role of the planning system in relation to archaeology, within the context of the Government’s commitment to sustainable development.

“This commitment has particular relevance to the preservation of the historic environment, which, by its nature is irreplaceable. Yet the historic environment of England is all-pervasive, and it cannot in practice be preserved unchanged. We must ensure that the means are available to identify what is special in the historic environment; to define, through the development plan system, its capacity for change; and, when proposals for new development come forward, to assess their

impact on the historic environment and give it full weight, alongside other considerations.” (paragraph 1.3)

5-A.9.16 The concept of *Stewardship: the role of local authorities and others* in maintaining and protecting the historic environment is also examined in the guidance, including their role as highway authority.

“The Government urges local authorities to maintain and strengthen their commitment to stewardship of the historic environment, and to reflect it in their policies and their allocation of resources. It is important that, as planning authorities, they adopt suitable policies in their development plans, and give practical effect to them through their development control decisions. As highway authorities too, their policies and activities should reflect the need to protect the historic environment and to promote sustainable economic growth, for roads can have particular impact at all levels not only through strategic decisions on the siting of new roads, but also through the more detailed aspects of road building and road maintenance, such as the quality of street furniture and surfaces.” (paragraph 1.6)

5-A.9.17 Section 5 of PPG 15 entitled *Transport and Traffic Management* examines the potential impact on the historic environment from transport infrastructure improvements:

“Major new transport infrastructure developments can have an especially wide-ranging impact on the historic environment, not just visually and physically, but indirectly, for example, by altering patterns of movement or commerce and generating new development pressures or opportunities in historic areas. Local highway and planning authorities should therefore integrate their activities and should take great care to avoid or minimise impacts on the various elements of the historic environment and their settings.” (paragraph 5.2)

5-A.9.18 Paragraph 5.4 states that: *“When contemplating a new route, authorities should consider whether the need for it, and any impact on the environment, might be obviated by an alternative package of transport management such as parking and charging policies, park-and-ride schemes, and public transport priority. New roads should not be built just to facilitate more commuting into already congested areas.”*

5-A.9.19 Paragraph 5.5 recognises that in all transport infrastructure schemes such as road proposals that the historic environment must be considered in scheme development:

“If a new route is unavoidable, authorities should initially identify any features of the historic environment – including parks, gardens, battlefields and archaeological sites as well as buildings and areas – and evaluate their importance. Wherever possible, new roads ... should be kept away from listed buildings, conservation areas and other historic sites. However, in each case a suitable balance has to be struck between conservation, other environmental concerns, economics, safety and engineering feasibility.”

5-A.9.20 Paragraph 5.11 emphasises the need for local authorities to protect the historic environment from the worst effects of traffic.

5-A.9.21 The Guidance contained with PPG 15 is intended to complement the advice on archaeology and the role of the planning system contained with PPG 16, which is discussed below.

Planning Policy Statement 1 Delivering Sustainable Development

5-A.9.22 In setting the Government's objectives for the planning system PPS1 explains that: "*planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by...protecting and enhancing the natural and historic environment, the character of the countryside and existing communities.*" (paragraph 5)

5-A.9.23 The PPS goes on to state that the Government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas (paragraph 17) and that the planning system should seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through policies on issues such as design, conservation and the provision of public space (paragraph 18).

5-A.9.24 In respect of planning decisions, PPS1 states that: "*Planning authorities should seek to enhance the environment as part of development proposals. Significant adverse impacts on the environment should be avoided and alternative options which might reduce or eliminate those impacts pursued. Where adverse impacts are unavoidable, planning authorities and developers should consider possible mitigation measures. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.*" (paragraph 19)

Planning Policy Guidance note 16 - Archaeology and Planning (November 1990)

5-A.9.25 This guidance note provides advice on the importance of managing and safeguarding the archaeological resource within the planning process. PPG 16 states that archaeological remains are a finite resource and are vulnerable to damage and highlights the need for appropriate management.

5-A.9.26 Paragraph 3 states: "*Archaeological remains are irreplaceable. They are evidence - for prehistoric periods, the only evidence - of the past development of our civilization.*"

5-A.9.27 The guidance goes on to state: "*These remains vary enormously in their state of preservation and in the extent of their appeal to the public. "Upstanding" remains are familiar enough - the great stone circles, the castle and abbey ruins of the Middle Ages or abandoned coastal defence systems. But less obvious archaeological remains, such as ancient settlements and field systems, are also to be found across large parts of the country.*" (paragraph 5)

"Archaeological remains should be seen as a finite and non-renewable resource, in many cases highly fragile and vulnerable to damage and destruction. Appropriate management is therefore essential to ensure that they survive in good condition. In particular, care must be taken to ensure that archaeological remains are not needlessly or thoughtlessly destroyed. They can contain irreplaceable information about our past and the potential for an increase in future knowledge. They are part of our sense of national identity and are valuable both for their own sake and for their role in education, leisure and tourism." (paragraph 6)

5-A.9.28 The guidance acknowledges that with the many demands of modern society, it is not always feasible to save all archaeological remains. Therefore: *“The key question is where and how to strike the right balance. Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation.”* (paragraph 8)

5-A.9.29 If this is not feasible the guidance states that an alternative would be *“an archaeological excavation for the purposes of preservation by record”*, however this is regarded as the second best option, because excavation may lead to destruction of evidence, and may prove expensive and time-consuming (paragraph 13).

5-A.9.30 Paragraph 18 explains that: *“The desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications whether that monument is scheduled or unscheduled. Developers and local authorities should take into account archaeological considerations and deal with them from the beginning of the development control process.”*

5-A.9.31 Paragraph 22 explains that Local Planning Authorities can expect developers to provide site assessments and evaluations as part of their applications for sites where there is good reason to believe there are remains of archaeological importance.

Regional Policies and Plans for Cultural Heritage

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.9.32 The *Vision and Key Development Principles* (Chapter 3) of the RPG identify a cultural heritage role for the Region:

“... 9 There should be continued protection and enhancement of the Region’s biodiversity, internationally and nationally important nature conservation areas, and enhancement of its landscape and built and historic heritage.” (paragraph 3.5)

5-A.9.33 Throughout the Region significant areas of land are statutorily designated in recognition of their intrinsic environmental and cultural heritage value. Policy E1 of the RPG states: *“Priority should be given to protecting areas designated at international or national level either for their intrinsic ... or cultural importance... Development plans should ... accord with guidance in PPG15 (Planning and the Historic Environment) and PPG16 (Archaeology and Planning) in protecting and enhancing existing and new areas designated for their ... cultural value ...”*

Draft RSS - The Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.9.34 Policies on cultural heritage are contained within Section D8 of the South East Plan, *Management of the Built and Historic Environment*.

5-A.9.35 Policy BE7 on the management of the historic environment states: *“In developing and implementing plans and strategies, local authorities and other bodies should adopt policies and proposals which support the conservation and, where appropriate, the enhancement of the historic environment and the*

contribution it makes to local and regional distinctiveness and sense of place. Proposals that make sensitive use of historic assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate use, should be encouraged.”

Integrated Regional Framework (IRF) for the South East

5-A.9.36 “*Regional objective 14: To protect, enhance and make accessible for enjoyment the region’s countryside and historic environment.*” (pages 54–55)

County Policies and Plans for Cultural Heritage

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December, 1999)

5-A.9.37 The County’s policy stance on cultural heritage is explained at paragraph 9.31 of the Explanatory Memorandum: “The first priority is to safeguard the archaeological resource on land or sea either in situ or by record, and to protect the plan area’s stock of historic buildings, parks and gardens, from development or change which would damage them. Where sites are particularly sensitive, proper evaluation of the sites’ importance is required and for the local planning authority to be satisfied no damage will be caused to the objectives of designation before planning permission can be contemplated.”

5-A.9.38 Paragraph 9.33 goes on to explain that urban areas of East Sussex form the environment, home, workplace and leisure activity for the majority of the county’s (including Brighton & Hove) population. Therefore the quality of the built environment is central to the quality of life of its residents. It is therefore important that development and change contribute to and enhance the quality of the built environment given that the development strategy focuses the overwhelming majority of development on these areas.

5-A.9.39 In light of this commitment policy EN26 places an emphasis upon the regeneration of urban areas, town centres and seafronts and other popular visitor areas, through linked initiatives on environmental, economic development and transport improvements.

5-A.9.40 Specifically, policies S24 (Hastings) and S25 (Bexhill) provide strategic objectives for the development of the two towns. Priorities given to the regeneration and improvement of the urban environment of Hastings, and the use of redundant or underused sites in both towns.

5-A.9.41 Policy S1 (j) seeks to protect a range of designated sites including those designated for their historical significance such as SAMs, Listed Buildings and Conservation Areas. Criterion (m) of the same policy extends these considerations to both protecting and enhancing conservation areas and other areas and features of townscape importance.

5-A.9.42 Structure plan policy EN1 places a requirement on development and change within the structure plan area to sustain, conserve and where possible, enhance the character, diversity and quality of the landscape, and natural and built environment.

5-A.9.43 The County’s policy EN23 on archaeological and historic features states: “*Sites and features of demonstrable historical or archaeological*

importance and their settings, including ancient monuments, listed buildings, conservation areas, historic parks and gardens, battlefields and other historic features will be protected from inappropriate change and development.” (Policy EN23)

5-A.9.44 Policies EN22 and EN24 make provision for the identification, safeguarding, preservation and recording (should preservation in situ not be possible) of archaeological features, and require the submission of an archaeological assessment of the implications of the development proposal.

Local Policies and Plans for Cultural Heritage

Hastings Local Plan (April 2004)

5-A.9.45 Policies on cultural heritage are contained in Chapter 9 of the Hastings Local Plan. However, these policies address development within and adjacent to Conservation Areas and do not extend their scope to development beyond but affecting these areas. Similarly, listed building policies relate specifically to the alterations to or the demolition of listed buildings. No consideration is given to development proposals which may affect their setting.

5-A.9.46 Paragraph 9.112 states: *“The Borough contains 6 Scheduled Ancient Monuments, over 890 listed buildings and 17 conservation areas, and the Council is committed to using its planning powers to preserve and enhance the town’s unique architectural heritage.”*

5-A.9.47 However, paragraph 9.119 states that: *“a proposal outside a conservation area may affect its character by virtue of its visual or functional impact and policy L6 on historic parks and gardens may be relevant in this respect. Such proposal must respect the character or appearance of the conservation area.”*

5-A.9.48 Policy L6 states: *“Planning permission will not be granted for development that would result in harm to the historic significance, character, appearance and setting of identified historic parks and gardens.”*

5-A.9.49 Policy C6 (Archaeological Sites and Ancient Monuments) states that planning permission will not be given for development which adversely affects a scheduled ancient monument or other nationally important monuments or sites or their settings unless that: (a) an adequate assessment of the proposal has been undertaken: and, (b) it is demonstrated that the site/monument can be satisfactorily preserved either in situ or by record.

Rother District Local Plan (July 2006)

5-A.9.50 The Local Plan provides generic guidance on the protection and enhancement of the cultural environment. Policy GD1 (viii) requires that development proposals do not prejudice the character, appearance or setting of a number of designated historic/cultural features including listed buildings, conservation areas, scheduled ancient monuments, areas of archaeological significance or historic parks and gardens.

5-A.9.51 Policy BT1 (Planning Strategy for Battle) provides guidance for development proposals within Battle. However, paragraph 11.51 of the plan notes that the inadequacies of both the A259 and A21 mean that the *“net effect is*

regular traffic congestion, as well as harm to the historic character and environment of the town centre". Consequently its inclusion in this policy assessment is considered valid.

5-A.9.52 The policy requires: "*Proposals for development and change in Battle should be compatible with and, wherever practicable, contribute positively to the following objectives: (i) to maintain its historic, small town character; (ii) to protect the historic core and its setting; (iii) to conserve the AONB landscape setting; (iv) to enhance the commercial and tourism attractiveness of the town centre; (v) to minimise the demand for cross-town vehicular traffic; (vi) to maintain a substantial open countryside gap to Hastings.*" (Policy BT1)

5-A.9.53 Policy BX1 which provides the general objectives for guiding development and change in Bexhill. BX1 (iv) requires that development proposals "*promote the regeneration of the town centre in a way that reflects its unique character and cultural assets.*"

5-A.10 Social and Community Effects

Scope

5-A.10.1 The implications of the Scheme for social and community effects focuses on its impact on the development strategy of the Rother and Hastings local planning authorities, established in their adopted Local Plans. This also includes the wider strategic objectives for the Bexhill/Hastings area in the context of the regional planning process. It also considers the effects on housing provision, employment, local businesses, pedestrian and other movements to local community facilities, impacts on rights of way and generally on the character and functioning of the communities of Hastings and Bexhill.

5-A.10.2 This section also considers rural, leisure and recreation policy requirements.

National Policies and Plans for Social and Community Effects

Sustainable Communities: People, Places and Prosperity (January 2005)

5-A.10.3 The strategy's aim is to create sustainable communities – places that offer people:

- *"A decent home that they can afford;*
- *A community in which they want to live and work;*
- *The chance to develop their skills and interests;*
- *Access to jobs and excellent services; and,*
- *The chance to get engaged in their community and to make a difference."* (paragraph 1.2)

5-A.10.4 The strategy is built on two main principles:

- *"The need to give communities more power and say in the decisions that affect them; and,*

- *The importance of working at the right level to get things done.*(paragraph 1.8)

5-A.10.5 Two of the aims outlined in the strategy are:

- *“Local people and communities driving improvements in their neighbourhoods, in partnership with local government.”* (Chapter 3)
- *“Strong local authorities securing the excellent services that local people want and providing leadership for their communities.”* (Chapter 4)

Our Towns And Cities; The Future Delivering An Urban Renaissance - Urban White Paper - November 2000

5-A.10.6 Note: The majority of references to land-use planning in the White Paper have subsequently been incorporated in PPS1 and PPS3.

5-A.10.7 Paragraph 4.12 of the White Paper states that where there is a need or opportunity for new development in towns and cities we must ensure that it is of the highest quality. In particular we must ensure that it:

- Makes the best use of the land we have available; and,
- Is built in a sustainable way that is sensitive to the needs of people and the impact urban living has on the environment.

5-A.10.8 Paragraph 4.20 describes an approach to the design and development of urban areas which;

- Makes efficient use of the available land and buildings and reduces the demand for greenfield development;
- Provides homes which are attractive and environmentally friendly;
- Encourages well laid out urban areas with good quality buildings, well designed street and good quality public open spaces;
- Allows people to get to work easily and to the services they need like local shop, post offices, schools and health and leisure facilities; and,
- Makes good public transport viable and makes walking and cycling attractive options.

5-A.10.9 The government’s objectives for brownfield development are explained at paragraphs 4.33 and 4.34. *“Where brownfield land and empty properties are not redeveloped or reoccupied quickly they become, not only a wasted resource, but a problem for the whole community. We need to recognise their value and do what we can to make them easier to recycle, particularly, in the case of empty buildings, where they represent part of our country’s heritage. If we are successful they offer a major opportunity to redevelop and revitalise towns and cities, building on existing character and diversity.”*

5-A.10.10 *“To grasp this opportunity we need to make our brownfield and empty properties fit for new purposes, clean them up where they are contaminated and turn them back into community assets whether it be as homes or as a new area of open recreational space.”*

5-A.10.11 Paragraph 4.35 explains that to achieve regeneration aims, actions to do so need to recognise the different circumstances of different places and the reasons they are underused. It could involve:

- Encouraging businesses to move back into small brownfield plots or vacant buildings in a town centre;
- Bringing about the wholesale transformation of an area by rehabilitating old industrial land, developing new uses and building new communities; or,
- Bringing new services to a residential area to improve its popularity.

Our Countryside - The Future – A Fair Deal for Rural England (November 2000)

5-A.10.12 Chapter 11 of the White Paper entitled *Increasing Enjoyment of the Countryside* states that the countryside is an enormous recreational asset, “... with its high quality landscapes, fresh air, open space and tranquillity.” (paragraph 11.1.1) The Command document goes on to state that the Government’s strategy is to increase enjoyment of the countryside by:

“Legislation to make it easier for people to enjoy recreation in open countryside and to use footpaths, bridleways and other rights of way ... making sure all sections of society can enjoy the countryside ... seeking to ensure that recreation is managed in a way that benefits local communities and protects the environment that people come to visit.” (paragraph 11.1.2)

5-A.10.13 The White Paper goes on to examine the role of walking in the countryside, which is the most popular recreational activity in a rural environment. The UK Day Visits Survey showed that 35% of countryside visits had walking as the main activity (page 134). It is the Government’s aim to ensure that by 2005 people in England and Wales will have a right of access for recreational reasons on foot to moor, heath, down, registered common land and mountain. However, it is likely that the right will be limited in scope and take account of the interest of land managers and others in the countryside.

5-A.10.14 The document notes that increasing rights of access will also open up new possibilities for many millions of walkers. However, it goes on to state: *“Nonetheless, our historic rights of way networks are likely to remain the most important means of access into the countryside for walkers, as well as for the several million horse riders and cyclists in England. Although much of the rights of way network reflects the day-to-day working needs of a bygone age, it now offers many opportunities for countryside recreation. There are 147,000 kilometres of footpath, 32,000 kilometres of bridleway, 6,000 kilometres of roads used as public paths/restricted byways and 4,000 kilometres of byways open to all traffic in England.”* (paragraph 11.2.3).

5-A.10.15 The White Paper examines the role of tourism in the rural economy. *“In some honeypot areas, tourist numbers can be damaging to the local environment if not properly managed and some rural communities may feel swamped by visitors in the peak seasons. We believe that the main solution to these problems is to develop effective visitor management schemes... The main challenge is transport. The majority of tourist visitors to rural areas use private cars rather than public transport, adding to pollution, and traffic congestion. Without action this is likely to become worse over the next decade as the popularity of visits to the country grows.”* (page 139).

Our Towns and Cities – The Future – Delivering an Urban Renaissance (2000)

5-A.10.16 The main aims of the Strategy are:

- *“To accommodate the new homes we will need by 2021 through a strategy that uses the available land, including, in particular, brownfield land and existing buildings in urban areas wisely to create homes which people will find attractive and planning carefully any expansion of urban areas;*
- *To encourage people to remain and move back into urban areas, particularly the centres of our major cities and conurbations, by making them places which offer a good quality of life. This means having an attractive urban environment employment opportunities and good quality services;*
- *To tackle the poor quality of life and lack of opportunity in certain urban areas as a matter of social justice, to enable all to share in and contribute to our growing prosperity and to enhance the overall attractiveness of cities to people and business;*
- *To strengthen the factors in all urban areas which will enhance their economic success especially in those areas with a wider regional impact; and,*
- *To make sustainable urban living practical, affordable and attractive to enable us to reduce the emissions, waste products and other local and global environmental impacts.” (paragraph 2.36)*

5-A.10.17 Main targets include:

- *“More jobs by 2004 with the biggest improvements in the 30 areas with the lowest current employment rates and amongst disadvantaged groups;*
- *Reduced crime rates with 30% less vehicle crime by 2004, 25% less domestic burglary by 2005 and 14% less robbery by 2005;*
- *Better education standards in all areas, and in particular in deprived areas, with fewer adults with literacy and numeracy problems, improved GCSE passes and better understanding of ICT and science by 2004;*
- *Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010;*
- *Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas;*
- *Better health services and a reduction in the health gap between the most deprived areas and the rest of the country; and,*
- *A better environment with 60% of new housing provided on previously developed land or through conversions of existing buildings by 2008; 17% of underused land reclaimed by 2010; better designed buildings and places; and clean and more attractive streets.” (paragraph 7.28)*

Planning Policy Statement 1 – Delivering Sustainable Development (2004)

5-A.10.18 PPS 1 outlines the general principles under which the planning system operates following the introduction of the Planning and Compulsory Purchase Act 2004, and sets out an overview and general statement on the objectives of the planning system.

5-A.10.19 PPS 1 states that, “*Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:*

- *Making suitable land available for development in line with economic, social and environmental objectives to improve people’s quality of life;*
- *Contributing to sustainable economic development;*
- *Protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;*
- *Ensuring high quality development through good and inclusive design, and the efficient use of resources; and,*
- *Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.”*
(paragraph 5)

Planning Policy Statement 3 Housing (November 2006)

5-A.10.20 PPS 3 provides guidance on housing provision and tenures: PPS3 sets out the national planning policy framework for delivering the Government’s housing objectives.

“The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking:

- *To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.*
- *To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need.*
- *To improve affordability across the housing market, including by increasing the supply of housing.*
- *To create sustainable, inclusive, mixed communities in all areas, both urban and rural.”* (paragraph 9)

5-A.10.21 Paragraph 16 outlines the Government’s design objectives for new residential development, namely:

- Easily accessible and well-connected to public transport and community facilities and services, and is well laid out so that all the space is used efficiently, is safe, accessible and user-friendly;
- Provides, or enables good access to, community and green and open amenity and recreational space (including play space) as well as private outdoor space such as residential gardens, patios and balconies;
- Well integrated with, and complements, the neighbouring buildings and the local area more generally in terms of scale, density, layout and access;
- Facilitates the efficient use of resources, during construction and in use, and seeks to adapt to and reduce the impact of, and on, climate change;

- Takes a design-led approach to the provision of car-parking space, that is well-integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly;
- Creates, or enhances, a distinctive character that relates well to the surroundings and supports a sense of local pride and civic identity; and,
- Provides for the retention or re-establishment of the biodiversity within residential environments.

5-A.10.22 Paragraph 37 establishes the criteria for Regional Planning Bodies in their identification of strategic locations for development, (these criteria are largely replicated in guidance for identifying sites in Local Development Documents).

“At the regional level, the Regional Spatial Strategy should identify broad strategic locations for new housing developments so that the need and demand for housing can be addressed in a way that reflects sustainable development principles:

- *The contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car and where it can readily and viably draw its energy supply from decentralised energy supply systems based on renewable and low-carbon forms of energy supply, or where there is clear potential for this to be realised...*
- *The availability and capacity of, and accessibility to, existing major strategic infrastructure, including public and other transport services, and/or feasibility of delivering the required level of new infrastructure to support the proposed distribution of development....*
- *The need to create and maintain sustainable, mixed and inclusive communities in all areas, both urban and rural.”*

“At the local level, Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy. In circumstances where Regional Spatial Strategies are in development, or subject to review, Local Planning Authorities should also have regard to the level of housing provision as proposed in the relevant emerging Regional Spatial Strategy.” (paragraph 53)

Planning Policy Guidance Note 4 – Industrial, Commercial Development and Small Firms (November 1992)

5-A.10.23 One of the Government's key aims is to encourage continued economic development in a way which is compatible with its stated environmental objectives. Economic growth and a high quality environment have to be pursued together (paragraph 1).

5-A.10.24 Industry and commerce have always sought a locational advantage in response to various external factors. These include: the demands of customers; access to raw materials and suppliers; links with other businesses; the workforce catchment area; and various transport considerations. Business often gives high priority to good access to roads, and sometimes rail, airports and ports.

5-A.10.25 The locational demands of businesses are therefore a key input to the preparation of development plans. Development plan policies must take account of these needs and at the same time seek to achieve wider objectives in the public interest. Development plans offer the opportunity to:

- Encourage new development in locations which minimise the length and number of trips, especially by motor vehicles;
- Encourage new development in locations that can be served by more energy efficient modes of transport (this is particularly important in the case of offices, light industrial development, and campus style developments such as science and business parks likely to have large numbers of employees);
- Discourage new development where it would be likely to add unacceptably to congestion; and,
- Locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movement (paragraphs 9 and 10).

Planning Policy Statement 6 – Planning for Town Centres (March 2005)

5-A.10.26 The Government's key objective for town centres is to promote their vitality and viability by:

- Planning for the growth and development of existing centres;
- Promoting and enhancing existing centres, by focusing development in such centres; and
- Encouraging a wide range of services in a good environment, accessible to all. (paragraph 1.3)

Planning Policy Statement 7 – Sustainable Development in Rural Areas (August 2004)

5-A.10.27 The Government's objectives for rural areas are:

- *“To raise the quality of life and the environment in rural areas through the promotion of:*
 - *thriving, inclusive and sustainable rural communities, ensuring people have decent places to live by improving the quality and sustainability of local environments and neighbourhoods;*
 - *sustainable economic growth and diversification;*
 - *good quality, sustainable development that respects and, where possible, enhances local distinctiveness and the intrinsic qualities of the countryside; and*
 - *continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources.*
- *To promote more sustainable patterns of development by:*
 - *focusing most development in, or next to, existing towns and villages;*
 - *preventing urban sprawl;*

- *discouraging the development of 'greenfield' land, and, where such land must be used, ensuring it is not used wastefully;*
- *promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas; and,*
- *providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside.”* (page 6)

5-A.10.28 With reference to tourism and leisure PPS7 states that ‘tourism and leisure activities are vital to many rural economies. As well as sustaining many rural businesses, these industries are a significant source of employment and help to support the prosperity of country towns and villages, and sustain historic country houses, local heritage and culture.’ (paragraph 34).

Planning Policy Guidance note 17 - Planning for Open Space, Sport and Recreation (August 2002)

5-A.10.29 This PPG provides guidance on the use of all types of open space of public value. The Planning Objectives section of the PPG states: “*Open spaces, sport and recreation all underpin people's quality of life. Well designed and implemented planning policies for open space, sport and recreation are therefore fundamental to delivering broader Government objectives. These include:*

- *...supporting a rural renewal - the countryside can provide opportunities for recreation and visitors can play an important role in the regeneration of the economies of rural areas. Open spaces within rural settlements and accessibility to local sports and recreational facilities contribute to the quality of life and well being of people who live in rural areas ...”* (Planning Objectives, PPG 17).

5-A.10.30 The value of the countryside for walking and informal recreation using ‘Recreational Rights of Way’ is also recognised. “*Rights of way are an important recreational facility, which local authorities should protect and enhance. Local authorities should seek opportunities to provide better facilities for walkers, cyclists and horse-riders, for example by adding links to existing rights of way networks.”* (paragraph 32).

Planning Policy Guidance Note 21 - Tourism (November 1992)

5-A.10.31 This guidance reinforces the sections of PPS 7 and PPG 17 which deal with recreational issues and enjoyment of the countryside. PPG21 recognises the important contribution that tourism makes to the local, regional and ultimately national economy. The important links between tourism and protection of the environment are also recognised in the following paragraphs:

“Tourism makes a major contribution to the national economy and to the prosperity of many ... rural areas. Its continuing growth generates a range of economic activity and new job opportunities. Because it often depends on a high quality environment, it can act as a positive force for environmental protection and enhancement. Many areas have important natural, historical or architectural features which serve to attract tourists. It is important to identify and consider ways of protecting these, as well as to consider ways in which new development can help the industry grow.” (paragraph 1.1)

5-A.10.32 Paragraph 4.11 goes on to identify strategic tourism aspects which may need to be planned for and protected, including: “*...The need to protect key*

tourism assets, including such features as characteristic landscapes ... areas of special interest for nature conservation ...”

A New Focus for England’s Woodlands – England Forestry Strategy (December 1998)

5-A.10.33 Woodlands are a major resource for recreation, tourism and sport. Woodlands are robust and absorb people better than open countryside. The Government’s programme of Forestry for Recreation, Access and Tourism aims to provide more and better-quality access to woodlands. The programme includes opportunities for ensuring that woods and forests continue to be used for a wide range of recreational pursuits as well as complementing and supporting other leisure interests, notably the tourist trade. (page 18)

5-A.10.34 Page 26 of the strategy outlines the key actions for the Forestry Commission, namely;

- Promote a network of forest tracks suitable for cycling as part of the National Cycle Network and our Integrated Transport Strategy;
- Develop the Forestry Commission’s Woodland Park network close to towns and cities;
- Work in partnership with sports’ governing bodies to accommodate noisy or intrusive recreation in suitable woodlands and relieve pressure on sensitive sites;
- Improve recreational and other facilities through private-sector partnerships;
- Support research into the economic contribution that woodlands and forests make to tourism and the potential for forest-based tourism initiatives to benefit local communities;
- Engage with the public to promote the benefits of trees, woods and forests; and,
- Support the Forest Education Initiative by developing the national network of local groups to encourage children and young people to better understand the importance of woods and forests. (page 20)

Regional Policies and Plans for Social and Community Effects

Regional Planning Guidance for the South East (RPG9) (March 2001)

5-A.10.35 The key objectives and policies governing community and social effects of the Scheme can be summarised in the following manner.

5-A.10.36 Chapter 5: Quality of Life in Town and Country emphasises the need to integrate spatial development with the management of resources as well as the need for regional partners to co-operate in taking a holistic approach to urban and rural areas. Key policies are:

- Policy Q1 states urban areas should be the prime focus for development and redevelopment, reiterating in large part the objectives of PPG3 (now replaced by PPS3);
- Policy Q2 requires development strategies to raise the quality of life in the urban areas through significant improvement to the urban environment,

making urban areas more attractive places to live, work, shop, spend leisure time and invest thus helping to counter trends to more dispersed patterns of residence and travel;

- Policy Q3 requires development to make more efficient and better use of land and integrate new development with facilities for walking, cycling and public transport; and,
- Policy Q5 serves to underline the need for the region's network of larger town centres to be the focus for major retail, leisure and office developments. To support an urban renaissance, promote social inclusion, and encourage more sustainable patterns of development.

5-A.10.37 Chapter 6: Environmental Strategy and the Countryside provides generic guidance on biodiversity, rural and landscape issues. Policy E6 promotes greater access to the countryside and requires development plans to maximise the use of highly managed areas such as regional parks and maximise the benefits of sport, leisure and recreation.

5-A.10.38 Chapter 7 provides the expression of the objectives and policies for the regional economy, emphasising the role it has to play in the national economy and acknowledging the structural weaknesses in parts of the region's economy (including the Sussex Coastal Towns Priority Area for Economic Regeneration). The key policies are;

- Policy RE1 notes that development strategies should support the objectives of the Regional Economic Strategy;
- Policy RE3 encourages local authorities to engage with local, strategic and regional partners in order to develop comprehensive economic development strategies;
- Policy RE4 requires development strategies to reduce business related travel, locate new business development in close proximity to public transport routes and encourage forms of development which maximise environmental and social benefits, for example, mixed use development which links housing and employment; and,
- Policy RE7 aims to address the spatial inequalities in the region and requires regional and local partners to give particular attention to actively supporting economic regeneration and renewal including inward investment in Priority Areas for Economic Renewal (PAERs). This includes the Sussex Coastal Towns PAER which includes the Bexhill Hastings area.

5-A.10.39 Chapter 8 sets out the housing requirement for the region and establishes the county level apportionment of regional housing growth. Policy H2 sets out an annual housing rate in East Sussex (including Brighton & Hove) of 2,290 dwellings up to 2006. This rate will be rolled forward until such time as RPG9 is replaced. Structure Plans and Unitary Development plans should adopt the rates of development as set out in guidance and consider its distribution and implementation.

5-A.10.40 Chapter 12 identifies the Sussex Coast and Towns PAER as extending from Shoreham Harbour to Hastings, and notes that the coastal towns contain significant pockets of deprivation and unemployment associated with the decline

of the traditional tourist industry as well as the mismatch between the pool of labour and available jobs. The objective is to raise economic performance in the area and the role of transport in this is important. It is noted (at paragraph 12.22) that joint working is required to develop complementary strategies through development plans, local transport plans and other strategies to bring about the regeneration of the area whilst respecting the environment.

5-A.10.41 Chapter 14 replaces the relevant tourism section in RPG9. It establishes regional objectives for Tourism and related sports and recreation.

5-A.10.42 The contribution of tourism to the overall vision for quality of life in the South East can be significantly enhanced by:

- *“Delivering a high quality and rewarding experience for all visitors;*
- *Providing a greater variety of jobs and opportunities for training over a wide range of skill levels;*
- *Providing stronger support for urban renaissance and regeneration, especially in the south coast resorts and the Thames Gateway;*
- *Helping to diversify and develop further the rural economy;*
- *Underpinning and promoting environmental quality and local distinctiveness in town and country;*
- *Generating community benefits to enhance quality of life for all social groups in the region; and,*
- *Encouraging travellers passing through the region’s international gateways to spend time within the South East.”* (paragraph 14.7)

5-A.10.43 Falling from these objectives a set of policies are established which will guide both LDD development and development control decisions within the region.

5-A.10.44 Policy TSR1 (Coastal Resorts) aims to secure a diverse coastal tourism economy, to this end the South East England Development Agency (SEEDA) and the coastal authorities are encouraged to work together to regenerate the coastal towns.

5-A.10.45 Policy TSR4 (Tourism Attractions) places a priority on improving existing attractions in terms of high standards of environmental design and access requirements. It goes on to identify the south coast as an appropriate location for regionally significant attractions.

5-A.10.46 Policy TSR6 (Visitor Management) requires both LDDs and Local Transport Plans (LTPs) to be coordinated to ensure that tourism related travel demand is managed in an integrated manner.

5-A.10.47 Paragraph 14.43 - Coastal belt and the Isle of Wight – states that: *“Complementary approaches should work towards the improvement of access to and within the area, and ensure that the upgrading of facilities retains and enhances the natural character of the area.”*

5-A.10.48 This statement is supported by policy TSR7: (Priority Areas For Tourism) which establishes that: *“Within the framework set by the overall vision and objectives of the Regional Spatial Strategy, Local Development Frameworks,*

tourism/cultural strategies and transport plans should seek to emphasise and implement the following sub-regional priorities for tourism:

The coastal belt and the Isle of Wight

- *Seeking complementary approaches to the development and management of tourism so as to upgrade facilities, promote diversity, reduce seasonality and improve access, whilst retaining and enhancing the natural character of the area. This includes making use of the attraction of Canterbury and Brighton to encourage longer stays through linked trips to surrounding areas.”*

Regional Economic Strategy for the South East of England 2002-2012 (July, 2002)

5-A.10.49 The Regional Economic Strategy (RES) identifies three main problems (transport congestion, skill shortage and [a lack of] affordable housing) which need to be tackled if the RES is to assist in delivering the Regional Sustainable Development Framework’s vision of “*A prosperous region delivering a high quality of life and environment for everyone, now and in the future*”. The RES sets five objectives to help deliver this vision; Competitive Businesses; Successful People; Vibrant Communities; Effective Infrastructure; and Sustainable Use of Natural Resources.

5-A.10.50 Under these objectives the RES sets out 18 priorities. Of these the following are relevant in the context of the Social and Community effects of the proposed Scheme.

- Priority 8 (Community Participation and Local Leadership) identifies the key action of addressing deprivation wherever it occurs;
- Priority 9 (Urban Renaissance – achieve an urban renaissance by making towns and cities work) looks to promoting sustainable forms of urban development;
- Priority 12 (housing – secure quality affordable housing) emphasises the need for the level of affordable housing to be maximised in urban and rural areas; and,
- Priority 13 (Transport – secure a sustainable transport network) this makes the link between an efficient transport system and economic growth, but acknowledges that the link between economic growth and traffic growth must be weakened. Nonetheless, the RES accepts that increased capacity will be needed in order to overcome regeneration and economic development objectives. Section 4 (page 63) goes on to make specific reference to the need to implement as a matter of urgency, the balanced package of transport measures recommended as part of the South Coast Multi Modal Study (of which the link road is a key component).

Draft Regional Spatial Strategy “A Clear Vision for the South East: the South East Plan - March 2006 Draft Plan for submission to government

5-A.10.51 Section D1 sets out the cross cutting policies for the draft regional spatial strategy. A priority is placed upon ensuring that the infrastructure necessary to support development is in place in a timely manner

5-A.10.52 As part of a resource efficient theme of the draft plan, policy CC8a outlines the need to focus development on urban areas, with particular emphasis on intensification around hubs. Policy CC8b identifies Hastings as a regional hub; this places an emphasis upon enhancing accessibility by sustainable modes, and encouraging higher densities and mixed uses.

5-A.10.53 Policy CC9 identifies the need to intervene to improve economic performance and reduce social exclusion in a number of areas including the Sussex Coast sub region. Falling from this is a suite of policies that seek to tackle deprivation in this part of the region. These are outlined in the Sussex Coast Sub Regional Strategy.

5-A.10.54 Policy RE2 provides the criteria for the provision and supply of employment land. Principal amongst the many criteria is the need for locations to be accessible to the proposed labour supply and focussed on urban areas.

5-A.10.55 Policy RE5 identifies the necessary spatial interventions to assist in addressing intra regional disparities. These include (for the Sussex Coast) a priority being placed upon developing delivery mechanisms to unlock and bring into use sites with economic development potential and address the transport constraints which are an impediment to increased economic performance.

5-A.10.56 Section D3 establishes the draft plan's strategy for housing provision in the region which has been developed to provide an integrated strategic approach to housing provision. This will support urban renaissance, deliver sustainable development and provide everyone with the opportunity of a decent home (paragraph 1.1).

5-A.10.57 Policy H1 identifies a need for 5,600 dwellings in Rother District over the plan's twenty year period, and 4,200 for Hastings. Policy H3 provides guidance on the location of housing, the majority of which should be in brownfield locations with greenfield development being accessible a variety of transport modes, served by the necessary infrastructure. Policy H4 sets out the regional requirement for affordable housing underlying the importance of the issue for the region. 25% of all new housing development should be social rented with 10% given over to other forms of affordable housing.

5-A.10.58 Section D8 provides a framework for the management of the region's built and historic environment. A key policy in this section is BE1 which adds detail to the overall vision for an urban renaissance in the region, in particular it highlights the need to ensure that the physical infrastructure necessary to support development strategies is planned and phased in accordance with planned development.

5-A.10.59 Section D8 provides advice on developing and maintaining the vitality and viability of town centres. Policy TC1 states that: *"Accessible, attractive and vibrant town centres are fundamental to the sustainable development of South East England, and will continue to be the focal point for development of a mixture of uses including leisure, services, retail, residential and commercial...LDDs will seek to promote good quality development where it is desirable to regenerate and renew town centres."*

5-A.10.60 Section D10 represents a rolling forward of alterations to RPG9 (adopted in 2004) and, barring some minor amendments, remain unchanged. This includes policy TSR1, which aims to diversify the economic base of coastal

resorts in a way which promotes higher value activity, reduce seasonality and support urban regeneration.

5-A.10.61 Section D11 describes the social, cultural and health dimensions of the draft plan. Policy S1 requires planning authorities to consider the spatial distribution of deprivation in the region, with particular regard to priority areas (e.g. priority areas such as the Sussex coast) and ensure that programmes and policies are implemented to address these issues.

5-A.10.62 Section E2 sets out the policy framework at a sub regional level for addressing the development needs of an area which is characterised by very high levels of multiple deprivation and a poor performing economy.

5-A.10.63 At paragraphs 2.1–2.2 the basis of the sub regional strategy is explained: *“The overall aim for the sub-region is to secure sustainable economic regeneration, substantially reduce the social and economic disparities with the rest of the region, whilst protecting and enhancing the environment and the quality of life of residents. By doing this the sub-region will make an increased contribution to the wealth of the regional economy rather than depressing overall performance.”*

The strategy seeks to increase the priority given to the sub-region in investment decisions of the public and private sectors. Recognition of the sub-region’s needs, at regional and national level, will need to be translated into action and support if real and lasting progress is to be made. Locally, promoting such a renaissance demands more focused and better coordinated efforts on laying the foundations for economic development.”

5-A.10.64 The core strategy for the Sussex Coast outlined in Policy SCT1 focuses on the need for a greater and more co-ordinated effort to bring about the sustainable regeneration of the sub-region. It recognises that the extent of problems, as well as the scope for addressing them, is not uniform across the sub-region and highlights that locally sensitive approaches and solutions will be necessary. It stresses the central importance of major improvements in strategic transport infrastructure to achieving the strategy’s main objectives.

5-A.10.65 Policy SCT2 (enabling economic regeneration) outlines key measures which will assist in realising a step change in the sub-region’s economic performance including continuing national and regional support and investment to the Hastings Bexhill area. Also, to enable the better functioning of overlapping local labour and housing markets, the policy places an importance of delivering improvements to east-west transport links which improve accessibility and facilitate strategic development opportunities.

5-A.10.66 Policy SCT4 (employment priority in land allocations) advises LDDs to give priority to delivering employment development in strategically accessible locations and providing for the needs of existing businesses, create opportunities for inward investment to the sub region and match increases in the resident workforce.

5-A.10.67 Policy SCT6 seeks to support and extend the work already undertaken in the Five Point Plan into the longer term and to capitalise upon Hastings as a regional hub, as part of wider strategy to bring about the social and economic regeneration of the sub region.

5-A.10.68 Policy SCT7 establishes the housing distribution for the sub region, taking the figures in policy H1 forward and apportioning them on a sub regional geography. Hastings' requirement remains 4,200, dwellings per annum whilst the Rother part of the sub region needs to accommodate 4,000 dwellings. As the supporting paragraphs (8.1 – 8.5) explain the housing land supply includes land already in the pipeline and allocated in the adopted local plans running up to 2011. This includes the North East Bexhill Development for some 1000 dwellings. However, to meet the overall provisions new strategic allocations on greenfield and brownfield sites in the Hastings Bexhill area will be necessary. In the east of the sub region the only strategic scope for significant greenfield development is at Bexhill.

5-A.10.69 Central to the development strategy and set out in the sub regional strategy is the need to achieve a jobs homes balance. *“This scale of development balances the need to contribute towards wider regional housing requirements with the limitations imposed by the sub-region’s poorly performing local economy, where relatively more employment development than housing growth is needed to promote a more sustainable balance between the supply of, and demand for labour. The overall housing target for the sub-region also reflects the extensive environmental constraints that severely restrict its scope for physical development.”* (paragraph 8.1)

The Draft RES – The Regional Economic Strategy (November 2005)

5-A.10.70 The draft RES notes that if the Coastal South East was to match the UK average in terms of economic performance, a further £13 billion in Gross Value Added (GVA) would be added to the UK economy each year. A targeted coastal strategy will be necessary if this untapped economic potential is to be realised. However in order to address the diverse potentials and challenges facing the Coastal South East, both overall coherence and a variety of locally-driven approaches will be needed. These must address social and environmental frameworks as well as economic opportunities, embracing new interventions beyond the traditional ones of physical renewal and community support.

5-A.10.71 This includes supporting:

- Housing-led growth in the region enabling cities and major urban areas reach their potential by investing in key infrastructure to enable housing development that supports economic prosperity;
- Connectivity as the basis for growth – addressing the remaining transport bottlenecks on the South Coast, ensuring efficient connections to major ports and maximising the potential of next generation broadband; and,
- Culture and leisure-based growth – using the strength of places for pleasure and quality of life to create industries as a catalyst for wider economic transformation.

Seeing The Wood For The Trees: A Forestry And Woodlands Framework For South East England

5-A.10.72 *Seeing the Wood for the Trees* sets out a framework for the future development of woodlands and forestry in the South East. Each of the four interrelated and interdependent themes of the framework is developed into a number of outcomes that we would like to see in the region. It states that:

“Trees and woodlands are an important part of life in South East England... Our wooded landscapes, such as the Chilterns and the New Forest, attract visitors from far and wide. Woods cover 14% of the land surface in this region — far more than the national average. Four of five of the country’s most wooded counties are found here. We have the highest concentration in the country of ancient woodlands, these being the richest woods in terms of biodiversity and heritage. Valuation studies have shown that in terms of ‘free’ public benefits, such as landscape enhancement or improved air quality, the woods of the South East are worth more than those of any other English region – and more than all those in Scotland and Wales put together.” (page 3)

5-A.10.73 The strategy’s vision of the region’s woodlands is:

- *“Better places for people to live;*
- *Enhanced environment and biodiversity;*
- *A stronger contribution to the economy; and,*
- *A secure future for our woodland resources.”* (page 13)

5-A.10.74 In respect of the contribution that woodlands make to communities and society in general the strategy looks to:

- *“Trees and woodlands supporting the development of sustainable communities;*
- *More people’s health and well-being improved through visiting woodlands; and,*
- *Greater use being made of trees and woodlands for community projects and activities.”* (page 13)

County Policies and Plans for Social and Community Effects

East Sussex and Brighton and Hove Structure Plan 1991-2011 (Adopted December 1999)

5-A.10.75 The Structure Plan provides the strategic planning framework for the area, under which the local plans for both Hastings and Rother were prepared. The key policies of the Structure Plan insofar as they relate to Social and Community Effects are described below.

5-A.10.76 Chapter 1 of the explanatory memorandum establishes a strategy for a more environmentally sustainable future for the county. Subsequent topic specific chapters add detail to this strategy. Key policies in terms of social and community impacts are:

- S1 requires that all planning activities take account of 21 criteria as basis for achieving a more sustainable pattern of development. Of particular relevance is the need to maintain the jobs/homes balance (a) and providing compensation where environmental loss is incurred as a consequence of achieving other policies in the plan (b). Unacceptable traffic conditions should not be perpetuated or created as a result of development (d) and the environment and character of the urban and rural areas should be protected and enhanced for residents, businesses and visitors.
- S4 establishes the strategic pattern of the development in the plan area and sets out the factors of which will guide the broad pattern and timing of

development and change. This supports the early implementation of commitments of high quality business development at north Bexhill (b), the allocation of employment land as close to the Hastings urban area as possible, and the implementation of the existing allocation for the new community and north Bexhill (e). The plan also requires that development is well related to an improved strategic transport network and that there is adequate transport capacity and appropriate access to meet the needs of the development(j), ensuring that development is well related in both scale and timing to programmed infrastructure which is identified as being necessary for the development to proceed (k), and that housing development is well related to the availability of sufficient existing and planned local employment opportunities (l).

- S6 establishes that existing development pattern will be maintained with no new settlements identified. Therefore development and change will be focused on existing towns with the objective of improving their environment, social and environmental well being(a), reduce congestion, improve air quality and accessibility by modes other than the private car (b).
- S24 sets the strategic objectives for Hastings, which are to maintain its role as a major employment, shopping, service and tourism centre; the improvement and diversification of the economy; and the regeneration of the town.
- S25 sets the strategic objectives for Bexhill. Whilst the current role of the town as an employment, residential, tourist, shopping and service centre will be maintained, a primary concern is to provide more employment and a wider range of jobs to improve the economy of the Bexhill Hastings area. This will entail the development of a new business park and community at north-east Bexhill with the necessary and appropriate transport improvements in to be in place (or available in time) both to provide access and to avoid adding to the transport problems in the wider area.

5-A.10.77 Chapter 2 provides guidance on the economy and employment. Policy E1(c) emphasises the urgency required in providing strategic sites for modern businesses. E11 emphasises the need to implement an existing committed proposal for business development including in north Bexhill (e). Policy E13 reiterates the need to maintain and improve the jobs/homes balance in the area by providing sufficient job opportunities and reduce the need for out-commuting.

5-A.10.78 The Structure Plan contains guidance and policies for leisure and tourism in Section A, Chapter 10 and Section B, Chapter 7. Policy LT1 on leisure and tourism activities states: *“Leisure and tourism activities and facilities will be strengthened and developed to meet the needs of residents and visitors and bring economic benefits, where this is compatible with the conservation of the environment and distinctive local character.”* (Policy LT1)

5-A.10.79 Policy LT11 focuses on sporting facilities and activities: *“Proposals for new sports facilities will be supported, particularly:*

- *Where they would help to enable a broad range of activities to be undertaken across the plan area and where they fill ‘gaps’ in existing provision;*

- *Where they would help to meet local needs, especially small-scale facilities to meet the needs of rural communities;*
- *The provision of regional level sports facilities; and,*
- *Provision for dual use, by both the institution and community, in educational facilities.”*

5-A.10.80 Policies LT15 and 16 support the provision of new recreational routes which improve access to the coast and countryside for cyclists, walkers and horse riders, and the improvement of the rights of way network.

Local Policies and Plan for Social and Community Effects

Hastings Local Plan (April 2004)

5-A.10.81 Chapter 5a (Employment Land) establishes local plan policy on employment land development and release. The chapter refers to joint work already undertaken by both the Borough Council and its neighbour Rother District in identifying suitable employment land. It also notes that there is an unmet local demand but the supply of appropriate premises is limited. (paragraph 5.09).

5-A.10.82 The Local Plan recognises the importance of tourism to Hastings: *“Tourism is a key element in the local economy. Hastings annually attracts 2 million day visitors and 300,000 staying visitors, contributing £75m a year to the town in total (Paragraph 5.45). The Council therefore wishes to build on the quality of the Hastings tourism ‘product’ with its history, architecture and unique setting to attract more visitors to the town whilst seeking to reduce the effects of overcrowding and congestion that can occur at peak times.”* (paragraph 5.46)

5-A.10.83 Chapter 7a sets out the local plan’s housing policies. It establishes the high level of need for affordable housing and requires (policy H6) a 25% and 30% element of affordable housing on brownfield and greenfield housing developments.

5-A.10.84 Chapter 10 contains guidance and policies on open space, allotments and footpaths. Policy OS1 promotes the protection of open space: *“Identified open spaces within the built-up area boundary will be protected from any development which would lead to the loss of their open character. Planning permission will only be granted for small scale development which directly contributes to or enhances the recreational value of the open space itself. Where this does occur, compensatory provision or a contribution towards further off-site provision may be sought.”*

5-A.10.85 Chapters 11a/b/c/d set out the plan’s objectives for Hastings Town Centre, Central St Leonards, Old Town and West St Leonards all of which are affected by the levels of traffic on the A259. A key issue is the severance of the main urban area from the seafront and the need to improve the public realm. In West St Leonards the impact of the Bexhill Road AQMA and the prospect of improving public transport links are of particular importance. (pages 203/212/218/227).

Rother District Local Plan (July 2006)

5-A.10.86 The development strategy for Rother is established in the adopted Rother District Local Plan. As the Plan explains in Chapter 4 (paragraphs 4.31–

4.37) the development strategy which has recently been tested at Inquiry rests on the successful completion of the link road. Without completion of the link road, the necessary housing and employment land at north-east Bexhill will not be released, and therefore the development strategy adopted by the RDLP will not be realised.

5-A.10.87 Development options in Rother, a rural district with the majority of its area designated as an AONB, are limited. Without urban extensions at Bexhill, there is no other sustainable pattern of development in the district. Its rural nature and the predominance of nationally designated landscape would lead to the scattering of development in small rural settlements with few services. This would adversely affect the rural character the settlements and increase car dependency and usage in the rural areas.

5-A.10.88 In this context the RDLP establishes the distribution and quantity of business and housing land required to meet the district's strategic obligations and national policy requirements. Paragraph 4.21 explains that regeneration and inward investment in the Bexhill Hastings area is a regional priority, as is the need to improve the balance between jobs and homes in the district.

5-A.10.89 The plan explains (at paragraph 4.23) that new sites are needed to allow local businesses to expand. The total employment floor space requirement for the district as part of the Structure Plan's 'Eastern Area' requirement is given as being in the region of 73,000 to 103,000 m² (Table 2 page 18). This is translated into site allocations totalling 84,500 m² of which 48,000 m² represents the strategic allocation at north-east Bexhill.

5-A.10.90 The RDLP's approach to determining the level and supply of housing land is explained at paragraphs 4.10 – 4.20. This indicates that (as of April 2004) there was a requirement (to 2011) for new allocations of 864 dwellings, once all other sources of supply are discounted from the overall requirement of 2,560 dwellings for the district. Table 3 (page 25) sets out the summary of housing allocations which identifies 1,110 dwellings at north-east Bexhill. This is dependent upon the delivery of the Scheme and will only yield 250 dwellings before the end of the plan period i.e. 2011.

5-A.10.91 Chapter 10 of the RDLP focuses on Bexhill, and policy BX1 establishes the RDLP's strategy for the town, namely:

“Proposals for development and change in Bexhill should be compatible with and, wherever practicable, contribute positively to the following objectives:

- i) To develop its residential, employment, shopping and service centre functions;*
- ii) To provide for both the growth of local firms and appropriate inward investment in order to improve the range of job opportunities for local people as well as to ensure that residential development is sustainable;*
- iii) To ensure that development is of a rate and form compatible with the town's environment and amenities, whilst also contributing to a long-term spatial vision;*
- iv) To promote the regeneration of the town centre in a way that reflects its unique character and cultural assets;*

- v) *To significantly improve accessibility both within the town and to important employment centres, especially Hastings, by all modes of transport; and,*
- vi) *To maintain and enhance the town's distinctive character and identity, including maintaining the strategic gap to St. Leonards in accordance with Policy DS5."*

5-A.10.92 Policy BX2 establishes that allocated land to the east of the Scheme will provide 980 dwellings of which 40% will be affordable (iii) and 22,000 m² of business floorspace (iv). Provision is also made for community infrastructure (v) and contributions to offsite facilities such as the proposed Pebsham Countryside Park (xv).

5-A.10.93 Policy BX3 sets out the allocations of 26,000m² of business development (ii) and at least 130 dwellings of which 40% will be affordable (iii). Provision is made for community facilities and off site requirements (x).

5-A.10.94 Policy BX4 allocates land between Bexhill and Hastings as a Countryside Park.

5-A.10.95 Policy CF2 promotes the protection of community facilities: *"Development which would result in the net loss of community facilities, including recreational facilities, play space, amenity areas or allotments will be resisted..."*

5-A.10.96 Policy CF5 provides guidelines for equestrian development. Proposals should not adversely affect the landscape character and residential amenities of the area (i), new buildings should be appropriately designed (iii), the proposal will not give rise to additional traffic problems in the area, and (v) that the local network should be capable of accommodating increased use. Where appropriate obligations will be imposed to secure the necessary improvements.

5-A.11 Travel and Transport

Scope

5-A.11.1 The transport implications of the Scheme will be assessed in terms of the extent to which it complies with national, regional and local policies on promoting travel choice to enable the rebalancing of the transport network in favour of non car modes, the reduction of congestion and air pollution and the objective of improving health. This section is intimately related to the amount and disposition of development within local plans and what impact transport policy will have the development strategy of the development plans of the local planning authorities, the County Council and the Regional Assembly. However, this issue will be dealt with in greater detail in the Social and Community section of this chapter.

National Travel and Transport Policies and Plans

The Future of Transport (July 2004)

5-A.11.2 The Government White Paper *The Future of Transport* (Cm 6234) recognises that increased investment in transport infrastructure will be required to address the constraints of the existing transport network and to support anticipated growth. The Government's goal is to deliver a transport network that meets the challenges of a growing economy and the increasing demand for

travel, while also meeting environmental objectives. The government's strategy involves developing coherent transport networks with:

- The road network providing a more reliable and freer-flowing service for both personal travel and freight, with people able to make informed choices about where and when they travel;
- The rail network providing a fast, reliable and efficient service, particularly for interurban journeys and commuting into large urban areas;
- Bus services that are reliable, flexible, convenient and tailored to local needs; making walking and cycling a real alternative for local trips; and,
- Ports and airports providing improved international and domestic links. (paragraph 6).

5-A.11.3 Paragraph 3.5 provides the government's strategic objectives for roads:

- We continue to improve safety;
- We identify, fund, and deliver promptly additional road capacity where this is justified – balancing the needs of motorists and other road users with wider concerns about the impact on the environment, including the landscape;
- We get ever greater performance out of the road network through improved management;
- We facilitate smarter individual choices about the trips we need to make, giving people alternatives to using their car, particularly for short journeys; and,
- Support and promote these choices by ensuring that new ways of paying for road use are developed so they become practical options.

5-A.11.4 The Government's strategy (in respect of bus provision) has a direct bearing on the proposed Scheme which aims to relieve congestion at Bexhill Road and provides a new route, linking housing and employment areas in north-east Bexhill with rest of the town and Hastings. Chapter 5 elaborates the government's strategy on bus services and access. Of note are that our bus services must be:

- Punctual – which means giving buses priority in congested locations and using more pre-paid ticketing to speed boarding;
- Good value – for the traveller and the taxpayer;
- Frequent and reliable – with up-to-date travel information that is easy to obtain;
- Seamless – with good integration of bus services and other travel networks;
- Safe – both when travelling on the bus and when walking to and from the bus stop; and,
- Clean, comfortable and attractive – with well-designed and maintained buses. (paragraph 5.6)

A New Deal for Transport: Better for Everyone (July 1998)

5-A.11.5 The Government White Paper *A New Deal for Transport* sets out an integrated transport policy that will extend choice and secure mobility in a way that supports sustainable development. The White Paper goes on to explain that the transport policy aims for:

- Integration within and between different types of transport;
- Integration with policies for the environment;
- Integration with land use planning; and,
- Integration with policies for education, health and wealth creation.

5-A.11.6 The White Paper states that in order to tackle the associated problems of congestion and safety in a sustainable manner “*we need to get all modes of transport working together.*” (paragraph 3.124)

5-A.11.7 The White Paper states that the way we travel is changing our environment for the worse including light and noise pollution, climate change and increased carbon dioxide emissions and that the New Deal sets out a framework to:

- Reduce road traffic growth;
- Respond to the challenge of climate change;
- Minimise transport’s demand for land, protect the environment and maintain wildlife variety;
- Limit the visual intrusion caused by transport;
- Reduce the use of non renewable materials/energy sources;
- Ensure that environmental impacts are taken fully into account in investment decisions and in the price of transport; and,
- Enhance public awareness of transport and environment issues.

5-A.11.8 Chapter 4 of the White Paper entitled *Making it Happen* goes on to state that the new approach to appraisal is designed to look at: “*The contribution of different forms of transport in developing alternative solutions and the potential effect of the new integrated transport approach, including the scope for and effect of demand management measures.*” (paragraph 4.195)

5-A.11.9 In undertaking Environmental Impact Assessments of proposals, the White Paper also considers it important that alternatives to construction are considered from the earliest stage of planning, including making better use of existing infrastructure and managing demand (paragraph 4.199). There also will be a strong presumption against development which will have an adverse impact on the integrity of internationally designated sites, environmentally sensitive areas or important species, habitats and landscapes (paragraphs 4.200 and 4.201). It is further stated (paragraph 4.202) that particular consideration should be given to species or habitats given international protection e.g. under the EC Birds and Habitats Directive, taking account of such factors as the area’s importance or significance for UK Biodiversity, the seriousness of impact, alternatives and their costs and whether mitigation or compensatory measures are feasible.

5-A.11.10 The White Paper also emphasises the importance of understanding the effects of noise and of measures to reduce noise from new transport infrastructure (paragraphs 4.212 to 4.223).

5-A.11.11 Paragraph 2.1 of the White Paper summarises the Government’s promotion of sustainable transport as follows: “*A modern transport system is vital to our country’s future. We need a transport system which supports our policies*

for more jobs and a strong economy, which helps increase prosperity and tackles social exclusion. We also need a transport system which doesn't damage our health and provides a better quality of life now - for everyone - without passing onto future generations a poorer world. This is what we mean by sustainable transport and why we need a New Deal."

5-A.11.12 The White Paper goes on to state that *A New Deal for Transport* would establish a framework to:

- "... reduce pollution from transport;
- Improve air quality;
- Encourage healthy lifestyles by reducing reliance on cars and making it easier to walk and cycle more;
- Reduce noise and vibration from transport; and,
- Improve transport safety for users, those who work in the industry and the general public." (paragraph 2.12).

Transport 2010 - The 10 Year Plan (July 2000)

5-A.11.13 This is the Government's investment plan for delivering its White Paper commitments to an integrated transport system. The plan outlines the levels of transport investment to be made over the ten year period between 2000 and 2010.

5-A.11.14 Outcomes and targets for local transport include:

- Better integration and co-ordination between transport modes through local transport plans and improved interchanges;
- Improvements in air quality, noise pollution and the local environment and reduction in CO₂ emissions;
- Improvement in local road safety, contributing to the achievement of national targets; and,
- Better access to jobs and services, including for deprived and rural areas. (paragraph 6.62)

Securing the Future – Delivering UK Sustainable Development Strategy – The UK Government Sustainable Development Strategy (March 2005)

5-A.11.15 The UK Government Sustainable Development Strategy sets out priority areas for immediate action including climate change and energy. The strategy notes that effects of a changing climate can already be seen. Temperatures and sea levels are rising, ice and snow cover are declining, and the consequences could be catastrophic for the natural world and society. Scientific evidence points to the release of greenhouse gases, such as carbon dioxide and methane, into the atmosphere by human activity as the primary cause of climatic change. We will seek to secure a profound change in the way we generate and use energy, and in other activities that release these gases. At the same time we must prepare for the climate change that cannot now be avoided. We must set a good example and will encourage others to follow it. (page 17)

Tackling Congestion by Influencing Travel Behaviour (2004)

5-A.11.16 This document outlines the way in which the Highways Agency (HA) will meet the Department for Transport's congestion target, and how the development process can contribute to meeting that target. Key to this are the following initiatives:

- Spatial planning and development control – this section notes that new developments have implications of the HA's network and recommends developers discussing their proposals with the HA at the earliest opportunity;
- The use of travel plans as part of new and existing development are commended; and,
- The more effective management of existing roadspace by providing priorities for buses and coaches and the introduction of car sharing lanes. (overview section)

Tomorrow's Roads - Safer for Everyone: The First Three Year Review (April 2004)

5-A.11.17 This White Paper underlines how safety is a main objective in designing, building, operating and maintaining local roads and ensuring safety continues to be part of the planning framework for main and local routes.

5-A.11.18 The White Paper sets casualty reduction targets to help achieve a further substantial improvement in road safety across Britain over the 10 years to 2010.

5-A.11.19 By 2010, the aim is to achieve, compared with the baseline average for 1994-1998 improvements in road safety. These targets are expressed as Best Value Performance Indicators (BVPI) which are included within the East Sussex LTP2 :

- A 40% reduction in the number of people killed or seriously injured in road accidents;
- A 58% reduction in the number of children killed or seriously injured in road accidents; and,
- A 25% reduction in the slight casualty rate, expressed as the number of people slightly injured per 100 million vehicle kilometres.(page 201)

Planning Policy Statement 1 – Delivering Sustainable Development (2004)

5-A.11.20 PPS 1 outlines the general principles under which the planning system operates following the introduction of the Planning and Compulsory Purchase Act 2004, and sets out an overview and general statement on the objectives of the planning system.

5-A.11.21 PPS 1 follows the Government's sustainable development themes of:

- Social cohesion and inclusion;
- Prudent use of natural resources;
- Sustainable economic development; and,

- Integrating sustainable development in to development plans.

5-A.11.22 PPS 1 recognises the requirement to: *“Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.”* (paragraph 27 vii)

Planning Policy Guidance note 13 - Transport (March 2001)

5-A.11.23 PPG 13 seeks to integrate planning and transport from the national, regional, county and local level. The key objectives of the PPG are to:

- “Promote more sustainable transport choices for both people and for moving freight;
- Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and,
- Reduce the need to travel, especially by car.” (paragraph 4).

5-A.11.24 The key aims are to ensure that local authorities carry out their land use policies and transport programmes in a way that supports sustainable development. These policies are part of the Government’s overall approach to addressing the needs of motorists, other road and public transport users and business by reducing congestion and pollution. Also addressed is the aim of achieving better access to development and facilities.

5-A.11.25 Key amongst the requirements of PPG13 is the need to ensure that local transport plans and development plans are complementary, particularly with regard to land allocations and local transport plan priorities and investment. In light of this, the PPG requires development plans to *“take into account the potential for changing overall travel patterns, for instance by improving the sustainability of existing developments through a fully co-ordinated approach of development plan allocations and transport improvements.”* (paragraph 20 section 3).

5-A.11.26 The PPG acknowledges that to improve access to new developments and facilities may require associated infrastructure improvements. Such associated infrastructure can range from major new transport investment to more localised measures facilitating pedestrian and cycle movements. Annex C deals with *“mitigating the impact of new transport infrastructure”*. This states: *“Care must be taken to avoid or minimise the environmental impact of any new transport infrastructure projects or improvements to existing infrastructure; this includes the impacts which may be caused during construction (including the need to transport materials to and from the site and dispose of spoil). Wherever possible, appropriate measures should be implemented to mitigate the impacts of transport infrastructure.”* (Annex C, paragraph 1).

Walking and Cycling – An Action Plan (June 2004)

5-A.11.27 This is the Government’s action plan for increasing levels of walking and cycling in England. The action plan describes the different ways in which the Government is aiming to increase walking and cycling. These are:

- *“Creating places that people want to walk and cycle in;*

- *Providing high quality facilities for safe walking and cycling;*
- *Influencing travel behaviour, through education, training, marketing and promotion;*
- *Building skills and capacity; and,*
- *Monitoring success through better targets and indicators.” (page 8)*

National Cycling Strategy (September 1996, modified October 2004)

5-A.11.28 The overall vision of the National Cycling Strategy is to increase cycle use. In order to achieve this the strategy aims to establish a culture favourable to the increased use of bicycles for all age groups; to develop sound policies and good practice; and to seek out effective and innovative means of fostering accessibility by bicycle. Central Government targets include:

- Double the number of trips by cycle (on 1996 figures) by end 2002; and,
- Quadruple the number of trips by cycle (on 1996 figures) by end 2012.(page 7)

5-A.11.29 The Strategy states that local authorities and other transport providers and trip generators should set local targets which will contribute to the central targets to increase cycle use.

National Cycling Strategy - Cycling and Health Leaflet (March 2003)

5-A.11.30 This leaflet explores the links between cycling and health, stating that: *“Daily cycling is sufficient to lead to significant health benefits: one study showed that even after adjustment for other risk factors, including leisure time physical activity, those who did not cycle to work experienced a 39% higher mortality rate than those who did.”*

5-A.11.31 The leaflet then goes on to explain the advantages of daily exercise including reducing:

- Coronary heart disease;
- Stroke;
- Diabetes;
- Cancer; and,
- Overweight, obesity and associated conditions.

5-A.11.32 As well as improving mental health and well being, and building and maintaining healthy bones, muscles and joints.

5-A.11.33 The benefits of cycling do not stop at improvements to physical and mental health. Cycling is also beneficial to wider public health through reduced adverse impacts associated with motor vehicle use. Benefits include:

- Improved air quality;
- Reduced noise pollution;
- Reduced danger;
- Decreased social exclusion; and,

- Reduced cost to society.

Regional Policies and Plans for Travel and Transport

Regional Planning Guidance for the South East (RPG9) (March 2001) (inc subsequent alterations)

5-A.11.34 RPG9 covers the period up to 2016 and sets the regional planning policy framework for local authority development plans in the south east of England. In addition the RPG provides the spatial framework for other strategies and programmes. These include the preparation of local transport plans by local authorities and the regional economic strategy of the SEEDA. Following the enactment of the Planning and Compulsory Purchase Act 2004 Regional Planning Guidance is conferred with the status of RSS and consequently forms part of the development plan. If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise (section 38(6) Planning and Compulsory Purchase Act 2004).

5-A.11.35 The RPG has an overall vision of: *“encouraging economic success throughout the Region, ensuring a higher quality of environment with management of natural resources, opportunity and equity for the Region’s population and a more sustainable pattern of development. The focus is on ... promoting a prosperous and multi-purpose countryside and promoting wider choice in travel options, thereby reducing the reliance on the private car.”* (paragraph 3.1)

5-A.11.36 The RPG then goes on to examine how the key development principles which should govern the continuing development of the Region should incorporate the principles of sustainability. Of greatest importance to the transport element of the Scheme are:

- 11) “Access to jobs, services, leisure and cultural facilities should be less dependent on longer distance movement and there should be increased ability to meet normal travel needs through safe walking, cycling and public transport with reduced reliance on the car; and
- 12) Transport investment should support the spatial strategy, maintaining the existing network, enhancing access as part of more concentrated forms of development, overcoming bottlenecks and supporting higher capacity and less polluting modes of transport” (paragraph 3.5).

5-A.11.37 In July 2004 the Government Office for the South East (GOSE) published an alteration to the transport policies (chapter 9) of RPG9. Commonly known as the Regional Transport Strategy (RTS) the alteration established that regional transport policy should treat increases in road capacity as the last option in the management of the transport network, aim to rebalance the transport system in favour of more sustainable modes of transport, and support the development strategy of the RSS and its component sub regional strategies.

5-A.11.38 RPG then goes on to state that in order “... to meet the sustainable development objectives for the Region, transport investment will [be] need[ed] ... Congestion in parts of the Region is at a level that will provide a constraint on

growth unless changes are made to the way people and goods travel” (paragraph 3.12).

5-A.11.39 In addition, the geography of the South East creates a number of specific transport problems and opportunities. As the largest Region in the United Kingdom with a generally prosperous economy (second only to London in terms of GVA per capita), close to neighbouring European countries, the impacts of high car use, through traffic and congestion are significant.

5-A.11.40 Paragraph 9.7 describes the vision for the region’s spatial framework as being one which acts as a catalyst for continued economic growth and provide for an improved quality of life for all in a sustainable and socially inclusive manner. The regionally specific objectives for integrating transport and spatial planning are set out in paragraph 9.8 and include:

- Facilitating an urban renaissance and foster inclusion by rebalancing the structure and use of the transport system;
- Reducing the wider environmental, health and community impacts associated with the transport system by bringing forward measures to positively manage the transport system in ways which reduce dependence on the private car; and,
- Improving the road and rail links along the south coast to improve spatial connectivity, and realise economic opportunities to reduce disparities within the region.

5-A.11.41 Chapter 9 of RPG9 sets out policies which the relevant regional strategies, development plans and LTPs must observe. The following policies are of greatest relevance to the proposed Scheme:

- T1 (Manage and Invest) requires that policies and proposals should encourage development that is located and designed to reduce average journey times (iii) and that investment should support the delivery of the spatial strategy by developing the network of regional hubs and spokes (ii) and facilitating urban renewal and renaissance as a means of achieving a more sustainable pattern of development;
- T2 (Key Management Issues) looks to ensuring that economic growth, environmental enhancements and social inclusion are delivered by giving priority to the maintenance of the existing transport system (i); improving overall levels of safety (ii); improving accessibility to services by all sections of society (iii); reducing the impact of movement on the natural and built environment (iv); and, that the location, design and construction of all new infrastructure projects enhances the environment and communities affected (v).
- T4 (Regional Hubs) (whilst Hastings is not designated a regional hub in the current RSS, its replacement proposes that the town should be designated as such). Paragraphs 9.22 to 9.29 describe regional hubs as being centres of economic activity and transport services (and therefore greater accessibility) which act as focus for development activity supporting the polycentric development strategy for the region. Central to this is encouraging development of concentrations of higher density land uses that require a high level of accessibility so as to create living centres (ii).

- T5 (Regional Spokes) the A259/A27 and A21 transport corridors are designated regional spokes connecting the proposed regional hub with those of Brighton & Hove, Ashford and Tunbridge Wells. Priority is therefore placed upon improving connectivity by increasing mobility and reducing journey times along the spokes by all modes of transport with the objective of supporting the spatial strategy and the role of regional hubs as a focus for economic activity (ii) (iii).
- T9 (Public Transport) and T10 (Mobility Management). Fundamental to regional transport policy is de-linking growth in private car use with economic growth. Both policies seek to influence transport investment decisions by promoting an improved and integrated network of public transport services, measures aimed at reallocating existing road space, the management of car parking space, and charging initiatives.
- T17 (Priorities for Investment) Paragraph 9.89 describes the key issues and transport priorities for the Sussex Coast and Towns and states: “*Improved road and rail links along the coastal corridor are important to realising economic opportunities and improving spatial connectivity, and, towards that end, a number of important schemes in the investment tables seek to reduce delays and unreliable journeys along the coast.*” The policy itself requires development plans to safeguard the specific investment proposals set out in tables later in the document¹.

Regional Economic Strategy for the South East of England 2002-2012 (July 2002)

5-A.11.42 “*The RES sets a 10-year framework for delivering the economic aspirations of that vision, set within the broader context of Sustainable Development. The aim is that by 2012 the South East will be recognised by all as one of the world’s 15 top performing regional economies, as measured against a broad range of economic, social and environmental indicators*” (paragraph 1.1). Currently, the region stands at 31st in the league of the world’s top performing regions according to SEEDA’s *Review of RES The evidence Base Interim Paper*, November 2005.

5-A.11.43 The Strategy sets out a number of priorities. Priority 13 is concerned with Transport and “*secure[ing] a sustainable transport network*” (page 61). The strategy focuses on two main issues affecting the Region:

- The need to concentrate on delivery rather than more studies; and,
- Face up to the challenge of congestion.

5-A.11.44 These issues lead to strategic transport actions being developed for effective infrastructure (including):

- Ensure the regional transport system supports national and international priorities;
- Improve cross regional movements; and,
- Support economic development and regeneration. (page 62)

¹ Table 4 Sussex Coast and Towns Investment Framework (page 44) identifies the Bexhill-Hastings Link Road as a priority scheme which will assist in the delivery of the spatial strategy.

Draft Regional Spatial Strategy - The South East Plan submission to Government (March 2006)

5-A.11.45 The South East Plan “provides the statutory regional framework that forms the context within which Local Development Documents and Local Transport Plans need to be prepared, as well as other regional and sub-regional strategies and programmes that have a bearing on land use activities.” (Section A, paragraph 1.2) and once adopted will replace the current RSS (RPG9) and all Structure Plans in the region.

5-A.11.46 Policies on transport are contained with Section D4 of the South East Plan, *Communications and Transport*. The operating principles of the current regional transport strategy remain in evidence within this draft document, i.e. that that transport system is to be rebalanced in favour of non car modes of transport as a means of access to services and facilities, that economic success and growth in car use are de-linked, and that transport priorities, policies, and investment decisions must support the implementation of the spatial plan and its polycentric development strategy supported by hubs and spokes. Bar the renumbering of policies and detailed changes, the description provided of the adopted regional transport policies remains valid in this context, with the exception of:

- Adopted policies T1 and T2 are merged to provide draft policy T1 with an additional criterion (iv) which requires the improvement of overall levels of accessibility;
- Adopted policy T4 has become draft policy CC8b which identifies (at Box CC1) the 22 regional hubs which includes Hastings;
- Adopted policy T5 has been revised in a draft policy T3 (regional spokes) with a new criterion (iv) which seeks to address identified bottlenecks;
- Adopted policy T9 (Public Transport) has been deleted; and,
- Adopted policy T17 has been removed with an equivalent policy and table included in section E2 (Sussex Coast Sub region) and the draft Implementation Plan, respectively.

5-A.11.47 Section E2 of the draft RSS sets out the Sussex Coast Sub regional strategy. This strategy was developed in response to the sub region’s (including Hastings and Bexhill) extensive socio-economic difficulties, and policy CC9 (Addressing Intra-regional Disparities) of the draft plan identifies the Sussex Coast as an area in need of extensive regeneration. The strategy was developed by the principal authorities of East and West Sussex, and Brighton & Hove in partnership with key stakeholders and local authorities and led by East Sussex County Council. Advice on a sub regional strategy was submitted to the Regional Assembly in the summer of 2005. East Sussex County Council then consulted extensively on its proposals for a housing distribution for its part of the sub region and the “rest of East Sussex” in October 2005 which was submitted to the Regional Assembly (following Cabinet approval) in December 2005.

5-A.11.48 The sub region is an area suffering from structural weaknesses in its economy and performs poorly against regional averages for family incomes, GVA per head, employment rates, levels of deprivation and academic achievement. Notably there is a net commuting outflow from the sub region of nearly 37,500

employees. Significant contributors to this poor economic performance are a combination of the peripherality of the sub region from the rest of the South East with poor road and rail links both beyond and within the sub region, and a high quality environment which frustrates development opportunities which only serves to reinforce the peripherality of the area.

5-A.11.49 In seeking to address these issues and provide a development strategy which accommodates 2,700 dwellings a year, the sub regional strategy requires:

- The relevant local authorities and agencies to deliver major improvements strategic transport infrastructure and services both to reduce its peripherality and improve access within the sub-region. To achieve a better balance between the jobs/home balance. (SCT1 (iii) (iv) – Core Sub-regional Strategy);
- “...realising substantial improvements in strategic transport communications and infrastructure ...It is seen as crucial to the success of the strategy, ...improving east-west transport links, especially the A27/A259, will improve complementary connections with other key sub-regions. This will also improve access within the sub-region, help widen employment opportunities throughout the Sussex Coast and improve the balance of labour supply and demand.” (paragraph 3.3);
- To help realise a step change in the sub-region’s economic performance, increased priority should be given to investment decisions and other direct support for the sub-region. Key measures should include; “*delivering improvements to east-west transport links by road and rail to improve accessibility, facilitate strategic development opportunities and enable the better functioning of overlapping local labour markets.*” (SCT2 (ii) – Enabling Economic Regeneration);
- To develop and extend the work already undertaken in the Five Point Plan into the longer term and to capitalise on Hastings as a regional hub. (SCT6 – Co-ordination, Leadership and Promotion of the Sub-region);
- That development ...“*should only proceed if all the necessary infrastructure is available, or can be delivered in sufficient time, to serve that development.*” (paragraph 10.2); and,
- All relevant agencies to work jointly to ensure that all of the necessary local and strategic, social and physical infrastructure can be provided in time to serve development proposed in this strategy. The strategic infrastructure necessary to deliver strategy is identified in the Sub-regional Investment Framework. (SCT9 - Infrastructure)

5-A.11.50 The revised South East Plan Implementation Plan sets out the Sub-regional Investment framework for the Sussex Coast in Annex 3.2, in which the Bexhill Hastings Link Road is identified.

Draft RES: The Regional Economic Strategy (November 2005)

5-A.11.51 The RES will shape the future economic development of the South East. SEEDA is responsible for progressing the strategy and will oversee its implementation, but the RES is relevant to all who have an interest in the future performance of the regional economy. A Draft Regional Economic Strategy has

now been published, which, following the SEEDA Board on 20th July 2006, will be submitted for Ministerial endorsement.

5-A.11.52 The Draft Regional Economic Strategy updates and reviews the current strategy which runs to 2012. It identifies Hastings as one of the “*string of pearls of coastal towns*” which requires transformation to become a major asset to the region (page 12). It goes on (page 18-20) to describe the challenges which face the Coastal South East which includes poor infrastructure and connectivity. In response to these issues the draft refers to the objectives of a coastal strategy including:

- Housing – led growth – ensuing major urban areas reach their potential by investing in key infrastructure to enable housing development that supports economic prosperity; and,
- Connectivity as the basis for growth – addressing the remaining transport bottlenecks on the South Coast, ensuring efficient connections to major ports and maximising the potential of next generation broadband.

5-A.11.53 Page 20 identifies key priorities for the South East Coast which reinforces the message that the improvements to connectivity along the “*south coast artery*” and to “*key hinterlands and London*” are essential.

Integrated Regional Framework for the South East (June 2004)

5-A.11.54 The IRF establishes a shared vision and objectives for integrated working and, ultimately, sustainable development of the region. It is an evolution of the Regional Sustainable Development Framework (RSDF) published in June 2001.

5-A.11.55 The IRF sets out 25 regional objectives covering various environmental, social and economic issues including air and water quality, accessibility, cultural heritage, and community services. Regional objective 15 relates to transport: “*To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry.*” (page 56)

County Policies and Plans on Travel and Transport

East Sussex and Brighton and Hove Structure Plan 1991-2011 (adopted December 1999)

5-A.11.56 The East Sussex Structure Plan was originally prepared in 1974, and approved by the Secretary of State in 1978. Since 1978 the Structure Plan has updated a number of times. In 1993 the County Council decided to carry out a fundamental review of the plan to ensure that county’s strategic planning policies remained relevant to its needs. The deposit draft version of the replacement structure plan was published in 1996.

5-A.11.57 Following local government reorganisation in 1997 and the establishment of a unitary authority of Brighton & Hove, the County Council and Brighton & Hove Council worked jointly to review and update the structure plan. The Examination in Public of the draft structure plan took place in 1998. With the proposed modifications stage and final adoption taking place in the mid to late 1999.

5-A.11.58 The Planning and Compulsory Purchase Act 2004 introduced a reformed planning system which places an emphasis upon regional spatial strategies and local development frameworks. Structure plans have been abolished as a consequence of this emphasis. However, current structure plans will remain part of the adopted development plan until the current review of RSSs is complete. It is anticipated that the RSS for the South East (the South East Plan) will be adopted early in 2008.

5-A.11.59 The structure plan's policies on transport are set out in chapter 4 of Section B, the Written Statement. However, Chapter 1 (Strategy for a More Environmentally Sustainable Future) contains key related policies. A large number of policies are applicable in this context of this proposal, and can be summarised in the following manner:

- S1 (Twenty One Criteria for the 21st Century) a sustainable development pattern will be promoted, development plans and development control decisions will need to accord with the following criteria:
 - Minimise the impact on environment and provide compensation where loss is acceptable and unavoidable to achieve other policies in the plan (b);
 - Reducing the need to travel and improving accessibility for all to a range of services and facilities (c); and,
 - Not creating or perpetuating unacceptable transport conditions (d).
- S24 (Hastings) sets the strategic objectives for development and change in Hastings, emphasising the need to regenerate the town, providing good quality and accessible business premises, and the need to improve both strategic road and rail links;
- S25 (Bexhill) sets the strategic objectives for the town and expresses the primary concern as being the provision of more employment and a wider range of jobs to improve the economy of the Bexhill and Hastings area. The Structure Plan anticipates the completion of a new community and a high quality business park at north-east Bexhill which will require the appropriate transport improvements and measures to place in time to serve the development. This will provide the necessary access and to avoid adding to the transport problems in the wider area.
- An Integrated Transport and Environment Strategy is set out in policy TR1, this describes the priorities of a more sustainable transport system in the county. This includes the early completion of improvements to the trunk road network in the county (f) and early provision of and/or improvement of links from the trunk road network into the main coastal towns. This Strategy is supplemented by subsequent detailed policies, of which the following are key;
- Policy TR4 (d) supports measures which develop residential, employment and other development in locations which encourage the use of walking as a form of transport and provide safe and convenient routes which link into the existing network. Criterion (f) supports the maintenance and improvement of the network of rights of way.
- Policies TR5 and 6 seek to improve facilities for cyclist for both utility and recreational purposes, and promote the construction and promotion of a strategic network of cycle routes including the South Coast Cycle Route.

- *“Better integration between bus and rail services, and between public passenger transport and all other forms of transport will be sought”* (Policy TR8);
- TR11 seeks an increase in the use of buses and the introduction and improvement of facilities including bus lanes;
- *“The Government will be urged to give priority to the early improvement of the trunk roads within the plan area (A27/A259, A26 (south of the A27), A21) and links to the coastal towns. Longer distance traffic will be encouraged to use the trunk roads”* (Policy TR20);
- Improvements to the South Coast Trunk road are supported in principle (Policy TR21);
- The strategy for the Bexhill Hastings area will support regeneration efforts and emphasises the role alternative modes to the private car and environmental improvements to support this (Policy TR39); and,
- The construction of the link roads (Bexhill Northern Approach Road and Hastings Spur Road Phase 2) is proposed (Policy TR40).

Local Policies and Plans on Travel and Transport

Hastings Local Plan (April 2004)

5-A.11.60 The Local Plan sets out proposals for comprehensive improvements in the town. The priorities within the town are:

- *“A need for improved transport connections between Hastings and Bexhill combined with management measures to protect sensitive areas from inappropriate traffic”*;
- Good access to the town centre;
- Environmental and safety improvements for congested areas, especially for the A259 along the seafront;
- Measures, including demand management measures, to make alternatives to journeying by car (cycling, public transport and walking) a more attractive proposition; and,
- Continuing measures to reallocate roadspace in favour of pedestrians.” (paragraph 6.12)

5-A.11.61 Policy TR4 provides for the safeguarding of a South Coast Cycle route between West Marina and the western boundary of the Borough towards Bexhill.

Rother District Local Plan (July 2006)

5-A.11.62 The Rother District Local Plan emphasises the importance of good accessibility within and between communities. Hence, transport planning must be integral to effective land use planning. Integration is also important between different modes of transport, and should encourage more sustainable travel. It is an aim of the Local Plan (paragraph 2.23) to promote a safe, efficient and sustainable transport system.

5-A.11.63 To this end the adopted Local Plan provides guidance on generic transport objectives which are derived from the national, regional and county

level. The Local Plan also sets out policy guidance on the development strategy for the district and the role of the Bexhill Hastings Link Road in that strategy, thus providing a more distinct and locally relevant advice on transport planning.

5-A.11.64 Policies GD1 and DS1 provide general guidance on the need to ensure accessibility by all 'relevant' modes of transport (GD1 (iii) and DS1 (iv)), the need to provide infrastructure necessary to serve the development in a timely manner (GD1 (ix)), and that the best use of existing infrastructure is made (DS1 (v)).

5-A.11.65 Policy TR1 sets out the requirement to protect the area of search for the Bexhill Hastings Link Road. The area is shown on the proposals map and will be reviewed as the Scheme progresses. Policy TR2 (linked closely to general development policy GD1 and development strategy DS1) requires development proposals to demonstrate how they will provide for the demands for access they will generate.

East Sussex Local Transport Plan 2006-2011 (March, 2006)

5-A.11.66 The LTP2 vision is to: *"To make East Sussex a thriving County where every resident enjoys an enhanced quality of life with improved travel choice and access to employment opportunities and local facilities; safer and healthier communities and a cleaner environment that is valued, protected and improved for future generations."* (page 17, paragraph 2.4)

5-A.11.67 In order to achieve this vision the LTP2 lays out the following objectives:

- *"Improve access to services by providing greater travel choices and influencing land use decisions;*
- *Manage demand and reduce the need to travel by private car;*
- *Improve road safety and reduce fear of crime in communities;*
- *Reduce congestion and improve the efficiency of the transport network;*
- *Protect, promote and enhance the environment; and,*
- *Improve maintenance and management of the transport network."* (page 18 paragraph 2.4)

5-A.11.68 Chapter 8 outlines the County Council's intention to include the Bexhill Hastings Link Road within the LTP2 programme for East Sussex. It outlines the purpose of the Scheme as:

- Being a crucial component of the £400 million regeneration plan for the area;
- Being fundamental to meeting the strategies set down in the adopted East Sussex and Brighton & Hove Structure Plans and the emerging South East Plan;
- Facilitating the release of major housing and employment land allocations;
- Providing relief from traffic congestion on the A259 at Glyne Gap; and,
- A key contributor to improving accessibility, reducing congestion in other transport corridors in the area and providing substantial public transport opportunities (pages 209-210).

Hastings Air Quality Action Plan (October 2005)

5-A.11.69 The AQAP contains 24 proposed actions to be taken to help improve and monitor air quality in Hastings, focussing on the AQMA at Bexhill Road. These include air quality monitoring, bus service improvements and supporting workplace and a school travel plans.

5-A.11.70 The Action Plan contains several actions relating to transport, including:

- Implementation of ‘travel choice’ measures (i.e. workplace travel plans, school travel plans, targeted public transport information) to manage demand and reduce need the need to travel by private car (Action 3);
- Construction of the Bexhill Hastings Link Road (Action 6) – this is accorded a high air quality impact with non air quality impacts of increased accessibility and regeneration.
- “*The provision of support to new bus services serving local schools and colleges*” (Action 9); and,
- “*The extension of Real Time bus information systems into Hastings*” (Action 10);

5-A.11.71 It should be understood that although the measures listed in the AQAP have been ranked according to DEFRA (LAQM.PGA (05)) guidance, it is clear that those 5 above cannot be implemented before the link road is constructed such as the reallocation of road space to provide a priority for bus services along the A259 at Glyne Gap. Its ranking belies its importance in improving air quality in the area. (LTP2 Annex 6)

Appendix 5-B Policy Impact Evaluation Matrix

5-B.1 Introduction

5-B.1.1 This Appendix sets out the Planning Policies and Development Plans Impact Evaluation Matrix. This provides the basis to the summary text found in section 5.6 of Chapter 5 Policy and Planning.

5-B.1.2 Section 5.6 provides a thematic narrative summarising the degree of compliance or conflict with policies and plans at the national, regional, county and local level. The narrative draws from the assessment provided in the Policy Impact Evaluation Matrix.

5-B.1.3 The purpose of this evaluation is to assess the policy performance of the Scheme, rather than its environmental benefits/disbenefits which are addressed in other chapters of this ES. This distinction is necessary to provide a full assessment of the Scheme's compliance with general and specific policy objectives for the area.

5-B.1.4 All relevant policies under each of the topic headings have been carefully examined and an assessment made of the degree to which the Scheme helps or hinders achievement of the policy objectives.

5-B.1.5 Where it is considered that the Scheme contributes towards the achievement of the policy objective, the impact was assessed as being Beneficial.

5-B.1.6 Where it is considered that the Scheme is contrary to the policy objective and therefore impedes achievement of the policy objective, the impact was assessed as being Adverse.

5-B.1.7 Where it is considered that the Scheme either has no effect on achievement of the relevant policy objective or where it has both positive and negative impacts such that on balance the Scheme has neither a beneficial nor adverse impact, the impact was assessed as being Neutral.

Table 5.2: Policy Impact Evaluation Matrix

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Agriculture & Forestry						
Our Countryside: The Future – A fair deal for rural England	Paragraph 9.3.4	Considering all impacts- productivity of land, leisure, amenity etc and taking most important into account	This EIA has assessed the impact of the Scheme upon local farms, and good quality agricultural land. Where appropriate mitigation is proposed in line with good practice.	✓		
	Page 115	<i>“We want a significant increase in woodland cover across England; and we want to encourage tree planting whose main priorities are visual, environmental and recreational as well as commercial.”</i>	The Scheme proposes significant areas of new planting and management of existing woods.	✓		
A New Focus for England’s Woodlands – England Forestry Strategy	Page 2	Emphasises the role of the Forestry sector in supporting rural economies and promoting regeneration on the urban/rural fringe.	Although the Scheme passes close to areas of woodland it is unlikely that the Scheme would impact on sustainable management of this woodland.		✓	
PPS7 Sustainable Development in Rural Areas	Page 6	Raise the quality of life and the environment in rural areas	The Scheme would adversely affect agricultural holdings in the study area. Extensive enhancements to the local environment are proposed. Opportunities to diversify into leisure and recreation may arise as demands for access to the countryside increase as the two towns develop.		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
PPS7 Sustainable Development In Rural Areas	Page 6	Promote the development of the English regions by improving their economic performance.	The Scheme does not directly meet this objective although it does adversely affect agricultural holdings. Opportunities may arise to meet leisure and recreation demands as the towns develop.		✓	
		Promote sustainable patterns of development.	The Scheme assists in protecting the wider countryside by enabling development to be focussed on the urban area of Bexhill. Without this the rural areas may have to receive far greater levels of development.	✓		
	Paragraph 15	Planning policies should provide a positive framework for facilitating sustainable development that supports traditional land-based activities and makes the most of new leisure and recreational opportunities that require a countryside location	The Scheme would affect agricultural enterprises in the study area. Opportunities may arise to meet leisure and recreation demands as the towns develop.		✓	
	Paragraph 16	Support development that delivers diverse and sustainable farming enterprises	The Scheme would affect agricultural enterprises in the study area. Opportunities may arise to meet leisure and recreation demands as the towns develop.		✓	
		Support other countryside-based enterprises and activities which contribute to rural economies, and/or promote recreation in and the enjoyment of the countryside	The Scheme would affect agricultural enterprises in the study area. Opportunities may arise to meet leisure and recreation demands as the towns develop.		✓	
	Paragraph 27	The role of the agricultural sector in the rural economy and as a manager of the countryside should be recognised in policy.	The Scheme recognises the role of the agricultural sector in the management of the landscape and proposes management agreements between landowners to enhance the value of SSSIs.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
PPS7 Sustainable Development In Rural Areas	Paragraph 28	Wherever possible the best and most versatile agricultural land (ALC 1, 2, 3a) should be protected.	The alignment of the Scheme has been developed to ensure that key environmental features are not adversely and significantly affected. There would be loss of some the Best and Most Versatile (BMV) agricultural land as a result but this is unavoidable given wider policy imperatives. Mitigation is proposed to minimise loss of this soil. Nonetheless, this would represent a depletion of a finite and nationally significant resource.			✓
	Paragraph 33	Notes that forestry policy is aimed at both the sustainable management of woodlands and an increase in the area of managed woodland is beneficial to the environment and society.	Additional planting of woodland is proposed as part of the mitigation/compensation package, these proposals also involve active management to maximise environmental benefits.	✓		
Regional Planning Guidance for the South East (RPG9)	Policy Q7	Countryside should fulfil range of needs: recreation, farming, forestry etc.	The Scheme proposes active management as part of biodiversity mitigation measures. Also by releasing land for development the Scheme would increase demands for access to the countryside and therefore create the conditions for rural diversification.	✓		
	Policy E8	The valuable characteristics of soil should be protected.	The Scheme would involve the loss of BMV agricultural land; however, land management proposals are part of the mitigation package to enhance the biodiversity value of agricultural land.		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S5	Provides guidance for local plans on the definition of development boundaries, and includes the objective of conserving landscape character, natural resources, woodland and agriculture of the countryside in general.	Agricultural holdings would suffer an overall adverse impact. In the longer term there may be potential for diversification as the growth and regeneration of the two towns would lead to increasing demands for access to the countryside.		✓	
	Policy S10	States that outside defined development boundaries agriculture and woodland will remain the predominant land uses.	The Scheme proposes mitigation and compensation which is aimed at local farms and woodlands and does not lead to agriculture and woodland being usurped as the predominant land uses beyond current development boundaries.	✓		
	Policy S12	Supports woodland management and new planting proposals.	The Scheme proposes new planting.	✓		
Rother Local Plan (July 2006)	Policy DS1 (ix)	5-B.1.2 “In determining whether development is appropriate in a particular location, proposals should accord with the following principles: ‘... it respects the importance of the countryside in terms of its distinct landscape character, natural resources, woodland and agriculture ...”	Although the Scheme involves the development of some countryside to meet wider policy objectives it proposes a wide ranging package of mitigation and compensation, in response to the importance of the countryside in terms of biodiversity and agricultural activity.		✓	
	DG1 (xiv)	5-B.1.3 On the use of agricultural land, policy states that “where significant development of agricultural land is unavoidable, it makes use of poorer quality land (grade 3b, 4 and 5) in preference to that of higher quality except where this would be inconsistent with other sustainability considerations.”	The alignment of the Scheme has been developed to ensure that key environmental features are not adversely and significantly affected. There would be loss of some BMV agricultural land as a result but this is unavoidable given wider policy imperatives. Mitigation is proposed to minimise loss of this soil.		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Geology, Soils, Contaminated Land and Waste						
Waste Strategy for England and Wales	Paragraph 2.32	By 2005 to reduce the amount of industrial and commercial waste sent to landfill to 85% of that landfilled in 1998	A Waste Management Strategy will be submitted detailing measures to reduce construction and demolition waste diverted to landfill.	✓		
PPS10: Planning for Sustainable Waste Management	Paragraph 3	Ensure the design and layout of new development supports sustainable waste management	It is unlikely that the Scheme would impact on sustainable waste management, but there is potential for recycling construction materials		✓	
MPS1 Planning And Minerals	Paragraph 9	To ensure, so far as practicable, the prudent, efficient and sustainable use of minerals and recycling of suitable materials, thereby minimising the requirement for new primary extraction.	The Waste Management Strategy accompanying the Scheme will outline measures to incorporate waste materials in the construction process.	✓		
		To secure closer integration of minerals planning policy with national policy on sustainable construction and waste management and other applicable environmental protection legislation.	The Scheme will be accompanied by a Waste Management Strategy ensuring that construction waste is minimised.	✓		
	Paragraph 18	Encourage the efficient use of all minerals and alternatives to them	The use of a waste minimisation strategy will guide the efficient use of minerals and construction waste during the construction phase.	✓		
PPS23 Planning And Pollution Control	Paragraph 18	Identify and remove unacceptable risks to human health; and	Detailed site inspections would take place, it is anticipated that some contamination may be present along the disused railway line.	✓		
		Seek to bring damaged land back into beneficial use.	The Scheme involves the development of potentially contaminated land.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Regional Planning Guidance for the South East (RPG9)	Policy E8	Soils to be protected so that they can perform functions such as supporting habitats.	A soil handling and management strategy will ensure the protection of soils for future use	✓		
	Policy W2	Ensure development design, construction and demolition which minimises waste production and associated impacts	The use of a Waste Management Strategy will guide the efficient use of minerals and construction waste during the construction phase.	✓		
	Policy M1	Local Development Documents (LDDs) should promote the use of construction materials that reduce the demand for primary minerals, by requiring new projects to include proportion of recycled and secondary aggregates wherever practicable.	Where possible secondary aggregates and recycled materials would be used in the construction process.	✓		
East Sussex and Brighton and Hove Minerals Local Plan	Paragraph 1.8	<i>"...greater use of secondary aggregates and recycled material."</i>	Where possible secondary aggregates and recycled materials would be used in the construction process.	✓		
East Sussex and Brighton and Hove Waste Local Plan	Paragraph 5.5	To increase recycling and recovery and achieve targets set by Government and this Plan	The Waste Management Strategy will identify measures to recycle demolition and construction wastes.	✓		
	Paragraph 5.5	To minimise road traffic associated with the transportation of waste.	The Waste Management Strategy submitted alongside the application will assist in reducing the amount of construction waste leaving the site for landfill.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Waste Local Plan	WLP11	Requires construction practices which minimise the use of raw materials and maximises the use of secondary aggregates and recycled materials.	Where possible secondary aggregates and recycled materials would be used in the construction process. The Waste Management Strategy will illustrate how construction waste can be incorporated into the Scheme design.	✓		
Supplementary Planning Document – Construction and Demolition Waste (January 2006)	Section III	Advises on the need for a Site Waste Management Plan as part of the planning application process.	This will be submitted as part of the application.	✓		
Hastings Borough Local Plan (2004)	Policy DG34	Requires site investigations and necessary remedial measures.	Suspected land contamination will be investigated and dealt with according to good practice and relevant regulations.	✓		
Rother District Local Plan (July 2006)	Policy GD1 (xiii)	Development proposals should “...properly address any known or suspected contamination of the site, or threat from landfill gas, through site investigations and suitable remediation.”	Suspected land contamination will be investigated and dealt with according to good practice and relevant regulations.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Water Quality & Drainage						
Working with the Grain of Nature: A Biodiversity Strategy for England (2002)	Paragraph 5.1	A holistic approach to land and water management, with active support from local communities, recognising and benefiting from the social, economic and environmental gains	Flood attenuation measures are proposed as part of the package of mitigation/compensation measures. These would have positive gains in terms of water management in the area.	✓		
PPS25 Development and Flood Risk	Paragraph 5	Ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding. Where new development is exceptionally necessary, policy aims to make it safe in such areas without increasing flood risk elsewhere and where possible, reducing flood risk overall.	The Scheme crosses an area of flood risk. A flood risk assessment (FRA) will be provided alongside the application to demonstrate that the nature of flood risk in the area can be managed effectively by mitigation measures.	✓		
	Paragraph 10	An FRA should be carried out to the appropriate degree at all levels of the planning process, to assess the risks of all forms of flooding to and from the development. It should take climate change into account and inform the application of the sequential approach.	The Scheme crosses an area of flood risk. A FRA will be provided alongside the application to demonstrate that the nature of flood risk in the area can be managed effectively by mitigation measures.	✓		
	Paragraph D9 (the exception test)	It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic FRA where one has been prepared.	The Scheme provides wide ranging benefits in terms of the development and regeneration strategies for the area.	✓		
		The development should be on developable, previously-developed land or, if it is not on previously developed land, there are no reasonable alternative sites on developable previously-developed land.	Whilst the Scheme uses greenfield land for a large proportion of its route there is no other reasonable alternative to meet the need for the development.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
PPS25 Development and Flood Risk	Paragraph D9 (the exception test)	A FRA must demonstrate that the development would be safe, without increasing flood risk elsewhere, and, where possible, would reduce flood risk overall.	Chapter eight of this ES will demonstrate that flood and drainage issues are capable of being managed effectively.	✓		
PPS23 Planning And Pollution Control	Paragraph 26	Ensure the adverse effects of polluting activities are minimised and contained to within acceptable limits.	Pollution associated with the Scheme would be appropriately managed and mitigated so that it is contained within acceptable limits	✓		
Regional Planning Guidance for the South East (RPG9)	Policy INF1	Development should be guided away from areas at risk or likely to be at risk in future from flooding, or where it would increase the risk of flood damage elsewhere.	Large sections of the Scheme are situated in a flood risk area, but mitigation such as flood water storage would reduce risk and enhance habitats.	✓		
Regional Economic Strategy for the South East of England	Priority 18	Achieve sustainable management of water, waste and energy.	It is unlikely that the Scheme would have an impact on sustainable management of water.		✓	
Draft Regional Spatial Strategy - The South East Plan	Policy NRM1	Water supply, ground water and river water quality would be maintained and enhanced through avoiding adverse effects of development on the water environment.	Run-off resulting from the Scheme may contain contaminants from vehicles, which could enter water courses causing pollution. Mitigation such as oil interceptors at drains would minimise this risk	✓		
	Policy NRM3	The sequential approach to development in flood risk areas set out in PPG25 will be followed. Inappropriate development should not be allocated or permitted in zones 2 and 3 of the floodplain or areas with a history of groundwater flooding, or where it would increase flood risk elsewhere, unless there is over-riding need and absence of suitable alternatives.	The Scheme is situated within a flood risk area and additional run-off caused by the impermeable surface of the new road may increase that risk. However, the benefits of the Scheme, the lack of alternatives and the package of flood management measures meet national and regional policy requirements.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S1(g)	Seeks to protect and enhance the quality of water and groundwater and river levels for the good of society the economy and biodiversity.	The Scheme proposes mitigation measures to ensure that water quality is not compromised during construction and operation phases.	✓		
	Policy S1 (h)	Avoid land at risk from flooding and avoid the risk of flooding elsewhere	The Scheme is situated within a flood risk area and additional run-off caused by the impermeable surface of the new road may increase that risk. However, the benefits of the Scheme, the lack of alternatives and the package of flood management measures meet national and regional policy requirements.	✓		
	Policy EN11	Proposals which would have a significant adverse effect on the quality and quantity of water resources which are important for human consumption and use, and biodiversity (including aquifers, groundwater sources, rivers, lakes, reservoirs, seawater and bathing water) would not be acceptable.	Run-off resulting from the Scheme may contain contaminants from vehicles, which could potentially enter water courses causing pollution. Mitigation such as oil interceptors at drains would minimise this risk	✓		
	Policy EN12	Measures to conserve and make best use of existing water resources, including reducing wastage, would be encouraged and supported.	It is unlikely that the Scheme would impact on the use of water resources		✓	
Cuckmere and Sussex Havens Catchment Flood Management Plan (draft) (March 2006)	PU10	To take action to increase the frequency of flooding to deliver benefits locally or elsewhere, which may constitute an overall flood risk reduction (e.g. for habitat inundation)	The flood management measures proposed as part of this EIA have been developed in consultation with the Environment Agency.	✓		
	PU11 and 12	Take further action to sustain the current scale of flood risk into the future (responding to the potential increases in flood risk from urban development, land use change and climate change).	The flood management measures proposed as part of this EIA have been developed in consultation with the Environment Agency.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Hastings Local Plan (2004)	Policy DG26	Planning permission will not be granted for new development within areas at risk from river or coastal flooding, unless environmentally acceptable flood mitigation and protection measures can be provided by the developer, to compensate for the impact of development.	Flood mitigation and protection measures will be provided as part of the Scheme design	✓		
	Policy DG27	Planning permission for development that, as a result of increased surface water runoff, could increase the risk of flooding, will only be granted where the Council (in consultation with the Environment Agency) is satisfied that all appropriate alleviation and mitigation works (including the promotion of Sustainable Urban Drainage Systems) have been investigated, designed and constructed before the start of development.	The Scheme will increase run-off volumes which could lead to an increased risk of flooding, however careful consideration has been given to flood prevention and mitigation measures	✓		
Rother District Local Plan (2006)	Policy GD1(x)	It provides adequate and appropriate means for foul and surface water drainage, with suitable alleviation and mitigation measures where necessary.	Appropriate drainage would be constructed for surface water run-off from the road	✓		
	Policy GD1(xv)	Avoid flood risk and not create flood risk elsewhere	As discussed above, the Scheme meets the requirements of the exceptions test i.e. that it delivers significant benefits, no reasonable alternatives exist and any risk arising from the proposal is capable of effective mitigation and management.	✓		
	Policy DS1(xi)	Avoid land at risk of flooding.		✓		
Air Quality						
National Air Quality Standard	Executive Summary	Protect people's health and environment without imposing unacceptable costs.	The Scheme would improve local air quality around the A259, which should help protect peoples health from respiratory problems	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Air Quality Strategy for England, Scotland, Wales and Northern Ireland, and Addendum	Table 1a	Benzene- 5µg/m ³ (1.54 ppb) annual average by 31 December 2010.	The Scheme would help improve air quality in the Bexhill Road AQMA.	✓		
		Carbon monoxide - 10mg/m ³ (8.6ppm) maximum daily running 8-hour mean by 31 st December 2003.	The Scheme would help improve air quality in the Bexhill Road AQMA.	✓		
		Polycyclic aromatic hydrocarbons- 0.25ng/m ³ B[a]P as annual average by 31 st December 2010.	The Scheme would help improve air quality in the Bexhill Road AQMA.	✓		
		24-hour mean by 31 st December 2010.	The Scheme would help improve air quality in the Bexhill Road AQMA.	✓		
		Particles (PM ₁₀)- 23µg/m ³ annual mean by 31 December 2010.	The Scheme would help improve air quality in the Bexhill Road AQMA.	✓		
PPS23 Planning And Pollution Control	Paragraph 26	Ensure the adverse effects of polluting activities are minimised and contained to within acceptable limits.	Pollution associated with the Scheme would be appropriately managed and mitigated so that it is contained within acceptable limits.	✓		
Regional Planning Guidance for the South East (RPG9)	Paragraph 3.5	Development to assist in reducing pollution of air, land and water.	The Scheme would help to reduce local air pollution.	✓		
	Policy E7	Local authorities should work with the Environment Agency and others to play a positive part in pollution control and encourage measures to improve air quality.	The development of the Scheme has involved consultation with the Environment Agency at key stages.	✓		
Draft Regional Spatial Strategy - The South East Plan	Policy NRM7	Local authorities and other relevant bodies should seek an improvement in air quality in their areas so that there is a significant reduction in the number of days of medium and high air pollution by 2026.	The Scheme would help to reduce air quality problems along the A259 by relieving traffic congestion.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Draft Regional Spatial Strategy - The South East Plan	Policy CC2	Requires local authorities to mitigate GHG emissions through measures such as reducing the need to travel and sets targets for the reduction of GHG emissions: 20% below 1990 levels by 2010 and by at least 25% below 1990 levels by 2015.	The Scheme would result in a marginal increase in GHG emissions over current levels.			✓
Integrated Regional Framework (IRF) for the South East	Regional objective 11	To reduce air pollution and ensure air quality continues to improve.	The Scheme would help to reduce air quality problems along the A259 by relieving traffic congestion, with the overall aim being to remove the need for a AQMA in this location.	✓		
	Regional objective 12	To address the causes of climate change through reducing emissions of GHGs and ensure that the South East is prepared for its impacts.	The Scheme would result in a marginal increase in GHG emissions over current levels.			✓
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S1 (i)	Requires development proposals to contribute a reduction of air pollution and enhancement to air quality– includes both air pollution and GHG emissions.	The Scheme would alleviate poor environmental conditions at Bexhill Road and provide wider benefits to both urban and rural communities. However, the Scheme would involve marginally higher GHG emissions over current levels.	✓		
	Policy EN13	Support would be given to the monitoring of air quality and the development of policies and action programmes to maintain air quality and, wherever possible, to improve it.	The Scheme would help to improve local air quality through reducing congestion on local roads.	✓		
	Policy EN16	The setting of targets for limiting noise pollution and for meeting air and water quality standards will be supported, together with policies, programmes of action and regular monitoring to achieve them.	The Scheme would result in an overall gain in air quality in the study area.	✓		
Hastings Air Quality Action Plan	Action 6	The construction of the Link Road, which will reduce traffic flows in the AQMA.	This Action directly supports the link road which is the proposed Scheme	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Hastings Local Plan (2004)	Policy DG33	Planning permission will not be granted for development which would be likely to cause unacceptable pollution of air, water or land.	Appropriate mitigation measures would be implemented to avoid unacceptable levels of pollution occurring.	✓		
Noise and Vibration						
Our Countryside: The Future – A fair deal for rural England	Paragraph 9.4.1/9.4.2	Promoting tranquillity and protecting countryside from noise and vibration.	The Scheme runs through the countryside and would have an adverse impact on the setting and tranquillity of the area.			✓
	Paragraph 9.4.2.	Using new methods such as new road building techniques to reduce existing noise / vibration.	Measures to mitigate against noise impacts would be considered as part of the EIA .	✓		
Our Towns And Cities; The Future Delivering An Urban Renaissance - Urban White Paper	Summary paragraph 3	Commends good design and planning which makes it practical to live in a more environmentally sustainable way with less noise, pollution and traffic congestion.	The Scheme would bring benefits in terms of reduced noise impacts on both urban and rural communities. However, some limited adverse impacts will be experienced.		✓	
PPG24: Planning and Noise	Paragraph 10	Planning system to not put unjustifiable obstacles in way of noise generating, essential infrastructure.	The Scheme does not affect this policy objective.		✓	
	Paragraph 20	Special consideration given to noisy developments close to SSSIs and AONBs.	The Scheme runs very close to two SSSIs which would be affected by noise pollution. The design of the Scheme proposes mitigation measures to minimise impacts on designated sites, and the AONB.	✓		
Regional Planning Guidance for the South East (RPG9)	Policy Q6	RPG9 requires local authorities, service providers, key agencies, and others throughout the region to improve the local environment, public health and safety through a number of measures including the reduction of the incidents of noise pollution.	The Scheme would assist in reducing traffic flows on the A259 at Glyne Gap and other parts of the urban areas as well as rural communities. However, a significant number of properties will be affected by increased noise levels.			✓

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Draft Regional Spatial Strategy - The South East Plan	Policy NRM8	Measures to address and reduce noise pollution will be developed at regional and local level through means such as: <ul style="list-style-type: none"> • Locating new residential and other sensitive development away from existing sources of significant noise or away from planned new sources of noise; • Traffic management; and, • Encouraging high levels of sound-proofing and screening. 	The Scheme would reduce traffic volumes on local roads, reducing noise levels. Screening of the proposed road would be encouraged through tree planting to reduce noise intrusion on the countryside. However, a significant number of properties will be affected by increased noise levels.		✓	
East Sussex and Brighton and Hove Structure Plan 1991-2011	EN1	Development and change within the structure plan area should sustain, conserve and where possible, enhance the character, diversity and quality of the landscape, and natural and built environment.	The Scheme would introduce noise impacts to an area of relative tranquillity.			✓
	EN15	Development proposals and transport schemes will be required, where applicable, to include measures to minimise noise.	The Scheme would include proposals for minimising noise	✓		
	EN16	The setting of targets for limiting noise pollution and for meeting air and water quality standards will be supported, together with policies, programmes of action and regular monitoring to achieve them.	The Scheme would help to reduce air pollution in certain areas, especially along the A259, and mitigation measures such as screening would help reduce any noise impacts associated with the Scheme	✓		
East Sussex Local Transport Plan 2006-2011	Chapter 3, page 59	Notes that road surfacing has an impact on traffic noise.	The Scheme has been designed to a specification which would minimise as far as is possible road noise.	✓		
		Discouraging routing of traffic, in particular freight vehicles, through sensitive environments – residential streets and rural roads - except for access.	The Scheme would result in the redirection of some traffic from the rural areas to more appropriate routes.	✓		

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East Sussex Local Transport Plan 2006-2011	Chapter 3, page 59	Encouraging the use of non-car 'quiet' modes of transport such as walking and cycling.	The Scheme would generate traffic noise, but the creation of the Greenway would help encourage walking and cycling. The Scheme would also facilitate the planned growth of Bexhill giving rise to further opportunities for travel choice.		✓	
Hastings Local Plan (2004)	Policy DG4	Planning permission will not be granted for proposals likely to result in unacceptable levels of noise.	The full assessment of noise impacts is discussed elsewhere in this ES. The design of the Scheme has been to a standard which minimises noise as far as is reasonably possible.	✓		
Rother District Local Plan (2006)	Paragraph. 5.7	The impact of development needs to be carefully considered in relation to issues such as loss of light and privacy, avoiding an overbearing presence and otherwise causing intrusion such as through noise, lighting or activity at unsocial hours.	The Scheme would produce noise and visual intrusion from street lighting, however these impacts would be mitigated through screening and careful design and placement of light units.	✓		
	Policy DS1 (vi)	Provides guidance on environmental impacts, it states that in considering the location of development the following should be borne in mind; <i>"it avoids prejudicing the character and qualities of the environment, particularly the High Weald AONB and undeveloped coastline."</i>	The noise arising from the Scheme would, despite mitigation, alter the character of the receiving countryside.			✓
Nature Conservation and Biodiversity						
Natural Environment and Rural Communities Act 2006	Section 40	<i>"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."</i>	The development of the Scheme, the consideration of alternatives, and design of appropriate mitigation measures have been undertaken in consultation with Natural England. The alignment of the Scheme avoids nationally designated sites. Proposed mitigation will, as far as is practicable, minimise impacts.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Countryside And Rights Of Way Act 2000	Schedule 9 Section 28G	The Act imposes a duty on 'public bodies' in exercising their functions to take reasonable steps, consistent with the proper exercise of those functions, to further conservation and enhancement of the special features on an SSSI. This applies where the public body is exercising its statutory functions on an SSSI or on land outside the SSSI where those functions affect an SSSI.	The alignment of the Scheme has been designed to avoid nationally significant sites. Mitigation and compensatory measures have been developed to address direct and indirect impacts of the Scheme on SSSIs.	✓		
Our Countryside: The Future – A fair deal for rural England	Paragraph 121	95% of SSSIs to be in favourable condition by 2010.	The Scheme would have some limited minor adverse impacts on designated sites.		✓	
Working with the grain of nature: A biodiversity strategy for England	Paragraph 6.1	To conserve the biodiversity of all woodland types, particularly ancient semi-natural woodland, veteran trees and wood pasture.	The Scheme would involve some limited loss of probable ancient woodland.			✓
PPS9: Biodiversity and Geological Conservation	Page 2	Promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development.	The Scheme runs close to two SSSIs and through a SNCI. While some habitat would be lost, the package of mitigation and compensation includes the re-creation and enhancement of habitats in the area.		✓	
		To conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat.	A key element of the design is that areas of wetland and open water would be created together with new woodlands. These habitats would complement the SSSIs and mitigate adverse impacts upon local wildlife		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
PPS9: Biodiversity and Geological Conservation	Page 2	To contribute to rural renewal and urban renaissance by enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people	A key element of the design is that areas of wetland and open water would be created together with new woodlands. These habitats would complement the SSSIs and compensate for adverse impacts upon local wildlife.	✓		
	Paragraph 1	Planning decisions should be based upon up-to-date information about the biodiversity and geological resources of the area.	The assessment of the Scheme's impact upon local biodiversity has involved field studies.	✓		
	Paragraph 1	The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. If significant harm cannot be mitigated or satisfactorily compensated, permission should be refused.	The Scheme proposes mitigation and compensation for the adverse impacts on habitats and species. Significant harm has been avoided, and impacts are considered to be slight adverse.	✓		
	Paragraph 9	Development adversely affecting SSSIs should only proceed where the benefits clearly outweigh the impact on the site or on the national network of SSSIs.	The Scheme does not directly affect the two SSSIs in the area; indirect minor impacts have been identified and significant harm avoided.	✓		
	Paragraph 12	Networks of natural habitats provide a valuable resource. They can link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. Development proposals should integrate such features within their design.	The design of the Scheme has taken into account the issue of severance and proposals have been developed in response to the needs of the local area. Proposals for new woodland planting, badger runs and other examples of good practice are part of the Scheme's design.	✓		
	Paragraphs 15 and 16	Planning authorities should refuse planning permission where harm to protected species or their habitats would result from development unless the need for, and the benefits of, the development clearly outweigh that harm.	The Scheme's proposals for mitigation and compensation are sufficient to ensure that species and habitats do not suffer significant and unacceptable harm.	✓		

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				Benefit	Neutral	Adverse
Integrated Regional Framework (IRF) for the South East	Regional objective 13	To conserve and enhance the region's biodiversity.	The Scheme's proposals for mitigation and compensation are sufficient to ensure that species and habitats do not suffer unacceptable harm. However, some residual minor adverse impacts remain.		✓	
A Biodiversity Action Plan for Sussex	Page 1	Conserve and enhance the biological diversity of Sussex and contribute to the conservation and enhancement of both national and international biodiversity.	The Scheme's proposals for mitigation and compensation are sufficient to ensure that species and habitats do not suffer unacceptable harm. However, some residual minor adverse impacts remain.		✓	
Regional Planning Guidance for the South East (RPG9)	Policy E1	Priority should be given to protecting areas designated at international or national level for their nature conservation value.	The Scheme avoids two SSSIs in the study area. Although there would be indirect minor impacts, a package of measures aimed at minimising these to acceptable levels is proposed.	✓		
	Policy E2	Biodiversity maintained and enhanced with actions put in place to achieve Local Biodiversity Action Plan targets.	Proposals are to increase the amount of flood plain grassland (a priority BAP habitat).	✓		
	Policy E5	Woodland habitats in the Region should be increased whilst protecting the biodiversity and character of existing woodland resources and other areas of established or potential nature conservation value.	The Scheme proposes new planting as part of the mitigation package.	✓		
Regional Economic Strategy for the South East of England	Priority 16	Invest in environmental capital to maximise its contribution to a sustainable regional economy.	Areas of wetland and open water would be created together with new woodlands. These habitats would complement the SSSIs and may attract more visitors to the area, helping the local economy	✓		

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				Benefit	Neutral	Adverse
Draft Regional Spatial Strategy - The South East Plan	Policy NRM4	In the development and implementation of plans and strategies, local authorities and other bodies shall avoid a net loss of biodiversity, and actively pursue opportunities to achieve a net gain across the region.	With mitigation, the Scheme registers a slight adverse impact. Significant harm has been avoided, and new habitats and management arrangements will improve the biodiversity value of the area in general.		✓	
Draft Regional Spatial Strategy - The South East Plan	Policy NRM5	Provides for the protection of Ancient Woodland and promotes planting of new woodland to meet other environmental objectives.	The Scheme would involve some limited loss of probable ancient woodland.			✓
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy EN1	Places a requirement on development and change within the structure plan area to sustain, conserve and where possible, enhance the character, diversity and quality of the landscape, and natural and built environment.	The Scheme entails development in the countryside, but it is designed to a high environmental standard and adverse impacts are minimised to acceptable levels.		✓	
	Policy EN17	The existing natural resource of species, habitats and geological features, including statutory sites of national and international importance and their settings, ancient woodland, and other sites of demonstrable geological, landscape or wildlife importance (including the active residence of specially protected species) will be protected from damage.	The Scheme would involve the loss of one SNCI and probable ancient woodland (to a limited extent). The Scheme may have limited and indirect adverse impacts on nationally designated sites. However, significant harm has been avoided.		✓	
	Policy EN18	Actions to increase the extent and diversity of the natural resource will be supported. These may take the form of extensions to existing wildlife habitats, the creation of new habitats, the protection or creation of habitat corridors, and the location or creation of new geological exposures.	An element of the Scheme's design is that substantial areas of wetland and open water would be created together with new woodlands.	✓		

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				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy EN20	Where major development, for which there is an established need, would result in significant loss of important habitat, measures to provide compensating and equivalent habitat will be required.	Where the Scheme results in a loss of habitat, compensatory and equivalent land would be found.	✓		
Hastings Local Plan	Policy NC2	Designated Sites of SSSIs will be safeguarded and protected.	The Scheme avoids SSSIs although some minor indirect impacts remain.	✓		
	Policy NC3	Areas designated or proposed as Local Nature Reserves (LNRs) will be safeguarded and protected.	The Scheme would be situated 1.5 km from Filsham Reedbed LNR and is therefore unlikely to have a significant impact.	✓		
	Policy NC8	Development proposals will be required to minimise damage to wildlife and habitats.	The Scheme contains proposals to compensate for damage to wildlife with measures such as habitat creation and enhancement and wildlife corridors. Significant harm has been avoided.	✓		
	Policy NC10	Planning permission will not be granted for development that would adversely affect an area of ancient woodland.	The Scheme would involve some limited loss of probable ancient woodland..			✓
Rother District Local Plan (2006)	Policy DS1	Protects sites of recognised nature conservation importance, particularly internationally and nationally important sites.	The Scheme contains proposals to minimise damage to wildlife with measures such as habitat creation and enhancement and wildlife corridors. Compensation is provided for lost SNCI habitat.	✓		

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				Benefit	Neutral	Adverse
Landscape and Visual Effects						
Our Countryside: The Future – A fair deal for rural England (2000)	Paragraph 9.4.4	Light pollution in night sky intrudes into the countryside at night and should be controlled	The Scheme would cause some light pollution from street light, but through careful design, screening and placement of lighting units impacts would be reduced		✓	
Our Towns And Cities; The Future Delivering An Urban Renaissance - Urban White Paper	Paragraph 4.35	Local Authorities should consider possible ways of regenerating local townscapes and economies, including bringing about the wholesale transformation of an area by rehabilitating old industrial land, developing new uses and building new communities.	The Scheme plays a significant role by facilitating the sustainable growth of the urban area, and allow for the master planning of strategic development sites.	✓		
PPS1 Delivering Sustainable Development	Paragraph 5	Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by “... <i>protecting and enhancing the natural and historic environment, the character of the countryside and existing communities.</i> ”	The Scheme involves a significant change in the character of the receiving countryside. However, it facilitates a development pattern which is focussed upon the urban areas, and allows the master planning of residential areas in a sustainable manner in line with national policy.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
PPS1 Delivering Sustainable Development	Paragraph 17 and 18	The planning system should seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through policies on issues such as design, conservation and the provision of public space	The Scheme would improve poor air quality, and assist in boosting investor confidence in the area. This may facilitate improvements to the urban and historic environment as traffic flows are altered and a (potentially) improved economy brings improvements to the public realm. The layouts of new residential environments (facilitated by the Scheme) would be capable of being planned in a strategic and sustainable manner.	✓		
	Paragraph 19	Planning authorities should seek to enhance the environment as part of development proposals. Significant adverse impacts on the environment should be avoided and alternative options which might reduce or eliminate those impacts pursued. Where adverse impacts are unavoidable, planning authorities and developers should consider possible mitigation measures. Where adequate mitigation measures are not possible, compensatory measures may be appropriate	The Scheme involves some environmental loss. A package of mitigation and compensation measures is proposed as part of this application.	✓		
PPS7 Sustainable Development In Rural Areas	Objectives Page 6	The continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources.	Whilst the Scheme does not involve development within a designated landscape, it entails the loss of a tranquil area of undeveloped countryside.			✓

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
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PPS7 Sustainable Development In Rural Areas	Objectives Page 6	To promote more sustainable patterns of development by: focusing most development in, or next to, existing towns and villages; preventing urban sprawl; discouraging the development of greenfield land, and, where such land must be used, ensuring it is not used wastefully; promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas; and, providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside.	The Scheme facilitates a development strategy observing these principles. Although greenfield sites would be used this accords with the search sequence set out in PPS3.	✓		
	Key Principle iv	The Government's overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all.	The Scheme would involve the loss of undeveloped countryside which is noted for its character and tranquillity.			✓
	Paragraph 15	Planning policies should ensure that the quality and character of the wider countryside is protected and where possible enhanced, with particular regard for the designated sites and landscapes.	The Scheme would involve the loss of undeveloped countryside which is noted for its character and tranquillity.			✓
	Paragraph 16 (v)	Local planning authorities should conserve specific features and sites of landscape, wildlife and historic or architectural value, in accordance with statutory designations	The Scheme does not involve the development of nationally or locally designated landscapes.		✓	
Regional Planning Guidance for the South East (RPG9)	Policy E1	Development plans to accord with guidance in PPS7 in protecting and enhancing existing and new international and national landscape designations	The Scheme would not venture into designated landscapes and with appropriate mitigation the setting of the nearby AONB would not suffer significant adverse effects.	✓		

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				Benefit	Neutral	Adverse
Draft RSS - The Draft Regional Spatial Strategy - The South East Plan	Policy C2	Establishes the general principles applied to designated landscapes in PPS7	The Scheme avoids the AONB and does not significantly affect its setting.	✓		
	Policy C3	Seeks to protect the countryside and enhance its distinct qualities.	The Scheme involves the development of countryside.			✓
	Policy BE1	Policy BE1 (Management for an urban renaissance) places a priority on the improvement of the urban environment if it is to be the focus for the region's development	The Scheme facilitates development in the urban areas and supports the development strategy for the area.	✓		
	Policy BE4	Requires development plans to identify opportunities for multifunctional fringe areas, to ensure better management of such areas, and for opportunities to enhance fringe areas through urban extensions to be identified by local authorities	The Scheme enables the master planning of north-east Bexhill and facilitates the implementation of the Pebsham Countryside Park.	✓		
East Sussex and Brighton & Hove Structure Plan 1991-2011	Policy S1	Minimise the impact on the environment including: <ul style="list-style-type: none"> • Residential areas (b), • Protect, enhance the attractiveness and individual character of urban and rural areas (f), • Effective use of brownfield sites (j), • Protection of conservation areas and other areas of townscape importance (m). 	Whilst the Scheme would not enhance the character of the Combe Haven Valley it would yield benefits in terms of reducing traffic flows from conservation areas and residential areas, and as part of the wider development strategy for the area assist in focussing development on urban areas		✓	
	Policy S5	Places a priority on the protection of countryside beyond development boundaries.	The Scheme would involve the development of open and tranquil countryside.			✓
	Policy S6 (d)	Supports the existing development pattern and requires development and change within existing urban areas to maintain and enhance urban character and environmental quality.	The Scheme is key in the implementation of the development strategy for the area.	✓		

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				Benefit	Neutral	Adverse
East Sussex and Brighton & Hove Structure Plan 1991-2011	Policy S10	Affords high protection to countryside; however exceptions are permitted where a town or village location would not be acceptable.	The Scheme is an essential component of the development strategy. As the SoCoMMS report concluded there is no option if the development needs of the area are to be met.	✓		
	Policy S24 (Hastings)	Provides strategic objectives for the development of the town. Priorities are placed upon the regeneration and improvement of the urban environment of Hastings, and the use of redundant or underused sites.	The Scheme is an integral part of a long term development strategy which aims to increase the prosperity of the area. An increase in the economic fortunes of the two towns would give rise to opportunities to enhance the urban and historic fabric of Hastings and Bexhill.	✓		
	Policy S25 (Bexhill)	Provides strategic objectives for the development of the town. Priorities are placed upon the regeneration and improvement of redundant or underused sites.	The Scheme facilitates the development strategy for the area resulting in the development of high quality residential and business areas.	✓		
	Policy EN1	Development and change will be required to sustain, conserve and, where possible, enhance the character, local diversity and quality of the landscape and natural and built environment of the plan area including, where appropriate, the creation of new, equally good and distinctive local character. Features contributing to landscape character will be protected.	The Scheme involves the significant change in the character of an undeveloped tranquil stretch of countryside. However, it would enable the release of development land which would be master planned providing well designed residential and business environments.		✓	
	Policy EN2	Conserving and enhancing landscape quality and character will be the primary objective in the Sussex Downs and High Weald AONB.	The Scheme would not have a significant adverse impact on the character of the High Weald AONB		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton & Hove Structure Plan 1991-2011	Policy EN7	The landscape character of urban fringe areas - that is, usually areas within 2 km of the predominantly built up areas of major towns - will be subject to positive measures to improve landscape character whilst encouraging appropriate recreational use and public access. Priority in implementing this policy will apply to the urban fringes of Brighton & Hove, Eastbourne, Bexhill and Hastings.	The Scheme acts as the catalyst for development and enhancements throughout the study area. By enabling development at north-east Bexhill, development contributions would be provided to support the Pebsham Countryside Park. Access would also be enhanced with the inclusion of the Greenway as part of the Scheme's design.	✓		
	Policy EN8	The plan area's diminishing stock of areas of relative remoteness and tranquillity will be protected.	The Scheme would cause noise pollution from traffic adversely affecting an area of relative tranquillity.			✓
	Policy EN26	Encouragement will be given to the development of programmes and packages of measures to regenerate urban areas, town centres, seafront and other popular visitor areas, through linked initiatives on environmental, economic development and transport improvements.	The Scheme is an essential component of a wider strategy to regenerate, improve and develop the two towns.	✓		
Hastings Local Plan	Policy L1	Planning permission will not be granted for development which would substantially compromise the distinctive landscape setting of the town.	The Scheme will not compromise the setting of Hastings.	✓		
	Policy L2	Planning permission will not be granted for development that would adversely affect the natural beauty of an AONB.	The Scheme would not have a significant effect on the setting of the AONB.	✓		
Rother District Local Plan (2006)	Policy DS1 ix	5-B.1.4 "In determining whether development is appropriate in a particular location, proposals should accord with the following principles: ... it respects the importance of the countryside in terms of its distinct landscape character, natural resources, woodland and agriculture ..."	The Scheme would adversely affect the character of the surrounding countryside, although design and mitigation measures would minimise impacts.			✓

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Rother District Local Plan (2006)	Policy BT1	Proposals for development and change in Battle should be compatible with and, wherever practicable, contribute positively to the need to maintain its historic, small town character; to protect the historic core and its setting; to enhance the commercial and tourism attractiveness of the town centre; and to minimise the demand for cross-town vehicular traffic.	The Scheme gives rise to benefits for the wider rural area as traffic flows are reduced.	✓		
	Policy BX1	Proposals for development and change in Bexhill should be compatible with and, wherever practicable, contribute positively to the regeneration of the town that reflects its unique character, and maintains and enhances the town's distinctive character and identity, including maintaining the strategic gap to St. Leonards in accordance with Policy DS5.	The Scheme provides opportunities for introducing well designed residential and business areas. It also facilitates the Pebsham Countryside Park concept which safeguards the strategic gap between the two towns.	✓		
Cultural Heritage						
Power of Place	Recommendation 1	Put conservation at the heart of renewal and regeneration.	The route avoids designated historic sites. Although the overall impact of the Scheme is judged to be slight adverse, this is restricted to a relatively narrow study area.		✓	
The Historic Environment: A Force for our Future	Paragraph 9	The historic environment is accessible to everybody and is seen as something with which the whole of society can identify and engage.	It is unlikely that the Scheme would impact on this policy.		✓	

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Planning (Listed Buildings and Conservation Areas) Act 1990 (c.9)	Section 56 (1)	Local Authorities must consider the impact of a proposal on a listed building or its setting.	The Scheme potentially affects the setting of a limited number of listed buildings in the study area, but would also provide the opportunity to reduce traffic impacts on listed buildings and conservation areas in the wider area, such as Battle.	✓		
	Section 56 (2)	A local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.	The Scheme does not affect the integrity of designated features or areas.	✓		
	Section 72 (1)	In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area	The Scheme does not adversely affect the character of designated areas.	✓		
The Hedgerow Regulations 1997: A Guide to the Law and Good Practice	Section 1	The Hedgerow Regulations 1997 were made under Section 97 of the Environment Act 1995 and came into operation on 1 st June 1997. They introduced new arrangements for local planning authorities in England and Wales to protect important hedgerows in the countryside, by controlling their removal through a system of notification	The Scheme would involve the removal of some hedgerows marking ancient field patterns. This loss cannot be mitigated by new planting elsewhere, however recording of these patterns is proposed.			✓
Ancient Monuments and Archaeological Areas Act 1979		Once a site is scheduled, consent must be obtained from the Secretary of State for any works that affect it, with the exception of those noted under class consents.	The Scheme does not adversely affect nationally designated features.	✓		

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				Benefit	Neutral	Adverse
PPS1 Delivering Sustainable Development	Paragraph 5	Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by “... <i>protecting and enhancing the natural and historic environment, the character for the countryside and existing communities.</i> ”	The Scheme involves adverse impacts on the settings of a limited number of receptors. However, gains are anticipated in the wider area as traffic flows are altered and relieve congested areas such as Battle.	✓		
	Paragraph 17 and 18	The planning system should seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality through policies on issues such as design, conservation and the provision of public space.	The Scheme would improve poor air quality, and assist in boosting investor confidence in the area. This, in turn, may facilitate improvements to the urban and historic environment. As discussed above, positive impacts are anticipated as changes in traffic flows relieve adverse impacts on designated areas and features.	✓		
	Paragraph 19	Planning authorities should seek to enhance the environment as part of development proposals. Significant adverse impacts on the environment should be avoided and alternative options which might reduce or eliminate those impacts pursued. Where adverse impacts are unavoidable, planning authorities and developers should consider possible mitigation measures. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.	The Scheme’s design has sought to minimise and avoid adverse environmental impacts and proposes a package of mitigation measures and compensation.	✓		
PPG15: Planning and the historic environment	Paragraph 1.1	The physical survivals of our past are to be valued and protected for their own sake, as a central part of our cultural heritage and our sense of national identity.	The route avoids designated historic features and listed buildings. Construction may reveal archaeological remains which will be conserved and recorded in accordance with best practice.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
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PPG15: Planning and the historic environment	Paragraph 1.3	When proposals for new development come forward, their impact on the historic environment should be fully assessed and given full weight, alongside other considerations.	This EIA considers the impact of the Scheme on the historic environment.	✓		
	Paragraph 5.2	Local highway and planning authorities should integrate their activities and should take great care to avoid or minimise impacts on the various elements of the historic environment and their settings.	This EIA meets this requirement by providing a full assessment of impacts and proposes a programme of appropriate mitigation measures.	✓		
	Paragraph 5.4	When contemplating a new route, authorities should consider whether the need for it, and any impact on the environment, might be obviated by an alternative package of transport management such as parking and charging policies, park-and-ride schemes, and public transport priority.	The SoCoMMS report revealed that an increase in road capacity is necessary to meet transport and planning objectives. The development of the Scheme has been undertaken in consultation with the Statutory Environmental Bodies.	✓		
	Paragraph 5.5	If a new route is unavoidable, authorities should initially identify any features of the historic environment – including parks, gardens, battlefields and archaeological sites as well as buildings and areas – and evaluate their importance. Wherever possible, new roads “... <i>should be kept away from listed buildings, conservation areas and other historic sites. However, in each case a suitable balance has to be struck between conservation, other environmental concerns, economics, safety and engineering feasibility.</i> ”	The Scheme and its supporting EIA have been developed with environmental considerations at the forefront of the design and assessment process.	✓		
PPG16: Archaeology and Planning	Paragraph 8	Where nationally important archaeological remains are affected there should be a presumption in favour of their physical preservation.	If any archaeological remains are found during the road construction the appropriate action would be taken and authorities notified. However, preservation in situ may not always be possible.		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
PPG16: Archaeology and Planning	Paragraph 13	If physical preservation is not feasible the guidance states that an alternative would be “ <i>an archaeological excavation for the purposes of preservation by record</i> ”, however this is regarded as the second best option, because excavation may lead to destruction of evidence, and may prove expensive and time-consuming.	Impacts on the historic environment have been minimised as far as is practicable. Where loss is unavoidable provision is made for the recording of remains.	✓		
	Paragraph 18	Developers and local authorities should take into account archaeological considerations and deal with them from the beginning of the development control process	The design of the Scheme has involved consultation with the Statutory Environmental Bodies. Archaeological considerations form part of this EIA.	✓		
	Paragraph 22	Local Planning Authorities can expect developers to provide the results of such assessments and evaluations as part of their applications for sites where there is good reason to believe there are remains of archaeological importance.	The application would be accompanied by a full EIA including an assessment of the cultural heritage implications of the Scheme.	✓		
Regional Planning Guidance for the South East (RPG9)	Policy E1	Priority should be given to protecting areas designated at international or national level for their cultural value.	Although the Scheme adversely affects some historic/cultural receptors, it is anticipated that benefits would arise from changes in traffic flows in both the urban and rural areas, such as Battle.	✓		
Draft RSS - The Draft Regional Spatial Strategy - The South East Plan	Policy BE7	<i>“In developing and implementing plans and strategies, local authorities and other bodies should adopt policies and proposals which support the conservation and, where appropriate, the enhancement of the historic environment and the contribution it makes to local and regional distinctiveness and sense of place. Proposals that make sensitive use of historic assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate use, should be encouraged.”</i>	The Scheme entails limited and indirect adverse impacts on the historic environment. However, as part of a wider development strategy the Scheme makes a contribution to the regeneration of the area. The benefits anticipated through the changes in traffic flows would contribute to the maintenance and potential enhancement of the historic environment of settlements such as Battle.		✓	

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Integrated Regional Framework (IRF) for the South East	Regional objective 14	To protect, enhance and make accessible for enjoyment the region's countryside and historic environment.	The Scheme has been designed to ensure that designated and known historic features are avoided. Archaeological remains revealed during the construction phase will be recorded according to best practice.		✓	
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S1 (j)	Seeks to protect a range of designated sites including those designated for their historical significance such as SAMs, Listed Buildings and Conservation Areas.	The Scheme has been designed to ensure that designated and known historic features are avoided. Archaeological remains revealed during the construction phase will be recorded according to best practice.		✓	
	Policy S1 (m)	Extends the above considerations to both protecting and enhancing conservation areas and other areas and features of townscape importance	The Scheme does not adversely affect these features, and will in some instances bring about improvements as traffic flows are redirected.	✓		
	Policy EN1	Structure Plan places a requirement on development and change within the structure plan area to sustain, conserve and where possible, enhance the character, diversity and quality of the landscape, and natural and built environment.	The Scheme provides a range of both adverse and beneficial impacts. Its design and alignment has sought to maximise environmental gains and sought to provide adequate mitigation where needed.	✓		
	Policy S24 (Hastings)	Provides strategic objectives for the development of the town. Priorities are placed upon the regeneration and improvement of the urban environment of Hastings, and the use of redundant or underused sites.	The Scheme is an integral part of a long term development strategy which aims to increase the prosperity of the area. An increase in the economic fortunes of the two towns would give rise to opportunities to enhance the urban and historic fabric of Hastings and Bexhill.	✓		

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East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S25 (Bexhill)	Provides strategic objectives for the development of the town. Priorities are placed upon the regeneration and improvement of redundant or underused sites.	The Scheme is an integral part of a long term development strategy which aims to increase the prosperity of the area. An increase in the economic fortunes of the two towns would give rise to opportunities to enhance the urban and historic fabric of Hastings and Bexhill.	✓		
	Policy EN22	Provision should be made for the identification, recording, safeguarding, investigation and preservation, preferably in situ or, where not feasible, by record, of all archaeological sites (including those of maritime interest) and monuments and historic and listed buildings.	If any archaeological remains are found during the road construction the appropriate action would be taken and authorities notified.	✓		
	Policy EN23	Sites and features of demonstrable historical or archaeological importance and their settings, including ancient monuments, listed buildings, conservation areas, historic parks and gardens, battlefields and other historic features will be protected from inappropriate change and development.	The Scheme would not directly impact on SAMs or other nationally important archaeological sites or monuments; but their setting may be affected in terms of noise and visual intrusion. Mitigation measures would help to reduce these impacts. Benefits may arise from the change in the flow of traffic in the rural and urban areas.		✓	
	Policy EN24	Development proposals affecting known archaeological sites or areas of potential archaeological interest should be accompanied by an assessment, based on a field evaluation, of their archaeological implications before decisions on applications for planning permission can be made.	An archaeological assessment will be carried out as part of the EIA for the Scheme.	✓		

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East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy EN26	Encouragement will be given to the development of programmes and packages of measures to regenerate urban areas, town centres, seafront and other popular visitor areas, through linked initiatives on environmental, economic development and transport improvements.	The Scheme would facilitate regeneration and economic development of both towns through improvement to transport links and accessibility and the release of land for strategic development.	✓		
	Policy C6	Planning permission will not be granted for development that would adversely affect a SAM or other nationally important archaeological site or monument or their settings.	The Scheme will not affect nationally designated features or areas.		✓	
	Policy L6	Planning permission will not be granted for development that would result in harm to the historic significance, character, appearance and setting of identified historic parks and gardens.	The construction of the Scheme will not affect historic parks or gardens.		✓	
Hastings Local Plan	Policy C6	Planning permission will not be given for development which adversely affects a SAM or other nationally important monuments or sites or their settings unless that (a) an adequate assessment of the proposal has been undertaken, and (b) it is demonstrated that the site/monument can be satisfactorily preserved either in situ or by record.	There are no nationally designated sites in the study area.		✓	
Rother District Local Plan (2003)	Policy GD1	Development should not prejudice the character, appearance or setting of heritage features (including SAMs, sites of archaeological importance, listed buildings, conservation areas, registered historic parks and gardens, registered battlefields).	The Scheme would indirectly impact on the setting of heritage features; however, mitigation measures such as screening may help to reduce these impacts. The wider area would benefit from reduced/redirected traffic flows		✓	

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Rother District Local Plan (2003)	Policy BT1	Proposals for development and change in Battle should be compatible with and, wherever practicable, contribute positively to the need to maintain its historic, small town character; to protect the historic core and its setting; to enhance the commercial and tourism attractiveness of the town centre; and to minimise the demand for cross-town vehicular traffic.	The Scheme has the potential to reduce traffic levels within this historic town (and other rural settlements).	✓		
	Policy BX1	Development proposals should promote the regeneration of Bexhill's centre in a way that reflects its unique character and cultural assets.	The Scheme facilitates development around Bexhill and may contribute to the regeneration of the area.		✓	
Social and Community Effects						
Sustainable Communities : People, Places and Prosperity (2005)	Paragraph 1.2	Provide decent affordable homes.	The Scheme would enable the development of the Sidley and Pebsham housing areas in north Bexhill which are dependent on the completion of the Scheme for planning permission. The allocations would involve a 40% provision of affordable housing.	✓		
		Provide access to jobs and excellent services.	The Scheme would improve links between Bexhill and Hastings and access to job opportunities in other towns	✓		
Our Towns And Cities; - Urban White Paper.	Paragraph 4.12	Where there is a need or opportunity for new development in towns and cities we must ensure that it is of the highest quality.	The Scheme would facilitate the release of development land in north-east Bexhill. An indirect effect is that it would enable the master planning of a sustainable urban extension.	✓		

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Our Towns And Cities; - Urban White Paper.	Paragraph 4.20	Development of urban areas should involve the efficient use of land, ensure that spaces and buildings are well designed and guarantee ready access to jobs and services.	The Scheme would facilitate planned development which will facilitate ready access to jobs and services.	✓		
	Paragraph 4.35	Possible ways of regenerating local townscapes and economies include bringing about the whole scale transformation of an area by rehabilitating old industrial land, developing new uses and building new communities.	The Scheme facilitates the release of land for a mixed use development of 1100 dwellings and 48,000m ² of employment floorspace, identified in the Rother Local Plan. The South East Plan envisages a similar order of greenfield development in the period 2011 – 2026. This would make a significant contribution to the regeneration of the area.	✓		
	Paragraph 7.28	Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010.	The Scheme would reduce congestion along the A259 and thus improve existing bus service reliability. It would also provide the opportunity to provide additional routes servicing new development at north-east Bexhill and north Hastings.	✓		
		Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas.	The Scheme would enable the development of 1100 dwellings of which 40% would be affordable/social housing.	✓		
		Better health services and a reduction in the health gap between the most deprived areas and the rest of the country.	The Scheme provides the opportunity to develop better access to services (including health care) but would do little to directly influence the investment decisions of the Primary Care Trust.		✓	

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Our Countryside: The Future – A fair deal for rural England	Paragraph 11.1.2	Increase enjoyment of the countryside to make it easier for people to enjoy recreation in open countryside and to use footpaths, bridleways and other rights of way.	The Greenway would make it easier for people to enjoy the countryside and provide a place for people to cycle, horse ride and walk. The release of development land at north-east Bexhill would enable the proposed Pebsham Countryside Park to be established thus providing a major recreational resource for the area.	✓		
PPS 1 – Delivering Sustainable Development (2004)	Paragraph 5	Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development.	The Scheme releases development land at north-east Bexhill and provides the opportunity for the town to meet longer term strategic requirements emerging from the draft SEP. By allowing Bexhill to be the focus of development in Rother, the Scheme prevents the unsustainable dispersal of development within the AONB.	✓		
PPS3 Housing (November 2006)	paragraph 9	The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.	The Scheme releases development land at north-east Bexhill and provides the opportunity for the town to meet longer term strategic requirements emerging from the draft SEP, and contribute to affordable housing need as part of a planned community.	✓		
	Paragraph 16	Establishes the Government’s objectives for residential environments, including the need to ensure accessibility to services via alternative modes of transport.	By releasing land for development the Scheme provides the opportunity to plan for a sustainable urban extension to Bexhill. It is envisaged that the Scheme would be supported by a set of integrated transport measures delivered through other strategies such as the LTP2.	✓		

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PPS3 Housing (November 2006)	Paragraph 37	The criteria for identifying strategic locations for development are described as, focussing development on areas with good public transport access, the feasibility of delivering key infrastructure, the need to create sustainable, mixed and inclusive communities.	The Scheme contributes to these objectives by creating the conditions within which planned development can take place.	✓		
	Paragraph 53	LDDs should identify 15 years of housing land supply which meets regional requirements.	The Scheme serves to release housing land and contributes to further development over the longer term.	✓		
PPG 4 – Industrial, Commercial Development and Small Firms	Paragraph 1	One of the Government's key aims is to encourage continued economic development in a way which is compatible with its stated environmental objectives. Economic growth and a high quality environment have to be pursued together.	The Scheme releases land for development which in turn allows for the planned development of business land to high environmental standards.	✓		
	Paragraphs 9 and 10	The locational demands of businesses are therefore a key input to the preparation of development plans. Development plan policies must take account of these needs and at the same time seek to achieve wider objectives in the public interest.	By releasing development land, the Scheme provides opportunities for local businesses to relocate to more accessible areas and expand.	✓		
PPS 6 – Planning for Town Centres (March 2005)	Paragraph 1.3	The Government's key objective for town centres is to promote their vitality and viability by: <ul style="list-style-type: none"> • Planning for the growth and development of existing centres; • Promoting and enhancing existing centres, by focusing development in such centres; and • Encouraging a wide range of services in a good environment, accessible to all. 	The Scheme is an important component in the regeneration of the area. Should regeneration take root as expected as part of this and other interventions the role and viability of the town centres would be enhanced.	✓		

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PPS7 Sustainable Development In Rural Areas	Page 6	The objectives of rural policy focus on securing sustainable communities with improved quality of life for residents.	By releasing strategic development opportunities a dispersed pattern of development is avoided, as are adverse impacts on transport and other infrastructure e.g. rural rat running.	✓		
		Focusing most development in, or next to, existing towns and villages.	The Scheme enables the planned development of Bexhill to take place, thereby avoiding a dispersed settlement pattern in rural Rother.	✓		
		Promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas and providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside.	By releasing land for development the Scheme contributes to this policy objective. Development contributions collected from the North East Bexhill Development would enable the Pebsham Countryside Park at to be implemented in full.	✓		
PPS7 Sustainable Development In Rural Areas	Paragraph 35	Allow appropriate facilities needed to enhance visitors' enjoyment, and/or improve the financial viability of a particular countryside feature or attraction.	Areas of wetland and open water would be created together with new woodlands and the Greenway. These facilities may attract more visitors to the area	✓		
PPG17 Planning for open Space, Sport and Recreation	Paragraph 32	Seek opportunities to provide better facilities for walkers, cyclists and horse-riders.	The Greenway would provide facilities for cyclists, walkers and horse-riders to enjoy the countryside	✓		
PPG21 Tourism	Paragraph 1.1	Consider ways to protect important natural, historical or architectural features, which serve to attract tourists.	The Scheme aims to minimise adverse impacts on the environment. Congestion relief would benefit the rural areas and Hastings' seafront.		✓	

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PPG21 Tourism	Paragraph 4.11	Protect key tourism assets such as characteristic landscapes and areas of special interest for nature conservation.	The Scheme would affect the setting of the countryside and nature conservation sites through noise and visual intrusion, mitigation measures may help to reduce these impacts			✓
A New Focus for England's Woodlands – England Forestry Strategy (December 1998)	Page 18	Woodlands are a major resource for recreation. Woodlands are robust and absorb people better than open countryside. The Government's programme of Forestry for Recreation, Access and Tourism aims to provide more and better-quality access to woodlands. The programme includes opportunities for ensuring that woods and forests continue to be used for a wide range of recreational pursuits as well as complementing and supporting other leisure interests, notably the tourist trade.	The provision of the Greenway along with the indirect support the Scheme lends the proposed Pebsham Countryside Park would assist in enhancing countryside access	✓		
Regional Planning Guidance for the South East (RPG9)	Policy Q1	States urban areas should be the prime focus for development and redevelopment, reiterating in large part the objectives of PPG3 (now replaced by PPS3).	The Scheme enables the urban extension of Bexhill to take place, conforming to the requirements policy Q1.	✓		
	Policy Q2	Requires development strategies to raise the quality of life in the urban areas through significant improvements to the urban environment, making urban areas more attractive places to live, work, shop, spend leisure time and invest thus helping to counter trends to more dispersed patterns of residence and travel.	The Scheme contributes to the regeneration of the area, as part of a wider strategy promoted by the Regional Development Agency, GOSE, District, Borough and County Councils. It also enables strategic land allocations to be developed in the form of sustainable urban extensions. It relieves congestion, improves environmental quality, and contributes to economic regeneration and the improvements that it would bring.	✓		
	Policy Q3	Requires development to make more efficient and better use of land and integrate new development with facilities for walking, cycling and public transport.	The Scheme provides the Greenway and public transport measures. It also facilitates opportunities for new public transport services and new pedestrian and cycle friendly urban environments.	✓		

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Regional Planning Guidance for the South East (RPG9)	Policy Q5	Serves to underline the need for the region's network of larger town centres to be the focus for major retail, leisure and office developments. To support an urban renaissance, promote social inclusion, and encourage more sustainable patterns of development.	The Scheme would contribute to the urban renaissance of Hastings and facilitate the achievement of regional objectives.	✓		
	Policy E6	Opportunities to be provided for leisure and recreation in the countryside in ways that retain and enhance its character.	The Greenway would provide facilities for cyclists, walkers and horse-riders to enjoy the countryside. The Scheme would also provide indirect support for the Pebsham Countryside Park as development contributions arising from the North East Bexhill Development would be used to support the park in line with local plan policy.	✓		
	Policy RE1	Notes that development strategies should support the objectives of the Regional Economic Strategy.	The Scheme is supported by the Bexhill Hastings Task Force, a partnership including the Government Office and the Regional Development Agency.	✓		
	Policy RE3	Encourages local authorities to engage with local, strategic and regional partners in order to develop comprehensive economic development strategies.	The Bexhill Hastings Task Force also includes the County and District councils.	✓		
	Policy RE4	Requires development strategies to reduce business related travel, locate new business development in close proximity to public transport routes and encourage forms of development which maximise environmental and social benefits, for example, mixed use development which links housing and employment.	The Scheme would provide opportunities to develop strategic mixed-use allocations and set the conditions for further mixed uses over the period of the SEP (i.e. up to 2026).	✓		
	Policy RE7	Identifies the need to regenerate the Sussex Coastal Towns Priority Area for Economic Renewal.	The Scheme is viewed as a key component of the regeneration strategy of the Bexhill Hastings area.	✓		

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Regional Planning Guidance for the South East (RPG9) (March 2001)	Policy TSR1	Aims to secure a diverse coastal tourism economy.	The Scheme is viewed as a key component of the regeneration strategy of the Bexhill Hastings area. It would also contribute (through the release of development land and subsequent development contributions) to the proposed Pebsham Countryside Park which would prove to be a sub-regionally significant leisure resource. It would also reduce traffic flows along the A259 at Hastings seafront, giving rise to the opportunity to reconnect the seafront with its urban hinterland.	✓		
	Policy TSR4	Places a priority on improving existing attractions in terms of high standards of environmental design and access requirements. It goes on to identify the south coast as an appropriate location for regionally significant attractions.	The Scheme would assist in realising the proposed Pebsham Countryside Park. It would also reduce traffic flows along the A259 at Hastings seafront, giving rise to the opportunity to reconnect the seafront with its urban hinterland.	✓		
	policy TSR7:	Seeking complementary approaches to the development and management of tourism so as to upgrade facilities, promote diversity, reduce seasonality and improve access, whilst retaining and enhancing the natural character of the area.	The Scheme would contribute to the regeneration of the area; however, this would not be a primary or direct effect.		✓	
Regional Economic Strategy for the South East of England 2002-2012 (July, 2002)	Priority 8	Identifies the key action of addressing deprivation wherever it occurs.	The Scheme is a key component of an overall strategy to regenerate the Bexhill Hastings area and alleviate poor environmental conditions along the A259.	✓		
	Priority 9	Looks to promoting sustainable forms of urban development.	The Scheme would facilitate the release of strategic allocations.	✓		

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Regional Economic Strategy for the South East of England 2002-2012 (July, 2002)	Priority 12	Housing – secure quality affordable housing. This emphasises the need for the level of affordable housing to be maximised in urban and rural areas.	In providing access to strategically significant development areas, the Scheme would enable a higher proportion of affordable and social housing to be delivered in areas of most concentrated need.	✓		
	Priority 13	Transport – secure a sustainable transport network. This makes the link between an efficient transport system and economic growth, but acknowledges that the link between economic growth and traffic growth must be weakened.	The Scheme would contribute to the development of a more efficient transport system. The increased road capacity as part of the development of Bexhill would provide the opportunity to deliver an integrated package of transport measures which would assist in limiting local traffic growth.	✓		
Draft Regional Spatial Strategy - the South East Plan	Policy CC8b	Identifies Hastings as a regional hub; this places an emphasis upon enhancing accessibility by sustainable modes, and encouraging higher densities and mixed uses.	The Scheme would contribute directly and it is essential in establishing the conditions conducive to regional hub objectives.	✓		
	Policy CC9	Identifies the need to intervene to improve economic performance and reduce social exclusion in a number of areas including the Sussex Coast sub region.	The Scheme is an example of one of the direct intervention necessary to address the poor economic conditions facing the area.	✓		
	Policy RE2	Provides the criteria for the provision and supply of employment land. Principal amongst the many criteria is the need for locations to be accessible to the proposed labour supply and focussed on urban areas.	The Scheme would release employment land. Without the Scheme, employment land allocations would need to be made elsewhere in the district and more distant from the potential workforce and strategic transport links.	✓		
	Policy RE5	Identifies the necessary spatial interventions to assist in addressing intra regional disparities. These include (for the Sussex Coast) a priority being placed upon developing delivery mechanisms to unlock and bring into use sites with economic development potential and address the transport constraints which are an impediment to increased economic performance.	The Scheme meets this policy requirement as it directly addresses one of the identified transport constraints on the local economy.	✓		

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Draft Regional Spatial Strategy - the South East Plan	Policy BE1	Highlights the need to ensure that the physical infrastructure necessary to support development strategies is planned and phased in accordance with planned development.	The Scheme is identified in the recently adopted Local Plan as necessary to release development land.	✓		
	Policy TC1	Accessible, attractive and vibrant town centres are fundamental to the sustainable development of South East England, and will continue to be the focal point for development of a mixture of uses including leisure, services, retail, residential and commercial.	The Scheme would not contribute directly to the achievement of this policy objective. It would however, contribute to the regeneration of the Bexhill Hastings area, potentially giving rise to more vital and viable town centres.	✓		
	Policy S1	Requires planning authorities to consider the spatial distribution of deprivation in the region, with particular regard to priority areas (e.g. priority areas such as the Sussex Coast) and ensure that programmes and policies are implemented to address these issues.	The Scheme is a component of a development strategy which aims to alleviate the high levels of deprivation through regeneration.	✓		
	Policy SCT1	Emphasises the need for a more co-ordinated effort to bring about the sustainable regeneration of the sub-region. It stresses the central importance of major improvements in strategic transport infrastructure to achieving the strategy's main objectives.	The Scheme is specifically referred to as one of the key improvements to the transport infrastructure.	✓		
	Policy SCT2	Improvements to east-west transport links (to improve accessibility and facilitate strategic development opportunities) are essential to enable the better functioning of overlapping local labour and housing markets.	The Scheme would contribute to improving better east west links by removing a bottleneck on the A259.	✓		
	Policy SCT4	Advises LDDs to give priority to delivering employment development in strategically accessible locations, providing for the needs of existing businesses and create opportunities for inward investment to the sub region and match increases in the resident workforce.	The Scheme would assist in releasing much needed strategically accessible employment land.	✓		

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Draft Regional Spatial Strategy - the South East Plan	Policy SCT6	Seeks to support and extend the work already undertaken in the Five Point Plan into the longer term and to capitalise upon Hastings as a regional hub, as part of wider strategy to bring about the social and economic regeneration of the sub region.	The Scheme would contribute to the regeneration strategy for the area.	✓		
	Policy SCT7	Establishes the housing distribution for the sub region, taking the figures in policy H1 forward and apportioning them on a sub-regional geography. Hastings' requirement remains 4,200 dwellings per annum whilst the Rother part of the sub region needs to accommodate 4,000 dwellings.	The Scheme would assist in releasing land for development which would meet sub-regional/regional requirements.	✓		
The Draft RES – The Regional Economic Strategy (November 2005)	Executive Summary	Promotes housing-led growth in the region. Investing in key infrastructure is essential to bring forward housing development which in turn supports economic prosperity;	The Scheme would assist in achieving regeneration ambitions for the area.	✓		
		Connectivity as the basis for growth – addressing the remaining transport bottlenecks on the South Coast, ensuring efficient connections to major ports and maximising the potential of next generation broadband.	The Scheme is designed with the objectives of alleviating poor transport conditions at Glyne Gap and the removal of a bottleneck on the trunk road network.	✓		
		Culture and leisure-based growth – using the strength of places for pleasure and quality of life to create industries as a catalyst for wider economic transformation.	The Scheme would not directly contribute to this objective, although it would assist in the regeneration of the area.		✓	
Integrated Regional Framework (IRF) for the South East	Regional objective 4	To reduce poverty and social exclusion, and close the gap between the most deprived areas in the South East and the rest of region.	The Scheme would help to facilitate social inclusion through better accessibility for deprived areas to jobs and services	✓		

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Seeing The Wood For The Trees: A Forestry And Woodlands Framework For South East England	page 3	The strategy's vision for forestry and woodland management is: <ul style="list-style-type: none"> • Better places for people to live, with an enhanced environment and biodiversity; • A stronger contribution to the economy; and, • A secure future for our woodland resources. 	As part of the package of mitigation and compensation, the Scheme would provide for new planting and increased biodiversity. It would also facilitate access to the countryside, primarily through the introduction of new residential environments and contributing to the realisation of a Pebsham Countryside Park.	✓		
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S1	The need to maintain the jobs/homes balance (a).	The Scheme would allow access to strategically significant employment and residential land.	✓		
		Providing compensation where environmental loss is incurred as a consequence of achieving other policies in the plan (b).	The Scheme would involve the development of the countryside and designated sites would be affected. However, the Scheme is seen as essential to meeting the Structure Plan's objectives for Bexhill. The Scheme proposes a package of measures to mitigate and compensate for loss identified in the EIA process.	✓		
		Unacceptable traffic conditions should not be perpetuated or created as a result of development (d).	The Scheme would not perpetuate or create unacceptable traffic conditions; it ensures that subsequent residential and employment development is capable of being accessed in a sustainable manner.	✓		
		Efficient and effective renewal and re-use of existing premises and brownfield sites particularly in the urban areas to reduce the need for greenfield sites (e).	The Scheme contributes to the economic conditions which would lead to an improvement of the viability of brownfield sites in Bexhill and Hastings.	✓		

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East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S1	The environment and character of the urban and rural areas should be protected and enhanced for residents (f)	The Scheme provides opportunities to enhance residential environments on the A259 and create more sustainable and well designed new residential areas.	✓		
	Policy S4	Establishes the strategic pattern of development in the plan area and sets out the factors which will guide the broad pattern and timing of development and change.	The Scheme would contribute to the maintenance of the development pattern by releasing land which is closely related to the coastal towns. Thus avoiding the potential for dispersed and unsustainable rural development.	✓		
		This supports the early implementation of commitments of high quality business development at north Bexhill (b).	The Scheme allows this development to take place.	✓		
	Policy S4	Make allocations for employment use as close to the Hastings urban area as possible (d).	The Scheme allows the allocation and realisation of employment land in the North East Bexhill Development.	✓		
		The implementation of the existing allocation for the new community and north Bexhill (e).	The Scheme allows this development to take place.	✓		
		The plan also requires that development is well related to an improved strategic transport network and that there is adequate transport capacity and appropriate access to meet the needs of the development (j).	The Scheme meets this policy objective by providing the necessary infrastructure to release development land.	✓		
		Ensuring that development is well related in both scale and timing to programmed infrastructure which is identified as being necessary for the development to proceed (k).	The Scheme is necessary to enable allocated sites to be developed.	✓		

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East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S4	That housing development is well related to the availability of sufficient existing and planned local employment opportunities (I).	The Scheme enables employment and residential development around Bexhill to take place, too the benefit of both Bexhill and Hastings residents. Without the Scheme an alternative development strategy of dispersed rural development would be likely. This would have little chance of delivering commensurate employment opportunities for new residents.	✓		
	S6	Establishes that existing development pattern will be maintained with no new settlements identified. Therefore development and change will be focussed on existing towns with the objective of improving their environment.	The Scheme would contribute to the maintenance of the development pattern by releasing land which is closely related to the coastal towns. Thus avoiding the potential for dispersed and unsustainable rural development.	✓		
	S24	Sets the strategic objectives for Hastings	The Scheme would assist in meeting the strategic objectives set for Hastings.	✓		
	S25	Sets the strategic objectives for Bexhill.	The Scheme is of direct relevance to the implementation of strategic objectives for the town.	✓		
	E1(c)	Emphasises the urgency required in providing strategic sites for modern businesses.	The Scheme would release strategic employment land.	✓		
	E11(e)	Emphasises the need to implement existing committed proposal for business development including north Bexhill.	The Scheme allows this development to take place.	✓		
	Policy E13	Reiterates the need to reduce the need for out-commuting and maintain and improve the jobs/homes balance in the area by providing sufficient job opportunities.	The Scheme releases development land for both residential and employment uses. This would assist in maintaining a balance between homes and jobs and contribute to the employment needs of Hastings.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy LT1	Leisure and tourism activities and facilities will be strengthened and developed to meet the needs of residents and visitors bringing economic benefits where this is compatible with the conservation of the environment and distinctive local character.	The Scheme would provide additional countryside leisure facilities such as cycling, walking and horse riding along the Greenway.	✓		
	Policy LT11	Focuses on sporting facilities and activities: Proposals for new sports facilities will be supported, particularly; where they would help to enable a broad range of activities to be undertaken across the plan area and where they fill “gaps” in existing provision.	The Scheme would provide the basis for the proposed Pebsham Country Park to be implemented. Along with the proposed Greenway and additional recreational routes for cyclists, pedestrians and equestrians, the Scheme would facilitate the development of a sub-regionally significant leisure and informal sporting facility.	✓		
	Policy LT15	Supports the provision of new recreational routes which improve access to the coast and countryside for cyclists, walkers and horse riders.	The Scheme would assist in enhancing and adding to recreational routes in the area.	✓		
	Policy LT16	Supports the improvement of the rights of way network.	The Scheme would assist in enhancing and adding to recreational routes in the area.	✓		
Hastings Local Plan (2004)	Policy OS1	Identified open spaces within the built-up area boundary will be protected from any development which would lead to the loss of their open character.	Although some open space would be lost, this is not likely to happen in built-up areas.		✓	
	Chapter 11a	Hastings Town Centre: notes the significant impact of traffic levels on the A259. A key issue is the severance of the main urban area from the seafront and the need to improve the public realm.	As part of an integrated package of measures the Scheme would assist in reducing the flow of traffic on the A259 along the seafront, giving rise to opportunities to reconnect the urban area with the seafront.	✓		
	Chapter 11b	Central St Leonards: notes the significant impact of traffic levels on the A259. A key issue is the severance of the main urban area from the seafront and the need to improve the public realm.	As part of an integrated package of measures the Scheme would assist in reducing the flow of traffic on the A259 along the seafront, giving rise to opportunities to reconnect the urban area with the seafront.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Hastings Local Plan (2004)	Chapter 11c	Old Town: notes the significant impact of traffic levels on the A259. A key issue is the severance of the main urban area from the seafront and the need to improve the public realm.	As part of an integrated package of measures the Scheme would assist in reducing the flow of traffic on the A259 along the seafront, giving rise to opportunities to reconnect the urban area with the seafront.	✓		
	Chapters 11d	In West St Leonards the impact of the Bexhill Road AQMA and the prospect of improving public transport links are of particular importance.	As part of an integrated package of measures, the Scheme would assist in reducing the flow of traffic on the A259 along the seafront, giving rise to opportunities to reconnect the urban area with the seafront.	✓		
Rother District Local Plan (2006)	paragraphs 4.31 – 4.37	The development strategy which has recently been tested at Inquiry rests on the successful completion of the link road. Without the Link Road necessary housing and employment land at north-east Bexhill will not be released, and the development strategy of the adopted Rother District Local Plan will not be realised.	The Scheme has been designed to meet this policy objective.	✓		

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				Benefit	Neutral	Adverse
Rother District Local Plan (2006)	Policy BX1	<p>Proposals for development and change in Bexhill should be compatible with and, wherever practicable, contribute positively to the following objectives:</p> <ul style="list-style-type: none"> • To develop its residential, employment, shopping and service centre functions; • To provide for both the growth of local firms and appropriate inward investment in order to improve the range of job opportunities for local people as well as to ensure that residential development is sustainable; • To ensure that development is of a rate and form compatible with the town's environment and amenities, whilst also contributing to a long-term spatial vision; • To promote the regeneration of the town centre in a way that reflects its unique character and cultural assets; • To significantly improve accessibility both within the town and to important employment centres, especially Hastings, by all modes of transport; • To maintain and enhance the town's distinctive character and identity, including maintaining the strategic gap to St. Leonards in accordance with Policy DS5. 	The Scheme contributes to the delivery of the development strategy established in the adopted local plan. Its implementation would provide the opportunity for the town to grow, and for accessibility to employment centres and services within the town and in Hastings to be enhanced.	✓		
	Policy BX2	<p>Establishes that allocated land to the east of the Scheme will provide 980 dwellings of which 40% will be affordable (iii) and 22,000 m² of business floorspace (iv). Provision is also made for community infrastructure (v) and contributions to offsite facilities such as the proposed Pebsham Countryside Park (xv).</p>	The Scheme enables this development to take place.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
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Rother District Local Plan (2006)	Policy BX3	Sets out the allocations of 26,000m ² of business development (ii) and at least 130 dwellings of which 40% will be affordable (iii). Provision is made for community facilities and off site requirements (x).	The Scheme enables this development to take place.	✓		
	Policy BX4	Allocates land between Bexhill and Hastings as a Countryside Park.	The Scheme, by enabling strategic development, would assist in the implementation of the Pebsham Countryside Park concept through the securing of development contributions.	✓		
	Policy CF2	Development which would result in the net loss of community facilities, including recreational facilities, play space, amenity areas or allotments will be resisted.	The Scheme would not cause a loss of community facilities, it should increase accessibility to these services.	✓		
	Policy CF5	Provides guidelines for equestrian development. Proposals should not adversely affect the landscape character and residential amenities of the area: <ul style="list-style-type: none"> • New buildings should be appropriately designed; • The proposal will not give rise to additional traffic problems in the area; and, • That the local network should be capable of accommodating increased use, and where appropriate obligations will be imposed to secure the necessary improvements. 	As part of the vision for the Pebsham Countryside Park it is anticipated that it would become a sub-regionally significant centre for equestrian activities.		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Travel and Transport						
The Future of Transport	Paragraph 3.5	Improve transport network through better safety, capacity and management while meeting environmental objectives.	The Scheme should reduce volumes of traffic along the A259 through Bexhill and Hastings, potentially reducing road traffic accidents and making the road safer but also minimising impacts on the environment.	✓		
	Paragraph 5.6	Places a priority on the role of bus provision in transport policy and focuses on a safe, reliable, integrated bus network which is good value for money.	The Scheme would provide opportunities to enhance public transport provision in the area through the provision of a new route serving north Bexhill and Hastings and release road space on the A259 at Bexhill Road and the seafronts.	✓		
	Paragraph 6	Establishes the key objectives for transport policy, namely enhancing of transport reliability by both road and rail and for all modes. Actions should be geared towards providing transport choices for the individual.	The Scheme is part of the necessary improvement of the transport infrastructure for an area in need of regeneration. It removes a bottleneck at Glyne Gap. It establishes the foundation for enhanced public transport provision and enhancing access to jobs and services to areas of planned development.	✓		
A New Deal for Transport: Better for Everyone	Paragraph 3.124	Reduce the stress involved with driving.	The Scheme should reduce congestion between Bexhill and Hastings helping to decrease traffic related stress.	✓		

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				Benefit	Neutral	Adverse
A New Deal for Transport: Better for Everyone	Paragraph 3.124	All modes of transport need to integrate to improve on safety and congestion.	The Scheme would be fully integrated with the existing transport network, including bus services and cycle paths. An integrated package of transport measures aimed at supporting the planned expansion of Bexhill and regeneration of Hastings would be developed to support and “lock in” the benefits of the Scheme.	✓		
	Paragraph 4.195	Commends the use of an integrated approach to transport decisions, requiring that demand management measures should be considered in transport planning.	The Scheme would provide opportunities to enhance public transport measures and to increase indigenous employment opportunities which in turn would provide wider travel choice. An integrated package of transport measures aimed at supporting the planned expansion of Bexhill and regeneration of Hastings would be developed to support and “lock in” the benefits of the Scheme.	✓		
	Paragraph 4.199	Alternatives to construction should be investigated, including making better use of existing infrastructure.	The Scheme concept was recommended through SoCoMMS following an extensive assessment of transport issues facing the area.	✓		
	Paragraph 4.200 and 4.201	There will be a strong presumption against development which will have an adverse impact upon internationally designated sites, environmentally sensitive areas or important species, habitats and landscapes.	The Scheme would have an indirect impact on designated species and habitats such as SSSIs. However through mitigation and translocation of species impacts would be minimised. Nonetheless, the Scheme traverses undeveloped countryside of notable character.			✓

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
A New Deal for Transport: Better for Everyone	Paragraph 4.202	Particular consideration should be given to protected species and habitats, including those affecting UK biodiversity.	The Scheme would traverse priority habitats and several species may be affected. However, full consideration has been given to biodiversity issues in the Scheme's alignment and design.	✓		
	Paragraphs 4.212 to 4.223	Understand the effects of noise and measures to reduce the noise impact.	Measures to reduce noise such as screening through tree and hedge planting are considered as part of the Scheme.	✓		
	Paragraph 2.1	The UK needs a transport system that reduces pollution, improves safety, increases prosperity and social inclusion, doesn't damage health and provides a better quality of life.	The Scheme would alleviate congestion on the trunk road network at Glyne Gap, contribute to improving poor air quality on the Bexhill Road AQMA, would assist in reducing rural rat running and release development land to meet regional objectives for growth.	✓		
Tomorrow's Roads: Safer for Everyone: The first three year review	Theme 4, objective 1	Safety should be a main objective in designing, building, operating and maintaining local roads.	The Scheme has been designed with safety in mind.	✓		
Transport 2010: The Ten Year Plan	Paragraph 6.62	Improvements in air quality, noise pollution and the local environment and reduction in CO ₂ emissions.	The Scheme would result in an overall improvement in air quality and noise levels for the local population. However, a negligible increase in GHG emissions is anticipated.	✓		
		Improvement in local road safety, contributing to the achievement of national targets.	The Scheme would reduce traffic volumes on local roads, improving road safety.	✓		
		Better access to jobs and services, including for deprived and rural areas.	The Scheme would release residential and business land thus enhancing access to local jobs.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Securing the Future – Delivering UK Sustainable Development Strategy – (March 2005)	Page 17	Climate change is now having a discernable impact on our environment. National policy should be geared towards a shift from a high to a low carbon economy. This will have profound implications for the way we generate and use energy.	The Scheme should be viewed in terms of part of an overall strategy for the area which is aimed at reducing the need to travel by the private car. However, it is anticipated that CO ₂ levels would experience a slight increase on current levels.		✓	
Tackling Congestion by Influencing Travel Behaviour (2004)	Introduction	The objectives for the Highways Agency (HA) in terms of minimising the impacts of development on the trunk road network. To this end it recommends that developers discuss with the HA their proposals at the earliest opportunity, that travel plans are established for new and existing development and that the better management of existing roadspace will be necessary to facilitate the flow of public transport.	The HA has been engaged in development of the Scheme and policy development at both the regional and local level. The Scheme would alleviate congestion on the A259 trunk road and would provide opportunities to secure dedicated bus lanes in the area.	✓		
Walking and Cycling: An Action Plan	Page 8	Creating places people want to walk and cycle in.	Part of the proposed Scheme is to build the Greenway for walking, cycling and horse-riding and to facilitate access to the proposed Pebsham Countryside Park. The Scheme would also give rise to opportunities to masterplan development at Bexhill.	✓		
	Page 8	Providing high quality facilities for safe walking and cycling.	Part of the proposed Scheme is to build the Greenway for walking, cycling and horse-riding and to facilitate access to the proposed Pebsham Countryside Park. Also as part of the planned expansion of Bexhill it would enable new residential environments which would provide for the needs of residents.	✓		
		Influencing travel behaviour through education, training, marketing and promotion.	The Scheme would not have a significant role in delivering this objective.		✓	

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National Cycling Strategy	Page 7	Double the number of trips by cycle (on 1996 figures) by end 2002.	The Scheme would contribute to this target through providing the safe Greenway where people can cycle in the country.	✓		
		Quadruple the number of trips by cycle (on 1996 figures) by end 2012.	The Scheme would contribute to this target through providing a safe Greenway where people can cycle in the country.	✓		
Cycling and Health Leaflet (National Cycling Strategy)	Page 1	Increase levels of cycling.	The Scheme would contribute to this objective through providing a safe Greenway where people can cycle in the country. As the development and regeneration of the area takes place there is the longer term prospect of achieving a shift towards cycling for commuting purposes.	✓		
PPS1: Delivering Sustainable Development	Paragraph 27 (vii)	Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development.	The Scheme is integral to a development strategy which aims to provide travel choice and reduce out commuting through the development and regeneration of the area.	✓		
PPG13: Transport	Paragraph 4	Schemes should promote sustainable transport choices for people and freight, promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and reduce the need to travel, especially by car.	The Scheme would alleviate congestion and provide opportunities to enhance public transport provision in the area; as a consequence this would enhance accessibility to services. By co-locating residential and employment uses and as part of a wider regeneration strategy accessibility would continue to improve.	✓		

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				Benefit	Neutral	Adverse
PPG13: Transport	Paragraph 20	The PPG requires development plans to “take into account the potential for changing overall travel patterns, for instance by improving the sustainability of existing developments through a fully co-ordinated approach of development plan allocations and transport improvements.”	The Scheme is key to releasing land for the North East Bexhill Development, as agreed through the strategic and local planning process. The draft SEP proposes a level of development for the area which cannot be delivered without the Scheme. This is recognised and endorsed in the LTP2 for the area.	✓		
	Annex C, Paragraph .1	Care must be taken to avoid or minimise the environmental impact of any new transport infrastructure project. Steps should be taken to mitigate any negative impacts.	A full EIA of the Scheme is being undertaken assessing all the environmental impacts and appropriate mitigation measures.	✓		
Regional Planning Guidance for the South East (RPG9)	Paragraph 3.1	Encouraging economic development of the area and reducing reliance on private cars.	Viewed in isolation the Scheme would not actively discourage the use of the private car. It would release strategically significant residential and employment land as part of regional, strategic and local policy objectives which seek to achieve a better jobs/homes balance.	✓		
	Key Development Principle 11, Para 3.5	Access to jobs, services, leisure and cultural facilities should be less dependent on the car, and more so on sustainable modes of transport.	The Scheme would release development land (co-locating residential with employment uses) as part of the planned expansion of Bexhill giving rise to opportunities to enhance access and provide an integrated package of transport measures aimed at reducing car dependency.	✓		

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				Benefit	Neutral	Adverse
Regional Planning Guidance for the South East (RPG9)	Key Development Principle 12, Para 3.5	Transport investment should maintain the existing network, enhancing access as part of more concentrated forms of development, overcoming bottlenecks and supporting higher capacity and less polluting modes of transport.	The Scheme would enhance the existing road network, help reduce the congestion along the A259, release development and thereby avoid a dispersed pattern of development in the rural area, and provide opportunities to enhance public transport provision.	✓		
	Paragraph 3.12	Transport development will be needed in the region in order to achieve sustainable development.	The Scheme would help promote more sustainable patterns of development and create the conditions for greater travel choice.	✓		
	Paragraph 9.7 and 9.8	The objective of the Regional Spatial Strategy is to act as the catalyst for sustainable growth in the region. An emphasis is placed upon rebalancing the structure of transport in the region, minimising environmental impact on communities whilst providing travel choice and improving road and rail links in the region to enhance connectivity.	The Scheme would meet regional objectives for the area in that it would assist in promoting a more sustainable pattern of development, assist in facilitating movement between urban areas within the sub region and the wider region and ultimately provide for travel choice. Although the Scheme would affect environmental designations between the towns it would address issues of severance and poor air quality affecting local communities.	✓		
	Policy T1	Facilitate an urban renaissance by promoting development which reduces journey times, and facilitates and implements the concept of regional hubs and spokes.	The Scheme is intrinsic to the delivery of the development strategy for this part of the region. Although the development strategy for the area is reliant on a range of measures, the Scheme would release strategically significant land allocations and assist in creating the conditions for growth and regeneration.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
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Regional Planning Guidance for the South East (RPG9)	Policy T2	Social inclusion, environmental enhancements and economic growth are key priorities for regional policy. Accessibility and safety should be improved. Environmental impacts should be minimised and new infrastructure projects should enhance the environment and communities affected.	The Scheme is central to a strategy of improving accessibility as the area grows and regenerates over the coming years. It would however, entail development in a notable (but undesignated) landscape.		✓	
	Policy T4	Regional Hubs are described as being centres of economic development and transport services which are central to the regional spatial strategy's polycentric development pattern. These centres will promote high density development which is characterised by high levels of accessibility to services including public transport.	Whilst the adopted Regional Spatial Strategy does not designate Hastings as regional hub, the draft SEP does.		✓	
	Policy T5	The A259 and A21 transport corridors are identified as regional spokes. Objectives for the management of these routes are: <ul style="list-style-type: none"> Improving connectivity and mobility; Reducing average journey times with the outcome of improving interregional connectivity, and; Supporting the development of regional hubs. 	The Scheme would remove a bottleneck on the A259, assist in providing greater reliability and reduced journey times, and provide a link from Bexhill to the A21 without travelling through Hastings or using inappropriate rural routes.	✓		
	Policies T9 and T10	Fundamental to regional transport policy is de-linking growth in private car use with economic growth. Both policies seek to influence transport investment decisions by promoting an improved and integrated network of public transport services, measures aimed at reallocating existing road space, the management of car parking space and charging initiatives.	The Scheme is integral to a development strategy which is closely related to urban areas and provides opportunities to develop a more self sufficient economy with reduced levels of out commuting. In turn this would lead to opportunities to achieve a more integrated approach to transport provision.	✓		
	Policy T17 and paragraph 9.89	The RSS identifies specific schemes which are seen as being essential to the delivery of its development strategy. To this end the RSS requires development plans to safeguard specific proposals which includes the Scheme.	The Scheme has been identified as a vital infrastructure project which would assist in delivering regional objectives.	✓		

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				Benefit	Neutral	Adverse
Draft Regional Spatial Strategy - The South East Plan	Policy T1 (iv)	In addition to adopted policies T1 and T2 this policy adds a requirement to improve overall levels of accessibility.	The Scheme releases land for the North East Bexhill Development, providing employment opportunities for residents and significant enhancements to public transport provision in the area. An objective of the long term development strategy for the area is to reduce out commuting.	✓		
	Policy T3 (iv)	Carries forward adopted policy T5 with an additional criterion which seeks to tackle identified bottlenecks.	The Scheme would alleviate the significant congestion which occurs along the A259 Bexhill Road.	✓		
	Policy CC8b	Identifies Hastings as a Regional Hub.	The Scheme would contribute to the prospects of the economic regeneration of the area and release land for the North East Bexhill Development. This would provide accessible employment opportunities for Hastings residents. The Scheme is also seen as being essential to improve business and house building confidence in the area and attract inward investment from the private sector.	✓		
	Policy SCT1 (iii)(iv)	Relevant local authorities and agencies to deliver major improvements to the transport infrastructure to assist in the regeneration of the area, facilitate greater connectivity to the wider region and to achieve a better jobs/homes balance.	The Scheme is identified in the draft SEP as strategically significant and a much needed transport improvement, which is key to achieving the strategic objectives of the area.	✓		
	Paragraph 3.3	Realising substantial improvements to the strategic transport infrastructure is essential to the delivery of the sub-regional development strategy.	The Scheme is an identified component of the development strategy.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
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Draft Regional Spatial Strategy - The South East Plan	Policy SCT2(ii)	Key improvements to the transport network are necessary to facilitate better east west links and enhance accessibility and thereby secure the better functioning of overlapping labour markets.	The Scheme is an identified component of the development strategy.	✓		
	Policy SCT6	Local authorities should take forward work on the FPP and capitalise on the designation of Hastings as a regional hub.	The Scheme has a significant influence on the realisation of regeneration initiatives.	✓		
	Policy CC5, SCT9 and paragraph 10.2	Requires that development should only proceed if all infrastructure necessary to serve development is available or can be delivered in a timely manner.	The Scheme is an infrastructure project essential to the delivery of housing and employment development in the Bexhill area, and Hastings to a lesser extent.	✓		
Integrated Regional Framework (IRF) for the South East	Regional objective 15	To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry.	The Scheme would reduce road congestion and improve air quality in some areas. In terms of its impact on the need to travel by car, the Scheme contributes to a longer term development strategy which envisages a better jobs/homes balance and greatly enhanced accessibility to services and public transport opportunities.	✓		
Regional Economic Strategy for the South East of England	Priority 13	Secure a sustainable transport network.	The Scheme is essential in providing conditions for growth where transport and spatial planning can be better integrated and offer real travel choices to residents.	✓		
Draft RES: The Regional Economic Strategy	Pages 18 – 20	Housing – led growth – ensuring major urban areas reach their potential by investing in key infrastructure to enable housing development that supports economic prosperity.	The Scheme would release land for development as part of the strategic objectives for the area and the sub region.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
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Draft RES: The Regional Economic Strategy	Pages 18 – 20	Connectivity as the basis for growth – addressing the remaining transport bottlenecks on the South Coast, ensuring efficient connections to major ports.	The Scheme would remove a significant bottleneck on the A259; however the achievement of sub-regional connectivity would be delivered in conjunction with a number of identified schemes.	✓		
		Key priorities for the South East Coast: improvements to connectivity along the “ <i>south coast artery</i> ” and to “ <i>key hinterlands and London</i> ” are essential.	The Scheme, in combination with other improvements along the south coast corridor and the A21 corridor would assist in meeting this objective.	✓		
East Sussex Local Transport Plan	Paragraph 2.4	Improve access to services by providing greater travel choices and influencing land use decisions.	As part of an integrated package of measures both within the two towns and on a sub-regional and regional level, the Scheme would contribute/complement the development strategy of the RSS, the objectives of the RTS and the LTP2, and the relevant local plans.	✓		
		Manage demand and reduce the need to travel by private car.	The Scheme would contribute to development strategy of the area which is aimed at securing greater travel choice and accessibility to local jobs and services.	✓		
		Improve road safety and reduce fear of crime in communities.	The Scheme would reduce congestion on local roads, helping to increase road safety.	✓		
	Paragraph 2.4	Reduce congestion and improve the efficiency of the transport network.	The Scheme would help to reduce congestion along the A259 and other local roads, which in turn would improve the efficiency of the transport network.	✓		
		Protect, promote and enhance the environment.	The Scheme would indirectly affect species and designated habitats such as SSSIs. However through mitigation and translocation of species impacts would be minimised. Nonetheless, the Scheme would alter the character of a locally significant landscape.			✓

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex Local Transport Plan	Paragraph 2.4	Improve maintenance and management of the transport network.	The Scheme would not assist in the maintenance of the transport network but it would provide opportunities for improved management of roadspace in the urban areas.	✓		
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S1	Minimise the impact on environment and provide compensation where loss is acceptable and unavoidable to achieve other policies in the plan.	The Scheme is essential to delivering strategic aspirations for the area. It has been designed to avoid/minimise environmental damage as far as is practicable. Mitigation measures have been developed where possible. Where this cannot be achieved the Scheme proposes compensation.	✓		
		Reducing the need to travel and improving accessibility for all to a range of services and facilities.	As discussed above, the Scheme should be seen as an essential part of the development strategy of the area and a key component of an integrated package of transport measures which would have the anticipated effect of increasing accessibility.	✓		
		Not creating or perpetuating unacceptable transport conditions.	The Scheme would alleviate congestion along the A259 at Glyne Gap, and provide relief to rural areas. However, some adverse impacts are anticipated along the Ridge.	✓		
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S24	Sets the strategic objectives for development and change in Hastings, emphasising the need to regenerate the town, providing good quality and accessible business premises, and the need to improve both strategic road and rail links.	The Scheme assists in improving road links and removes a strategically significant bottleneck.	✓		

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				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy S25	Sets the strategic objectives for Bexhill and expresses the primary concern as being the provision of more employment and a wider range of jobs to improve the economy of the Bexhill and Hastings area. The Structure Plan anticipates the completion of a new community and a high quality business park in north-east Bexhill which will require the appropriate transport improvements and measures to place in time to serve the development. This will provide the necessary access and to avoid adding to the transport problems in the wider area.	The release of strategically significant development sites can only take place with an increase to road capacity, rather than relying solely on demand management measures.	✓		
	Policy TR1	Priorities of the integrated transport and environment strategy are: <ul style="list-style-type: none"> • The reduction of the impact of traffic on communities and the environment; • Encouragement of and provision for greater use of walking; • Cycling and public transport (including buses); • Increasing travel awareness; and, • Maintenance of local rail networks and public transport. 	The Scheme would reduce congestion on local roads which should reduce traffic impacts on local communities. The creation of a Greenway would encourage greater use of walking and cycling.	✓		
	Policy TR2	A greater awareness of the environmental and economic cost of car journeys and the potential for reducing car use and using more environmentally friendly forms of transport will be promoted.	It is unlikely that the Scheme would reduce car use in the short term. However, when considered in terms of the development strategy for the area the Scheme contributes to the objective of securing higher levels of accessibility as part of the sustainable development of the Bexhill Hastings area over the coming twenty years.		✓	

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy TR4	Improved access and facilities for pedestrians will be encouraged and supported.	The Greenway, along with the planned urban extensions of Bexhill facilitated by the Scheme, would provide enhanced pedestrian facilities. The contribution from the North East Bexhill Development to the Pebsham Countryside Park would also assist in providing enhanced recreational facilities.	✓		
	Policy TR5	Improved facilities for cyclists, both for utility and recreational purposes, will be encouraged and supported.	The creation of the Greenway as part of the Scheme would provide facilities for cyclists. The contribution from the North East Bexhill Development to the Pebsham Countryside Park would also assist in providing enhanced recreational facilities	✓		
	Policy TR6	The construction and promotion of a strategic network of cycle routes within the plan area will be supported	The construction of the Greenway would add to the strategic cycle network in the area, as would the Pebsham Countryside Park (funded in part by contributions secured from the North East Bexhill Development).	✓		
	Policy TR7	Provision for and use of public passenger transport (bus and rail) as an attractive alternative to the private car and as part of a balanced package of measures including demand management, particularly in congested urban areas, will be encouraged and supported.	The Scheme enables an integrated package of measures to be developed which would support and guide spatial and transport planning in the area over the coming decades. The improvements to local bus facilities are promoted as part of the application.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
East Sussex and Brighton and Hove Structure Plan 1991-2011	Policy TR8	Better integration between bus and rail services, and between public passenger transport and all other forms of transport will be sought.	It is unlikely that Scheme would have a direct impact on the integration of bus and rail services. However, the role of the Scheme in delivering the development strategy for the area over the coming twenty years and the opportunities for enhancing and integrating transport measures across the area should not be overlooked.		✓	
	Policy TR11	Use of buses will be encouraged and supported by seeking the provision of improved facilities, such as bus priorities, bus lanes, improved shelters, access to bus stops, and improved information.	The Scheme would improve local bus services by alleviating congestion, providing opportunities to reallocate road space and introducing new routes to service existing and new developments.	✓		
	Policy TR21	Expresses support for improvements to the South Coast Trunk Road.	The Scheme alleviates congestion at Glyne Gap, contributing to strategic and regional objectives of introducing improving east west communications along the Sussex Coast.	✓		
	Policy TR30	Lorries, in particular larger vehicles, will be encouraged to use the strategic road network wherever possible and avoid unsuitable roads, villages, towns and other sensitive locations, except as required for local access.	The new road Scheme would provide an alternative route between Bexhill and Hastings avoiding small inappropriate rural roads.	✓		
	Policy TR39	Development and implementation of a transport and environment strategy for Bexhill and Hastings will be sought. This strategy emphasises the need for the economic regeneration of this area, and outlines the role which transportation policies can play in this process.	The Scheme would contribute to economic regeneration by facilitating access to strategic development sites, alleviating congestion on the A259 and as a consequence contribute to improving investor confidence in the area.	✓		
	Policy TR40	The construction of the Bexhill Northern Approach Road is proposed.	The Bexhill Northern Approach Road forms part of the Scheme known as the Bexhill Connection (from the junction with the A259 through to the old railway line).	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Hastings Air Quality Action Plan	Action 3	Implementation of “travel choice” measures (i.e. workplace travel plans, school travel plans, targeted public transport information) to manage demand and reduce need the need to travel by private car.	The Scheme would not have a direct impact on the development and adoption of travel plans, however, but would (in the longer term) create the conditions for improved travel choice.		✓	
	Action 6	Construction of the BHLR – this is accorded a high air quality impact with non air quality impacts of increased accessibility and regeneration.	The objectives of the Scheme directly relate to the improvement of local environmental conditions.	✓		
	Action 9	<i>“The provision of support to new bus services serving local schools and colleges.”</i>	The Scheme would improve reliability of bus services using the A259 at Glyne Gap.	✓		
	Action 10	<i>“The extension of Real Time bus information systems into Hastings.”</i>	The Scheme would not significantly affect this policy objective.		✓	
Hastings Local Plan	Paragraph 6.12	The objectives for Hastings include a need for improved transport connections between Hastings and Bexhill combined with management measures to protect sensitive areas from inappropriate traffic.	The Scheme provides additional road capacity and overcomes longstanding congestion problems.	✓		
		Environmental and safety improvements for congested areas, especially for the A259 along the seafront.	The Scheme promotes a number of complementary measures which assist in meeting this objective. The implementation of the Scheme and allied improvements would reduce the level of traffic on the seafront, therefore providing opportunities to implement improvements to the public realm and reconnect the urban area with its seafront.	✓		
		Measures, including demand management measures, to make alternatives to journeying by car (cycling, public transport and walking) a more attractive proposition.	The provision of the Greenway would contribute to both a strategic network of cycle and pedestrian routes, and enhanced access to the countryside. Reductions on the level of congestion on Bexhill Road would improve the reliability of bus services using that route.	✓		

Document Name	Policy Nr/Para. Nr	Summary of Policy	Evaluation	Impact		
				Benefit	Neutral	Adverse
Hastings Local Plan	Paragraph 6.12	Continuing measures to reallocate roadspace in favour of pedestrians.	The reduction of traffic flows on the A259 and other routes provide opportunities to improve the public realm.	✓		
	Policy TR4	Land is safeguarded between West Marina and towards Bexhill for a cycle and pedestrian route.	The Scheme would moderate traffic flows along the A259 enabling the reallocation of road space and public realm improvements.	✓		
Rother District Local Plan	Policy TR1	The area of search for the proposed Bexhill to Hastings Link Road, as shown on the Proposals Map, will be safeguarded from prejudicial development.	The alignment of the Scheme conforms with the area of search.	✓		
	Policy TR2	Proposals that provide improvements in the availability, quality and efficiency of sustainable transport opportunities, including quality bus routes, cycle networks and related buildings and ancillary facilities will be encouraged.	The Scheme would help improve the quality and efficiency of the local bus service and provide opportunities for cycling along the Greenway.	✓		
	Paragraph 2.23	An aim to promote a safe, efficient and sustainable transport system.	By releasing land in Bexhill, the Scheme facilitates a more sustainable pattern of development with the potential for improved accessibility and greater travel choice.	✓		
	Policy GD1(iii)(ix)	Development must provide for all access needs in a sustainable manner, and the infrastructure necessary to serve the development is available or can be provided as part of the development.	The Scheme would provide the necessary access to serve the North East Bexhill Development which is promoted through the adopted Local Plan.	✓		
	Policy DS1(iv)(v)	Development should have a high level of accessibility to key services and employment opportunities. Best use should be made of existing infrastructure	By facilitating the North East Bexhill Development, the Scheme would ensure that alternative and unsustainable dispersed development options are not promoted.	✓		

