

**ENVIRONMENTAL STATEMENT:
NON-TECHNICAL
SUMMARY**

August 2008

**HOLMHURST
ST. MARY**

St Leonards on Sea



**Submitted in support of full planning application
by the Gladedale Special Projects Division
on behalf of The Mother Agnes Trust**

Land at Holmhurst St Mary,
St Leonards on Sea

Environmental Statement
Non Technical Summary

Gladedale Special Projects Division
On behalf of
The Mother Agnes Trust

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**Prepared For
Gladedale Special Projects Division
On Behalf Of
The Mother Agnes Trust**

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CONTENTS

	Page No
1.0 INTRODUCTION	1
• The Application Site	3
• Surrounding Uses	3
• Existing Buildings	4
• Flora and Fauna	4
• Geology and Drainage	5
• Topography and Views	5
2.0 EIA METHODOLOGY	6
• Assessment Methodology	6
• Determining the Content of the ES	6
3.0 ALTERNATIVES	8
4.0 THE PROPOSED DEVELOPMENT	9
• Residential Provision	10
• Building Heights	10
• Vehicular Access and Circulation	11
• Public Transport Access	12
• Pedestrian and Cycle Access	12
• Parking	12
• Landscaping and Open Space	13
• Sustainable Drainage	14
• Construction of the Proposed Development	14
5.0 SOCIO ECONOMICS	15
• Introduction	15
• Population and Housing	15
• Education	15
• Health Facilities	16
• Provision of Environmental Play Area	16
6.0 LANDSCAPE AND VISUAL ASSESSMENT	17
• Introduction	17
• Existing Landscape Features	17
• Visual Assessment	17
• Retention of Existing Landscape Features	17
• Effects During the Construction of the Proposed Development	18
• Effects on completion of the Proposed Development	18

Land at Holmhurst St Mary, St Leonards On Sea

Environmental Statement

Non Technical Summary

CONTENTS

	Page No
7.0 TRANSPORT AND ACCESS	19
• Introduction	19
• Existing Highway Network	19
• Existing Public Transport	19
• Existing Pedestrian Accessibility	19
• Construction Traffic	19
• Traffic Generated by the Proposed Development	20
8.0 FLOOD RISK AND DRAINAGE	21
• Introduction	21
• Protection of the water environment during demolition and construction activities	21
• Maintaining Water Quality	21
• Preventing Flood Risk	21
9.0 ECOLOGY	22
• Introduction	22
• Existing Ecology	22
• Effects during Demolition and Construction Activities	22
• Retention of Ecological Assets	23
10.0 ARCHAEOLOGY AND CULTURAL HERITAGE	24
• Introduction	24
• Archaeological Potential	24
• Cultural Heritage Resources	24
• Archaeological Investigation	24
• Retention of Cultural Heritage Resources	25
11.0 AIR QUALITY	26
• Introduction	26
• Existing Air Quality	26
• Dust during Demolition and Construction Activities	26
• Air Pollutants derived from the Operation of the Proposed Development	26
12.0 RESIDUAL EFFECTS	28

1.0 INTRODUCTION

- 1.1 Gladedale Special Projects Division (hereafter referred to as the "Applicant"), on behalf of the Landowner Mother Agnes Trust, is seeking to obtain detailed planning permission for the construction of new housing (173 dwellings including 52 affordable homes), dismantling and repositioning of a Grade II* Listed¹ statue of Queen Anne, together with associated open space, new planting and landscaping (collectively referred to hereafter as the "Proposed Development") on 12.87 hectares (ha) of land at Holmhurst St Mary (the "Application Site") in St Leonards on Sea. The dismantling, relocation and conservation of the Listed statue of Queen Anne requires an additional application for Listed Building Consent.
- 1.2 The Application Site is situated within the administrative area of Hastings Borough Council (HBC), in East Sussex. The location and extent of the Application Site is shown on **Figures 1 and 2**.

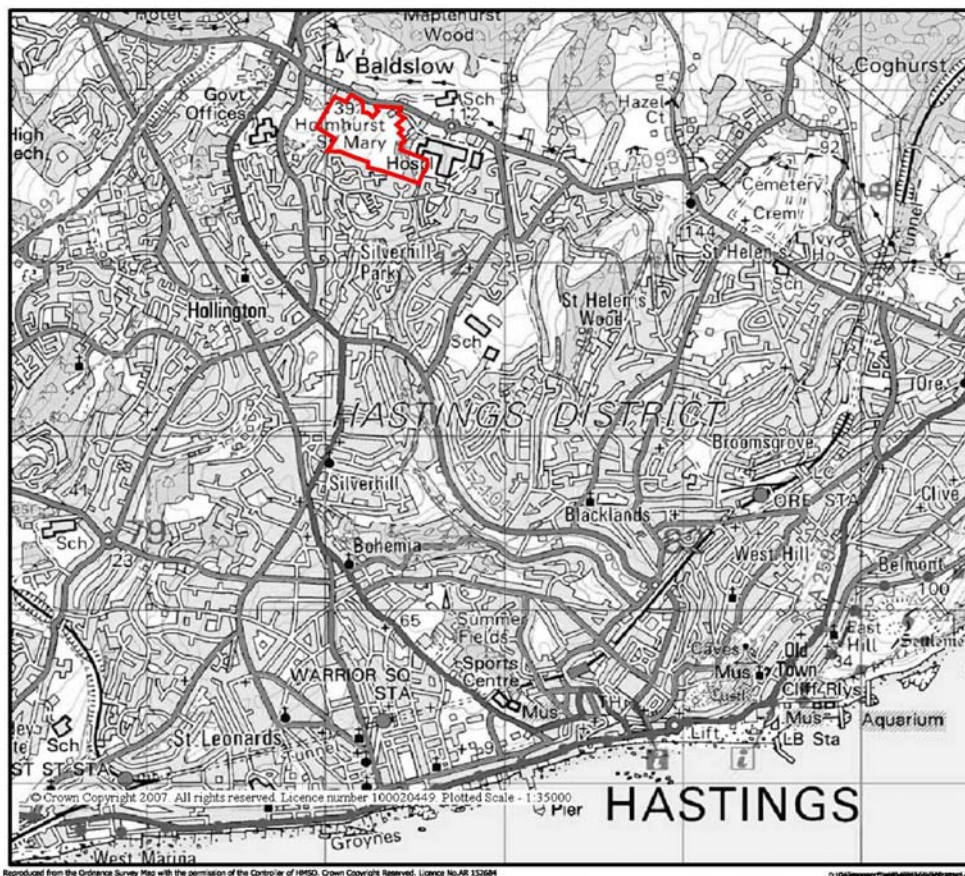


Figure 1: Location of the Application Site

¹A building of special architectural or historic interest. Listed buildings are graded I, II* or II with grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. well within its curtilage). Consent is required for the demolition, in whole or in part of a listed building, or for any works of alteration or extension that would affect the character of the building.



Figure 2: Application Site Boundary

- 1.3 This report is a non-technical summary (NTS) of the Environmental Statement (ES) which accompanies the planning application that is submitted for the Proposed Development. The ES presents the findings of an Environmental Impact Assessment (EIA) which has been undertaken in conjunction with the design process for the Proposed Development, and the various supporting studies which have been completed and informed the design of the Proposed Development.
- 1.4 The full findings of these studies and of the overall ES are presented in a comprehensive set of documents that can be viewed at the offices of HBC, Century House, Menzies Road, St Leonards on Sea, East Sussex, TN38 9BB. Additional copies of the NTS (no charge), ES (£120 plus postage) and its Technical Appendices (£250 plus postage), are available from Natalie Wells, Barton Willmore, 35 Kings Hill Avenue, West Malling, Kent, ME19 4BW. Telephone: 01732 845 845 or email natalie.wells@bartonwillmore.co.uk. The complete ES can also be obtained in CD format for £10 from the same address.

The Application Site

Context

- 1.5 The Application Site is situated on the northern edge of the town of Hastings with the High Weald Area of Outstanding Natural Beauty (AONB) situated in close proximity to the north. The High Weald AONB is characterised by rolling hills, small irregular fields, abundant woods, scattered farmsteads and sunken lanes.
- 1.6 The Application Site once formed part of the property of Holmhurst St Mary, a Grade II Listed stone Victorian villa which was once the residence of the Victorian writer Augustus Hare (until c.1903) and subsequently a Convent and Convent School run by the Anglican Sisters of the Community of the Holy Family. The Convent School closed in 1987 with the Convent continuing operation until 1997. After this time the Convent and grounds were passed to the The Mother Agnes Trust to maintain. Some existing features associated with the site's use as a Convent and Convent School still remain within the Application Site today. The Listed building of Holmhurst St Mary has recently been converted to residential apartments (known as Holmhurst St Mary) with the remaining school site redeveloped for private housing (now known as Eldridge Way).

Surrounding Uses

- 1.7 The Application Site is bounded by the following:
- To the north by The Ridge (the B2093) along with its associated residential properties off Beaulieu Gardens as well as the Listed building of Holmhurst St Mary, and associated new housing, which abuts the central area of the Application Site;
 - To the east by the Conquest Hospital and associated buildings, a district general hospital operated by East Sussex Hospital NHS Trust. The complex includes St Annes operated by private healthcare provider BUPA;
 - Domestic gardens to the rear of dwellings situated on roads leading off Little Ridge Avenue abut the southern boundary of the Application Site; and
 - The Harrow Lane recreation ground abuts the western boundary of the Application Site.

Existing Buildings and Features

- 1.8 The Application Site comprises approximately 12.87ha of land characterised by predominantly open fields with a Site of Nature Conservation Importance (SNCI)², known as the Holmhurst St Mary SNCI, occupying 7.4ha of land within the eastern part of the Application Site.
- 1.9 The Application Site includes landscape and historic features originally created by Hare in the late nineteenth century such as the boundary wall, a grotto, an orchard, two ornamental ponds and the Grade II* Listed statue of Queen Anne, although this is in a poor state of repair and included on the Buildings at Risk Register. The Application Site also contains a number of prefabricated buildings in the north-east corner of the Application Site (these consist of former temporary classrooms, originally part of the Convent School which are now derelict and unoccupied, as well as some greenhouses), a former staff dwelling located close to Eldridge Way at 731 The Ridge, and tennis courts. There is also a small simple graveyard which is the resting place of the Nuns who were part of the Community, and associated nineteenth century walling within the main woodland area situated in the centre of the Application Site.

Flora and Fauna

- 1.10 In addition to the SNCI and the open fields containing grassland habitats, the Application Site also contains a large number of trees, a belt of trees run north to south in the centre of Application Site creating a strong landscape feature. This woodland area includes a small orchard which has been neglected. Large mature and over-mature trees are present throughout the Application Site and a large number of the trees and the blocks of woodland within and on the periphery of the Application Site are covered by Tree Preservation Orders (TPO)³.
- 1.11 Other vegetation within the Application Site comprises predominantly mature hedgerows with hedgerow trees defining the field boundaries to the western and central areas.
- 1.12 In terms of fauna, the Application Site is used by badgers, bats, amphibians (although not great crested newt which are not present), reptiles (although restricted to slow worms), breeding birds and invertebrates.

² Locally important sites of nature conservation adopted by local authorities for planning purposes.

³ A TPO is an order made by the local authority to protect these trees from indiscriminate felling, lopping or topping, and an application must be made to undertake work to these trees.

Geology and Drainage

- 1.13 The general geology of the Application Site comprises mudstones, siltstones and sandstones with numerous faults, specifically a north-south fault line which runs roughly through the central area of the Application Site.
- 1.14 Due to the underlying geology the Application Site is relatively impermeable, creating a high rate of water runoff.
- 1.15 The Environment Agency's Flood Map identifies the Application Site as lying within a low probability flood area and no other significant sources of flooding are considered to affect the Application Site.

Topography and Views

- 1.16 The Application Site is situated on ground which rises from the south-east to the north-west to a high point of around 135m above ordnance datum (AOD). The Application Site generally slopes towards the south-east at approximately 90m AOD.
- 1.17 Due to the topography of the Application Site and its position to the north of Hastings, there are views southwards from within the Application Site out towards the English Channel, Hastings town centre and Beachy Head.

2.0 EIA METHODOLOGY

Assessment Methodology

- 2.1 The EIA process is a systematic procedure, using the best practicable techniques and the best available sources of information to determine the potential effects of a development on the environment (i.e. beneficial, adverse, negligible, temporary, permanent, direct, indirect and cumulative). This enables the importance of predicted effects to be evaluated by a local planning authority (in this case HBC) before a decision is made about the planning application. The prediction of such effects was made in relation to both the demolition/construction and the completed development phases of the Proposed Development.
- 2.2 The EIA process provides the opportunity for environmental effects to be determined at an early stage in the formulation of the Proposed Development and for mitigation measures to be incorporated into the design in order to reduce, off-set or avoid any undesirable effects on the environment.
- 2.3 Within the ES, the following matrix (see **Table 1**), which applies to all predicted effects, was used to define the level of significance of those effects.

Table 1: Significance Matrix

Sensitivity/Value of Receptor	Magnitude of Effect		
	High	Medium	Low
High (England, UK, International)	Major	Major/ Moderate	Moderate
Medium (County, Regional)	Major/ Moderate	Moderate	Moderate/ Minor
Low (Local, District)	Moderate	Moderate/ Minor	Minor

Determining the content of the ES

- 2.4 The scope (content) of the ES was established at the start of the assessment process to identify the environmental issues to be addressed in the ES. The scope of the ES was also informed based on knowledge of the Application Site and surrounding area. Using this information request for a Scoping Opinion⁴ was prepared for the Proposed Development and

⁴ a written statement of the opinion from HBC as to the information to be provided in the ES.

submitted to HBC on 24 January 2008. The following environmental issues associated with the Proposed Development were identified as needing to be addressed in detail in the ES:

- Socio Economics;
- Transport;
- Archaeology and Cultural Heritage;
- Landscape and Visual;
- Ecology;
- Flood Risk and Drainage Strategy; and
- Air Quality.

2.5 HBC adopted its Scoping Opinion on 29 February 2008 confirming the inclusion of the proposed matters set out in the request.

3.0 ALTERNATIVES

- 3.1 The EIA Regulations require land developers to provide an outline of the main alternatives to development which have been considered.
- 3.2 No alternative sites have been considered for the Proposed Development, as the Applicant does not control any suitable alternative land outside of the Application Site. In addition, it has not been appropriate to consider alternative sites to the Application Site as it has been allocated by HBC for residential development in their Local Plan⁵. Failure to develop it in accordance with the aspirations of HBC would result in a loss of an opportunity to deliver much needed housing, including affordable homes at the Application Site.
- 3.3 The 'no development' option has been considered, however to proceed with this option would deny development of the Application Site and would result in the loss of the opportunity to provide the following benefits:
- new dwellings, in particular family and affordable homes;
 - deterioration of landscape and environmental quality of the Application Site, with lack of management of woodland and SNCI areas;
 - continued trespassing and potential damage to the SNCI and existing historic features and assets within the Application Site; and
 - further deterioration of the historical assets within the Application Site, in particular the Grade II* Listed Statue of Queen Anne, already identified on the Buildings at Risk Register.
- 3.4 In terms of alternative designs, a number of design options were explored in order to minimise any effects on the environment and to maximise potential enhancement. The most appropriate form of development on the Application Site has evolved through consideration of the environmental issues which were included in the EIA.

⁵ A plan setting out planning policies to guide the type and form of development within its Borough.

4.0 THE PROPOSED DEVELOPMENT

4.1 Full planning permission is being sought by the Applicant for the demolition and clearance of existing buildings and structures (apart from the Grade II* Listed Statue of Queen Anne) and development of the following:

- 173 residential dwellings (of which 52 are affordable), comprising two bedroom apartments, and two, three and four bedroom houses;
- Dismantling, renovation and repositioning of the Grade II* Listed statue of Queen Anne;
- Ecological/landscape enhancement and woodland management of the Holmhurst St Mary SNCI;
- Provision of an environmental play area within the SNCI;
- Use of existing vehicular access junction from The Ridge known as Eldridge Way and provision of a new access route linking Welton Rise with Eldridge Way;
- Provision of areas for pedestrian priority with new pedestrian and cycle routes; and
- Associated landscaping and car parking.

4.2 A detailed Masterplan of the Proposed Development is shown on **Figure 3**.



Figure 3: Masterplan

Residential Provision

- 4.3 A total of 173 dwellings will be provided on the Application Site in a mixture of two bedroom flats and two to four bedroom houses, as shown in **Table 1**. 30% of the proposed dwellings will be classified as affordable⁶. It is intended that three affordable units will be provided for disabled people and equipped with wheelchair access.

Table 1: Proposed Housing Provision

Tenure Type	Market	Affordable	Total
2 Bedroom Flat	11	5	16
2 Bedroom House	28	14	42
3 Bedroom House	44	24	68
4 Bedroom House	38	9	47
TOTAL	121	52	173

- 4.4 The dwellings will be provided as part of a variety of built forms in a mix of house types within distinctive character areas. Areas will be characterised by incorporating a range of surface materials and width of shared surfaces, roadways, paths and tracks. Some areas concentrate buildings around a mews style courtyard, and elsewhere the style will be more open with buildings incorporated into the existing trees and vegetation.

Building Heights

- 4.5 The building heights within the Proposed Development have been established in response to a combination of factors including existing building heights surrounding the Application Site, topography and levels, and a detailed assessment of landscape and visual effects on surrounding properties, public rights of way and other 'visual receptors'.
- 4.6 Building heights will range from between two and two and a half storeys, as shown in **Figure 4**.

⁶ this is housing that meet the needs of local people whose income is insufficient to enable them to secure housing on the renting and open market within the private sector.



Figure 4: Building Heights

Vehicular Access and Circulation

- 4.7 A single vehicular access point will serve the Application Site, and will utilise the already constructed access and junction into the Application Site (Eldridge Way) from The Ridge (B2093).
- 4.8 The new access route linking Eldridge Way with Welton Rise in the south (see **Figure 3**) has also been designed to facilitate access for buses and emergency vehicles (see below). Vehicles will not be able to gain entrance to, or exit, the site to Welton Rise as this access will be restricted to bus/emergency vehicles only and controlled by rising bollards.
- 4.9 The circulation routes within the site will include a range of different street types and uses. This will include a variety of elements from public squares to private parking mews, designed in accordance with current best practice and standards on road design. The design of the streets will promote low vehicular speeds to ensure pedestrian and cycle safety.
- 4.10 In addition to the main access route, a new driveway will be constructed through the central belt of woodland to serve the north-east part of the Application Site. The design of this driveway will reflect the rural woodland setting of the access route, and the need for particular sensitivity in environmental terms. The route chosen limits any adverse impacts on heritage features, any ecology present and mature trees.

Public Transport Access

- 4.11 Provision has been made for a potential bus link to utilise the main access route and if provided, a bus service would enter the Application Site from The Ridge to Harrow Lane, in Welton Rise. Initial consultation has been undertaken with the local bus operator (Stagecoach). The service provider has confirmed that the re-routing of existing services would improve service reliability.
- 4.12 Pedestrian access points will be provided to The Ridge and, via adjoining footpaths, to Harrow Lane which will connect to existing bus stops located within 400m of the Application Site.

Pedestrian and Cycle Access

- 4.13 The existing footpath which runs north-south through the centre of the Application Site will be retained and integrated to form a wider network of pedestrian routes within the Application Site. These routes will link with the wider network of local footpaths.
- 4.14 Further pedestrian routes have been incorporated into the design of the Proposed Development to integrate with the public highway and the existing pedestrian network. Pedestrian routes will provide access to the SNCI area to the south-east corner of the Application Site, subject to further investigation of potential links by HBC, for residents linking to the locality.
- 4.15 The roads and pedestrian routes through the Application Site will also facilitate cycle access through the use of surfaces suitable and designed to encourage shared use, limiting vehicle speeds.

Parking

- 4.16 Car parking will be provided at a ratio of one parking space per two bedroom dwelling and two parking spaces per three and four bedroom dwellings. Parking will also be provided for disabled persons.
- 4.17 Cycle parking will be provided in secure covered locations or within the boundaries of the dwellings. All dwellings will have cycle storage facilities.

Landscaping and Open Space

4.18 The landscape proposals are shown on **Figure 5**.



Figure 5: Landscape Masterplan

4.19 The Proposed Development has been designed to ensure that the buildings are separated from the Holmhurst St Mary SNCI, in order to maintain its integrity. A detailed landscaping strategy has been incorporated into the design principles with the overarching objective to retain and reinforce the existing strong landscape structure that defines the Application Site. This structure includes not only the informal woodland elements, but also the designed landscape, the historic hedgerows and individual / groups of trees. New landscaping measures will retain and enhance the landscape structure within the Application Site.

Draft Landscape, Ecological and Woodland Maintenance and Management Plan

4.20 A draft Landscape, Ecological and Woodland Maintenance and Management Plan has been prepared as part of the Proposed Development, and is submitted as part of the planning application. This sets out the protection, maintenance and continued enhancement of the landscape and ecological assets within the Application Site, and covers a 20 year period. The draft Plan has been prepared in conjunction with HBC and will be formally agreed with HBC in due course.

- 4.21 A wildlife pond is proposed in the south-east corner of the SNCI. One of a number of ecological enhancements proposed within the SNCI. This will be designed to be a permanently wet feature encouraging increased biodiversity within the SNCI.

Sustainable Drainage

- 4.22 A sustainable drainage system is proposed. This will ensure that the run-off from the roofs and the proposed hard surfaces within the Application Site is collected and treated in a sustainable manner. Measures such as permeable pavements and rainwater harvesting techniques will be employed. In addition, in order to combat extreme rainfall events, two detention basins have been incorporated into the overall layout of the Proposed Development. These basins are intended to be water-filled only following extensive rainfall, but have the potential to be wetland habitats at other times of the year.

Construction of the Proposed Development

- 4.23 The construction programme will span approximately four years. The estimated commencement date is 2009 with completion likely in 2013, subject to gaining planning permission.
- 4.24 Prior to construction commencing, a Construction Environmental Management Plan (CEMP) will be prepared which will set out the methods for managing environmental issues for all involved with the demolition and construction works.

5.0 SOCIO ECONOMICS

Introduction

- 5.1 An assessment has been undertaken to identify the likely significant social effects of the Proposed Development upon the Application Site and the surrounding area. These considerations are most commonly related to the effects upon the residents that live in close proximity to the Application Site. The analysis focuses on current provision for housing, education, health and open space within the Application Site and the surrounding area.

Population and Housing

- 5.2 The population profile of Hastings Borough is fairly even spread across age ranges with a large proportion of population falling within their 30's (14%), closely followed by those in their 40's (13%) and their 5'0s (13%), with a sharp fall in elderly population i.e. those in their 80/90's (6%). Children below the age of 15 accounted for 20% of the overall population at that time. The population within Hastings Borough is forecast to rise by 12.5% in the period to 2026. It is estimated that approximately 409 people will occupy the Proposed Development once it is completed.
- 5.3 A recent housing assessment, on behalf of HBC, has outlined a growing housing need within Hastings Borough, in particular affordable housing, family housing and flats. The Proposed Development will provide an appropriate range of dwelling sizes in order to meet these identified local needs.

Education

- 5.4 East Sussex County Council (ESCC) has identified that the increase in population of the Proposed Development will not significantly affect local primary and secondary schools and that these schools have the capacity to accommodate additional children generated by the Proposed Development.
- 5.5 However, in terms of early years education (e.g. nursery schools/crèches), local education facilities are considered to be inadequate to meet the needs of the Proposed Development. Consequently a contribution towards nursery education facilities is sought by ESCC.

Health Facilities

- 5.6 Data obtained from Hastings and St Leonards Primary Care Trust (an independent statutory body responsible for planning, providing and commissioning health services for the local population) has identified a number of doctors' surgeries, dental practices, and hospitals (with the Conquest Hospital being immediately adjacent to the Application Site) within close proximity of the Application Site. Discussions are currently taking place with Hastings and St Leonards Primary Care Trust and HBC in order to identify whether there would be provision to meet the health service needs of the Proposed Development.

Provision of Environmental Play Area

- 5.7 The retention and enhancement of the Holmhurst St Mary SNCI and the provision of an environmental play area as part of the Proposed Development will create improved open space provision within the Application Site. This is recognised as a beneficial effect on the future occupiers of the Proposed Development as well as providing a facility for the wider community. A comprehensive long-term package of proposed improvements and enhancements to the SNCI and wider Application Site are set out in the Landscape, Ecological and Woodland Management Plan to be agreed with HBC.

6.0 LANDSCAPE AND VISUAL ASSESSMENT

Introduction

6.1 A detailed landscape and visual assessment of the potential effects of the Proposed Development has been undertaken. This assessment includes the Application Site and the immediate surrounding area and identifies effects on 'visual receptors' (e.g. neighbouring properties, nearby roads and public rights of way).

Existing Landscape Features

6.2 The Application Site contains a range of existing landscape features:

- Holmhurst St Mary SNCI and associated woodland;
- Other woodland and trees covered by TPOs; and
- Historic landscape features associated with the Listed Building and former grounds of Holmhurst St Mary, including the Listed Statue of Queen Anne and informal walkways, a grotto, and the Nuns' Graveyard.

Visual Assessment

6.3 A ridgeline is situated to the north and west of the Application Site, and contains the site which is at a lower level with sloping topography. The Application Site is also characterised by existing dense boundary vegetation. The visual assessment records that views into the Application Site are limited to those in either close proximity or within the Application Site itself.

6.4 Existing views across the main section of the Application Site occur from the dwellings on Beaulieu Gardens, Francis Bird Place and the Listed Building of Holmhurst St Mary to the north; from the buildings located in the grounds of the Conquest Hospital to the east; and more limited views from the public rights of way which traverse, and are adjacent to, the Application Site.

Retention of Existing Landscape Features

6.5 The Proposed Development has retained the majority of the landscape features within the Application Site, namely the existing woodland, hedgerows and individual trees, the historic landscape associated with the Listed Building of Holmhurst St Mary, including the Listed

Statue of Queen Anne and the grassland habitat of the SNCI. Approximately 60% of the Application Site is designated as retained SNCI (51% of which is retained within the Proposed Development).

Effects during the construction of the Proposed Development

- 6.6 Construction activities will result in an inevitable change to the existing landscape character which is considered to represent a moderate adverse effect, although due to the visual enclosure of the Application Site this effect will be at a local level. Effects will be limited to those landscape and visual receptors within, or adjacent to, the Application Site by the use of mitigation measures such the siting and specification for the construction compound and strict adherence to the provisions of the Code of Construction Practice.
- 6.7 The construction effects on the rights of way surrounding the Application Site are considered to be of minor adverse significance as views of construction activities will be screened.

Effects on completion of the Proposed Development

- 6.8 Overall, effects of the Proposed Development will range from minor adverse for views from local receptors (e.g. residential properties) to moderate beneficial, as the development proposals will enhance the landscape setting of the Listed Statue of Queen Anne and its visual relationship with the Listed Building of Holmhurst St Mary.
- 6.9 Trees and hedgerows are affected by the proposals, but the losses are balanced by new initiatives on landscape, woodland and ecological management and maintenance set out in the Management Plan and by new planning proposals throughout the site.
- 6.10 Effects on the night-time landscape character have also been considered. There will be a change in the current dark landscape of the Application Site to one that is lit. This will result in a permanent effect on the landscape of minor to moderate adverse significance, but the specification on lighting is proposed to minimise the increased illumination. Significant areas of site will remain undeveloped and retain their current night time characteristics.

7.0 TRANSPORT AND ACCESS

Introduction

- 7.1 An assessment of the current conditions in the vicinity of the Application Site in terms of existing transport infrastructure, highway network and public transport provision, as well as pedestrian and cycling access has been undertaken.
- 7.2 In order to determine the effects of the Proposed Development on the local highway network, including a number of nearby junctions, a series of traffic counts were carried out in 2006 and 2008 at junctions around the Application Site.

Existing Highway Network

- 7.3 Vehicular access to the Application Site is taken from The Ridge B2093 which is an important distributor road and provides a west to east link to the north of Hastings Town Centre. The B2093 provides the link to the A21 Trunk road network and a wider area.
- 7.4 Independent of the Proposed Development, a new link road and bypass is proposed to improve the connection from the west of Hastings to Bexhill. Although this will increase the amount of traffic on The Ridge and the A21, junction improvement proposals are in place to ensure that the road network can operate within its capacity.

Existing Public Transport

- 7.5 There are a number of bus services along The Ridge which pass the Application Site; Bus stops are located within 400m of the Application Site on The Ridge and on Harrow Lane.

Existing Pedestrian Accessibility

- 7.6 There are public footways along The Ridge, Harrow Lane and into Welton Rise, providing pedestrian connectivity to the Application Site. In addition, the public right of way which traverses the Application Site provides connection to the aforementioned roads.

Construction Traffic

- 7.7 Construction vehicle movements on the local highway network will be subject to an appropriate routing agreement and controlled by hours of operation, to be agreed with HBC.

Traffic generated by the Proposed Development

- 7.8 The Proposed Development will result in a less than 5% increase in traffic flows on the local highway network. A number of sustainable transport measures are proposed, including the preparation of a Travel Plan to encourage the use of private cars for journeys by for the prospective occupiers of the new housing.

8.0 FLOOD RISK AND DRAINAGE

Introduction

- 8.1 An assessment of the likely significant effects of the Proposed Development on drainage, groundwater and flood risk has been undertaken. The assessment involved gathering baseline information regarding the Application Site and the wider downstream catchment area. This information included relevant maps for the area, a topographical survey⁷ and results from an intrusive ground investigation.

Protection of the water environment during demolition and construction activities

- 8.2 During demolition and construction there is a potential risk of chemical contaminants entering the surface and groundwater environment. In order to protect the surface and groundwater from potential pollution, a number of measures will be incorporated into the Construction Environmental Management Plan (CEMP). Such measures will ensure that all fuels, oils and chemicals are stored in appropriate containers and that best practice precautionary measures are adopted to prevent any accidental pollution incidents.

Maintaining Water Quality

- 8.3 In order to minimise the risk of any problems associated with sediment entering the water environment, the Proposed Development will incorporate trapped gullies to retain any sediments received from the road and car parking areas. The use of permeable paved areas will also assist in removing sediments.

Preventing Flood Risk

- 8.4 Although the Proposed Development will result in the creation of impermeable areas in the form of roofs, hardstanding and access roads, the drainage strategy has been designed to mimic the existing drainage regime of the Application Site. Natural flow rates will be maintained through the use of the detention basins, permeable pavements and rainwater harvesting as part of the drainage strategy.
- 8.5 The Proposed Development therefore will not result in the risk of flooding, both inside and outside the Application Site, and could result in specific beneficial effects, which could reduce the prospect of flood risk outside of the Application Site.

⁷ A detailed analysis of the ground surface to determine levels and identify all above ground features

9.0 ECOLOGY

Introduction

9.1 A detailed assessment to review the ecological and nature conservation characteristics of the Application Site has been undertaken to assess the effects arising from the demolition/construction and operational phases of the Proposed Development.

Existing Ecology

9.2 A number of ecological surveys have been undertaken at the Application Site. These involved surveys for badgers, bats, amphibians, reptiles, breeding birds and invertebrates.

9.3 The dominant habitats within the Application Site are grassland and woodland. The Application Site also supports bats, badgers, slow worms (although a small population), invertebrates and birds (the most notable being the nightingale). In particular, the Holmhurst St Mary SSSI contains good foraging habitats for badgers.

9.4 The Application Site contains some extensive areas of Japanese Knotweed which is an invasive plant which can damage building foundations if not removed.

Effects during Demolition and Construction Activities

9.5 It will be necessary to remove a proportion of the grassland, trees and other vegetation during the construction of the Proposed Development. Without mitigation, such activities would significantly disturb the existing fauna using the Application Site. Detailed measures to protect habitats and species will include:

- Removal of sections of hedgerows in the autumn or winter period preceding commencement of construction in order to avoid the disturbance of nesting birds;
- Protection of retained trees, grassland areas and retained badger setts with protective fencing;
- Any identified reptile species from within the footprint and construction working area will be carefully moved to a new area within the SSSI;
- Removal of two badger setts under a licence issued by Natural England; and
- Removal of the Japanese Knotweed.

- 9.6 Some adverse residual effects will be seen during construction activities, although these will be short-term in nature and only significant at a local level.

Retention of Ecological Assets

- 9.7 The Proposed Development has been designed to retain and where possible enhance the ecological biodiversity of the Application Site. Although two badger setts are proposed to be closed, a main badger sett within the Application Site will be retained with buffer planting to help safeguard the protected species, and reduce the risk of disturbance.
- 9.8 The main part of the Holmhurst St Mary SNCI has been retained, and the higher density housing is located on the western side of the Application Site, furthest away from the SNCI. The lowest density housing on the site is located to the north of the SNCI. The Masterplan layout is intended to lessen the potential effect of recreational pressure on the SNCI, and the opportunities for formal recreation review centred on the playing fields and sports pitches at Harrow Lane.
- 9.9 A new water feature has been introduced in the south-eastern corner of the Application Site within the SNCI. This ecological and landscape feature has the potential to create a new habitat and will not form an active part of the drainage strategy.
- 9.10 The Landscape, Ecological and Woodland Maintenance and Management Plan will provide measures to manage and enhance the retained SNCI. In addition, it will provide measures to manage potential recreational pressure on the SNCI, such as providing mown pathways within sensitive areas and providing interpretation boards to raise awareness of the Application Site's landscape and ecological assets.

10.0 ARCHAEOLOGY AND CULTURAL HERITAGE

Introduction

- 10.1 An assessment of the effects of the Proposed Development on archaeology and cultural heritage is based on the findings of an Archaeological Desk Based Assessment, which examined the nature and extent of the known and potential archaeological resource across the Application Site, and a series of cultural heritage reports which examined the cultural heritage resources within the Application Site.

Archaeological Potential

- 10.2 The Application Site is considered to have a low or low to moderate archaeological potential with evidence of late Medieval and Post Medieval activity. Field and woodland boundaries within the Application Site are likely to be late Medieval and Post Medieval in origin.

Cultural Heritage Resources

- 10.3 The potential for cultural heritage resources on the Application Site is considered to be moderate with certain elements which have a high significance. The nineteenth century landscape features surviving within the Application Site, and which formed part of the gardens of the Listed Building of Holmhurst St Mary as laid out by the Victorian writer Augustus Hare, have moderate cultural heritage potential and significance. Included in the area of the former gardens is the Grade II* Listed Statue of Queen Anne, dating to 1712 originally erected outside St Paul's Cathedral, and removed by Hare to the Application Site in the late 19th century. The Statue is identified as having high significance and a high cultural heritage potential.

Archaeological Investigation

- 10.4 A programme of archaeological investigation, involving excavation, recording and publication will be undertaken to record and remove the important archaeological remains prior to the commencement of the demolition/construction activities within the Application Site. It is proposed that this work would be carried out as a benefit to the wider community, with the involvement of local interest groups culminating in the production of an inclusive publication. Following this mitigation, the Proposed Development would have no significant effects on archaeology as archaeological remains would already have been recorded and removed.

Retention of Cultural Heritage Resources

- 10.5 Prior to construction, protective fencing will be erected around the existing ornamental pond, grotto and pet cemetery and nuns' graveyard (and associated nineteenth century walling) to protect and safeguard these resources.
- 10.6 The setting of the Listed Building of Holmhurst St Mary, and its relationship with the relocated Listed Statue of Queen Anne, has been considered as an integral part of the design of the Proposed Development. The Statue will be dismantled, renovated off-site and then relocated within the Application Site. The relocation is intended to reposition the statue in a more prominent position, whilst retaining the setting and visual relationship with the adjacent Listed Building of Holmhurst St Mary.

11.0 AIR QUALITY

Introduction

- 11.1 The air quality assessment examined the existing air quality in the area, outlined the relevant air quality standards and guidelines and assessed the potential changes in air quality arising from the demolition/construction and operational phases of the Proposed Development. Only nitrogen dioxide and fine particulate matter were considered in this assessment as these are the main vehicular-derived pollutants and the only ones of relevance to the Proposed Development.

Existing Air Quality

- 11.2 Background concentrations of nitrogen dioxide and fine particulate matter at the Application Site are predicted to achieve, or have achieved, their respective air quality objective concentration levels.

Dust during Demolition and Construction Activities

- 11.3 The demolition/construction effects of the Proposed Development on local air quality will primarily be from dust. This will, however, be controlled through mitigation measures as part of the CEMP (e.g. through dust suppression techniques) ensuring any adverse effects on surrounding receptors (e.g. local residential properties and along construction vehicle routes) are minimised. Although it is likely that some deposition of dust in the surroundings will still occur, the periods over which dust may occur will be short and the extent of the area affected will be significantly reduced through the application of the mitigation measures.
- 11.4 An asbestos survey of the prefabricated buildings that are to be demolished within the Application Site will be undertaken to prevent the risk from any airborne contamination. Further measures will be incorporated into the CEMP should any asbestos be found.

Air Pollutants derived from the Operation of the Proposed Development

- 11.5 The Proposed Development will result in an increase in nitrogen dioxide and fine particulate matter through the generation of traffic. An assessment of these emissions was undertaken using a computer model. The computer model forecast only very small increase in concentrations and the air quality standard concentration levels are not predicted to be

exceeded. Hence, the overall effect of the Proposed Development is predicted to be negligible.

12.0 RESIDUAL EFFECTS

12.1 The main residual effects of the Proposed Development are summarised as follows:

- Compliance with national, regional and current and emerging local planning policy;
- Provision of dwellings (including affordable homes) to deliver housing choice and help to meet the housing needs within Hastings Borough;
- Retention, relocation and renovation of the Listed (Grade II*) statue of Queen Anne;
- Enhancement of the setting of the Listed (Grade II) building of Holmhurst St Mary;
- Encouraging sustainable modes of transport, including the opportunity to introduce a bus route through the Application Site, and to improve pedestrian/cycleway links;
- Provision of a comprehensive landscape strategy to retain and reinforce the existing landscape structure within the Application Site, e.g. woodland elements, historic hedgerows and individual / groups of trees;
- Ecological/landscape enhancement of the Holmhurst St Mary SNCI including provision of a play area and a new wildlife pond; and
- Provision of a management plan to ensure the long-term management of the SNCI.

12.2 Whilst the ES has identified some likely adverse effects, particularly during the construction stage, these are considered to be only of minor significance due to their relatively short and intermittent nature. It is intended that best practice techniques and procedures will be adopted to manage and minimise these effects.

12.3 Overall, it is considered that the Proposed Development will have a predominantly beneficial effect upon the Application Site and surrounding area through the provision of market and affordable housing, restoration of the historic assets of the Application Site, and the detailed management proposals to secure long-term maintenance and enhancement of the SNCI. The Proposed Development will introduce measures which have the potential to reduce the need to travel by car through improved public transport connectivity and providing a network of pedestrian and cycle routes to link the Application Site with adjoining areas.

12.4 Mitigation measures have been identified during the early stages of design and these have been incorporated into the Proposed Development. Appropriate mitigation will continue through further detailed design and implementation of the scheme proposals.

