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07 April 2026

Dear Sir/Madam

Re: Response from CPRE Sussex to the Reg 18 Consultation on the Hastings Local Plan

I am writing on behalf of the CPRE Sussex, the Sussex branch of the Campaign to Protect Rural England, registered charity 1156568. We set out below our reactions to the current Regulation 18 consultation on the Hastings Local Plan.

Housing targets

First and foremost, we recognise the unacceptable and practically impossible position that Hastings as a Local Planning Authority, has been placed in by the Government's approach to housing targets.

The 'Standard Method' produces an entirely unrealistic housing requirement for Hastings, this requirement is currently (May 2025) 697 homes a year. This equates to a requirement for 12,546 net new homes over the lifetime of the Plan. The formula that produces this total is largely disconnected from real local need.

Paragraph 1.2 of Hastings Local Plan gives a welcome assurance that the Local Plan is not just about meeting government housing targets. It is about shaping Hastings in a way that reflects the town's distinctive character, community spirit, and extraordinary setting.

And in paragraph 2.2 the Council admits that Hastings faces severe housing pressures, but growth must be balanced with environmental responsibility. The town is tightly constrained by the sea and protected landscapes, meaning new development must make efficient use of land and buildings.

Given the many constraints faced by the district, it is entirely appropriate therefore that the LPA is proposing a lower housing target than that suggested by the Standard Method, with the new housing target of 3,141 – 3,373 net new homes over the plan period (inclusive of small site Windfall). Annualised, this equates to 175 - 187 net new homes per annum.

Paragraph 4.16 rightly highlights that the NPPF "provides two exceptions to meeting development needs in full. First, where protecting areas or assets of particular

importance provides a strong reason for restricting the scale, type or distribution of housing development within an area. Second, where the adverse impacts of meeting needs in full would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.”

However, we do not believe that even this proposed lower target is acceptable or deliverable, given the other stated constraints - and worthy strategic aspirations of the plan (around landscape, nature, climate, water, community infrastructure).

Pre-existing challenges that make even the level of growth proposed unacceptable

As stated in the Draft Local Plan:

Hastings has significant levels of flood risk in different parts of the borough, and this risk will grow with climate change.

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

The borough of Hastings is rich in natural areas, diverse landscapes, and a magnificent coastline. The High Weald National Landscape (NL) follows the Borough's administrative boundary to the north and includes Hastings Country Park Nature Reserve at the east of the borough. At the western end of the borough is the Combe Valley Countryside Park.

The internationally designated Hastings Cliffs Special Area of Conservation (SAC), Ancient Woodlands, 3 nationally designated Sites of Special Scientific Interest (SSSI) at Marline Valley, Combe Valley and Hastings Cliffs, 8 Local Nature Reserves (LNR), and 25 Local Wildlife Sites (LWS).

A relatively low level of transport connectivity is a key issue for Hastings. Located on the periphery of the South East, Hastings has limited strategic transport infrastructure linking the Town to larger centres of population.

In Hastings, affordable housing is essential since local house prices and rents are much higher than local incomes; many households rely on benefits or low-paid work; the private rented sector is large but often expensive and insecure and there is strong demand for genuinely affordable homes.

In paragraph 4.40 the Council says that it will seek to ensure that where land in the council's ownership is suitable for housing development, the council's priority is to

secure the building of **100% affordable housing**. **The council has an ambition to see 100% affordable housing delivered on greenfield housing sites. Our evidence to-date supports a minimum viable delivery of 40%.**

However, Strategic Policy 2 (SP2) in Table 2 shows percentage of affordable housing required, which is rather disappointing.

Size of development	Brownfield site	Greenfield site
0-9 units	% requirement to be confirmed	% requirement to be confirmed
10-19 units	% requirement to be confirmed	40%
20 or more units	25%	40%

There is a welcome recognition in the Draft plan of many of these challenges, and we are heartened by paragraphs that, for example, state:

4.78 At the local level, the council has declared its recognition of global climate and biodiversity emergencies and its ambition to make work towards a carbon neutral borough ahead of the UK target of 2050.

4.97 The world is witnessing a colossal decline in global biodiversity with one million animal and plant species threatened with extinction. Most terrestrial habitats are damaged, and the council’s Nature Emergency Action Plan (NEAP) demonstrates the council’s commitment to delivering a greener, more biodiverse future where nature recovery is seen as a priority.

However, many of the proposed site allocations *do not* meet the requirements recognised elsewhere in the plan, and stand in contradiction to the plan’s own policies. As such, the level of housing growth as proposed in this draft is likely to make many of these challenges even worse – while failing to address the housing affordability crisis.

There is a significant risk that the Plan will end up consisting of aspirational and ambitious policies that are not worth the paper they are written on, undermined as they are by poor site allocations.

Site allocations that we cannot support

Given the Plan's welcome stated strategic priorities, there are a number of proposed site allocations that we cannot support, and which we believe must be withdrawn. We recognise that this may make the position even more challenging in relation to the government's requirements and a potential plan examination, but we do not believe that these sites meet the requirements for genuinely sustainable development, as required both by the National Planning Policy Framework, or by the Plan's own policies.

Policy HS1: Land adjacent to Sandrock Park, The Ridge

Reason for our objection: The site is bound by woodland, including trees subject to Tree Preservation Orders, which acts as a natural buffer to adjacent housing estates and The Ridge. Woodland to the south-west, west and north forms a continuous and unbroken woodland corridor to the St. Helen's Wood Local Nature Reserve and Local Wildlife Site to the south.

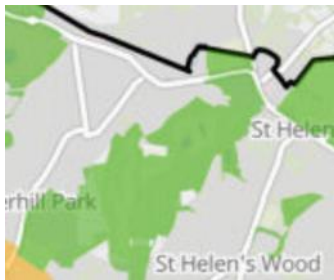
The site provides an ecological buffer to the neighbouring Local Wildlife Site (LWS) and Local Natural Reserve (LNR), as well as vital ecological connectivity to the wider High Weald landscape (National Landscape). The proposed development would have an unacceptable impact on landscape resilience and ecological connectivity between AONB and Local Natural Reserve.

The proposed development is likely to significantly degrade functional connectivity for terrestrial species both across the site and between St Helens Wood to the south and the High Weald AONB to the north.

In addition, the proposal site is in the ownership of the Local Planning Authority and the Lead Local Flood Authority. Whilst the Council in paragraph 4.40 states that where land in the council's ownership is suitable for housing development, the council's priority is to secure the building of 100% affordable housing, policy HS1 requires provision of 40% affordable housing (in line with Policy SP2). Empty promises?



Site Allocation Policy HS1



Policy SC12: Green and Blue Infrastructure

The above clearly shows how the Council contradicting itself. Both policies are the part of the Draft Local Plan.

Policy HS3: Former Westerleigh School

Reason for our objection: The required density of development on this site is unrealistic due to the character of surrounding development, existing green corridors and existing trees on the site which should be integrated.

Policy HS4: Former Malmesbury House, 123-125 West Hill Road

Reason for our objection: Due to dominant position of the site, pattern of surrounding development, required provision of 10m buffer and the presence of mature trees and shrubs on the site which are required to be maintained, indicative 37 dwellings is not feasible.

Policy HS5: Former West St Leonards Primary School, Bexhill Road

Reason for our objection: The site was formerly landfill and may still produce landfill gas. Landfills, meanwhile, cause various environmental issues that also threaten human health. However, complex biogeochemical conditions in landfills hinder the understanding of the long-term fates of disposed elements, limiting assessments and mitigations of environmental and health risks.

Too many constraints; this site would be more suitable for nature recovery since the nature could deal with this situation much better than us. The site is entirely inappropriate for the development. NPPF 125. Planning policies and decisions should: b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage;

Policy HS6: Ore Valley (Former Power Station)

Reason for our objection: We do not object to the principle of redeveloping the unwooded parts of the site, but due to numerous constraints on the site, the minimum Indicative Capacity of 130-165 dwellings is unrealistic.

Policy HS7: Former Post Office and University of Brighton building

Development on this site should seek to make new use of existing buildings. The regeneration or reuse of buildings for residential use is a sustainable approach that aims to repurpose existing structures to serve new functions while preserving their original character. This practice is not only beneficial for the environment but also for the community, as it can lead to the creation of new homes and contribute to urban regeneration.

It would minimize the demand for new materials and reduce the environmental footprint of construction. In the UK, adaptive reuse has been recognized as a significant strategy to meet housing demand while also addressing environmental sustainability goals.

Policy HS10: Land at Rock Lane

Reason for our objection: Due to sloping down terrain and exposure to High Weald National Landscape the dwelling should be single storey only, to demonstrate the conservation and enhancement of the National Landscape.

Policy HS18: Land at Tilekiln Farm

Reason for our objection: Proposals should seek to incorporate and focus on existing key features of the site such as the Bourne Stream, trees and hedgerows and public right of way.

The proposed buffer zone of 10m around the Bourne Stream is not adequate. 10m Ecological Buffer Zone (EBZ) to watercourses is minimum, generally, the wider the EBZ the more beneficial it is for wildlife, the exact size will depend on the site situation.

Houses front onto Fairlight Road, Fairlight Avenue, Tilekiln Lane, Edith Road benefit with rather deep rear gardens. Whilst maintaining the pattern of the area this site would be inappropriate for 70-100 dwellings.

Policy HS21: Land East of Rock Lane

Reason for our objection: It is questionable how to accommodate 22-32 dwellings on this site whilst demonstrating integration of development into existing site with existing trees. Encroachment into the countryside within the Natural Landscape and cumulative impact.

Policy HS23: Land East of Beaney's Lane, The Ridge

Reason for our objection: Encroachment to the countryside within the National Landscape, unsustainable location. The conservation and enhancement of the landscape and character of the High Weald National Landscape would be impossible by introducing residential development of density 45 - 55 dwellings per hectare.

As Policy SC9 requires; development in the High Weald NL should be limited in scale and extent, in terms of the proposed footprint, height and massing and appropriate in terms of its nature and location. Land within the setting of the High Weald NL will need to take into account the potential impact on the natural beauty of the NL in its location and design.

The development would impact the integrity of the Maplehurst Wood SSSI. This wood has probably existed since the Middle Ages and a large part of it is still semi-natural.

HSS3: Land adjacent 142 Bexhill Road

Reason for our objection: The site is in close proximity to the Combe Valley Countryside Park, South Saxons Local Wildlife Site and Combe Haven River. Building 6 dwellings within the site which rather lengthy access and likely impact on these areas during both the construction and occupation phases of the development would result in more harm than benefits (pushing the pumpkin into the water).

Policy ES7: Ivyhouse Lane, Northern Extension

Reason for our objection: 42ha site within the National Landscape, therefore there should be the requirement to retain all trees on the site to avoid impact on protected landscape. Any development must take full account of the effect on its setting, and views of it from other parts of the National Landscape.

Policy ES8: Land at the junction of The Ridge West and Queensway

Reason for our objection: Mainly open grassland and is surrounded by woodland with some belts of trees, including TPO trees in the Southwest and Northeast corners of the site. It is positioned close to the High Weald National Landscape and is adjacent to a Local Wildlife Site to the East. There should be condition attached to integrate the development into existing setting of the site with no loss of trees, as measures to conserve and enhance the setting of the High Weald National Landscape.

Finally, we would note as a general comment, that Plan Policy SC11: Trees and Woodland – which is very welcome in itself – is frequently compromised by many of the site allocations proposed.

We trust that the Plan will be duly amended before the Reg 19 submission draft.

Yours faithfully

Maria Tomalova

Planning Campaigner, CPRE Sussex