

# Hastings Draft Local Plan Preferred Options (Regulation 18) Consultation 2026 – Response form

**Part B:** Complete this part for each comment you make (continue on a separate sheet if necessary)

**Which part of the Plan or evidence base are you commenting on** (enter policy number, paragraph or section)?

Strategic Policy SP8(SP8): Conserving and Enhancing the Natural Environment  
Strategic Policy 9 (SP9): Managing Coastal Erosion and Flood Risk

Policy SC9 The High Weald National Landscape and Other Areas of Landscape Value

Policy SC10: Habitat Protection, Biodiversity and Net Gain .

Policy SC11: Trees and Woodland

Policy SC12: Green and Blue Infrastructure

Policy SC13: Urban Greening Factor

Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities

Policy SC15: Ground Behaviour, Geodiversity and Land Stability

Policy SC16: Flood Risk and Drainage

Policy SC17: Coastal Change Management

Policy SC18: Pollution and Hazards

Policy SC19: Environmental Nuisance

Policy SC20: Community Facilities

Do you support or object to the policy, paragraph or section?

Support      Object      Comment

If your response is over 100 words, please enter an optional summary here (up to 100 words)

This response sets out details of the local green spaces in West St Leonards Neighbourhood Area and the need to preserve them for the benefit of the community.  
It acknowledges that the Local Plan gives broad support for this, but there are concerns about how this will be implemented in practice.

**Enter your comments here** (provide evidence/ references where possible, and tell us what changes you suggest that would address your concerns)

### **Sustainable communities in particular SC9 – 20**

These policies potentially provide support for the development of West St Leonards Neighbourhood Area and as such are welcomed. There are specific comments on the most important policies below.

#### **Green spaces within West St Leonards Neighbourhood Area**

The forum welcomes the overall strategic policy contained in SP8, but is concerned about how this is going to be implemented. This is particularly important for the small green spaces which are scattered across the whole of the borough. The Forum has identified 27 local sites for designation as Local Green Spaces which are capable of enduring, reasonably close and special to the community they serve, holding particular local significance due to either beauty, historic significance, recreational value, tranquillity or richness of wildlife and local characteristics but are not necessarily extensive tracts of land.

This is encapsulated in En1 of the Forum's initial draft neighbourhood plan:

#### **Policy En1: Protecting Local Green Spaces**

Within these areas new development will only be permitted in very special circumstances or where it is compatible with their character and function as Local Green Spaces. Harley Shute and Marina allotments will be retained as allotments. Details of the currently proposed local green spaces are given at the end of this response.

#### **Coastal and flood protection**

Just over a quarter of the shoreline of Hastings is in West St Leonards Neighbourhood Area, which makes SP9 of particular importance to the area. It is noted that Hollington Stream which runs through the centre of the area is highlighted, although Combe Haven, which is on the border with Rother, but within Hastings from Marker Posts 5, 6 and 54 in Combe Valley Countryside Park to the sea, is not. This part is part of a flood plain taking in the length of the Combe within Combe Valley Countryside Park which needs to be managed and cared for appropriately to provide natural protection. This should include returning the Combe to its natural meandering state from the rigid straight line banks imposed in the past.

The coastal area is in the list of Local Wildlife Sites in the Hastings Local Wildlife Sites Review, produced by Sussex Wildlife Trust, 2020, as the Bulverhythe Shingle Beach and Cliffs. The forum propose that this important vegetated shingle running from just west of Marina Gardens to Glyne Gap including Sea Kale and Horned Poppies should be protected in the neighbourhood plan.

#### **Policy En2: Vegetated shingle**

Any impacts of planning proposals that would impact the coastal flora and or fauna should be assessed through an Ecological Impact Assessment and fully mitigated.

#### **Policy SC10: Habitat Protection, Biodiversity and Net Gain**

Hastings has an opportunity of utilising the provisions for monetising Biodiversity Net Gain in particular on the land of Upper Wilting Farm which it owns and possibly the Bulverhythe Lower Tier Recreation Ground, which could provide a firm financial basis for the protection of the Combe Valley Countryside Park in the future.

#### **Policy SC13: Urban Greening Factor**

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/UrbanGreeningFactorStandard.aspx>

The use of the Urban Greening Factor planning tool can provide a useful guide for the provision of green spaces, but care must be taken that such tools are not applied too rigidly. The visual and local impact of local green spaces may justify higher proportions of green space than the target score produced by the calculation.

**Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities**

This policy is welcomed in connection with green spaces, but active support needs to be given to providing such facilities. This is also covered in the section on youth provision.

**Identified green spaces within West St Leonards Neighbourhood Area**

As noted above the Forum has identified 27 local sites for designation as Local Green Spaces which as noted above in more detail are special to the community they serve, holding particular local significance but are not necessarily extensive tracts of land.

Details of the sites are available on the forum's website at [https://www.weststleonards.org.uk/?option=com\\_content&view=article&id=23&Itemid=300](https://www.weststleonards.org.uk/?option=com_content&view=article&id=23&Itemid=300) where clicking on the site name will show the draft proposal for designation if it has been completed.

The sites are listed below with some comments from the exhibition on March 28 2026:

01	Old Bathing Pool site with Seaside Road Play Space and car park
02	West Hill Road Cliffs (Incomplete) 02a Caves Road/BoPeep stairs 02b Sussex Steps 02c St Leonards Church Steps With the comment 'Reinstate access to front via Old Sussex Steps as well as to Bo Peep which would save much time'
03	West Marina Gardens
04	Coastal Strip with Little Galley Hill (Incomplete) Comment 'Bulverhythe Beach as a green space for recreation, walking, dog walking and cycling. Also the need to maintain the beach better and to improve bridge to beach on Bridge Road and path'.
05	West Marina cliffs and railway siding
06	Marina allotments
07	St Leonards Court, West Hill Road
07a	St Leonards Court path West Hill Road to Essenden Road
08	Gap West Hill Road
09	Bulverhythe Recreation Ground Lower tier – a comment about this was 'Well used green space - no use for housing as its floods'
10	Glyne Gap Reed Beds
11	Brick Boat Island, Bexhill Road
12	St Marys Church Bulverhythe
13	South Saxons Wetlands Comment '1984 - 2020 stopped Asda & cleared out the pond and and litter'
14	Hollington Stream and Schools Wood (Incomplete) Greenway
15	Edinburgh Road Triangle
16	Edinburgh Road verges and green spaces

17	Harley Shute allotments
18	Bunting Close Fieldway
19	Newts Way Playground
20	Porters Grove wood
21	Marsh Wood
22	Dog Kennel Wood
23	Heron Close
24	Combe Valley Countryside Park (the part within the neighbourhood area)

### Annex

We have received a substantive email from James Durling and we add below his comments on Green Spaces and connectivity below

#### 1. Green Spaces & Outdoor Exercise:

I propose installing outdoor exercise equipment at key green spaces to encourage free outdoor fitness and healthier lifestyles. Potential locations include:

- South Saxons Nature Reserve
- Bulverhythe Recreation Ground
- Old Bathing Pool Site

Equipment could include chin-up bars, parallel bars, sit-up benches, step platforms, and resistance machines. In the nature reserve, equipment and benches should be made from natural logs or timber rather than plastic or metal, so they blend in with the surroundings. These sites could form a linked outdoor fitness trail for runners, walkers, and young people.

Additional improvements could include:

- More wooden benches and seating
- Additional trees and planting
- Better maintenance of paths in South Saxons Nature Reserve
- Lighting on key footpaths, especially the path opposite Colemans (the black path), to improve safety

at night

#### 2. Walking, Cycling & Connectivity

Improving walking and cycling routes could reconnect historically linked areas. One key suggestion is to restore a footpath along the river from Bexhill Road to Bulverhythe Road, connecting to the footbridge opposite the chip shop. This would create a safe off-road walking and cycling route, however, I think due to an extension at the end house on the Bulverhythe side, this may not be feasible.

Other improvements could include:

- Better lighting on important footpaths
- Safer road crossings
- Improved walking routes from Cinque Ports to Bulverhythe (Bridge Way)
- Educational signage along Bulverhythe Road, opposite Skinners Sheds, along the fence overlooking the riverbank. Signs could illustrate the local habitat, such as kingfishers, swans, and nesting seasons, helping children and other pedestrians learn about the wildlife as they walk to school.

#### 3. Public Realm & Gateways

The Cinque Ports Way railway bridge is a main gateway into St Leonards but falls under Network Rail.

Improvements could include:

- Better lighting
- Murals by local artists (similar to what we see by the old bathing pool)

- Cleaning and repainting
- “Welcome to St Leonards” signage

These changes would enhance the first impression of the area and help create a stronger sense of place.

#### 4. Cleanliness & Small Improvements

Simple measures could make a big difference:

- More litter and dog waste bins along Bulverhythe Road and main walking routes. Bulverhythe Road is like a dog poo minefield!!!!
- Improved street lighting in darker areas along Bulverhythe, Cinque Ports (including the railway bridge) and the black path opposite Coleman's
- Pavement repairs where surfaces are poor

#### **Summary**

These suggestions focus on:

- Improving green spaces with natural, attractive seating and exercise equipment
- Encouraging outdoor exercise and healthier lifestyles
- Enhancing walking and cycling connectivity
- Making streets and public spaces cleaner and safer
- Improving gateways, educational opportunities, and the overall appearance of St Leonards

All comments will be taken into account ahead of the next stage, the Proposed Submission (Regulation 19) version of the Plan, due to be published later in 2026.