



# Rother District Council

## Local Development Framework

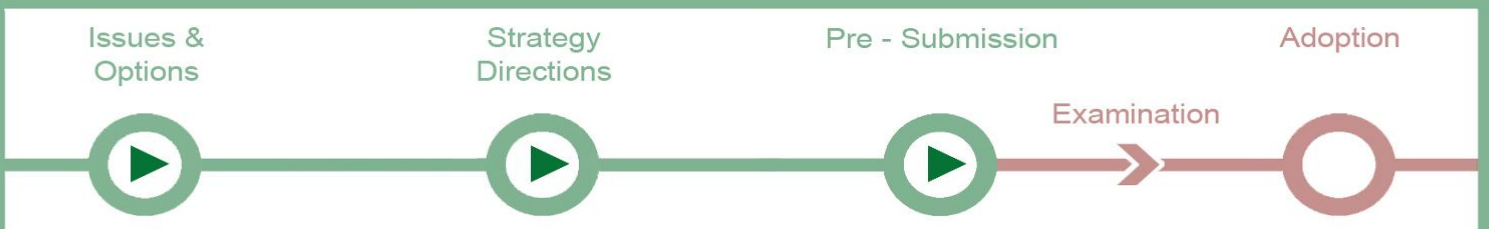
# Hastings Fringes



# Background Paper

August 2011

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## **Hastings Fringes Background Paper**

### **1.0 Introduction**

- 1.1 This paper forms part of the evidence base to inform Rother District Council's Core Strategy Development Plan Document.
- 1.2 It considers the evidence in relation to the Hastings Fringes as contained in the Core Strategy: Consultation on Strategy Directions, and sets out the current position on these themes.

### **2.0 Core Strategy – Consultation on Strategy Directions**

- 2.1 In November 2008, the Council consulted on their Core Strategy Preferred Strategy Directions, detailing the preferred strategy for Hastings Fringes (reproduced in the box below).
- 2.2 The three main themes focussed on:
  - Urban fringe management of the Hastings Fringe area,
  - Improving accessibility in the Hastings and Bexhill area, and
  - Looking at sustainable urban expansion that supports the shared vision for Hastings and Bexhill and is consistent with traffic and environmental constraints.
- 2.3 Each of these themes are taken in turn and discussed in detail within this background paper, stating the up-to-date position regarding the evidence base and the implications for formulating policy on these topic areas.

**The Preferred Strategy for the Hastings fringes in Rother District is to:**

a) For urban fringe management

Be pro-active in managing the Hastings urban fringe areas, in close liaison with Hastings Borough Council.

*This will be achieved by:*

- (i) Continuing to develop proposals for the establishment of the Pebsham Countryside Park in line with its emerging development strategy, including through securing appropriate developer contributions;
- (ii) Further joint working to develop integrated multi-functional green spaces as part of the management of the urban fringes of Hastings, including specific regard to land between Ivyhouse Lane and Rock Lane;
- (iii) Maintaining long term and effective countryside gaps between Hastings and Bexhill, Crowhurst, Battle and Fairlight.

b) For accessibility:

Realise opportunities to improve accessibility in the Hastings and Bexhill area.

*This will be achieved by:*

- (i) Securing early implementation of the Baldslow Improvement;
- (ii) Identifying a location for a new railway station in the Wilting area, if this is shown to be feasible;
- (iii) Planning for bus routes that serve movements both between Bexhill and the main employment areas on the outskirts of Hastings and between the (more deprived) western and northern parts of Hastings and the new major employment areas to Bexhill.

c) For development and housing:

Plan for sustainable urban expansion that supports the shared vision for Hastings and Bexhill and is consistent with traffic and environmental constraints.

*This will be achieved by:*

Some 200-450 dwellings and some 10,000sq.m. of business floorspace on the fringes of Hastings within Rother District, as follows:

- (i) Provide, in association with Hastings Borough Council, for limited development in the Wilting area, including for employment uses, in association with a new railway station in the Wilting area if this is shown to be feasible within environmental and access constraints;
- (ii) Provide for some development to the south of Battle Road, Hastings as an integral part of a larger scheme for mixed use development within Hastings Borough, but not separately, and only where environmental objectives are met;
- (iii) Give further consideration to only very limited development in the peripheral areas of Hastings, primarily for employment purposes, and only where this meets locational criteria and otherwise contributes to the shared vision, including for improved urban fringe management.

## *Consultation responses*

2.4 There were a number of responses to the preferred strategy; common themes include:

- The importance of safeguarding the fringe areas of Bexhill from development,
- Safeguarding of countryside gaps between settlements,
- Level of proposed development at Wilting and station development,
- Support towards the usefulness of the gap between Bexhill and Hastings being used for Pebsham Countryside Park and how this will act a barrier to development in this area,
- How effective management of fringe areas are likely to be more successful when they are delivered as part of a package which includes some development,
- The development at Breadsell is likely to erode the countryside gap between Battle and Hastings,
- The A21 Baldslow improvement is important in moving traffic efficiently onto the A21,
- Concern relating to protection of the AONB and the potential for gradual urbanisation.

## **3.0 Overview**

### *Shared approach to future prosperity*

3.1 As part of the Core Strategy Consultation on Strategy Directions, a jointly agreed shared vision was included which reflected an ongoing dialogue between the Councils regarding common issues and a recognition that strategies for development and change for Hastings and Bexhill need to consistent and complementary in order to be fully effective.

3.2 As part of the ongoing work between the two Councils the vision has been revisited and updated as part of the Overall Spatial Strategy. The development of the 'Shared Approach to Future Prosperity' provides the basis for joint working especially in relation to securing economic improvements.

### *Responses to Core Strategy Consultation on Strategy Directions*

3.3 In reviewing the representations made on the Core Strategy Consultation on Strategy Directions, it is considered appropriate to split Bexhill and Hastings Fringes into two separate chapters, as this better reflects the distinct identity of Bexhill and allows easier consideration of the fringes of Hastings to the circumstances of the town itself. Background to the Bexhill chapter can be found within the Bexhill Background Paper.

- 3.4 In developing Hastings Fringes as its own chapter, a separate strategic objective, followed by individual objectives for the chapter have been articulated (see the extract below). These objectives have been developed from the objectives contained in the preferred strategy for Bexhill and Hastings Fringes (when it was a single chapter) along with consideration of the representations made during the preferred strategy consultation.

The Strategic Objective for the Hastings fringes falling within Rother district is:

*To provide attractive and accessible fringes of Hastings, consistent with environmental designations.*

The following objectives elaborate upon this.

**Objectives:**

- (i) To contribute to the setting of Hastings and, where appropriate Bexhill;*
- (ii) To provide accessible green space in line with identified needs and opportunities;*
- (iii) To ensure that any development in Rother district is well integrated with Hastings, and contributes to its regeneration wherever possible, and complements respective strategies for Hastings and Bexhill.*

#### **4.0 Open space and green space enhancement**

- 4.1 The Consultation on Strategy Directions identified that there was some clear potential for improvement to open space on the fringes of Hastings. In view of the joint working on the Countryside Park, and given some similar potentials at Bexhill, a joint 'urban fringes strategy' was proposed. An area of particular potential for a joint urban fringe management approach is that either side of the railway as it approaches The Ridge, with Rock Lane to the east and Ivyhouse Lane to the west.
- 4.2 The High Weald Area of Outstanding Natural Beauty (AONB) abuts the urban edge of most of Hastings and there is evidence suggesting that in pockets along the fringes there is scope for improvement in terms of management and enhancement of these areas.
- 4.3 In both the Rother District Council Local Plan Inspectors Report (2005) and the Hastings Borough Council's Landscape Assessment (2008), consideration is given to the areas where enhancement is desirable.
- 4.4 In particular, the Inspector makes specific reference to the area east of Ivyhouse Lane, with regards to consideration as an employment omission site at the Inquiry (in relation to an existing employment allocation in Hastings which abuts the



boundary between the two authorities). The Inspector specifically considered the condition of this area, along with the sensitivity and vulnerability of the valley to development.

4.5 The area in question specifically:

*'lies at the southern head of the north-south valley which extends northwards at the right angle away from the Hastings Ridge. It forms part of a relatively broad valley, forming a belt of countryside extending up to the urban edge of Hastings. Two spurs of more elevated leading away from the main E-W ridge flank the valley. Large strands of woodland, much of it designated as Ancient Woodland, occupy extensive areas of the valley floor. Apart from Hastings-Ashford railway line which runs through this woodland and overhead power lines that also cross the valley, the southern end of this landscape tract is affected by other urban features, including a cemetery on higher ground to the west; the existing industrial estate and a caravan park to the south and residential development on rising ground well to the east.*

*I recognise that various urban features close to the periphery of this valley affect its character at present. As the objection site is at the southern end of the valley, it is in a sensitive and vulnerable location. This land is poorly managed, with invasive scrub a particular feature and on my visit I noted various examples of urban detritus dumped on the land. However, most of the urban developments are placed either on the main ridge to the south of the elevated areas flanking the valley. The exception to this is the Ivyhouse Lane industrial area, along with the neighbouring caravan park, which extend beyond the ridge down its north-facing slope. Nevertheless, the existing valley woodland tends to mitigate the visual effect of the urban development, including a mature tree belt which physically contains the present industrial area on its northern edge. To the east the lower slopes of the valley below the existing housing is undeveloped open land. Having walked through the objection site, and studied it from various more distant elevated viewpoints on both sides of the valley, I am convinced that its character relates clearly to the adjoining countryside to the north and north-west, as opposed to the urban area to the south.*

*In my view, the valley is a significant landscape feature forming an integral part of the wider Brede Valley countryside to the north. I consider it to be a critically important element of the rural setting of Hastings, immediately beyond the interface with the urban area. Notwithstanding the mature hedgerow along the northern boundary of the site, there is no distinct topographical or substantial*

*landscape feature which would define or contain an extension of the existing employment uses in this direction. I believe that to release this site for development would seriously erode the character of this valley, compromise its function as an important part of the defined AONB and run counter to the national policy which seeks to protect and conserve the natural beauty of the AONB. My visual assessment of the site from a number of vantage points to the east and west convince me that these conclusions are justified. In my opinion, development on this site would be conspicuous and would seriously intrude upon the extensive views of the valley from these more elevated areas. This conclusion is given added force when account is taken of the site's sloping topography which would require substantial and potentially intrusive earthworks<sup>1</sup>.*

4.6 The Rother District Council Local Plan Inspectors Report (2005) also considered the condition of another part of this urban fringe area.

4.7 The Inspectors stated that he was:

*'convinced that it [the area – Land east of Burgess Road] is subject to urban fringes pressures and clearly suffers from fly-tipping and a considerable level of unauthorised use by cars and motor cycles. It is a significantly degraded landscape pocket which would benefit from a carefully designed and deliberately limited and contained employment development. Moreover, the Policy seeks to ensure that the development of this small enclave provides the means to protect and enhance the wider landscape to the north and east<sup>2</sup>*

4.8 The Inspector also considered a Policy Omission in the Hastings Fringes area regarding a policy to include positive measures to enhance the urban fringe. At the time of consideration, the East Sussex and Brighton & Hove Structure Plan (1999-2011) contained a policy (EN7) relating to the positive measures to improve landscape character in urban fringe areas, with priority given to Bexhill and Hastings, amongst other areas. As a policy was contained within the Structure Plan to cover these positive measures, the Inspector stated that this did *'not need to be repeated in the Local Plan'*.<sup>3</sup>

4.9 The Inspector considered that the proposals at Pebsham Countryside Park were one of the positive measures sought in Policy EN7 in the Structure Plan, particularly as it manages the vulnerable urban fringe area between Bexhill and Hastings<sup>4</sup>. The

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<sup>1</sup> Paragraph 14.38- 14.40 of the Inspector's Report into representations to the Revised Deposit Rother District Council Local Plan – December 2005.

<sup>2</sup> Paragraph 14.3 of the Inspector's Report into representations to the Revised Deposit Rother District Council Local Plan – December 2005.

<sup>3</sup> Paragraph 14.16 of the Inspector's Report into representations to the Revised Deposit Rother District Council Local Plan – December 2005.

<sup>4</sup> Paragraph 14.17 of the Inspector's Report into representations to the Revised Deposit Rother District Council Local Plan – December 2005.

proposals for Pebsham Countryside Park have been brought forward into the Local Development Framework Core Strategy.

- 4.10 However, there were some more vulnerable areas identified north of Hastings within Rother District:

*‘Limited enhancement measures are also proposed in association with other specific development allocations. I acknowledge that there are vulnerable areas to the north of Hastings within Rother District which would benefit from positive measures of the type suggested in Policy EN7. However, having regard to the extensive work needed to implement BX4, which merits priority, I consider that it would be unrealistic within the available time to formulate further proposals for other areas as part of the Local Plan. Such considerations should therefore be deferred to further plan preparation processes’<sup>5</sup>.*

- 4.11 The Hastings Borough Council Landscape Assessment (2008) considers that:

*‘a comprehensive approach to the landscape planning of the urban edge embracing AONB and non AONB would generate some exciting opportunities for development and the conservation and enhancement of the AONB countryside’*

- 4.12 In particular the study focuses on three main areas for potential along the fringe, including:

*‘The Ivyhouse area is essentially run down and in need of a comprehensive facelift, as it is unworthy of its status as AONB. An overall landscape masterplan involving new development, management of existing and creation of new woodlands, open space and the management of motorised access corridors would create a revitalised urban fringe and be an example to others of coordinated landscape and development planning’<sup>6</sup>.*

*‘The area at Breadsell shares similar characteristics, except that it tends to look into the town rather than out to the AONB. It does however have an important role as a gap between [the] two towns<sup>7</sup> and as a buffer to the AONB’<sup>8</sup>*

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<sup>5</sup> Paragraph 14.18 of the Inspector’s Report into representations to the Revised Deposit Rother District Council Local Plan – December 2005.

<sup>6</sup> Section 3.2.2 of the Hastings Borough Council Local Development Framework Core Strategy Landscape Assessment - July 2008, Volume 1 – Available from Hastings Borough Council

<sup>7</sup> Between Hastings and Battle

<sup>8</sup> Section 3.2.2 of the Hastings Borough Council Local Development Framework Core Strategy Landscape Assessment - July 2008, Volume 1 – Available from Hastings Borough Council

*'The Combe Haven Valley [which forms part of the Pebsham Countryside Park] with its wetland SSSI is a distinctive tract of open countryside with proposals to enhance public access and use. Retention of this open countryside character is vital to the well being of users of both town and countryside'<sup>9</sup>*

- 4.13 The draft of Hastings Borough Council's Parks and Open Spaces Strategy indicated that there could be some potential for green space improvement along the fringes area, specifically in the Coghurst Wood/Rock Lane area in order to overcome deficiencies in provision within the Borough. Although this was removed from the final Strategy (for reasons of not being able to improve provision outside of their administrative boundary), it still indicates that there is potential for green space improvements along the fringe.
- 4.14 Parts of the Hastings Fringe (as identified for the purposes of the Core Strategy) have been recognised as a Biodiversity Opportunity Areas (BOAs)<sup>10</sup> as they represent priority areas for the delivery of Biodiversity Action Plan (BAP) targets. The BOAs include a number of designated sites including a Site of Scientific Interest (SSSI) at Maplehurst Wood as well as Sites of Nature Conservation Importance (SNCIs), Ancient Woodland and Local Nature Reserves (LNRs). The BAP identifies opportunities for woodland management and restoration, ecological networks, access and improvements and urban biodiversity in this BOA. Further consideration is made to this BOA in the Green Infrastructure Background Paper.
- 4.15 In consideration of the evidence above and the strategic importance of open space through both the Rother and Hastings Core Strategies, the joint working in delivering the Countryside Park and the identified potential for green space enhancement along the Hastings Fringes (particularly north of 'The Ridge'), policies regarding the management of land to secure environmental and access improvements in the Core Strategy will focus on the Ivyhouse Lane/ Rock Lane area, along with the establishment of the Pebsham Countryside Park to the west of Hastings.

## **5.0 Pebsham Countryside Park**

- 5.1 Pebsham Countryside Park is a part of the regeneration proposals for Bexhill and Hastings. With the help of the European Union INTERREG IIIa Fund, East Sussex County Council, Rother District Council and Hastings Borough Council, in partnership with the local community, have produced a strategy setting out the aspirations for a new major open space, based upon current Planning Policy BX4 in the Rother District Local Plan.
- 5.2 The Pebsham Countryside Park Project is based on established planning policy which has been carried forward into the Local Development Framework Core

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<sup>9</sup> Section 3.2.3 of the Hastings Borough Council Local Development Framework Core Strategy Landscape Assessment - July 2008, Volume 1 – Available from Hastings Borough Council

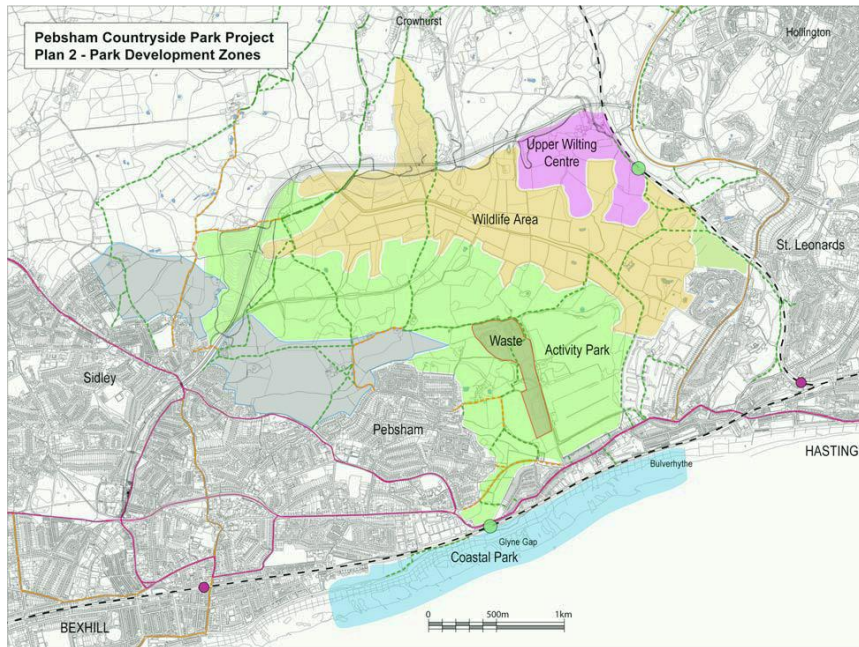
<sup>10</sup> Biodiversity Opportunity Areas as identified in the Biodiversity Action Plan - <http://www.biodiversitysussex.org/landscapes/rother-district>

Strategy. The proposals are currently under review and are likely to be completed in Winter 2011.

- 5.3 Pebsham Countryside Park will provide a green gap between Bexhill and Hastings which will be used as countryside open space to serve both towns. The Countryside Park Development Strategy identifies an overall area of some 650 hectares made up of 295 hectares of activity park, an 86 hectare coastal park to its south, a wetland wildlife area to the north of some 230 hectares and an environmental educational centre of 52ha (see map at paragraph 5.5). New and improved public access routes can enable the whole community to gain safe and controlled access to the Countryside Park. It is envisaged that this scheme will help to generate new commercial opportunities for local landowners and businesses to enhance the local economy.
- 5.4 The “Core” values<sup>11</sup> for the Development and Management of Pebsham Countryside Park include:
- High quality
  - Accessibility for all abilities
  - Sustainable, in the sense that:
    - Development will be suited to the character of the place.
    - Development will follow natural principles, use local and renewable materials and be an example of low carbon dioxide emissions.
    - Development should become financially self supporting
  - Support the local economy – to be a catalyst for investment and partnerships.
  - Conserve and enhance the “green gap” between the two towns but strengthen the physical link between them.
  - Conserve, enhance and celebrate the biodiversity and historic environment of the area, both land and sea.
  - Generate a creative synergy between the arts and the environment.
  - Add value to what is there – improve the aesthetic resource of the place.
  - Have a clear identity and improve the image of Bexhill and Hastings.
  - Be responsive to the needs of the Community.
- 5.5 The Countryside Park will consist of 4 distinct ‘Park Development Zones’ (The Activity Park, Coastal Park, Combe Haven Wildlife Area and Upper Wilting Centre) – see below.

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<sup>11</sup> Pebsham Countryside Park Project Development Strategy, March 2008 - <http://www.rother.gov.uk/article/3518/Pebsham-Countryside-Park-Project>



5.6 The objectives of these Park Development Zones are to:

- Retain and enhance the “green gap” between Bexhill and St Leonards on Sea.
- Retain and enhance the landscape character and integrity of the Combe Haven Valley
- Retain and enhance the natural characteristics of the Beach at Bulverhythe and Glyne Gap
- Retain and enhance the diversity of natural and cultural interest in the area.

5.7 The main roles of the Core Strategy in relation to Pebsham Countryside Park are to support the development of proposals for the Countryside Park and to support its development through securing appropriate developer contributions. The Core Strategy also maintains the focus on the strategic importance of Pebsham Countryside Park with respect to the overall shared approach to future prosperity for Hastings and Bexhill.

5.8 The draft East Sussex Open Spaces Study looks at East Sussex’s strategic open spaces rather than those which are merely local importance. It considers sites where they straddle administrative boundaries and attract visitors from a wide area. The Study considers that Pebsham Countryside Park will provide a large open space accessible to many living in the 20% most deprived areas under the Index of Multiple Deprivation. It further indicates that an area of deficiency stretching in a curve from Heathfield down to Hastings and up to Rye would be largely remedied by the development of Pebsham Countryside Park.

5.9 A Biodiversity Opportunity Area known as the Combe Haven and Marline Valley BOA, which for the purposes of the Hastings Fringes area is largely covered by

Pebsham Countryside Park, has been identified within the Biodiversity Action Plan (BAP). The BOA includes a number of designated sites including Sites of Scientific Interest (SSSIs) at Combe Haven and Marline Valley as well as Sites of Nature Conservation Importance (SNCIs), Ancient Woodland and Local Nature Reserves (LNRs). The BAP identifies opportunities for wetland habitat management, restoration and creation; floodplain restoration and reconnection; and access improvements, as opportunities associated with development within this BOA. Further consideration is made to this BOA in the Green Infrastructure Background Paper.

5.10 It is considered that the development of Pebsham Countryside Park is a key element in the Core Strategy visions for both Rother District and Hastings Borough (see shared approach to future prosperity in section 3 above). It is also has a key role in maintaining the open gap between Bexhill and Hastings (see section 6 below).

## **6.0 Strategic countryside gaps**

6.1 The separation of settlements to protect their individual identity, character and setting is regarded of strategic importance within Rother.

6.2 A number of countryside gaps between certain towns and villages which are regarded as vulnerable to development pressures that will tend towards their coalescence have for long been identified in planning policy documents as warranting specific recognition.

6.3 The Rother District Local Plan currently protects such gaps from development that would detract from their openness. The gaps that impinge on the fringes of Hastings and St Leonards are those between:

- Bexhill and St Leonards;
- Battle and Hastings;
- Fairlight and Hastings;
- Crowhurst and Hastings

6.4 Consultation during preparation of the Core Strategy demonstrated an appreciation of these gaps, especially to the relevant Town and Parish Councils, and a wish to retain them.

6.5 It is therefore proposed that a similar policy be included in the Core Strategy.

6.6 It is appreciated that the South East Plan does not include a policy in respect of strategic gaps between settlements, a draft policy having been removed at the 'proposed changes' stage. This was partly because they were perceived as negative and that they were a form of local landscape designation.

6.7 The Council made representations at the time that the Plan should urge a positive regard to strategic gaps, arguing that *'this reasoning fails to appreciate the identification of vulnerable gaps between settlements is part of a positive approach to place-shaping, and misunderstands that protection is not related to the quality of the landscape but to its function.'*<sup>12</sup>

6.8 This argument is considered to be further strengthened by the Coalition Government's "localism" agenda, as it is clear that the local communities affected consider that a positive approach to policy within these gaps is important in order to contain development that would inappropriately reduce or weaken these clearly defined areas.

6.9 It is concluded that those vulnerable gaps between settlements are identified on the Proposals Map and continue to be protected by a suitable Core Strategy policy. The extent of existing gaps will be reviewed as part of the Development and Site Allocations DPD.

## **7.0 Land at Breadsell Farm.**

7.1 As part of the Hastings Borough Council Core Strategy consultation at the Preferred Approaches stage in 2008, the plan included reference to a strategic housing allocation for 1000 houses and up to 10,000 square metres of employment floorspace on the north-western boundary with Rother<sup>13</sup>. The only viable option to facilitate access to the proposed allocation was in Rother. This proposal would facilitate around 200 dwellings within Rother, but built only in-conjunction with the Breadsell Farm proposal.

7.2 Rother District Council made a number of representations on the Hastings Borough Council Core Strategy Preferred Approaches Consultation. A report was presented at Cabinet on 7<sup>th</sup> July 2008 which considered the Breadsell proposal within the Hastings Core Strategy Preferred Approaches:

*'Development on the frontage land in Rother was rejected by the Local Plan Inspector on accessibility and environmental grounds. These remain concerns. However, it is acknowledged that if the development incorporates local shops and services, including a primary school, as well as employment land, then it could represent a sustainable urban extension. The proposal is supported on this basis.'*<sup>14</sup>

7.3 There were a number of strong objections to the proposal, including that from Natural

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<sup>12</sup> Report to Cabinet, South East Plan – Proposed Changes – 6 October 2008 - copy available from Democratic Services on request.

<sup>13</sup> Hastings Borough Council Core Strategy Preferred Approaches Document, May 2008 - [http://www.hastings.gov.uk/ldf/core\\_strategy\\_preferred\\_approaches\\_published.pdf](http://www.hastings.gov.uk/ldf/core_strategy_preferred_approaches_published.pdf)

<sup>14</sup> Report to Cabinet, Hastings LDF Core Strategy – Preferred Approaches – 7 July 2008 - copy available from Democratic Services on request.



England (NE). NE strongly objected to the identification of the Breadsell area for housing development. Their main concern was the potential impact on the adjacent Marline Valley Woods Site of Special Scientific Interest (SSSI), and particularly how this might affect the rare bryophyte populations associated with the Marline Stream.

- 7.4 Hastings Borough Council undertook both design and impact studies agreed with NE to determine feasibility and scope for mitigation of development in the Breadsell area. A number of studies were a cause for concern:

*'The Bryophyte Survey and the Hydrogeological Survey were key concerns: the former showed that the existing populations of bryophytes were already being affected by poor water quality arising from some outflows from neighbouring residential estates and farming activity, and visitor pressure and rubbish dumping at some points. The hydrogeological survey found that 'the hydro-environmental supporting conditions for the conservation interest features within Marline Valley Woods SSSI appear (at least in part) to be water quality and quantity dependent. In the absence of further information on these supporting conditions, a precautionary approach is required, where any development will need to maintain the current pattern (spatial and temporal variation) of surface water and groundwater fluxes across the SSSI boundary, in terms of quality and quantity, to maintain the hydrological status quo. It then went on to state that a significant programme of works would be required to characterise the hydrological regime of the site in detail so that any subsequent design could be shown to maintain the hydrological status quo. To get a basic understanding would require the results of one full year of monitoring, but at least three years monitoring would be required to develop a sufficiently refined understanding to enable detailed design of the hydrological aspects of the development'<sup>15</sup>.*

- 7.5 The results of these studies along with other potential constraints associated with the site, including providing sewer/waste water connections to the pumping station at Pebsham (approximately 3 miles from the Breadsell site, with the most direct route running through Marline Valley SSSI), led to the consideration of alternative options for housing potential within Hastings.
- 7.6 In March 2010, Hastings Borough Council's Cabinet considered its strategic options for housing distribution. The report looked carefully at how to proceed with the option of identifying greenfield housing potential at Breadsell Lane, given the serious question marks over its deliverability, and Natural England's objection at the Core Strategy "Preferred Approaches" stage.

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[http://www.hastings.gov.uk/meetings/meetings\\_docs/100301~cabinet~report06~Hastings\\_Local\\_Development\\_Framework\\_-\\_Strategic\\_Housing\\_Options.htm](http://www.hastings.gov.uk/meetings/meetings_docs/100301~cabinet~report06~Hastings_Local_Development_Framework_-_Strategic_Housing_Options.htm)

- 7.7 Work undertaken on the SHLAA strengthened the Council's evidence base, and as a result, Hastings Borough Council's Cabinet made the resolution to approve *'the strategic housing option for the pre submission version of the Local Development Framework Core Strategy involving a broad distribution of housing across the Borough with some windfall allowance up to 2026'*<sup>16</sup>. This decision effectively dropped Breadsell Farm from the Hastings Core Strategy.
- 7.8 This strategic decision has a knock-on effect on Rother District. Without the prospect of development of the adjoining land, it is considered that the frontage land alone does not represent a sustainable location for development. This is in line with the above resolution, as well as the earlier consideration of the appropriateness of the land in this area being developed in isolation, at the Rother District Local Plan Inquiry 2005.

## **8.0 Wilting Farm**

- 8.1 A range of representations were received to the Consultation on Strategy Directions concerning the sustainability of Wilting as a development location, as well as some regarding the prospect of a railway station.
- 8.2 There are a number of considerations regarding the Wilting Farm area. The introduction of a station at Wilting would provide access improvements for development in the area, and for a much wider area, with associated economic benefits. Therefore, it is considered that the station is key to the case for development in this area of Rother.
- 8.3 There has been no substantive commitment to a new station in this location from either Network Rail or a Train Operating Company, certainly not within the short term, such that it could be presented as persuasive evidence for an allocation at the LDF hearing.
- 8.4 The Kent Route Utilisation Strategy (RUS) indicates that the proposal for a new station at Wilting does not fulfil any identified strategic gap within the RUS but indicates that it may be an appropriate development in the future to support the planned residential development in the vicinity.
- 8.5 An additional station at Wilting *is not likely to provide operational problems, but would run counter to other aspirations to reduce journey times along the entire route*. The provision of this new station would impact negatively on journey times to/from Hastings<sup>17</sup>. There will also need to be a review of stopping patterns at adjacent stations, most notably Crowhurst Station.

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<sup>16</sup> [http://www.hastings.gov.uk/meetings/meetings\\_docs/100301~cabinet~minutes~CABINET\\_\(01-03-10\) - Minutes.htm](http://www.hastings.gov.uk/meetings/meetings_docs/100301~cabinet~minutes~CABINET_(01-03-10) - Minutes.htm)

<sup>17</sup> Figure 9.6 - Kent Route Utilisation Strategy – January 2010 – [www.networkrail.co.uk](http://www.networkrail.co.uk)

8.6 The RUS notes *that proposed development in this locality and would welcome the development of a business case by proposers given the opportunities and potential dis-benefits*<sup>18</sup>.

8.7 Investigations relating to the viability of providing a new parkway station in this location indicate that substantial development would be needed to viably support a station. Such numbers would not be appropriate in this location due to constraints detailed above<sup>19</sup>.

8.8 The Council's Landscape Assessment (2008)<sup>20</sup> made some very clear conclusions relating to the western edge of Hastings being inappropriate for major development:

*'Areas in West Hastings are inappropriate for major development from a landscape point of view. The only potential for development which may be considered would be related to facilitating the creation of a new railway station with an access from the new section of Crowhurst Road under the railway line, through the railway embankment. Any such development should be very limited in scale and to the south of Upper Wilting Farmhouse.... no development should be considered at Lower Wilting'*<sup>21</sup>

8.9 Given that the Landscape Assessment concludes that major development is not appropriate in this location, it is accepted that any housing development which could be considered will not support a range of services, hence, this area is in an unsustainable location. Although this area is relatively close to the urban area of Hastings, it is entirely detached from it by the railway line and Queensway, and any potential housing development will rely on services (such as schools and shops) in other areas.

8.10 Any employment development considered at this location is also very unlikely to be sufficient to support the development of a station in this location. The Council's position has been that the railway station is critical to this area being a sustainable development location.

8.11 In the past, the development at Wilting Farm has been supported by Hastings Borough Council as it is seen as supporting economic regeneration of the town, particularly if a new railway station were built. However, there are a number of real concerns relating to an adverse landscape impact, erosion of the countryside gap to Bexhill/Crowhurst and intrusion into the Pebsham Countryside Park area. The

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<sup>18</sup> Figure 9.6 - Kent Route Utilisation Strategy – January 2010 – [www.networkrail.co.uk](http://www.networkrail.co.uk)

<sup>19</sup> Possible New Station in the Wilting Farm Area, Hastings, Phase 1: Site Search and Threshold Analysis - June 2008, Seaspace

<sup>20</sup> [http://www.rother.gov.uk/media/pdf/e/d/Bexhill\\_Hastings\\_Fringes\\_Main\\_Report\\_Vol.\\_1.pdf](http://www.rother.gov.uk/media/pdf/e/d/Bexhill_Hastings_Fringes_Main_Report_Vol._1.pdf)

<sup>21</sup> 5.0 – Conclusions - Rother District Council Local Development Framework Core Strategy Landscape Assessment - March 2008

[http://www.rother.gov.uk/media/pdf/e/d/Bexhill\\_Hastings\\_Fringes\\_Main\\_Report\\_Vol.\\_1.pdf](http://www.rother.gov.uk/media/pdf/e/d/Bexhill_Hastings_Fringes_Main_Report_Vol._1.pdf)

Wilting Farm area does not enjoy easy access to the local services needed to support sustainable development and any associated traffic movements could have an impact on local roads in Hastings. Hence it is concluded that development in this area should not be pursued through the Core Strategy.

## **9.0 Baldslow Junction Improvement**

- 9.1 The Highways Agency put forward alternative routes for a short link road (known as the Baldslow Junction Improvement) between the A2100 and the A21 in conjunction with the earlier consultation on routes for the Bexhill-Hastings Link Road. This link road would be either to the North or the South of the existing junction. This Baldslow Improvement was included in the Regional Transport Programme approved by the Regional Assembly and was incorporated into the South East Plan. The scheme development was put on hold pending a decision regarding the Bexhill-Hastings Link Road and, following the Comprehensive Spending Review in October 2010, the A21 Baldslow Junction Improvement Scheme has been cancelled.
- 9.2 It is considered that investigating improvements at this junction should help alleviate some of the capacity issues experienced here. Although these improvements are not a necessary element of the Bexhill – Hastings Link Road, they would be considered as a complementary measure in order to increase capacity at this junction on to the A21. One particular consideration to such enhancements may be through bus improvements.
- 9.3 Rother District Council along with Hastings Borough Council, East Sussex County Council and other associated partners are investigating the potential for alternative improvements in the vicinity to improve capacity in the area. Therefore it is considered appropriate for the Core Strategy to contain a policy reference to further investigate opportunities to improve access to the A21 at Baldslow, including through bus improvements.

## **10.0 Housing and employment development along the Hastings Fringe**

- 10.1 The Consultation on the Strategy Directions, considered that the Hastings Fringes area had the potential for 200-450 dwellings, plus 10,000sqm of business floorspace. However, in light of the factors considered above, regarding the removal of Breadsell Farm and Wilting Farm for consideration as part of the Core Strategy, these numbers are no longer appropriate and reduced accordingly. This recognises in particular the need not to have any adverse impact on the character of the High Weald AONB.
- 10.2 There is a current planning permission for 45 dwellings at Woodlands Way (yet to be implemented). There may be some potential for additional small scale development in the Rock Lane area along the Fringe, subject to consideration of the impact on the High Weald AONB and wider landscape impacts in the area. Any

development in this area should be considered as part of a comprehensive approach to the area in order to facilitate improvements to areas of degradation which exist within the AONB along the Fringe. These considerations will be explored further within the Development and Site Allocations DPD.

- 10.3 The existing employment allocation for 3,000 sq.m business floorspace at Land east of Burgess Road along the Fringe is still required, given the floorspace requirements identified in the Employment Strategy and Land Review, the priority to retain existing employment land within the District and the shared approach to future prosperity for Bexhill and Hastings, provision will be made for at least 3,000 sq.m business floorspace along the fringe, giving scope to look for additional employment potential subject to no adverse impact on the landscape and AONB (discussed above).
- 10.4 In the event, there are some further limited opportunities for development, consideration shall be made for the priority of sites for employment use over that of any other development, particularly where they are distant from services on which residential development would rely. In any case, development sites on the Hastings fringe should not have any adverse impact on the character of the High Weald AONB as noted above.
- 10.5 Indications from the SHLAA show that there is limited potential for growth along the fringes, and the appropriate target of 45-80 dwellings reflects the constraints along the fringe such as the High Weald AONB, landscape impact, strategic countryside gaps, nature designations, access to services and highway infrastructure capacity.