

Interim Consultation Statement

**Prepared for Hastings Local Plan (Regulation 18),
Winter 2020/21**

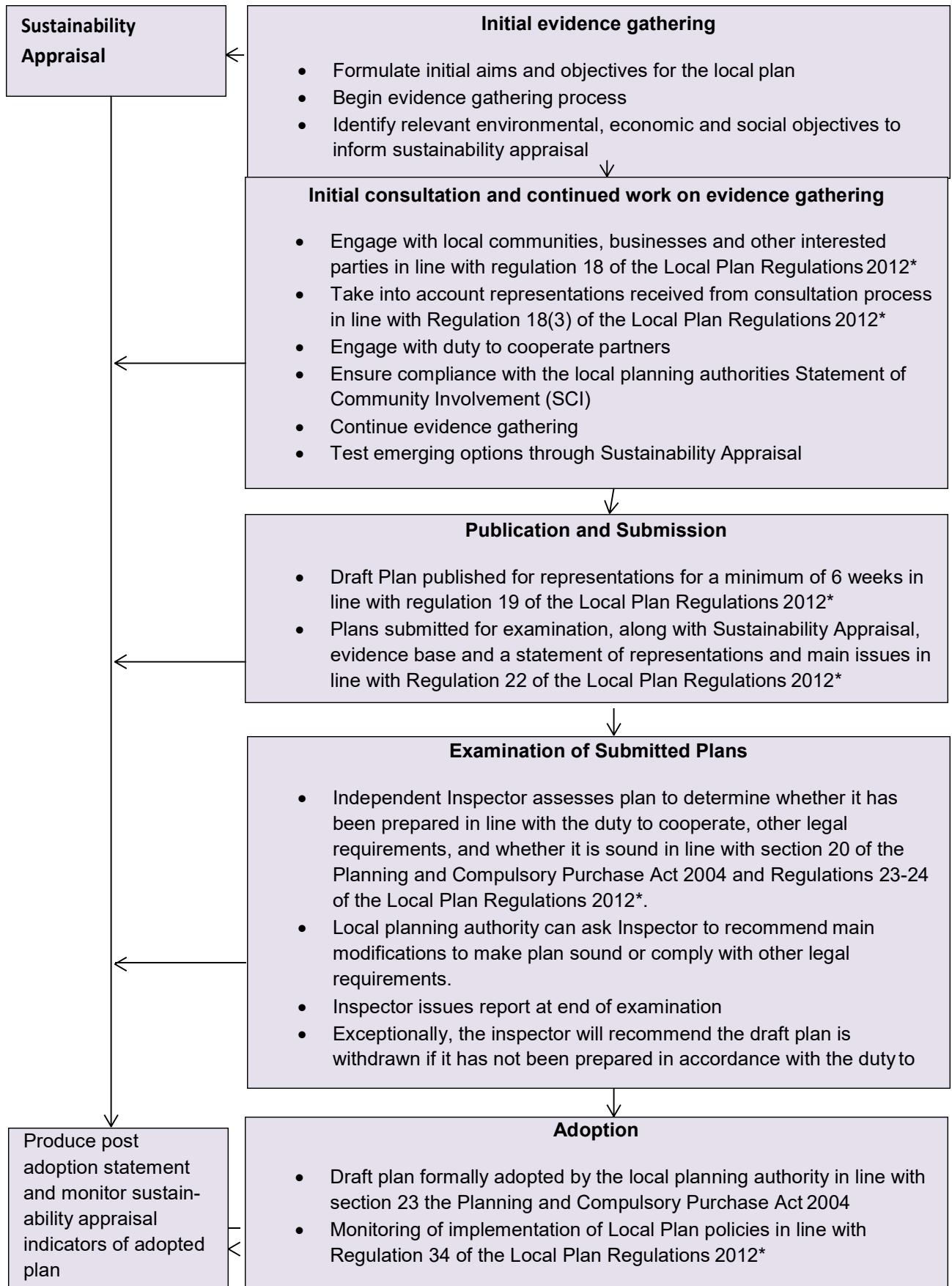
January 2021

1. Introduction

- 1.1 Hastings Borough Council's Planning Policy Team have been working with stakeholders to help develop a new draft Local Plan for Hastings to replace the existing Hastings Planning Strategy and Hastings Development Management Plan. This plan will become the statutory development plan for the borough.
- 1.2 The Local Plan will set out the Council's development vision and provide a local framework to manage change and guide development within the town up until 2039. It is a core document that will need to be adhered to in the consideration of planning proposals and the development of any subsequent supporting documents such as Supplementary Planning Documents.
- 1.3 The timetable for production of the new Local Plan is set out in our [Local Development Scheme](#) (LDS). We aim to adopt our new Local Plan by 2023 in line with the Government's objective for local plan adoption.
- 1.4 There are several formal stages that the Local Plan must go through in its preparation before it can be adopted. These stages of the Plan making process are outlined in figure 1 below.
- 1.5 Production of the Local Plan has now gone through early stakeholder engagement and this consultation statement sets out how the Council has engaged with the community and the wider public as part of the draft Plan's preparation.
- 1.6 There are a variety of ways in which our residents, businesses, stakeholders and groups can become involved in the preparation of the Local Plan. Our minimum requirements for consultation and engagement are provided in the Council's [Statement of Community Involvement](#) (SCI). However, the council wants to engage with as wide a range and as many individuals and organisations as possible, to help shape the Local Plan.
- 1.7 We are now embarking on the first formal phase of consultation, Regulation 18¹, with both the public and stakeholders. The responses will assist in the refinement of the draft Plan.

¹ The Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Figure 1: Plan-making process



*The Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)

2. Purpose of interim consultation statement

- 2.1 This document sets out how the Council has engaged with both stakeholders and the community in the preparing this first version of the draft plan. This includes details about who we consulted, how we consulted, and in certain circumstances, what comments and issues have been raised.
- 2.2 It also includes a summary of the comments we received on the Hastings Town Centre and Bohemia Area Action Plan - Preferred Approaches document which was subject to public consultation in 2018. This document is no longer being developed as an Action Plan, but elements of it are being taken forward in to the new draft Local Plan.
- 2.3 In due course, a final consultation statement, (as required under regulation 22), will set out the consultation arrangements and responses to the Local Plan undertaken for the two formal rounds of public consultation we must undertake (regulations 18 and 19). The final consultation statement will accompany the submission of the draft Local Plan to the Secretary of State.

3. Draft Local Plan – initial evidence gathering

- 3.1 As part of the initial evidence base stage, there have been several opportunities for local residents to inform the evidence gathering stage, and for key stakeholders to comment on emerging research. These are listed in the table 1 below.

Table 1: Consultation topics and events

Document title	Method and date of consultation
Hastings and Rother Housing and Economic Needs Assessment (HEDNA)	Stakeholder workshop took place 29 July 2019. A variety of local organisations were involved from across Hastings & Rother including public and private sector bodies, developers and housebuilders
Strategic Housing and Economic Land Availability Assessment (SHELAA)	Call for Sites ran from 28 August to 9 October 2019. Details of how sites have been assessed and whether or not they are considered suitable, available and achievable for development is set out in the Strategic Housing and Employment Land Availability Assessment (SHELAA)
Infrastructure Delivery Plan (IDP)	Consultation with statutory consultees took place between 30 June to 11 August 2020. A list of those involved is set out in Appendix A
Sustainability Appraisal Scoping Report	Consultation with targeted consultees ran from 17 April to 29 May 2020. A list of those involved is set out in Appendix B
Informal Open Space and Play Space Assessment	Consultation ran from 27 September to 27 October 2020 local residents we invited to get involved via HBC social media, local schools and notices placed in parks and open spaces. The results of this engagement stage are set out in the consultation section of the Assessment.
Local Plan online questionnaire	Early engagement questionnaire 02-10 September 2020. Invitations to complete the questionnaire and to find out more about the Local Plan were sent direct to people already registered with the Local Plan contacts database and via the Council's e-newsletter, Twitter, Facebook and Instagram. Respondents were invited to rank a number of suggested Local Plan objectives, and/or to submit their own objectives and upload information they thought was relevant to the Local Plan's development. Owing to Covid-19 restrictions, the questionnaire was based online, but the form was downloadable to enable paper submissions. Results can be found in the 'Early engagement' section of the Council's New local Plan webpages.
Low Carbon Energy Study	A stakeholder engagement workshop was held on 29 September 2020. Appendix F of the study briefly summarises the aims of the workshop, the topics discussed, and the key points raised. Involvement in the workshop was by invitation and list of the attendees is included in the Appendix

Hastings Town Centre and Bohemia Area Action Plan – Preferred approaches Consultation

3.2 In July 2018 we consulted on Hastings Town Centre and Bohemia Area Action Plan (AAP). There have been numerous changes to the national planning system since the current Local Plan was adopted. One critical change involves a requirement to establish a new housing target, one, which as its starting point, is based on a methodology prescribed in national policy. Establishing that new housing target is best completed by developing a new borough-wide plan. Therefore, rather than continuing to develop the Area Action Plan, a more effective approach is to take forward the draft Action Plan as part of a geographically wider Plan document. However, even though this Action Plan is no longer being taken forward, elements of the background work used to develop the Action Plan, together with the comments received during the first stage of formal consultation, are still relevant to the development of the new Local Plan.

Purpose of the consultation

3.3 The Preferred Approaches document set out the Council's preferred approaches to new development within the Action Plan area. The document considered the comments received through the earlier stakeholder engagement, and evidence from background studies.

Who did we consult?

3.4 The Council consulted with the statutory and general consultation bodies as set out in the Regulations as well as those detailed in the SCI and included on the Local Plan database consisting of over 400 individuals and or organisations.

3.5 All contacts on the database were invited to make comments as well as members of the general public.

How did we consult?

3.6 The formal consultation period ran from 2 July 2018, for a 12 week period, to 24 September 2018. To notify as many people in the borough the Council undertook a number of routes to advertising.

3.7 Mail shots were sent to those on the Local Plan database and those people/organisations who had expressed an interest in keeping informed of the AAP process to inform them of the consultation. In addition, statutory stakeholders were sent notification of the consultation, including links to the documents and a summary leaflet. The statutory consultees are set out in the [Council's SCI Appendix 1](#).

3.8 Local advertisement of the consultation was undertaken through a number of mediums:

- A local advertisement notice, which was published in the Hastings Independent Press
- Two Press releases in Hastings Observer – Friday 15 June 2018 and Friday 31 August

- Social Media Posts (Facebook and twitter) – Monday 2 July 2018, Monday 6 August 2018, Monday 13 August 2018, Wednesday 22 August 2018, Wednesday 29 August 2018, Wednesday 5 September 2018, Monday 17 September 2018 and Monday 24 September 2018
- Seafront posters
- Hastings Bid Newsletter – Monday 25 June 2018
- Hastings Voluntary Action newsletter – Tuesday 3 July 2018
- East Sussex Strategic Partnership newsletter – Tuesday 3 July 2018

3.9 The Council's Planning Policy team were available throughout the consultation period to attend local groups, associations and forums etc as required to explain the draft Action Plan and the purpose of the consultation process. Attendance at two such groups shown in table 2.

Date	Group and Location	Number of attendees
Tuesday 17 July 2018	West Hill Resident's Association – The Plough, 49 Priory Road, Hastings, TN34 3JJ	9
Wednesday 5 September 2018	Hastings Sustainable Transport Forum – Isabel Blackman Centre, Old Winding Road, Hastings Old Town	Not Known

Table 2: groups attended

3.10 Three public exhibition events were held during the consultation period. The dates and numbers who attended are detailed in table 3.

Date	Location	Number of attendees
Monday 13 August 2018	Council Chamber, Muriel Matters House	20
Wednesday 29 August 2018	Council Chamber, Muriel Matters House	18
Saturday 8 September 2018	Council Chamber, Muriel Matters House	32

Table 3: Exhibitions held

What were the main issues raised and how have these been taken into account?

3.11 115 respondents submitted a total of 717 comments the preferred approaches document. Of the comments submitted 228 (30.8%) were by email, 110 (14.8%) were via the official response form and 403 (54.4%) were via the Council's Local Plan consultation software.

3.12 The submitted comments have been compiled into a summary report which sets the broad scope of the comments received during the formal consultation stage. The summary report is set out in Appendix A. The table 2 sets out the main issues raised as a result of the consultation and how in broad terms these are taken forward into the in the new Local Plan:

Table 4: The main issues raised through this consultation were:

Issues raised	Where / How taken forward in new draft Local Plan
Concern that the amount and density of housing being proposed is too high	Meeting housing need, opportunities for meeting that need and how to promote housing delivery are key issues the new Local Plan is seeking to address
Concern about a lack of new infrastructure to accommodate the new housing	Early engagement has already taken place with infrastructure and service providers. This engagement will continue throughout the Plan's development and an Infrastructure Delivery Plan (IDP) will be published when the draft Plan is submitted to the Secretary of State.
Concern that potential flooding had not been appropriately reflected within the policy wording at specific sites	The Strategic Flood Risk Assessment has been updated and site-specific flood risk issues have been included in the draft Plan
The loss of important green and community space within the Bohemia and White Rock Area	The new Plan continues to identify the Bohemia as a focus for new housing but also new indoor and outdoor leisure and recreational facilities
Concerns about the types of housing and tenure mix	Achieving well designed homes in sustainable locations which address identified needs in terms of housing sizes and tenure is key theme of the draft Plan
The amount of new retail provision suggested for the town centre	Retail needs have been updated and requirements revised downwards
The loss of key views and vistas within the town	This is addressed in the draft Plan's development policy – Design, where relevant in the Focus Area policies, and at the site-specific level.
The potential conflict between new development and conservation of the town's built heritage	This is addressed in both strategic and development policies
The need to strengthen policies with regard to zero-carbon development and biodiversity net gain	Working towards zero carbon is a core theme running throughout the draft Plan. Biodiversity net gain which is being addressed in the draft Plan with further background work and policy development planned.
The need for greater consideration of active transport measures in the town including a focus on the Hastings Greenway	This is addressed in both strategic and development policies, focus area and site-specific policies.

4. CONCLUSION

4.1 In summary the Planning Policy Team have endeavoured to carry out as full pre-regulation 18 consultation as time, resources and Covid- 19 has allowed. We believe this now provides the basis for the publication of the new draft local plan.

Appendix A

Summary of comments received under AAP policy themes at Preferred Options (Regulation 18)

Question 1: Do you agree with the vision and objectives for Hastings Town Centre and Bohemia? If not now should these be changed?

There was support for vision and objectives were reasonable. The high profile given to safeguarding and enhancing the heritage of the area was welcomed. Other comments recommended changes to reflect other environmental concepts such as green infrastructure, natural capital, ecological networks and biodiversity net gain and flood risk. The need for more ambitious climate change measures was also raised.

The need to align the Plan with the DfT Inclusive Transport Strategy was raised. As was the draft Plan's approach.

Support was also given to the objective aims which support the delivery of the East Sussex Cultural strategy.

A number of respondents raised concerns about the level and provision of affordable housing and for local needs. Comments also related to the conversion of empty homes for affordable homes and the location of affordable homes.

Several respondents objected to development on The Oval in relation to town heritage and the natural environment. There was also objection to the development of a new hotel within White Rock Gardens area.

A significant concern for a number of respondents was the potential loss of green space from proposals set out within the AAP. Others respondents were concerned about whether high quality development would actually be delivered. More greening, particularly in the town centre was also suggested

A respondent felt that the existing leisure centre would benefit from a revamp and that moving the whole facility was unnecessary. Another response considered moving the ambulance station and other buildings to be costly and a waste of the current buildings.

A number of respondents questioned the need to expand retail floorspace within the town centre, some placed a high priority on creating employment opportunities.

A respondent suggests the use of co-design as a sector likely to want to run/own workspace within the AAP area. While a further respondent felt the objectives should be more permanent in nature, with activity seeding long-term business ventures in the town centre.

A respondent considered the affordable artisan / artist area to be very interesting but felt that it would be more suited to the town centre than Bohemia.

Comments were raised about the adequacy of infrastructure provision such as schools, doctors and other essential services to support new development. NHS Hastings and Rother CCG welcomed early dialogue with HBC to discuss how the Action Plan aligns with the CCG's whole system approach to developing health and social care.

Question 2: Do you have any comments on the supporting Sustainability Appraisal Report (SA/SEA)?

A respondent felt that delivering an additional 670 homes would be contrary to HN6 and Historic England guidance on enabling development. There was concern for the impact on biodiversity from new development and also about the loss of green space.

There was opposition against more retail.

Concern was raised about additional traffic that new development would bring. A respondent felt that transport and land-use planning were not integrated. Another respondent had concerns about proposals to extend St Johns Road and allowing traffic through the area.

A respondent commented that the options described within the SA should be maintained and subject to public consultation.

Question 3: Have we identified all of the key issues within the AAP area? If not what issues have we missed and how should these be addressed?

39 comments received

A number of respondents agreed with the key issues set out within the plan. In particular prioritising infrastructure to support public transport, cycling and walking to be essential to facilitate a change in travel mode from car to greener alternatives.

A further statutory respondent noted that no mention has been made of the designated site areas of Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) or Beachy Head East Marine Conservation Zone (MCZ) within the AAP.

A respondent commented that the fabric of the White Rock Theatre needed significant investment and new ideas needed discussion prior to any decision being made about its future. Further comments were received that the visitor economy of Hastings is held back by lack of accommodation and disjointed series of tourist assets. A respondent felt that the AAP needed a policy prohibiting AirBnB usage.

The built environment and heritage section should also consider buried heritage.

Another respondent asked that the Council ensures careful consideration of existing management plans of local wildlife sites and any increases in recreational uses to be sensitive and to understand how biodiversity currently use the site.

A respondent commented that employment is crucial for people of Hastings. A respondent also noted the contribution that language schools make to the local economy and wanted this to be reflected within the tourism section. A respondent considered Britannia Enterprise to be a vital asset for small start-up and craft businesses.

A respondent had concerns about empty shops similarly a respondent felt that priority should be given to use of existing empty space in the town centre before developing on green space in Bohemia.

A respondent felt that plan AAP policies should be developed to identify and suitably protect community assets such as public houses, meeting places and halls. Similarly, a respondent felt the retention of the town centre health centre to be vital.

A respondent questioned the America Ground being part of the town centre and considered them to have very different characters. Another respondent felt that the character areas set out within the AAP were too vague, that it would be valuable if strategic views were defined within the AAP, that non-statutory heritage assets be listed, and that areas around the town centre are often in very poor condition with poor wayfinding which impacts on the mobility of disabled people and detract significantly from the character of the area.

Respondents regarded the greenway link through the town centre via Station Plaza and up to Summerfields to be important considering it to be a key element on a map of connectivity across the plan area. A respondent felt the AAP neglected the importance of St Margaret's Road, Prospect Place high level promenade which they consider provides a physical link between St Leonards and Hastings Town. Another respondent didn't want the pedestrian route through St Andrew Market ignored.

A respondent felt that the sports issues section needed to be more explicit about deficiencies within Bohemia, which facilities would be appropriate or not for the area and the reasons and the existing problems with sporting provision need to be set out within the AAP. They also considered there to be a clear distinction between facilities for residents and those for visitors.

A respondent considered the AAP should draw on evidence about the varied venues in the Plan area, their capacity and potential to be more active. The respondent also commented that the AAP evidence base should include information about the supply and demand of different types of visitor accommodation, including hotels.

Respondents considered it important to include growth of the evening economy within the issues section. A respondent also felt potential increasing commercial rents on independent and artistic traders in the Trinity Triangle to be noted within the emerging threats.

A comment was raised about the need for a design review panel for all new development, and a clear statement of process for community involvement in all development.

Question 4: Do you agree with the key principles that underpin the spatial strategy? If not how should these be change?

29 comments

A number of respondents were in general agreement with the key principles

A respondent wanted to see reference to flood risk within the key principles. A further respondent considered the AAP could better reflect the multiple benefits of green infrastructure. A respondent wanted principles to be changed to protect and enhance greenspace and commented that housing should not exceed carrying capacity of sensitive sites. Comment referred to use of existing sites or empty homes for new development to meet local needs. A respondent felt it wasn't clear how the principles linked to the set of objectives.

A number of respondents disagree with the principle of expanding the retail floorspace supports sustainable transport but not more parking. A respondent was concerned that housing would be targeting affluent incomers rather than meeting local needs.

A number of respondents felt the level of development proposed within the town centre and Bohemia area to be excessive, particularly Bohemia. Many respondents did not want to see the loss of green space or green space spoilt in pursuit of improving the town, noting green space around the Covent site, the Oval, and Summerfields Wood area and White Rock Gardens.

A respondent commented on improving public transport and making the promenade from key transport hubs more pleasant. A respondent commented that housing provision should be truly affordable, particularly in terms of energy efficiency.

Question 5: Have we included all of the Opportunity Areas as shown in figure 3? Are there others, if so please describe?

A number of respondents were in general agreement around the opportunity areas were identified in the plan, while several commenters were neutral on the subject.

Some respondents identified further sites in the AAP area that could be considered as opportunity areas including Britannia Yard, the Queens arcade and the area around the lower part of Bohemia Road, Cornwallis Gardens and Cambridge Road, in relation to important transport links between the train station, town centre, Bohemia and the seafront. A further respondent suggested that the plan under addresses the opportunities of the seafront and the sub-terrarium space around the promenade.

There was also suggestion that areas just outside the AAP boundary may be suitable as opportunity sites, including the area at St Johns Road currently occupied by a playground and adjacent disused area, which has been suggested as appropriate for housing.

Some respondents felt that there is too much emphasis on housing over open and greenspace in the plan. This is particularly at opportunity areas 6 and 7.

Further respondents felt that the Convent site should not be included as an opportunity site and should be removed from the plan, as the site is in private ownership and an important heritage asset.

Question 6: Do you agree with the proposed uses and indicative capacity figures presented in Table 2? If not what changes do you think should be made?

A number of respondents offered support for the proposed uses and capacities in the plan, while some commenters suggested that without more specific details and designs it would be difficult to comment on the suitability of the proposed uses and capacities for each area, including Historic England.

Some respondents raised issues with capacities and uses as specific opportunity sites including PM2, WRP2, WP2, SG1, SG2, SG4, B1, B2, WR3, QR1 and QR2. These featured particular concerns about the density of housing proposed at sites B1, B2, PM2 and WRP2

and the loss of open and natural space as a result, and particular concerns about a previous landfill on the B2 site and the issues that this would cause.

Further issues raised by respondents included the use of housing instead of business/retail at SG4, over dense housing at WR3, concerns over the location of housing on PM2 and its effect on the Greenway proposals and comments that WP2 should be a green/open space within the town centre.

Some respondents also raised concerns around loss of car parking provision with the proposals for QR1, QR2 and SG1, and the effects this might have on business and retail in the town centre.

A number of respondents also questioned the wider need for specific uses in the plan including the need for new retail developments, new hotels and the potential of a cinema in the town.

A final respondent queried the overall housing capacity indicated and concern that there is no space for or provision of infrastructure, such as schools, to meet the provision for the demand of housing indicated in plan.

Question 7: Do you agree with the proposals for retail development in Policy AAP1? If not, how should the policy wording be changed and are there other sites which should be included?

24 comments

Respondents had a general scepticism of the need for new retail development, especially considering the vacant shops currently in the town centre. Concerns were also raised about the need for future provision in relation to the continuing rise of online shopping.

Several respondents suggested that the policy should focus more on upgrading existing retail facilities and that future town centre development should focus on improving the social culture rather than the shopping culture of the town centre. Further comments received included further support for independent retail in the town, increased marketing of the town and that business rates should be reduced to help retail businesses.

Question 8: Do you agree with the policy wording for AAP2? If not, how should the policy be changed and why? (AAP2 Primary and Secondary Shopping Frontages)

12 comments

A Number of respondents were in general agreement with the policy approach, while several respondents provided neutral comments.

Some respondents commented on the concern of conflicts between residential and the night-time economy, the clarity of the policy wording and also the importance of conservation of shopfronts, buildings and the character of the town centre.

Question 9: Do you agree with the proposed extent of the primary and secondary retail frontages shown in figure 4? If not, how should this be changes and why? (Policy AAP2 Primary and Secondary Shopping Frontages)

10 comments

A number of respondents were in general agreement with the policy approach for the primary and secondary frontage extension, while several respondents provided neutral comments.

Two respondents raised concerns regarding the extent of the primary retail frontage proposed. This included concerns that the primary frontage is too small and should extend along the west end of Robertson Street on both sides and include Claremont and Trinity Street and concerns regarding the extension of the primary retail frontage on the north side of Cambridge Road.

A response was also received suggesting that any new retail developments should be kept within the frontages proposed in Policy AAP2.

Question 10: Do you agree with the proposals for housing development included in AAP3? If not, how should the policy wording be changes and are there any other sites which should be included? (Policy AAP3: Housing Development)

47 comments

Many respondents were in general agreement for the need for new homes, and a limited number of respondents were in agreement with the proposed plans. Statutory consultees were generally supportive of the proposals. East Sussex County Council suggested policy wording to include reference to archaeological assessments required alongside subsequent planning applications and assessment of potential impacts of displaced car parking.

Historic England suggested including specific reference to the requirement to preserve and enhance the character and appearance of heritage assets and their settings where appropriate.

The Environment Agency raised concerns surrounding lack of policy wording for sites in flooding zones. They also suggested including reference to Policy SC7 of the Hastings Planning Strategy and providing an explanation of adapting to climate change.

Many respondents, however, raised concerns regarding the policy which largely related to density/numbers, types of housing/who they are for and proposed sites. A number of respondents raised concerns about the affordability of the proposed housing and whether this is being built for local people and their needs. Several respondents suggested that policy could be changed to include land being handed to community land trusts and the development of social housing for local people. A number of respondents also suggested greater regulation of AirBnB to ensure that stock remains in the market.

Several respondents raised concerns about the use of Greenfield sites in the Bohemia and White Rock Park. Several respondents proposed the use of existing Brownfield Land sites around the borough and the use of existing empty properties and space above shops for residential use before Greenfield land.

A number of respondents raised concerns regarding numbers/density of housing allocated over proposed residential sites. These objections largely centred on development in land around Bohemia and White Rock Park including use of the Oval , White Rock Gardens, the convent site, Horntye and Summerfields. A smaller number of objections were raised for town

centre sites including Morrisons, Station Yard and Cornwallis Car Park. A respondent also raised concerns regarding conflict between residential uses and the night-time economy in the town centre.

Question 11: Do you agree with proposals for the cultural and creative industries in Policy AAP5? If not, how should the policy wording be changed and why? (Policy AAP5Supporting Hastings Culture and Creative Industries)

22 comments

Many of the respondents were generally supportive of the policy approach, including statutory consultees. Both East Sussex County Council and Historic England suggested that policy wording could more reflect the relationship between heritage and the cultural and creative industries, while East Sussex County Council also proposed the inclusion of the concept of Creative enterprise zones (CEZ) and our support for these and a balance between production and presentation space.

Some respondents suggested that cultural facilities should be the focus of the Bohemia masterplan as opposed to sporting facilities. Another suggested amending the policy wording to include support for establishing long-term programmes and initiatives in the Town Centre. Some responses were received regarding the White Rock Theatre and its future role; some respondents suggested that there is no need for a bigger theatre, while others suggested the theatre could be reused for other cultural and creative purposes.

A respondent felt that the policy included too many cultural hubs and the focus should be on the existing hub in the Trinity Triangle/Claremont area. Another respondent suggested that the policy wording could be improved to support the wider America Ground area rather than focus onto one development in the Observer building.

Question 12: Do you agree with the approach to delivering good design set out in Policy AAP6? If not, how should the policy wording be changed and why (Policy AAP6: Delivering Good Design)

23 comments

Several respondents were in general agreement with the policy approach set out in Policy AAP6, including several statutory consultees. Comments included the need for additional wording to further strengthening of the policy wording to actively encourage the incorporation of listed features to ensure maximum developer participation is achieved.

A further respondent emphasised the importance of good design in underpinning other priorities and that the focus needs to be on avoiding unoriginal design and suggested including policy wording to include preserving and enhancing the overall character, especially in conservation areas.

Some respondents suggested that the policy could go further to promote and ensure good design. This included suggesting policy wording to support and encourage playful design through new developments and the inclusion of measurable goals for design in the policy.

Several respondents also requested the implementation of a design and planning forum set up for local people and civic groups to influence and co-design proposals and review planning

applications. Some respondents also suggested the inclusion of Hastings Urban design Group and the Academy of Urbanism in further development of the plans.

Further respondents raised concerns surrounding the proposed policy, this included concerns around the design illustrations shown in the White Rock Park & Bohemia Strategy and consideration of maintaining key views. Some comments were also raised regarding recent developments in Hastings, their poor design and a lack of trust that the Council can deliver good design or have the resources/expertise to do so.

Question 13: Do you agree with the approach to enhancing built heritage set out in Policy AAP7? If not, how should the policy wording be changed and why? (Policy AAP7: Enhancing Built Heritage)

17 comments

A number of respondents were in general agreement with the policy approach set out in the policy AAP7, including statutory consultees Historic England and East Sussex County Council. A respondent also commented that the use of modern cutting-edge design can complement heritage assets and areas.

Some respondents raised concerns about the policy. Several respondents focused on concerns surrounding policy to retain key views and vistas and the lack of identification of these views, while concerns surrounding conflict between the proposed plans and conservation areas and the Hastings local plan were also raised.

Question 14: Do you agree with the policy approach to shopfronts and advertising set out in Policy AAP8? If not, how should the policy wording be changed and why? (Policy AAP8: shopfronts and advertising)

11 comments

All respondents to this question were generally supportive of the policy, including statutory consultees, or provided no comment. A number of respondents expressed concern about the enforcement of policies regarding shopfronts and advertising, particularly highlighting the use of neon signs and loss of aesthetic details.

Question 15: Do you agree with the approach to the efficient use of natural resources set out in Policy AAP9? If not, how should the policy wording be changed and why? (Policy AAP9: Efficient use of natural resources)

21 comments

A number of respondents were in general agreement with the policy approach.

Southern Water and the Environment Agency were pleased to note the inclusion of higher water efficiency standards for new development. Natural England suggested further stringent water efficiency target of 100 litres per person per day to align with Southern Waters 'target 100' for the region by 2040.

Some respondents felt that new buildings should be built to be highly energy efficient and eco-friendly standards. The incorporation of solar panels and other green technology was also raised. Lack of specific sustainability goals was also raised as an issue

Question 16: Do you agree with the approach to promoting green infrastructure set out in Policy AAP10? If not, how should the policy wording be changed and why?
(Policy AAP10: Promoting Green Infrastructure)

27 comments

There was support for this policy. One respondent agreed with the policy approach but wanted to emphasise that the best way of enhancing green infrastructure is to look after existing assets.

Natural England was supportive of the Policy but suggested amendments to maximise developer participation. Natural England considers green infrastructure policy to be a good place to include concepts within the NPPF and DEFRA 20 year plan such as natural capital, wider ecological networks, and biodiversity gain. One respondent considered that biodiversity must be protected at all costs, which means without prioritising biodiversity, whether there are priority species present or not.

Concern was raised by a number of respondents that the proposals would result in the loss of green space and views of the sea which are important assets for residents and the town's economy. One respondent had concerns that the local primary school would be left with almost no grounds for the children.

Concern was also raised about the impact of building works on local businesses.

One respondent felt we should be exploring the possibility of roof gardens and green spaces on top of buildings with sea views and that the town centre must be providing green space and more planting.

One respondent stated that protected wildlife is known to present within the proposed AAP area and wanted to know what arrangements were in place for alternative foraging habitats as well as bat roosts.

Respondents considered the need for more trees and planting particularly within the town centre. The need to protect mature trees unless they are truly unhealthy was raised as an issue. Respondents also considered that rain gardens and sustainable drainage (SuDS) should also be promoted. ESCC states that green roofs should be biodiverse rather than using sedum.

A further respondent supports the inclusion of a green infrastructure policy within the AAP but suggested policy wording amendments to ensure provision is made for future management as well as maintenance. One respondent considers it important that Hastings creates new playful green spaces for people to use and to retain the wildness of Summerfields Woods linking wild areas through green corridors for wildlife.

Question 17: Do you agree with the approach to enhancing the public realm set out in Policy AAP11? If not, how should the policy wording be changed and why? (AAP11: Public Realm)

25 comments

There was support for the policy aims, including creating more walkways linking different areas of the town. Historic England agrees with the approach set out within the policy but considers there to be an opportunity to promote the retention and reinforcement of local character and distinctiveness by promoting the use of traditional materials and forms of streetscape.

A couple of respondents emphasised the need to work with local people and businesses to enhance the public realm.

A respondent considered the town centre signage needs attention.

A number of respondents stated where they wanted to see improvements to routes. A respondent considered that the main priority route should be from the station to town centre and maybe a green route from the station through to Harold Place, including tree planting. Comments from walkabout with Hastings Urban Design Group included difficulty walking across town due to narrow pavements in bad repair, few dropped kerbs and lack of key signage. Havelock Road was also considered by a number of respondents to have potential to be a pedestrian plaza from the station. Access through White Rock Gardens below Clambers was also considered to be a good pedestrian route.

A respondent considered the most pressing thing to be the transition from the town centre to the seafront and considered a significant improvement would be an attractive and vibrant walkway from the town to the seafront rather than having to use the current underpass. The underpass was also considered unsatisfactory.

A respondent commented that no mention is made in the plan of current walking and cycling strategy routes which affect all Opportunity Areas. These routes need to be embedded into the plan before any developments are considered.

A respondent felt that the A259 should be for local traffic only with the need for a clear designated route for through traffic to the north of the town.

A further respondent referenced the original SeaSpace Priory Quarter regeneration proposal for a land bridge from the station level over Cornwallis Terrace, in the form of an aerial cycle and walkway above Priory Street towards Cambridge Road to be a background document and given serious consideration. Another respondent considered it unrealistic that Priory Street should become an improved link between the station and seafront as ignores the massive drop in levels from Station Plaza to Priory Street and poor pedestrian access between mid-section of Cambridge Road and America Ground, especially for disabled people.

Another respondent wanted to see Queens Road included within Policy AAP11 list of improvements so that options can be explored for short term on-street parking and possibly

the creation of a one-way system. Others identified potential for improvements at Morrisons by removing the slip road.

A respondent wanted the plan to make clear provision for the children of Hastings giving consideration to playfulness in the public realm as well as art which can be linked.

Question 18: Do you agree with the approach to promoting sustainable transport set out in Policy AAP12? If not, how should the policy wording be changed and why?
(Policy AAP12: Sustainable Transport)

92 comments

A number of respondents consider it essential to prioritise pedestrian, cycling and public transport access to the AAP area over that of the car. A respondent considered that transport growth must be active travel while technological developments such as electric bikes, car and vans and 'mobility as a service' must be recognised and planned for, including the inclusion of a cycle parking policy. Respondents stated that any plan to improve the road infrastructure in Hastings has to commit to building more green routes and bus lanes with buses needing to be further up the sustainable transport hierarchy, inadequate bus shelters and unpleasant experience using buses was raised. Concern was raised that new housing will create more congestion in the town centre and more choice needed for people to travel such as cycle routes, off-road pedestrian walkways. A park and ride scheme would be supported as would faster train link and duelling of the A21 .

Natural England commented that working to deliver improvements to pedestrian and cycle access will reduce the impact of private vehicles emission, thereby reducing air pollution and anthropogenic climate change, these are key aims of the NPPF.

A number of respondents felt that the AAP should work around the Greenway Project that a lot of local people have been working towards for a number of years. A respondent felt that existing key roads (Queens Road, Braybrooke Road) have limited scope for enhanced safe cycling. There is support for pavement widening and better maintenance along Queens Road to improve access to the shops and businesses, also traffic calming and 20mph limit along Queens Road to improve walking and cycling conditions.

A respondent commented that there should be no access roads through the White Rock area, as this is a well-used pedestrian area, with lots of people using and enjoying the space.

Respondents thought that greater emphasis should be given on connecting the town centre to other areas including the railway station for pedestrian and cyclists as part of the overall strategy for Hastings and Rother, and to improve the pedestrian experience to the sea from the station. Concern was raised that Queens Road has very narrow footways and bad paving and there should be a policy in place to improve the pedestrian experience as well as the configuration of the bus stop. The need for traffic calming measures on major routes including Queens Road to make a more pleasant environment was raised.

It was further commented that there is no easy access to the sea and no signage. Havelock Road could be a stunning pedestrian plaza down to the sea and the current bus system is

inadequate, expensive and doesn't run into the evenings. The AAP ignores Bohemia Road, which needs upgrading to a neighbourhood road and the need for a seafront tram or other innovative alternatives to the cars.

Comment that policy wording should include broader and more imaginative transport options, such as boats going from the pier east to harbour arm and west to Bulverhythe/Bexhill.

A respondent wanted to see the area currently used as the underpass, and a pedestrian bridge over the road should be created to replace the unpleasant underpass.

A number of respondents were concerned that the proposals would result in more traffic, and associated problems including parking. Concern that not sufficient thought given to dealing with A259 and all the increased traffic that developments will bring. Another respondent considered advantageous to explore significant remodelling (particularly between the pier and Breeds Place) as opposed to just upgrading crossings.

A respondent questioned why consideration had not been given to a pedestrian bridge from the museum to White Rock Gardens, others wanted imaginative transport to encourage people from the pier to the oval.

Respondent applauds aim to create more walkways to link different areas of the town (part of the Government health campaign), and very much hopes plans will succeed to create easier foot access from pier, sea-front promenade up to White Rock Gardens, and, importantly, easier road crossing to the museum. Each ascending level provides wonderful views.

A further respondent felt that no mention is made in the place of the current walking and cycling strategy routes that affect all the Opportunity Areas. These were adopted as part of the local plan and need to be highlighted. A network of key walking and cycling routes needs to be embedded into the plan before any developments are considered in detail. This should include a route across the site connecting with the current footpath that connects with Redmayne Drive. The whole route needs upgrading.

The Hastings Urban Design Group identified the following pedestrian, and transport and access issues for Hastings town centre:

- How difficult it is to walk easily across town – narrow pavements in bad repair, few drop kerbs and lack of key signage
- Havelock Road has the potential to be a stunning pedestrian plaza sweeping down from the station.
- The town centre is our biggest civic space but it has a road going right through it.
- Queens Road has very narrow footways and bad paving. If there was a policy in place to improve the pedestrian experience developers could pay for drop kerbs and upgrades near their development.
- There is a lack of joined up thinking for all forms of transport, particularly for walkers.
- We need to carry out street audits as suggested by Living Streets.
- Station Plaza is a terrible pedestrian experience. No sense of where the sea is when arriving by train.
- The main priority should be routes from Hastings station to town centre, the current arrangements are considered to be dangerous. A green route from the station through to Harold Place should be considered.

And for the White Rock area:

- The plans completely ignore that Bohemia Road is the main route into town and is designated as the A21 trunk road. The road needs downgrading to a neighbourhood road at the edge of town and 20 mph limits imposed (at least) across the town centre.
- Walking and cycling routes need to be embedded across the site before any development is allowed.
- The current access through White Rock Gardens below Clambers could be a good pedestrian route with its wonderful views and mature trees. Currently it is dominated by cars.

A respondent wanted a specific policy to minimise car parking, having pedestrian only town centre was commented on. Another respondent raised concern as to where cars would park listing the proposed attractions that would draw people to the area. Similarly Love Hastings felt that care was needed to ensure key elements of the proposals are delivered as a whole rather than in a piecemeal fashion, for example parking lost at Priory Street would need to be mirrored by the creation of new spaces near the station.

A further respondent agreed that the station should be a memorable gateway for visitors to the town. They considered the main pedestrian routes presented to visitors from the station should be obvious and limited to two main ways, via Queens Square to Priory Meadow, and via Havelock Road to the centre, Trinity Triangle and the seafront. There was concern that the ESK site would be included in the central shopping area without major alterations, being cut off by traffic circulating and headed for the A21. The group also consider it a mistake to replace existing Priory Street car park with spaces in the commuter car park by the station.

Another respondent considered there to be insufficient detail about sustainable transport and lack of active travel infrastructure in Hastings including the planned and approved Hastings Walking & Cycling Strategy routes that are long overdue to link the Town Centre and Station Plaza to the seafront and to Alexandra Park and the North of the Borough.

The respondent also considers that the road system in Hastings, is a huge barrier to cycle travel, is already at capacity and any new housing built in or near the town centre must provide good quality safe walking & cycling routes to the centre of town and the station, to reduce car use and avoid even more congestion and parking problems.

The respondent also stated that, there is a need for a strong focus on transport issues throughout the entire plan and no additional development plans should be approved unless the necessary travel infrastructure is made an absolute requirement. Detailed input from local groups, the disability forum and other organisations supporting active travel alternatives to the car, will be needed to develop proposals for 'all access' and safe routes.

Others considered improvements to bus services to be essential. The respondent suggests a park and ride scheme to the town centre, in collaboration with the Conquest hospital, should be seriously considered along with other car reduction travel initiatives. They consider access to and from Hastings station on foot, by bike and for people using mobility scooters or other aids to be appalling.

Another respondent raised concern with traffic noise such as speeding motorcycles being an issue within the area, as well as air quality issues in heavily trafficked streets which they consider should be addressed by the AAP through measures to restrain traffic. A number of respondents wanted to see traffic re-routed away from the seafront and all parking removed

to improve air quality and people's lives along the seafront and for people using the beach. A shuttle service between St Leonards and Hastings was also raised.

Respondent wanted to see measurable goals supporting the sustainable transport measures as they felt little progress had been made on existing routes outline within the current walking and cycling strategy adopted in 2014.

A respondent identified that Hastings is ideally suited to electric bikes, which will increase the uptake of cycling because they help people get up hills. They wanted to see all new developments, public buildings, sports facilities etc. to be equipped with bike shelters with charging points for electric bikes. It was felt that a shared vehicle scheme would reduce pressure on space for parking in residential streets wording should include more sustainable and environmentally friendly transport approaches.

A respondent considered the closure of Schwerte Way to be misguided given the current coach route to the pick-up points and the increase in traffic that might be expected from new development. Coach parking near the town centre was also raised. Another view was that the AAP neglects the importance of the St Margaret's Road, Prospect Place high level promenade which provides an evident physical link between St Leonards and Hastings Town with the potential to step down into Cambridge Road and Claremont.

A respondent felt the car route into Priory Meadow from Devonshire Road/Station Road needs improving. It feels like a service road and is not particularly pleasant as a pedestrian route either. The car park layout needs looking at as it is confusing especially for people with mobility issues.

Concern was raised that parts of Middle Street are used for parking including loading/unloading, and that this space was used by maintenance contractors, delivery people and removal firms.

There were concerns about lack of support from ESCC over transport issues, such as the removal of substantial parts of the transport budget from the walking/cycling scheme, lack of support by bus companies to improve routes to serve the community and lack of support for the 20 is Plenty Campaign and similar initiatives.

Question 19: Do you agree with the proposals for Station Gateway and Priory Quarter (Opportunity Area 1)? The policies provide a framework for mixed use development and public realm improvements and build on policies in the Development Management Plan with a stronger focus on retail development. If you don't agree. How should the wording be changed and why?

A number of respondents supported the proposals set out for opportunity area 1, with a strong agreement that improvements could be made to the area and buildings in general.

A respondent commented that the plans are too broad-brush at this stage to fully support and would wish to comment on the details of any schemes that comes forward in view of the potential to affect significantly on heritage assets, settings and views.

A further respondent also suggested consideration of strengthening policy wording around green space networks to support the objectives of the plan.

A number of respondents supported the idea of further integration of housing into the

opportunity area to support the town centre uses.

Several respondents raised concerns about the pedestrian connectivity and mobility through the site, particularly from the station to the town centre.

Some concerns were raised about the loss of parking within the proposals and how feasible it would be to replace this parking and the affect that this may have on the prosperity of the town centre.

One respondent felt there was further need to directly consult with local individuals and businesses in the area to provide a more inclusive regeneration of the town.

One respondent commented that there is no mention the Augustinian Priory remains which are preserved under ESK and that if the site is redeveloped, the opportunity should be taken to uncover these and display them to public view as part of the scheme.

Question 20: Do you agree with the proposals for Wellington Place and Castle Street (Opportunity Area 2) and the opportunity sites shown in figure 7? The policies aim to strengthen the area's existing role as a shopping location, enhance public spaces and pedestrian links with the seafront. If you don't agree, how should the wording be changed and why?

A respondent commented that the plans are too broad-brush at this stage to fully support and would wish to comment on the details of any schemes that comes forward in view of the potential to affect significantly on heritage assets, settings and views.

The majority of respondents raised the issue of connectivity between the seafront and the town across the A259. A number of respondents raised concerns that the Harold place underpass is not fit for purpose. Several respondents also suggested that traffic should be rerouted away from the A259 to improve the seafront.

A Number of respondents also suggested improving the planting and green spaces available within the opportunity area.

Several respondents raised concerns about the closure of the Harold Place toilets.

Question 21: Do you agree with the proposals for Queens Road (Opportunity Area 3) and the opportunity sites shown in figure 8? The policies aim to strengthen the Queens Road area as a shopping location, gateway into the town centre and to improve the public realm. If you don't agree, how should the wording be changed and why?

Some respondents agreed with the proposals for developments at the Morrisons car park

Several respondents raised concerns around the loss of Morrisons car park to any potential housing development, due to concerns it would affect the footfall along Queens Road into the town.

A number of respondents suggested that consultation with local businesses along Queens road would be useful to gauge their views of the future development of Queens road.

Several respondents also suggested redeveloping Queens Road to include wider pavements, increased planting and less space for cars to improve the public realm in the area.

Question 22: Do you agree with the proposals for Priory Meadow (Opportunity Area 4) and the opportunity sites shown in figure 9? The policies seek to strengthen the primary shopping area with the potential to provide additional retail space within this area. If you don't agree, how should the wording be changed and why?

The majority of respondents questioned the need for increased retail development in the area considering the rise in online shopping and the difficulty retail is facing across the country as this time. Several respondents further suggested that there should instead be a focus on supporting the development of independent retail within the town centre.

Some respondents emphasised the need to develop more residential housing within the town centre to support the town centre in its function.

Some comments received focused on the disappointment of the priory meadow development and the hope that this could be removed from the town.

Question 23: Do you agree with the proposals for the White Rock and America Ground Cultural Quarter (Opportunity Area 5) and the opportunity sites shown in figure 10? The policies seek to strengthen the creative and visitor economy and the White Rock Theatre and Hastings Pier to provide the focus for performance, production and entertainment and the Trinity/America Ground for education and the creative industries. If you don't agree, how should the approach and policies be changed and why?

A number of respondents supported the proposals set out in opportunity area 5. Including statutory consultees who welcome the potential for this in turn to allow other areas to realise their potential.

A respondent noted that WR2 is in flood zone 2 and 3 but there is no reference of Policy WR2 to Policy SC7 of the Hastings Planning Strategy.

Another respondent also suggested consideration of strengthening policy wording around green space networks to support the objectives of the plan.

The majority of respondent's comments in this section related to the White Rock Theatre. Several respondents raised concerns and opposition to the potential of demolition of the White Rock Theatre, as well as the potential concerns that the theatre will be relocated to an out of town location.

Several respondents also supported the retention and extension of the building to offer a mix of uses, as well as further support for the proposals relating to Schwerte Way, although concerns were expressed whether this is realistically achievable.

A further respondent suggested that the current theatre is not fit for purpose and that the council should instead be focusing on an arts centre, which supports the creative people of Hastings.

Some respondents, however, raised concerns about the potential closure of Schwerte Way and White Rock Road and the effect that this could have on the local road network.

Several comments were also received regarding Hastings Pier, including a comment

emphasising the importance of protecting the pier, while a second respondent commented on the possibility of rebuilding the matching curved building on the pier where the space between them could be roofed with a glass structure, to provide indoor space.

A couple of respondents also expressed support for the mixed-use proposals for the Observer Building site.

Several respondents also raised concerns around the branding of the area as Bohemia, as this presented confusion for some residents as to where the plan and the policies were focusing on and concern that some residents might not read the Bohemia section thinking that it is not relevant to them.

Question 24: Do you agree with the proposals for White Rock Park (Opportunity Area 6) and the opportunity sites shown in figure 11? It is proposed that leisure and cultural facilities should be consolidated in a purpose built facility on the western side of Falaise Road, with the area east of Falaise Road retained as formal gardens. If you don't agree, how should the approach and policies be changed and why?

Many comments were received around the proposals for opportunity area 6. The majority of these comments were relating to concerns around the proposed amount of housing and loss of green space within the area.

Many respondents objected to the loss of greenspace at the Oval for potential housing, as well as objections to any development on White Rock Gardens.

A couple of respondents also raised the issue of covenants on both the White Rock Gardens and the Oval which prohibit their development.

Several objections were also received to the proposals for a hotel in the White Rock Garden, with concerns over the loss of green space, loss of views and conflict with other policies within the AAP and a general scepticism regarding the need for a hotel within the area.

Southern Water also commented that existing wastewater infrastructure is located in the WRP2 opportunity site and that this existing infrastructure would need to be accounted for in any proposed developments for the site.

A number of respondents also raised concerns about proposals for access roads through the Bohemia site and potential increase in traffic and parking problems associated with the new developments proposed.

A final respondent raised the issue of funding for the development, emphasising the need for any development to be self-sufficient financially.

Question 25: Do you agree with the proposals for Bohemia (opportunity area 7) and the opportunity sites in figure 12? It is proposed to promote this area as a vibrant place to live, work and visit with innovative new housing and good connections to the wider town and direct access to greenspaces and woodland. Relocation of existing uses will be required. If you don't agree, how should the approach and policies be changed and why?

There was a general negative response to the proposals within opportunity area 7. Many respondents raised concerns regarding the amount of housing proposed within the area and the loss of green open space. This was particularly focused on both the B1 and B2

opportunity sites.

A few respondents raised issues with the loss of sports facilities at Horntye Park and questioned the need to relocate these facilities to a new sports park.

A number of responses also raised concerns about the effect of the proposed developments on Summerfield wood and the impact this could have on biodiversity, including responses from East Sussex County Council and the Sussex Wildlife Trust.

A further respondent highlighted that opportunity site B2 is located on closed landfill site yet there has been no mention of this within the policy.

Southern Water also stated that there is limited capacity in the local wastewater infrastructure to accommodate the proposed development and upgrades to the infrastructure would be required to accommodate the proposed development.

Several respondents raised concerns about the affordability of the proposed housing and whether this would be accessible to local people within the borough.

A couple of respondents also queried the need to replace the existing facilities, which they believe to be adequate to serve the needs of Hastings.

A final respondent also raised concerns over the naming of the area as Bohemia; they felt that this is misleading and may confuse people regarding which area of the town is being discussed.

Question 26: Do you agree with the approach for the former Convent of Holy Child Jesus in Magdalen Road (Opportunity Area 8)? The approach here builds on Policy HN6 already adopted in the Development Management Plan. In the event of enabling development coming forward, pedestrian and cycle routes will be required to connect with the wider area. If you don't agree with this approach, how should the wording of policy OA8 be changed and why?

A number of respondents supported the proposals set out in opportunity area 8, this was particularly in relation to the use of the convent site for art and culture and opening up the site for the public and to provide access between St Leonards and Hastings Town Centre.

Several respondents suggested that the proposed policy is in conflict with Policy HN6 of the Hastings Development management plan and therefore cannot be brought forward.

A number of respondents raised concerns over the allocation of potential housing and use of the site for arts and culture due to the current ownership of the site by the Stars football academy and their plans for the site.

Concerns were also raised for the condition of the listed building and the lack of policy wording to regarding the council's actions to stop the deterioration of the Convent site.

Some respondents also raised concerns about the potential impact of housing development on both the setting of the convent and the potential traffic and parking issues that such a development could cause within the surrounding area.

One respondent also raised concern around the lack of policy wording around protecting trees within the opportunity area.

Question 27: Do you have any comments on Section 8 and how we propose to implement the proposals in the AAP and the indicative implementation schedule (table 3)?

A number of respondents agreed with the focus on community involvement and the monitoring suggested in the plan. A mix of messages were received on delivery with a particular respondent supporting its clear and strong vision on delivery while another suggested the aspirations on the plan were much stronger than the proposals on delivery of the plan.

Some respondents raised concerns of aspects of community involvement. Several respondents identified difficulties in responding to the consultation. This included the prescriptive nature of the questions in the plan, the length of the consultation document, the lack of summaries of the plan and lack of advertisement of the plan.

Respondents also emphasised that more community engagement should be undertaken including a preference to see a “Plan B” which would present further different options for the area, the development of a peoples planning and design forum and further inclusion and discussion with Local interest groups, such as those of Hastings Urban Design Group and Local transport groups.

A further respondent also suggested that Ecological Impact Assessments and Ecological Constraints and Opportunities Plans (ECOP) and Green Infrastructure strategies should accompany planning applications submitted in the area.

A further respondent commented on concerns around the sewage infrastructures ability to cope with the increased housing suggested in the plan and the flooding that could occur in the area because of this.

Some respondents also raised concerns about the partners delivering the plan, with suggestions that private developers should not be the focus of delivery but the area should be master planned by the Council and local people.

A further respondent suggested that S106 money should be ring-fenced for the provision of affordable housing in the plan.

Appendix B

List of organisations contacted for Infrastructure Delivery Plan consultation 30 June to 11 August 2020 (jointly undertaken with Rother District Council)

East Sussex County Council

Highways England

Stagecoach

Southern Railways

Southeastern Railways

Network Rail

South Coast Ambulance Service NHS Trust

South East Coast Ambulance Service

Sussex & Surrey Police

East Sussex Fire & Rescue Service

Marine Management Organisation

Environment Agency

National Grid c/o Avison Young

UK Power Networks

Southern Gas Networks

CCG

Sussex Partnership NHS Foundation Trust

NHS England – Sussex & Surrey Area Team

Vodafone & O2

EE

Three

Southern Water

BT Openreach

Appendix C

List of organisations contacted for Sustainability Appraisal Scoping consultation 17 April to 29 May 2020 (jointly undertaken with Rother District Council)

Historic England

Environment Agency

Natural England

Highways England

Sport England

Hastings & Rother CCG

Marine Management Organisation

South East Coastal Group

East Sussex County Council

Wealden District Council

Tunbridge Wells District Council

Ashford Borough Council

Folkestone & Hythe District Council