



Local Green Spaces in Hastings: Review of Designations and Nominations 2026

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1.Disclaimer and liability

- 1.1. In relation to this document, and any other document relating or referring to its findings, Hastings Borough Council makes the following disclaimer without prejudice:
- 1.2. This document is an aid for plan-making and not a statement of council policy.
- 1.3. The geographic scope of the document is limited to the administrative borough of Hastings.
- 1.4. This document does not allocate sites for development. The allocation of sites for development will be determined by the Hastings Local Plan 2023-2041 (when adopted) and any future Neighbourhood Development Plans.
- 1.5. The identification of potential Local Green Spaces within this document does not preclude them from being considered for other uses. The boundaries of assessed areas are based on the best information available at the time of assessment. This document does not prevent future changes to these boundaries for the purpose of designation in the Hastings Local Plan 2023-2041 (when adopted) and any future Neighbourhood Development Plans.
- 1.6. The conclusions within this document does not preclude the possibility of planning permission for development being granted in the future.
- 1.7. This document does not constitute an assessment of potential development capacity for any site or location mentioned.
- 1.8. This document has been produced to provide provisional findings to support the development of relevant local plan policy and does not in and of itself designate, de-designate or otherwise alter Local Green Spaces. The designation of Local Green Spaces will be determined through the Hastings Local Plan 2023-2041 (when adopted) and any future Neighbourhood Development Plans.
- 1.9. Where an area is not considered suitable for either designation or continued designation as a Local Green Space, this should not be construed as an assessment of suitability for alternative uses.
- 1.10. A full list of areas assessed within this document can be found in Appendix A.

2. Background: Review of Local Greenspace Boundaries

- 2.1. The National Planning Policy Framework (NPPF) was first published in 2012 and has been assessed numerous times since. The most recent (current) iteration is dated December 2024. The NPPF sets out the Government's planning policies for England, and how they should be applied to both plan-making and decision making.
- 2.2. The NPPF is guidance and not legislation, and therefore must be interpreted in the context of relevant legislation, including but not limited to:
- Town and Country Planning Act (1990)
 - Planning and Compulsory Purchase Act (2004)
 - Planning Act (2008)
 - Flood and Water Management Act (2010)
 - Localism Act (2011)
 - Environment Act (2021)
 - The Levelling Up and Regeneration Act (2023)
 - The Planning and Infrastructure Act (2025)
- 2.3. The concept of Local Green Spaces was introduced in the first iteration of the NPPF in 2012, and is a designation created solely through National Policy as opposed to through primary or secondary legislation. Paragraph 108 of the 2024 NPPF clarifies that the designation affords a level of protection consistent with Green Belt land designations, where development is only considered appropriate in 'very special circumstances' (NPPF, 2024, P153) as defined in the NPPF.
- 2.4. National Planning Policy Framework (NPPF, 2024) Paragraph 106 sets out that:
- "The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them."* Local Green Spaces should only be designated or reviewed when a plan is prepared or updated.
- 2.5. Paragraphs 106-107 of the NPPF, and the supporting Planning Practice Guidance, set out the criteria that need to be met for land to be designated a Local Green Space.
- 2.6. The area needs to be:
- in reasonably close proximity to the community it serves; and,
 - demonstrably special to a local community and hold a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife; and,
 - local in character and not an extensive tract of land; and,
 - capable of enduring beyond the plan period.

- 2.7. It is necessary that all criteria must be met in order for the designation to be considered suitable for initial or continued designation as a Local Green Space.
- 2.8. Furthermore, designating land as Local Green Spaces should be consistent with the local planning of sustainable development¹. In particular, local plans must identify sufficient land in suitable locations to meet identified development needs, and Local Green Space designation should not be used in a way that undermines the aim of sustainable plan making.
- 2.9. A Local Green Space designation is not always incompatible with built development. For land that is designated as a Local Green Space, NPPF paragraph 108 sets out that policies and decision making for managing development within it should be consistent with those for Green Belts.
- 2.10. NPPF paragraph 145-150 sets out a framework for Green Belt Review, which may be used to provide additional guidance and context for Local Green Space reviews. This includes:
- That boundary alternations should only take place where exceptional circumstances are fully evidenced and justified through the preparation or updating of Development Plans (NPPF, paragraph 145);
 - That exceptional circumstances may be considered to include, but are not limited to, instances where housing, commercial or other development needs cannot be met (NPPF, paragraph 146) and that all other reasonable options² for meeting identified needs have been examined fully including (NPPF, paragraph 147):
 - a. Making as much use as possible of suitable brownfield sites and underutilised land³;
 - b. Optimising the density of development, including whether policies promote uplifts to density⁴;
 - c. Co-operation with neighbouring authorities as to whether they could accommodate unmet identified needs⁵.
 - That where it is necessary to release land for development, plans should give priority to sites with a history of development (NPPF, paragraph 148) before considering land with no history of development.

¹ At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (NPPF, 2024, para 7).

² See Hastings Borough Council Interim Sustainability Appraisal 2026 <https://hastings.oc2.uk/> or within the council's evidence base library <https://www.hastings.gov.uk/planning/policy/new-local-plan/evidence/>

³ For the avoidance of doubt, 'underutilised' land refers to land or buildings that are vacant or only partially in use. It does not include uses that legitimately require operational space beyond the buildings themselves, such as loading bays serving industrial premises or grazing land required for livestock.

⁴ See Densification and Capacity Study within the council's evidence base library <https://www.hastings.gov.uk/planning/policy/new-local-plan/evidence/>

⁵ See Duty to Co-operate Statement within the council's evidence base library <https://www.hastings.gov.uk/planning/policy/new-local-plan/evidence/>

- That when defining boundaries, plans should:
 - a. Ensure consistency with the Development Plan's approach to meeting sustainable development;
 - b. Not include land where it is unnecessary for it to be kept permanently open;
 - c. Make it clear within the policies of the plan that land kept within Local Green Space boundaries is not allocated for development, and that planning permission for the permanent development of safeguarded land should only be granted where a site allocation is proposed through a Development Plan update;
 - d. Be able to demonstrate that boundaries will not need to be altered again following the plan period;
 - e. Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent⁶.

New National Planning Policy Framework (2026)

- 2.11. The government consulted on changes to the planning system, including a new draft NPPF between 16 December 2025 and 10 May 2026. The revised NPPF (styled 'NPPF 2026' within this document) is broadly consistent with the approach set out in the current NPPF, with criteria for designation set out in draft **Policy HC2: Local Green Space** which would replace paragraphs 107-107 of the current framework.
- 2.12. Policy H6 of NPPF 2026 contains one change to the suite of designation criteria, indicating that an area should be 'close' to the community it serves as opposed to 'reasonably close'. This change is proposed to emphasise that areas identified as LGS should be genuinely local.
- 2.13. Although the Hastings Local Plan 2023-2041 has been prepared under the 'legacy system' with regard to NPPF 2024, this assessment has taken the wording of policy HC2 into consideration.

Planning Practice Guidance

- 2.14. The Planning Practice Guidance (PPG) provides additional guidance and advice at a more granular level than the NPPF. It supports planners to interpret and implement the NPPF and is regularly updated. The PPG on Open space, sports and recreation facilities, public rights of way and local green space set out a number of key paragraphs to assist with the assessment of Local Green Spaces. At the time of writing, it was last updated in May 2014.
- 2.15. The following paragraphs are relevant to the evaluation of Local Green Spaces:
- Paragraph: 005 Reference ID: 37-005-20140306: **What is Local Green Space designation?** A Local Green Space designation is a way to provide

⁶ For example, streams or highway.

special protection against development for green areas of particular importance to local communities.

- Paragraph: 006 Reference ID: 37-006-20140306: **How is land designated as Local Green Space?** Local Green Space designation is for use in Local Plans or Neighbourhood Plans. These plans can identify on a map ('designate') green areas for special protection. Anyone who wants an area to be designated as Local Green Space should contact the local planning authority about the contents of its local plan or get involved in neighbourhood planning.
- Paragraph: 007 Reference ID: 37-007-20140306: **How does Local Green Space designation relate to development?** Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.
- Paragraph: 008 Reference ID: 37-008-20140306: **What if land has planning permission for development?** Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.
- Paragraph: 009 Reference ID: 37-009-20140306: **Can all communities benefit from Local Green Space?** Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.
- Paragraph: 011 Reference ID: 37-011-20140306: **What if land is already protected by other designations?** Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.
- Paragraph: 013 Reference ID: 37-013-20140306: **What types of green area can be identified as Local Green Space?** The green area will need to meet the criteria set out in the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.
- Paragraph: 014 Reference ID: 37-014-20140306: **How close does a Local Green Space need to be to the community it serves?** The proximity of a Local Green Space to the community it serves will depend on local

circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.

- Paragraph: 015 Reference ID: 37-015-20140306: **How big can a Local Green Space be?** There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land.
- Paragraph: 016 Reference ID: 37-016-20140306: **Is there a minimum area?** There is no lower size limit for a Local Green Space.
- Paragraph: 017 Reference ID: 37-017-20140306: **What about public access?** Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access. Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.
- Paragraph: 018 Reference ID: 37-018-20140306: **What about public rights of way?** Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation.
- Paragraph: 019 Reference ID: 37-019-20140306: **Does land need to be in public ownership?** A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.
- Paragraph: 020 Reference ID: 37-020-20140306: **Would designation place any restrictions or obligations on landowners?** Designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners.
- Paragraph: 021 Reference ID: 37-021-20140306: **Who will manage Local Green Space?** Management of land designated as Local Green Space will remain the responsibility of its owner. If the features that make a green area special and locally significant are to be conserved, how it will be managed in the future is likely to be an important consideration. Local communities can

consider how, with the landowner's agreement, they might be able to get involved, perhaps in partnership with interested organisations that can provide advice or resources.

- Paragraph: 022 Reference ID: 37-022-20140306: **Can a Local Green Space be registered as an Asset of Community Value?** Land designated as Local Green Space may potentially also be nominated for listing by the local authority as an Asset of Community Value. Listing gives community interest groups an opportunity to bid if the owner wants to dispose of the land.

Making Local Green Space Designations in your Neighbourhood Plan

2.16. The government published a toolkit for Neighbourhood Planners on 24 July 2026 titled 'Making Local Green Space Designations in your Neighbourhood Plan'⁷.

2.17. The guidance covers:

- why green space is important
- the different values of green space
- how neighbourhood plans can address green space
- evidence requirements
- an audit tool for use where existing evidence is not available
- community and stakeholder engagement
- guidance and a tool for making Local Green Space designations
- other green space designations
- policy making for Local Green Spaces

2.18. Whilst this guidance is directed to the development of Neighbourhood Plans, regard has been given to the methodology to achieve alignment.

⁷ [Making Local Green Space designations in your neighbourhood plan - GOV.UK](#)

3. Emerging Local Plan and Nominations

- 3.1. The Council is currently developing a new Local Plan and as such, has undertaken a review of Local Green Spaces to ensure that they continue to meet, or in the case of proposals for new Local Green Spaces, are capable of meeting, the criteria set out in the NPPF. It is important to note that not all green areas, irrespective of and without prejudice to their value or wider context, will be suitable for formal designation as Local Green Space.
- 3.2. There are 2 existing Local Green Space designations that were identified within the Development Management Plan (2015). One nomination for a new Local Green Space was identified through a review of Planning Officer reports. An additional 24 nominations were received through the Regulation 18 Preferred Options Consultation Process (2026).
- 3.3. The original designation of the Local Green Space known as Speckled Wood was first designated in 2015 through the Inspectors Final Report ⁸ in respect of the Development Management Plan 2015. The designation was made on the basis of the assessment of a number of individual land parcels as described in paragraphs 115-122 of the report. These parcels were CVO1: Victoria Avenue; CVO3: Rear of Old London Road; and a substantially larger parcel of land 'between' the two that runs from Church Street to Graystone Lane.
- 3.4. The assessment of suitability for re-designation follows the original assessment methodology on a comparison basis with one difference: - in order to provide a clear landscape boundary, the larger portion of land 'between' CVO1 and CVO3 has been assessed as two distinct parcels, with the centre point of the Ore Stream providing a boundary. CVO1 and CVO3 follow the extent as defined in their original assessment.
- 3.5. Three representations from or on behalf of landowners with ownership within the parcels identified as CVO1 and the Ore Stream Valley were received as part of the Regulation 18 local plan seeking reassessment of the suitability of three parcels of land in private ownership for inclusion in the designation. The character of these parcels was considered to identify if they should be assessed separately to their 2015 parcel, or no change should be made. These were:
- Land adjoining 9 Victoria Avenue;
 - Land rear of Old London Road;
 - Land adjacent Arlington Cottages, Victoria Avenue.
- 3.6. Land rear of Old London Road was considered to be of the same character area as the rest of the Southern Ore Valley area. It was not considered that this parcel should be assessed separately.

⁸ [Inspector's Report - modified version](#)

3.7. Land adjacent Arlington Cottages, Victoria Avenue and Land adjoining 9 Victoria Avenue were both considered to possess different characteristics to their wider host areas, and were assessed on their own merit using separate identifiers to reflect this.

3.8. The assessment parcels are as follows:

DMP Identifier (2015)	2026 Review Identifier (2026)
CVO1: Victoria Avenue	Land at Victoria Avenue
CVO3: Rear of Old London Road	Land at Graystone Lane
Ore Stream Valley (North of Stream)	Ore Stream Valley and Wet Woodland
Ore Stream Valley (South of Stream)	Southern Valley
CVO1: Victoria Avenue (part)	Land adjoining 9 Victoria Avenue
Ore Stream Valley (South)	Land adjacent Arlington Cottages, Victoria Avenue

3.9. Regulation 18 (Preferred Options) consultation undertaken in 2026, contributed to the assessment of the six Speckled Wood parcel through representations and supporting evidence made by landowners, stakeholders, management bodies and other interested parties.

3.10. The assessments of these parcels are therefore presented in a more detailed format than other site submissions within this report.

3.11. The following section sets out the methodology used to assess the nominations/ re-evaluate previously designated areas. A summary of evaluations is available in Table 4. A map of all sites is available as Appendix B.

4. Methodology

- 4.1. Each area was initially assessed through a desktop review to ascertain whether they meet/ continue to meet the criteria or not, and therefore whether their designations should continue. This review was performed in three parts, with Stage 1 acting as an initial 'sift' of areas that would clearly not be suitable for Local Green Space designation, Stage 2 acting as mitigation for potential 'double counting' of sites that already benefit from protectionist policies, and Stage 3 comprising a detailed evaluation. The results of this review were then confirmed through site visit where required.

Stage 1: Desktop Assessment and initial sift

- 4.2. This stage involved a high-level desktop review of sites against five sifting criteria. A 'pass' against all five criteria must be achieved in order to proceed to the Part 2 detailed assessment. The purpose of this initial screening is to identify and exclude any green spaces that are clearly not suitable for designation as a Local Green Space.

1. The area is outside the borough boundary (e.g., within Neighbouring Rother or the MMO Marine Plan area).
2. The area already has planning permission for development [PPG Paragraph 008].
3. The area forms part of the public highway as defined by Highways Act 1980⁹, including mitigation land¹⁰ and areas subject to planting agreements¹¹.
4. The area is allocated, identified, and/or protected for a particular use in the Minerals and Waste Local Plan and/or the adopted Hastings Planning Strategy (2014) or Development Management Plan (2015). [PPG Paragraph 007].
5. The area has an active, lawful economic, logistics, educational, utilities or transport use, including easement.

Stage 2: Prescence of existing designations

- 4.3. The purpose of a Local Green Space is to provide 'special protection against development for green areas of particular importance to local communities' (PPG Paragraph 005 Reference ID: 37-005-20140306).
- 4.4. 'Making Local Green Space Designations in your Neighbourhood Plan' advises that:

⁹ Areas with Designated Rights of Way within them may still be considered acceptable, provided the entirety of the assessed location is not within the DPRW.

¹⁰ Highways Act 1980 Section 246

¹¹ Highways Act 1980, Section 253

'There are numerous other designations that may already be applied to green spaces. It is essential to take these into account when considering making Local Green Space designations. In some instances, existing designations may be adequate, but in other cases Local Green Space designation may be necessary to provide the protection sought by the neighbourhood planning qualifying bodies.'

- 4.5. The protection bestowed by the designation is non-statutory and of a lesser status than other international, national, local and statutory protections. Legislation and the policies of the NPPF, East Sussex and Brighton and Hove Local Nature Recovery Strategy and the extant and emerging Local Plan give protection to many areas of green space covered by international, national, local and statutory protection and it is not the intention of the council to introduce additional designations to, or 'double count', such sites by identifying them as LGS.

- 4.6. The presence of existing protective designations creates a presumption that additional LGS designation is unlikely to be necessary unless evidence demonstrates a separate and distinct local community significance. It would also be material to consider whether the addition of a LGS designation may inhibit or otherwise restrict the protected area from being able to carry out its primary function as intended. 'Making Local Green Space Designations in your Neighbourhood Plan' advises a precautionary approach where there is potential to restrict the primary function of a designated area, for example with regard to historic parks and gardens:

'For example, some new development may be necessary in parks to enhance community value, for example by providing new changing or storage facilities for sports pitches or cafes and refreshment kiosks. This could be recognised in planning policies.'

- 4.7. Therefore where an area is currently protected as sites of biodiversity, geological or park status Special Areas of Conservation (SAC), National Landscape (NL), Sites of Special Scientific Interest (SSSI), County Park (CP), Countryside Park (CSP), Local Nature Reserve (LNR), Local Wildlife Sites (LWS), Registered Historic Parks and Gardens (HPG), Scheduled Monuments (SM) or through local or national policy protections that apply to open space, sports or leisure facilities and playing pitches such as those conveyed by Paragraph 104 of the NPPF (2024), consideration will need to be given to whether there would be any additional benefit derived from the additional designation and/ or whether the designation of an area as a Local Green Space may have the unintended consequence of prejudicing the ability of the area to safeguard its higher designations.

- 4.8. By contrast, and as set out in 'Making Local Green Space Designations in your Neighbourhood Plan', there are a number of instances in which Local Green Spaces could offer useful additional protection where it is clear areas have community value. For example, the guidance identifies areas covered by Tree Preservation Orders (TPOs) as an example, advising that:

'Tree preservation orders (TPOs) apply to single trees or groups of trees and require consent to be obtained to remove or do work to trees. The protection is specific to trees and does not preclude development. Local Green Space designation could

protect the wider space around TPOs or protected hedges, where such spaces meet the criteria.'

4.9. Local Green Space designations are not required to protect a public right of way.

Stage 3: Detailed Site Assessments

4.10. This stage involved a detailed desktop analysis of the remaining green areas through a further desktop review, analysis of supporting information submitted (e.g. Regulation 18 consultation responses) and, where appropriate, site visits. This stage focused on the criteria set out in Part 2, above.

4.11. The first step focused on the following criteria as set out in NPPF paragraphs 106-107, all of which must be met:

- The area is in reasonably close proximity to the community it serves; and,
- The area is demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife; and,
- The area is local in character and not an extensive tract of land; and,
- The area is capable of enduring beyond the plan period.

The area is in reasonably close proximity to the community it serves

4.12. Neither the NPPF nor the PPG clearly sets out nor provides a definition of what constitutes 'reasonably close proximity'. PPG Paragraph 014 explains that, if public access is a key factor, then the site would normally be in easy walking distance of the community it serves. Locality (2021) and Open Space Society (2022) both explain that a green area must not be isolated from the community it is intended to serve, whilst qualifying bodies and other local planning authorities have considered an "easy walking distance" to be 300 to 600m, the equivalent of a 5 to 10 minutes walking time.

4.13. As a compact Borough, a 5-10 minute walking time has the potential to cover an extensive area relative to the size of the administrative area. However, due to the Borough's complex and undulating topography, the actual distance it is possible for an apparently healthy adult¹² over 5-10 minutes can vary dramatically.

4.14. The council's Strategic Open Space and Play Assessment (2020) found that when asked how long it should take to walk to their nearest green space, 35% stated 5 minutes and 30% stated 10 minutes. The Assessment further set a standard of 3 minutes walking time (250m) for 'Small Local' Natural and Semi-Natural Green Spaces and Parks/ Gardens and a 5-minute walking time (400m) for

¹² An 'apparently healthy adult' is a public health classification used to describe an individual who has no known chronic diseases, shows no outward symptoms of illness and is free from conditions or functional impairments that would compromise physical function. This demography serves as a baseline demography.

‘Local’. For the purposes of this assessment, whether spaces are within 250-400m of the community they serve will be used as a starting point, taking into account all other factors- for example, whether the location aligns with active travel routes to local schools, faith centres or workplaces and whether the community they serve is formed of multiple neighbourhoods.

- 4.15. It is not intended that the distance identified above be used as a binary classification.

The green area is local in character and is not an extensive tract of land

- 4.16. Neither the NPPF nor the PPG clearly sets out nor provides a definition of what constitutes ‘an extensive tract of land’, although PPG Paragraph 016 confirms that there is no lower size limit for local green space designation. To identify an upper size limit, PPG Paragraph 15 explains that a degree of judgement will be needed and that blanket designations of open countryside should not be used to achieve what would be considered Green Belt or a strategic gap by another name. Locality (2021) adds that the above would be a misuse of the local green space designation, whilst Open Space Society (2022) advise that green areas should be fairly self-contained and have clearly defined edges.



Figure 1: Edinburgh Road Local Green Space, demonstrating a clearly defined edge (Google Maps, 2026).

- 4.17. In the context of the Borough, which is compact in nature, the best approach would be a proportionate one that compares the size of the green area to the scale of the community it serves and whether cumulatively with other nominated or confirmed sites it would result in an extensive tract of land.

The green area is demonstrably special and holds a particular local significance

- 4.18. The evaluation of whether a nominated green area is demonstrably special to a local community, and holds a particular local significance requires at least one of five sub-criteria of NPPF Paragraph 107a to be met or fulfilled. It should be noted that this paragraph considers these criteria to be sample criteria and therefore there may be opportunity for others to be introduced if the evidence base directs the assessor in this way (e.g., scarcity if it represents the only green space within a community and benefits from no higher designation as set out in 4.10 above).
- 4.19. The green area must be both 'demonstrably special' and 'hold a particular local significance' in this context. Achieving one and not the other would not be sufficient.

4.20. The council will assess this firstly on the basis of any evidence provided by the local community, where this has been submitted, and secondly based on any other public record that can easily be attributed to the site.

4.21. The evaluation further requires at least one of five sub-criteria to be met or fulfilled. These sub-criteria are:

- Beauty;
- Historic significance;
- Recreational value (including as a playing field);
- Tranquillity and/or,
- Richness of its wildlife.

4.22. The evaluation of an area against the five sub-criteria can be challenging given that some are potentially subjective. To ensure consistency and in recognition of updated information and guidance, the prompts and examples below in paragraphs 4.21-4.32 have been used when evaluating the nominated areas against the five sub-criteria.

Beauty

4.23. Beauty is a highly subjective concept, so much so that the NPPF was revised in December 2024 to remove references to the word 'beauty' with the then Deputy Prime Minister stating that the wording was 'too subjective'¹³. The Open Space Society (2022) explain that beauty can relate to the visual attractiveness of a green area and its contribution to landscape character, local identity, sense of place and/or the setting of a nearby settlement.

¹³ [Inside Housing - Comment - Removing 'beauty' from the NPPF shows that we are bringing objectivity back to planning](#)



Figure 2: Unobstructed views over the English Channel from land opposite 60-72 West Hill Road © Google 2024.

4.24. As a guide, assessors may consider the following examples:

- Does the space contribute to the visual attractiveness of the townscape or
- character/setting of the settlement?
- Is the site specifically mentioned in any relevant landscape character assessments as a particular point of interest or does it contain features that are characteristic of the area?
- Does the site contribute to the setting of a historic building/place or other special feature?
- Is the site highlighted in literature or art (e.g. the site is mentioned in a well-known poem or shown in a famous painting)?
- Are there valued views of the site or does it afford particular views?

Historic Significance

4.25. This sub-criterion considers how a green area may hold a particular local significance in relation to the history of a community or area. This may include a role as a location for traditional or cultural events tied to the Hastings cultural calendar, specific communities of interest and identity, or historic buildings, structures or features. This may include their setting- for example, whether it makes a positive contribution to the setting of a conservation area or scheduled monument.

- 4.26. As a guide, assessors may consider the following:
- Are there any historic buildings or heritage assets (including non-designated assets) within the space, or does it contribute directly to the setting of such buildings or assets within close proximity (e.g. listed buildings; scheduled ancient monuments; registered parks and gardens; ancient routeways)?
 - Are there any important historic landscape features in the space (e.g. old hedgerows, historic ponds or historic garden features)?
 - Did the area play an important role in the historic development of the town?
 - Did or do any important historic or cultural events take place on the site (e.g. long-standing local festivals, maypole dancing)?

Recreational Value

- 4.27. This sub-criterion considers how a green area may hold a particular local significance in relation to the opportunities it provides for recreation. This includes both formal (e.g. organised activities) and informal recreation. Consideration should be given to whether the community that the area serves are able to participate in recreational activities safely.
- 4.28. As a guide, assessors may consider the following:
- Are the public able to physically access and spend time in the area without difficulty and safely?
 - Is this access theoretically for all (e.g., the area is not a subscription garden or pay-to-access space)?
 - Is there evidence that the space is used formally or informally for recreation?
 - Is there any prohibition in force against the principle of recreation (e.g., 'no trespassing' notices)?
 - Are there facilities in the area designed to support recreation (e.g. rubbish or dog waste bins, benches, drinking fountains)?

Tranquillity

- 4.29. Tranquillity is the experience of a state of calm and quietude. The CPRE defines tranquillity as "the quality of calm experienced in places with mainly natural features, free from disturbance from manmade ones". The NPPF in paragraph 198b describes tranquil areas as those "which have remained relatively undisturbed by noise". NPPF 2026 adds within policy P3 the clarification that this should be "noise from human sources".
- 4.30. Hastings is an urban Borough with a built-up area that extends in places to the Borough boundary, and many green areas are adjacent to or in close proximity to highways, residences, workplaces, the resort area or infrastructure designed to support their role as a green space such as kiosks or cafes. As such, locations of tranquillity may be rare and are likely to be already protected by higher designations such as Site of Special Scientific Interest (SSSI), Country Park, Special Area of Conservation (SAC) or Local Nature Reserve (LNR).
- 4.31. As a guide, assessors may consider the following:

- Can the area be considered tranquil (e.g., these are no roads or busy areas close by)?
- Is the site within a recognised tranquil area (e.g. within the Campaign to Protect Rural England's tranquillity maps, or a sensory quiet space?)

Richness of its Wildlife

- 4.32. This sub-criterion considers how a green area may hold a particular local significance in relation to its management or role for local wildlife and habitats. In practice, this sub-criterion has been observed through officer site visits, further desktop reviews (including existing ecological and wildlife designations), and the evidence and information submitted with the nominations (including surveys). The meaning of wildlife in the Cambridge English (UK) dictionary is “animals and plants that grow independently of people, usually in natural conditions”, and therefore it is reasonable to consider both animal and plant life as ‘wildlife’ for the purpose of this assessment.



Figure 3: Knotweed clearance by the Ore Community Land Trust within the Ore Stream and Wet Woodland area, an example of land management designed to enhance the natural conditions while providing recreational value © Ore Community Land Trust, 2021.

- 4.33. As a guide, assessors may consider the following:
- Does the area contain notable biodiversity interest or value and in particular are there notable species or habitats present (e.g. does the site contain priority habitat, Protected Trees, or provide a buffer to other high-value areas?)
 - Is the area part of a formal and clearly recorded long-term study of wildlife or land management designed to enhance the natural conditions of the area by members of the local community?
 - Is the land free of cultivation or agriculture?

- 4.34. Following the assessment, landowners of any sites proposed to be carried forward as Local Green Spaces will be contacted to advise of the council's intention to take them forward as designated Local Green Spaces as part of the Pre-Submission Local Plan (Regulation 19).

5. Stage 1: Initial Desktop Assessment and Sift

5.1. The initial desktop assessment was performed on all submitted areas. Where the overlap of an area with a Stage 1 exclusion criteria was limited in such a way that a minor amendment to the boundary could be made to exclude these areas, they were progressed to Stage 2 Assessment with a boundary amendment warning in place.

5.2. Six areas were excluded at Stage 1.

Table 1: Stage 1 review

Reference	Name	Reason for Stage 1 Exclusion
WSL/LGS/17	South Saxons Wetlands	Initial Criterion 4: Allocated site for 60 dwellings in the DMP (2015) FB2
WSL/LGS/02	Old Bathing Pool Site with Car Park	Initial Criterion 4: Allocated site for 120 dwellings in the DMP (2015) FB3
WSL/LGS/15	Brick Boat Island, Bexhill Road	Initial Criterion 3: The area forms part of the Highway or its mitigation land as defined in the Highways Act 1980.
WSL/LGS/09	West Marina Cliff and Railways Siding	Initial Criterion 5: The majority of the area has an active transport use as a railway siding/ easement/ mitigation.
WSL/LGS/18	Hollington Stream and Schools Wood	Initial Criterion 5: A significant portion of the area has an active educational use as school buildings or playing fields. Designation could also have a detrimental impact on local education provision if it were to prevent or delay the construction of new school buildings.
WSL/LGS/08	Coastal Strip with Little Galley Hill	Initial Criterion 5: A significant portion of the area provides easement for existing sea defences, or is identified in the Shoreline Management Plan (SMP) as a location in which sea defences may need to be enhanced or added to over

Reference	Name	Reason for Stage 1 Exclusion
		time in order to maintain a policy of 'hold the line'. Designation could also have a detrimental impact the ability to defend homes, and key transport corridors if it were to prevent or delay the construction of new sea defences.

5.3. Four areas were progressed to Stage 2 with Stage 1 Warnings.

Table 2: Stage 1 Assessment with Warnings

Reference	Name	Reason for Stage 1 Warning
WSL/LGS/27	Combe Valley Countryside Park (within Neighbourhood Area)	Partial Failure Initial Criterion 3: The area forms part of the Highway or its mitigation land as defined in the Highways Act 1980 and Partial Failure Initial Criterion 5: Part of the area has an active transport use as a railway siding/ easement/ mitigation and sea defences easement and maintenance.
WSL/LGS/24	Marsh Wood	Partial Failure Initial Criterion 5: Part of the area has an active transport use as a railway siding/ easement/ mitigation.
WSL/LGS/22	Newts Way Playground	Partial Failure Initial Criterion 5: Part of the area has an active transport use as a railway siding/ easement/ mitigation.
WSL/LGS/25	Dogkennel Wood	Partial Failure Initial Criterion 3: The area forms part of the Highway or its mitigation land as defined in the Highways Act 1980 and Initial Criterion 4: Allocated site for 2 traveller

Reference	Name	Reason for Stage 1 Warning
		pitches in the DMP (2015) FB10. Partial Failure Initial Criterion 5: Part of the area has an active transport use as a railway siding/ easement/ mitigation.
WSL/LGS/14	Glyne Gap Reed Beds	Partial Failure Initial Criterion 5: Part of the area has an active infrastructure use requiring easement and reinforcement (High Pressure Gas Main).

6. Stage 2: Presence of existing protective designations

- 6.1. The presence of existing protective designations creates a presumption that additional LGS designation is unlikely to be necessary unless evidence demonstrates a separate and distinct local community significance. It would also be material to consider whether the addition of a LGS designation may inhibit or otherwise restrict the protected area from being able to carry out its primary function as intended.
- 6.2. Consideration will need to be given to whether applying an additional LGS designation will offer any additional benefit over and above that already in place, and whether unintended negative impacts may arise from this additionality that may prevent or delay activity taking place in support of these existing designations.
- 6.3. Such designations include: Special Areas of Conservation (SAC), National Landscape (NL), Sites of Special Scientific Interest (SSSI), County Park (CP), Countryside Park (CSP), Local Nature Reserve (LNR), Local Wildlife Sites (LWS), Registered Historic Parks and Gardens (HPG), Scheduled Monuments (SM) or through local or national policy protections that apply to open space, sports or leisure facilities and playing pitches such as those conveyed by Paragraph 104 of the NPPF (2024).
- 6.4. Areas where no additional benefit would be provided through a LGS designation will not be progressed to Stage 3.

Table 3: Stage 2 Assessments

Reference	Name	Nature of Existing Protection
WSL/LGS/27	Combe Valley Countryside Park (within Neighbourhood Area)	Designated as Countryside Park. Part designated as Combe Haven SSSI. Part designated as Local Nature Reserve (Filsham Reedbeds). Summary: The size of the parcel and cross-boundary recreational use also prevents it from being considered 'local in character'. It will not progress to detailed assessment.
WSL/LGS/07	West Marina Gardens	Locally designated as Historic Park or Garden. Summary: Due to their character, Historic Parks and Gardens including at West Marina, may be considered destinations in their own right that draw visitors from a wide area and therefore the existing designation is at odds with the site being considered 'local in character'. It will not progress to detailed assessment.
WSL/LGS/24	Marsh Wood	Designated as Countryside Park. Part designated as Combe Haven SSSI. Part designated as Local Nature Reserve (Filsham Reedbeds). Part designated as Old Filsham Golf Course Local Wildlife Site.

Reference	Name	Nature of Existing Protection
		Summary: The entirety of the area has one or more existing protective designation and limited additional benefit would be gained from an additional LGS designation. It will not progress to detailed assessment.
WSL/LGS/25	Dogkennel Wood	A significant portion of the area is within Wishing Tree Local Wildlife Site. Part designated as Ancient Woodland and its buffer. All other land is covered by Partial Failures of sifting criteria as set out at Stage 1. Summary: The entirety of the area has one or more existing protective designation and limited additional benefit would be gained from an additional LGS designation and has a partial failure against Stage 1 criteria and will not progress to detailed assessment.
WSL/LGS/14	Glyne Gap Reed Beds	Designated as Countryside Park. Part designated as Glyne Gap Local Wildlife Site. Summary: The entirety of the area has one or more existing protective designation and limited additional benefit would be gained from an additional LGS designation. It will not progress to detailed assessment.
WSL/LGS/01	Bulverhythe Lower Tier Recreation Ground	Designated as Countryside Park.

Reference	Name	Nature of Existing Protection
		Designated as a playing field. Summary: The entirety of the area has one or more existing protective designation and limited additional benefit would be gained from an additional LGS designation due to the lack of an additional practical planning value. It may also restrict the development of new or upgraded sports facilities, such as pavilions, within this area designed to support its primary purpose as a playing field. It will not progress to detailed assessment.
WSL/LGS/16	St Marys Church (Chapel) Bulverhythe	Designated as a Scheduled Monument Summary: The entirety of the area is designated as a SM. While there is precedent for areas around SM being designated as LGS to preserve their setting, the additional designation of an area that is wholly within the SM designation would not be considered to offer additional benefits. It and will not progress to detailed assessment.
WSL/LGS/10	Marina allotments	Designated as an allotment. Summary: Allotments are subject to more stringent protections than LGS, and the disposal of an allotment site in Local Authority ownership would require consent from the Secretary of State who must be satisfied that the loss is

Reference	Name	Nature of Existing Protection
		acceptable. Additional designation as an LGS is unlikely to offer additional benefit. It and will not progress to detailed assessment.
WSL/LGS/03	West Hill Road Cliffs	Designated as Caves Road Cliffs Local Wildlife Site. Summary: In addition to the LWS designation, the majority of the area is within a LARA (Landslide Activity Risk Area), a local designation that serves acknowledge the need for ongoing cliff management including through engineered solutions. The additional designation of the area as a LGS may restrict or inhibit the development of necessary land stability mitigation measures designed to prevent risk to life, habitat and property. It will not progress to detailed assessment.
WSL/LGS/20	Harley Shute Allotments	Designated as an allotment. Summary: Allotments are subject to more stringent protections than LGS, and the disposal of an allotment site in Local Authority ownership would require consent from the Secretary of State who must be satisfied that the loss is acceptable. Additional designation as an LGS is unlikely to offer additional benefit. It and will not progress to detailed assessment.
WSL/LGS/26	Heron Close	Part designated as Filsham Reedbed LWS. Part designated Play Area.

Reference	Name	Nature of Existing Protection
		Summary: An additional LGS designation at this location may result in conflict with National Planning Policy, including the flexibility offered by Paragraph 104 to relocate play spaces, or enhance them through built development including toilet blocks, expansion of equipped area, cafes and kiosks. It and will not progress to detailed assessment.
WSL/LGS/22	Newts Way Playground	Part designated Play Area. All other land is covered by Partial Failures of sifting criteria as set out at Stage 1. Summary: An additional LGS designation at this location may result in conflict with National Planning Policy, including the flexibility offered by Paragraph 104 to relocate play spaces, or enhance them through built development including toilet blocks, expansion of equipped area, cafes and kiosks. This area also has a partial failure against Stage 1 criteria It and will not progress to detailed assessment.

6.5. 18 areas have protective designations in place, and the presence of an additional designation will not deliver additional benefits. These areas have not been taken forward for detailed assessment.

6.6. The remaining 14 areas were considered free of protective designations and have been progressed to Stage 3: Detailed Assessment.

7. Stage 3: Detailed Assessment

- 7.1. The detailed assessment considers both whether the area is 'demonstrably special' and 'holds a particular local significance' when set against the criteria. An area must be both of these things to be designated as a Local Green Space through the Hastings Local Plan.
- 7.2. Evidence used to perform the detailed assessment included matters of public record, desk-based reviews, information submitted in support of nominations and, where appropriate, site visits.
- 7.3. Six areas were considered suitable for designation. The owners of these areas will be contacted to advise of the council's intention to designate land in their ownership.
- 7.4. A map of all areas assessed (Appendix B) can be accessed at [Local Green Space Assessment 2026](#)¹⁴.

¹⁴

<https://hastingsbc.maps.arcgis.com/apps/instant/sidebar/index.html?appid=78e3af6bb4504714add307dc0aba6d53>

Table 4: Assessment against core criteria

Reference	Area	Year of evaluation	Close proximity to community	Publicly accessible	Beauty	History	Recreation	Tranquillity	Wildlife	Other 'demonstrably special' characteristic	Extensive tract of land?	Designate?	Comments
WSL/LGS/11	St Leonards Court, West Hill Road	2026	Yes	Yes	No	No	No	No	No	No	No	No	Amenity green space providing a 'gap' between St Leonards Court and West Hill Road. It is not demonstrably special with regard to the NPPF tests.
WSL/LGS/12	St Leonards Court path West Hill Road to Essenden Road	2026	Yes	Yes	No	No	No	No	No	No	No	No	Area is principally amenity green space alongside a PROW. It is not demonstrably special with regard to the NPPF tests.
WSL/LGS/13	land opposite 60-72 West Hill Road	2026	Yes	Yes	Yes	Yes	Yes	No	No	Viewpoint, with long-range views over the English Chanel.	No	Yes	Privately owned land, which is publicly accessible and unpartitioned, within the Grosvenor Gardens conservation area. Evidence of frequent recreational use including, informal play and as a relaxation space. This weighs in favour of designation.

Reference	Area	Year of evaluation	Close proximity to community	Publicly accessible	Beauty	History	Recreation	Tranquillity	Wildlife	Other 'demonstrably special' characteristic	Extensive tract of land?	Designate?	Comments
WSL/LGS/21	Bunting Close Fieldway	2026	Yes	No	No	No	No	No	No		No	No	This area provides a 'green gap' between the rear gardens of Bunting Close, Moorhen Close, Reedswood Road and Field Way. The nomination is on the basis of the potential the area may have in the future, but does not at this time identify reasons that this parcel should be considered 'demonstrably special' to the local community with regard to the NPPF tests.
WSL/LGS/23	Porters Grove Wood	2026	Yes	Yes	No	No	Yes	No	No	No	No	No	The area is a woodland in an area of the Borough with access to numerous woodland locations including Marsh Wood, Dog Kennel Wood, Regeland Wood and Ponds Wood. From the information provided it is unclear in what respect this woodland should be considered 'demonstrably special' to the local

Reference	Area	Year of evaluation	Close proximity to community	Publicly accessible	Beauty	History	Recreation	Tranquillity	Wildlife	Other 'demonstrably special' characteristic	Extensive tract of land?	Designate?	Comments
													community to as the area is already well served by access to existing identified wooded areas that serve the same community catchment. It is not demonstrably special with regard to the NPPF tests.
HS/LGS/01	Land at the Corner of Harley Shute Road and Edinburgh Road	2026	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Yes	The area is visually prominent, and contributes positively to the setting of the Grade II listed Filsham Farmhouse. There is a clear boundary, and the site provides facilities for recreational users, including dog waste bins, a footpath and benches. The space is close to nearby schools and residences. This weighs in favour of designation.
WSL/LGS/19	Edinburgh Road verges	2026	Yes	Yes	No	No	No	No	No	No	No	No	Amenity green space, incorporating verges, green gaps and the pavement between

Reference	Area	Year of evaluation	Close proximity to community	Publicly accessible	Beauty	History	Recreation	Tranquillity	Wildlife	Other 'demonstrably special' characteristic	Extensive tract of land?	Designate?	Comments
	and green spaces												homes. The boundary lack the distinctiveness necessary for an area to be considered a local green space and portions of the area are entirely separated by highway. No part of the area represents a form of accessible green or open space that is otherwise lacking in the immediate locality. It is not demonstrably special with regard to the NPPF tests.
SW/LGS/01	Land at Victoria Avenue	2026	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	See detailed site assessment below, which takes into account representations received at Regulation 18 (2026) and the results of updated physical survey work.
SW/LGS/02	Ore Stream Valley and Wet Woodland	2026	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	See detailed site assessment below, which takes into account representations received at Regulation 18 (2026)

Reference	Area	Year of evaluation	Close proximity to community	Publicly accessible	Beauty	History	Recreation	Tranquillity	Wildlife	Other 'demonstrably special' characteristic	Extensive tract of land?	Designate?	Comments
													and the results of updated physical survey work.
SW/LGS/03	Southern Valley	2026	Yes	Yes	Partial	No	Yes	No	Yes	No	No	Yes	See detailed site assessment below, which takes into account representations received at Regulation 18 (2026) and the results of updated physical survey work.
SW/LGS/04	Land at Graystone Lane	2026	Yes	No	No	No	No	No	Yes	No	No	No	See detailed site assessment below, which takes into account representations received at Regulation 18 (2026) and the results of updated physical survey work.
SW/LGS/05	Land adjoining 9 Victoria Avenue	2026	Yes	No	No	No	No	No	No	No	No	No	See detailed site assessment below, which takes into account representations received at Regulation 18 (2026) and the results of updated physical survey work.
SW/LGS/06	Land adjacent	2026	Yes	No	No	No	No	No	No	No	No	No	See detailed site assessment below, which

Reference	Area	Year of evaluation	Close proximity to community	Publicly accessible	Beauty	History	Recreation	Tranquillity	Wildlife	Other 'demonstrably special' characteristic	Extensive tract of land?	Designate?	Comments
	Arlington Cottages,												takes into account representations received at Regulation 18 (2026) and the results of updated physical survey work.
OV/LGS/01	Red Lake Recreation Ground	2026	Yes	Yes	No	No	Yes	No	No	Within an area of deficiency of access to multiple tiers of the open space hierarchy.	No	Yes	The area provides a well-used multi-functional open space in an area where access to such spaces is limited. The value of the area is principally for recreation and weight should be given to safeguarding the continuation of this use.

A number of areas attracted representations either as part of the Preferred Options Regulation 18 (2026) consultation, or through updates to the Strategic Housing and Employment Land Availability assessment (SHELAA). These representations have informed the assessment of these sites, as set out below:

Table 5: Detailed Assessment 1

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Close proximity to community	- In close proximity to Ore Village Local Centre - In close proximity to local schools and early years provision - Within a residential area.	-	Yes. The area is within close proximity to the community it serves.
Publicly Accessible: Public accessibility is not a requirement for designation, but may contribute to assessment of recreational value or community significance.	- Partially. An informal footpath allows access to the north of the Ore Stream within this parcel from Church Street. - The majority of the area benefits from public access.	Some areas inaccessible.	Partial. The accessible portion of the site is well-used informal recreation; however, not all of the area is accessible
Extensive Tract of Land	Small parcel within a single community unit.	-	No. The site is not considered to be an extensive tract of land.
Beauty	TPO no.206 Made on the basis that 'The trees break up the urban appearance of this section of the Ore Valley and have significant value to the occupiers of neighbouring residential properties and users of adjacent public highways'.	-	Yes. The wording of the TPO indicates the area has visual amenity value above and beyond other areas in the locality.
Historic Significance	-	- No listed buildings or structures - No overriding historic significance - Not within a conservation area.	No. The site has limited historical significance as defined.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Recreational Value	- Part accessible to the public - Evidence of frequent walking and dog walking within the area.		Partial. The accessible portion of the site is well-used informal recreation; however, not all of the area is accessible
Tranquillity	Tranquillity in contrast to Ore Village Primary shopping frontage/ A259.	- In close proximity to Ore Village Local Centre. - In close proximity to residential streets and premises. - Close to the A259 trunk road.	No. The site is in close proximity to residences, residential gardens, commercial premises and the A259.
Richness of Wildlife	The site comprises established priority deciduous woodland which, subject to ongoing management, is expected to remain present beyond the plan period.	- Disturbance of habitat by invasive species - Clearance of trees unprotected by TPO. - The area is not identified as an Area of Particular Importance for Biodiversity (APIB)	Yes. On balance the area continues to have inherent ecological value despite the presence of invasive species and clearance of unprotected trees, the presence of priority habitat weighs towards a favourable position.
Other 'demonstrably special' characteristic	-	-	-
Capable of enduring	The woodland habitat has existed continuously for several decades, forms part of an established river valley landscape, and benefits from a TPO. There is no substantive evidence that the characteristics which make the area demonstrably special are likely to be lost during the plan period.	-	Yes. There is no evidence to suggest the area will not continue to provide the benefits set out above beyond 2041.

Conclusion: The area has experienced limited change since the 2015 assessment, and the TPO remains in force.

The site continues to meet the criteria as set out in NPPF Paragraphs 106-107 in full and it is justified that it is designated within the Draft Local Plan 2023-2041.

Clarification: For the avoidance of doubt, the council will refer to designated Local Green Space parcels by their parcel name within the written statement, as opposed to the composite name 'Speckled Wood Local Green Space'.

Table 6: Detailed Assessment 2

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Close proximity to community	- In close proximity to Ore Village Local Centre - In close proximity to local schools and early years provision - Within a residential area.	-	Yes. The area is within close proximity to the community it serves.
Publicly Accessible: Public accessibility is not a requirement for designation, but may contribute to assessment of recreational value or community significance.	- A network of informal footpaths connects Frederick Road, Speckled Wood (Street) and School Road to Church Street/ Victoria Avenue junction. - Community land management and organised recreational activities take place in a parcel of land to the east of the area under management by a Community Land Trust.	Some areas inaccessible, but these are limited compared to the overall scale.	Yes. The area benefits from good public access.
Extensive Tract of Land	Small parcel within a single community unit.	-	No. The site is not considered to be an extensive tract of land.
Beauty	TPO no.206 that covers a small part of the eastern portion of the area Made on the basis that 'The trees break up the urban appearance of this section of the Ore Valley and have significant value to the occupiers of neighbouring residential	-	Yes. The wording of the TPO indicates the area has visual amenity value above and beyond other areas in the locality, including other parts of the woodland river valley that do not benefit from this designation.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
	properties and users of adjacent public highways’. TPO no. 157 that covers a significant portion of the area Made partially on the basis that ‘The trees are of substantial value to the visual amenity of the area and will contribute greatly to the amenity of the residential occupiers of properties when the land is developed’.		
Historic Significance	-	- No listed buildings or structures - No overriding historic significance - Not within a conservation area.	No. The site has limited historical significance as defined.
Recreational Value	- Partially accessible to the public - Evidence of frequent walking and dog walking within the area. - Community Land Management activities take place within this parcel.	-	Yes. While there are some inaccessible areas, the parcel overall has clear evidence of both formal and informal recreation.
Tranquillity	Tranquillity in contrast to Ore Village Primary shopping frontage/ A259.	- In close proximity to Ore Village Local Centre. - In close proximity to residential streets and premises. - Within 100m of the A259 trunk road.	No. The site is in close proximity to residences, residential gardens, commercial premises and the A259.
Richness of Wildlife	The site comprises established priority deciduous woodland which, subject to ongoing management, is expected to	Disturbance of habitat by invasive species	Yes. On balance the area continues to have inherent ecological value despite the presence of invasive species, the presence of priority

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
	remain present beyond the plan period. - TPO no. 157 that covers a significant portion of the area Made partially on the basis that '... the trees make a valuable contribution to the ecological aspect of the valley which is an important wildlife corridor for the area'. - Contains an area of land to the west that is actively managed by a Community Land Trust to enhance the natural condition of the area, including the recent installation of a wildlife pond. - Work to manage invasive species within the CLT managed land has been ongoing for a period of years.	The area is not identified as an Area of Particular Importance for Biodiversity (APIB)	habitat and active land management with a view to enhancing the natural processes and habitat and the justification for TPO no.157 weighs towards a favourable position.
Other 'demonstrably special' characteristic	-	-	-
Capable of enduring	The woodland habitat has existed continuously for several decades, forms part of an established river valley landscape, benefits from active community management and contains priority habitat. There is no substantive evidence that the characteristics which make the area demonstrably special are likely to be lost during the plan period.	-	Yes. There is no evidence to suggest the area will not continue to provide the benefits set out above beyond 2041.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation

Conclusion: The area has experienced some improvement since the 2015 assessment, most notably the land management by the Community Land Trust including the construction and maintenance of new assets to support recreation and habitat improvement.

The site continues to meet the criteria as set out in NPPF Paragraphs 106-107 in full and it is justified that it is designated within the Draft Local Plan 2023-2041.

Clarification: For the avoidance of doubt, the council will refer to designated Local Green Space parcels by their parcel name within the written statement, as opposed to the composite name 'Speckled Wood Local Green Space'.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Clearly defined boundary	The boundary is clearly defined by the centre of the Ore Stream to the north, the boundary fence of no. 6 Greystone Lane to the east, the rear fences of school road gardens to the north west, the rear of a row of structures to the south west, banks with sharp changes in levels, private land and the highway to the south.	The area is in multiple ownerships/ separate ownerships.	Yes. The boundary is clearly defined by physical characteristics.
Close proximity to community	- In close proximity to Ore Village Local Centre - In close proximity to local schools and early years provision - Within a residential area.	-	Yes. The area is within close proximity to the community it serves.
Publicly Accessible: Public accessibility is not a requirement for designation, but may contribute to assessment of recreational value or community significance.	- A network of informal footpaths connects the adjacent Northern area (Ore Stream and Wet Woodland) to the edge of Ore Village Local Centre. - Community land management and organised recreational activities take place in a parcel of land to the south of the area under management by a Community Land Trust.	- Some areas inaccessible, but these are limited compared to the overall scale. - A part of the site is in private ownership. The landowner has indicated that they do not support continued community use, siting formal registration under the Public Rights of Way Act 1990 Section 31(6) and Commons Act 2006 Section 15A (1) deposits, protecting it for 20 years against competing claims for public use. The deposit is registered with East Sussex County Council.	Yes. The area benefits from good public access, which is in practice unrestricted by any physical (e.g., fencing), written (e.g. signage) or other method across the portion of the land in private ownership. While the registration and deposits made by the landowner do prevent access 'by right' in the context of preventing the land being registered under the Common Act as a Village Green and/ or the designation of Rights of Way (ROW) neither registration nor deposit serve to 'close' the land to public access, nor prevent the actual

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
			use of the informal footpaths and woodland. There is no recent evidence of action to prevent the use of privately owned area, for example in the form of injunction or the erecting of barriers or signage.
Extensive Tract of Land	Small parcel within a single community unit.	-	No. The site is not considered to be an extensive tract of land.
Beauty	TPO no. 157 that covers a limited portion of the area was Made partially on the basis that 'The trees are of substantial value to the visual amenity of the area and will contribute greatly to the amenity of the residential occupiers of properties when the land is developed'.	There is no landscape assessment available relevant to this area.	Partially. The wording of the TPO indicates the area has visual amenity value above and beyond other areas in the locality, including other parts of the woodland river valley that do not benefit from this designation. However, this TPO designation covers >50% of the total area.
Historic Significance	-	- No listed buildings or structures - No overriding historic significance - Not within a conservation area.	No. The site has limited historical significance as defined.
Recreational Value	- Majority accessible to the public - Evidence of frequent walking and dog walking within the area. - Includes a cabin and surrounding area used to deliver forest school provision. - Evidence of land management, both formal and informal.	-	Yes. The site is clearly well-used for recreational purposes for both formal and informal recreation.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Tranquillity	Tranquillity in contrast to Ore Village Primary shopping frontage/ A259.	- In close proximity to Ore Village Local Centre. - In close proximity to residential streets and premises. - Within 100m of the A259 trunk road.	No. The site is in close proximity to residences, residential gardens, commercial premises and the A259.
Richness of Wildlife	- The site comprises established priority deciduous woodland which, subject to ongoing management, is expected to remain present beyond the plan period. - TPO no. 157 that covers a significant portion of the area Made partially on the basis that '... the trees make a valuable contribution to the ecological aspect of the valley which is an important wildlife corridor for the area'. - Evidence of structures inhabited by protected wildlife observed during officer visits. - Contains an area of land to the east that is actively managed by a Community Land Trust to enhance the natural condition of the area. - Work to manage invasive species within the CLT managed land has been ongoing for a period of years.	- Disturbance of habitat by invasive species - Clearance of trees unprotected by TPO. - The area is not identified as an Area of Particular Importance for Biodiversity (APIB) - Representations were made by the community seeking a designation of a portion of the area to the south as allotment land, which would necessitate significant tree, ground habitat and hedgerow removal.	Yes. On balance the area continues to have inherent ecological value despite the presence of invasive species and clearance of unprotected trees, the presence of priority habitat and active land management with a view to enhancing the natural processes and habitat and the justification for TPO no.157 weighs towards a favourable position. There is no current allotment use of the portion of the area identified, and the landowner has not indicated that they are supportive of such a use. This assessment has therefore been made on the basis of the current condition of the area.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Other 'demonstrably special' characteristic	-		-
Capable of enduring	- The woodland habitat has existed continuously for several decades, forms part of an established river valley landscape, benefits from active community management and contains priority habitat. There is no substantive evidence that the characteristics which make the area demonstrably special are likely to be lost during the plan period. - Much of the parcel is subject to active management by a Community Land Trust, including clearance of waste and fly tipping.	- Some Regulation 18 submissions indicated the potential for instability and land loss as a result of the erosion of the Ore Stream. - One landowner has an interest in developing parts of this parcel for residential uses, together with SW/LGS/04.	Yes. The centre of the Ore Stream forms the northern boundary of the area. While further erosion may result in a change to the overall landform over time, it is unlikely to impact the area as a whole to the extent that the benefits provided as outlined above will no longer be evidenced. While some weight should be given to landowner intentions, as with parcel SW/LGS/04, there is no recent planning history nor extant permission. Therefore, minimal weight has been given. The active land management, including species cultivation, established habitat structures, lack of recent planning history or extant permissions and obvious frequent recreational use of the parcel weigh in favour of this criterion being met.

Conclusion: The area has experienced some beneficial changes since the 2015 assessment, most notably the land management by the Community Land Trust and the forest school provision that enhances the recreational value of the parcel. While there is some community stakeholder conflict regarding the future value of part of the site as a woodland, this assessment has been made on the basis of the current condition of the parcel and the capability of this condition to endure beyond the plan period. While stakeholders and officers agree that there is evidence of instability within the parcel, the impacts of any

heave, throw, subsidence, landslide or bank erosion are unlikely to sufficiently alter the land to the extent that the 'demonstrably special' characteristics are unable to endure due to the extent of the area and range of access routes.

The site continues to meet the criteria as set out in NPPF Paragraphs 106-107 in full and it is justified that it is designated within the Draft Local Plan 2023-2041.

Clarification: For the avoidance of doubt, the council will refer to designated Local Green Space parcels by their parcel name within the written statement, as opposed to the composite name 'Speckled Wood Local Green Space'.

Table 7: Detailed Assessment 4

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Clearly defined boundary	The area is bound by a retaining wall to the south, a footpath and green boundary to the east, a steep bank and green boundary to the north and a green boundary to the west.	The area is in separate ownerships.	Yes. The area has a clearly defined boundary.
Close proximity to community	- In close proximity to Ore Village Local Centre - In close proximity to local early years provision. - Within a residential area.	-	Yes. The area is within close proximity to the community.
Publicly Accessible: Public accessibility is not a requirement for designation, but may contribute to assessment of recreational value or community significance.	Limited public access, confined to an informal footpath to the west of the area.	- Remainder of the area is not considered to be able to be accessed 'easily and/ or safely'. - A part of the site is in private ownership. The landowner has indicated that they do not support continued community use, siting formal registration under the Public Rights of Way Act 1990 Section 31(6) and Commons Act 2006 Section 15A (1) deposits, protecting it for 20 years against competing claims for public use. The deposit is registered with East Sussex County Council.	No. In general, public access is poor and/ or unsafe, and potentially dangerous structures and sources of contamination from former uses are present within the area. While the registration and deposits made by the landowner do prevent access 'by right' in the context of preventing the land being registered under the Common Act as a Village Green and/ or the designation of Rights of Way (ROW) neither registration nor deposit serve to 'close' the land to public access, nor prevent the actual use of the informal footpaths and woodland. There is no recent evidence of action to prevent the use of privately owned area, for example

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
			in the form of injunction or the erecting of barriers or signage. However, in practical terms the access remains poor and/ or unsafe.
Extensive Tract of Land	Small parcel within a single community unit.	-	No. The site is not considered to be an extensive tract of land.
Beauty	-	- There is no evidence of particular landscape value. - Presence of uncleared remains of former structures and poor overall condition of the area.	No. Contributions to local views and the green character of the area are largely afforded by the presence of dense foliage along the edges of the area. The condition of the area itself additionally weighs against this criterion.
Historic Significance	-	- No listed buildings or structures - No overriding historic significance - Not within a conservation area.	No. The site has limited historical significance as defined.
Recreational Value	Limited public access, confined to an informal footpath to the west of the area.	Remainder of the area is not considered to be able to be accessed 'easily and/ or safely'.	No. In general, public access is poor and/ or unsafe, and potentially dangerous structures and sources of contamination from former uses are present within the area. Recreational value associated with the majority of this area is therefore greatly limited.
Tranquillity	Tranquillity in contrast to Ore Village Primary shopping frontage/ A259.	- In close proximity to Ore Village Local Centre. - In close proximity to residential streets and premises.	No. The site is in close proximity to residences, residential gardens, commercial premises and the A259.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
		- Structures within the boundary that are in current use. - Within 40m of the A259 trunk road.	
Richness of Wildlife	The site comprises established priority deciduous woodland which, subject to ongoing management, may remain present beyond the plan period.	- Disturbance of habitat by invasive species - The area is not identified as an Area of Particular Importance for Biodiversity (APIB) - There are no TPOs on the site. - Representations were made by the community seeking a designation of a portion of the area to the south as allotment land, which would necessitate significant tree, ground habitat and hedgerow removal.	Yes. On balance the area continues to have inherent ecological value as despite the presence of invasive species, the presence of priority habitat weighs towards a favourable position. There is no current allotment use of the portion of the area identified, and the landowner has not indicated that they are supportive of such a use. This assessment has therefore been made on the basis of the current condition of the area.
Other 'demonstrably special' characteristic	-	-	-
Capable of enduring	-	- The area demonstrates signs of active land instability at the northern boundary. In addition to officer site visits and a review of BGS data, this was identified by a number of Regulation 18 submissions. There is potential for landslide or failure without intervention. - The landowner has an interest in developing this parcel for	No. The landowner has maintained their aspiration to bring this site forward for development in conjunction with SW/LGS/03. While some weight should be given to landowner intentions, as with parcel SW/LGS/03, there is no recent planning history not extant permission, therefore, minimal weight has been given.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
		residential uses, together with SW/LGS/03. There is a lack of ongoing management in the area, and the condition of the site has visibly deteriorated since the initial 2015 designation, in contrast to parcels 01, 02 and 03 all of which have some visible improvement due to active land management programmes.	However, the visible deterioration of the parcel including to its accessibility, public safety and woodland management weigh against this criterion being met.

Conclusion: The area has suffered some degradation since the 2015 assessment, most notably the deterioration of the physical condition of the parcel constraining opportunities to safely and easily access the majority of the area, and the worsening of the stability of the area with areas of landslide and ground movement in particular evidence at the northern boundary. While ground movement in and around the neighbouring parcel in the Southern Valley would have limited impact on the ability of the features that make the site ‘demonstrably special’, continued ground movement is likely to have a greater impact in this location, including the potential loss of trees. However, it should be noted that there are no specialist geotechnical reports available for this area and therefore, minimal weight should be given.

The overall poor and dangerous condition of the parcel and the lack of an agreed land management scheme within this is a more significant factor that weighs against it being considered ‘demonstrably special’ as it has not benefitted from the care, recreational use and management seen at SW/LGS 01, 02 and 03. The site does not continue to meet the criteria as set out in NPPF Paragraphs 106-107 in full and it is not justified that it is designated within the Draft Local Plan 2023-2041.

Clarification: The absence of a designation does not serve to remove the area from the larger physical woodland that composes Speckled Wood. For the avoidance of doubt, the council will refer to designated Local Green Space parcels by their parcel name within the written statement, as opposed to the composite name ‘Speckled Wood Local Green Space’.

Table 8: Detailed Assessment 5

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Close proximity to community	- In close proximity to Ore Village Local Centre - In close proximity to local schools and early years provision - Within a residential area.	-	Yes. The area is within close proximity to the community it serves.
Publicly Accessible: Public accessibility is not a requirement for designation, but may contribute to assessment of recreational value or community significance.	-	No. The site is not publicly accessible.	No. The area is not publicly accessible.
Extensive Tract of Land	Small parcel within a single community unit.	-	No. The site is not considered to be an extensive tract of land.
Beauty	-	- There is no evidence of particular landscape value. - The area is different in character to its surroundings, predominately scrubby grassland in contrast to the adjacent wooded parcel of SW/LGS/01. - The land is currently in use for the storage of a caravan.	No. The character and current use of the area weigh against this criterion.
Historic Significance	-	- No listed buildings or structures - No overriding historic significance - Not within a conservation area.	No. The site has limited historical significance as defined.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Recreational Value	-	The area is inaccessible, with access restricted through the use of fencing.	No. The site does not offer recreational value.
Tranquillity	Tranquillity in contrast to Ore Village Primary shopping frontage/ A259.	- In close proximity to Ore Village Local Centre. - In close proximity to residential streets and premises. - Close to the A259 trunk road.	No. The site is in close proximity to residences, residential gardens, commercial premises and the A259.
Richness of Wildlife	The site is identified as priority deciduous woodland on the Natural England Priority Habitats Inventory.	- The area is not identified as an Area of Particular Importance for Biodiversity (APIB). - The majority of deciduous woodland habitat was cleared from the area between 2024-2025, altering the character of this parcel significantly in contrast to the adjacent parcel at SW/LGS/01.	No. The quality and character of the habitat have altered significantly since the initial 2015 designation.
Other 'demonstrably special' characteristic	-	This area has been nominated more than once by both individuals and community groups as a site suitable for residential development during the Local Plan making process.	No. Lack of community use, community interest in development potential, and the current use of the site for storage weigh against this criterion being met.
Capable of enduring	-	- The conditions that led to the initial designation of the of the site are no longer evident. - The landowner does not intend on implementation a management programme that would support continued	No. Changes to the character of the parcel weigh against this criterion being met.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
		designation, and has sought reassessment of the suitability of this area for designation.	

Conclusion: The area has changed significantly since the 2015 assessment, most notably the change in the overall character of the parcel which is now distinct from the adjacent LGS/SW/01 and does no longer reflects the ‘well wooded’ character as described in the 2015 Inspector’s Report. The 2026 assessment weighs against it being considered ‘demonstrably special’ as it has not benefitted from the care, recreational use and management seen at SW/LGS 01, 02 and 03. The site does not continue to meet the criteria as set out in NPPF Paragraphs 106-107 in full and it is not justified that it is designated within the Draft Local Plan 2023-2041.

Clarification: The absence of a designation does not serve to remove the area from the larger physical woodland that composes Speckled Wood. For the avoidance of doubt, the council will refer to designated Local Green Space parcels by their parcel name within the written statement, as opposed to the composite name ‘Speckled Wood Local Green Space’.

Table 9: Detailed Assessment 6

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Close proximity to community	- In close proximity to Ore Village Local Centre - In close proximity to local schools and early years provision - Within a residential area.	-	Yes. The area is within close proximity to the community it serves.
Publicly Accessible: Public accessibility is not a requirement for designation, but may contribute to assessment of recreational value or community significance.	-	No. The site is not publicly accessible.	No. The area is not publicly accessible.
Extensive Tract of Land	Small parcel within a single community unit.	-	No. The site is not considered to be an extensive tract of land.
Beauty	-	- There is no evidence of particular landscape value. - The area is different in character to its surroundings, predominately scrub and <i>calystegia sepium</i> (bindweed) and nettle.	No. The character of the area weighs against this criterion.
Historic Significance	-	- No listed buildings or structures - No overriding historic significance - Not within a conservation area.	No. The site has limited historical significance as defined.

Criteria	Summary of points weighing towards designation	Summary of point weighing against	Council recommendation
Recreational Value	-	The area is inaccessible, with access restricted through the use of fencing and barriers.	No. The site does not offer recreational value.
Tranquillity	Tranquillity in contrast to Ore Village Primary shopping frontage/ A259.	- In close proximity to Ore Village Local Centre. - In close proximity to residential streets and premises. - Close to the A259 trunk road.	No. The site is in close proximity to residences, residential gardens, commercial premises and the A259.
Richness of Wildlife	-	- The area is not identified as an Area of Particular Importance for Biodiversity (APIB). - The area is not part of an area of priority habitat.	No. The quality and character of the habitat weighs against this criterion.
Other 'demonstrably special' characteristic	-	-	-
Capable of enduring	-	- The conditions that led to the initial designation of the of the site are no longer evident. - The landowner does not intend on implementation a management programme that would support continued designation, and has sought reassessment of the suitability of this area for designation.	No. Changes to the character of the parcel weigh against this criterion being met.

Conclusion: The area has changed significantly since the 2015 assessment, most notably the change in the overall character of the parcel which is now distinct from the adjacent LGS/SW/02 which remains densely wooded in character. The 2026 assessment weighs against it being considered 'demonstrably

special' as it has not benefitted from the care, recreational use and management seen at SW/LGS 01, 02 and 03. The site does not continue to meet the criteria as set out in NPPF Paragraphs 106-107 in full and it is not justified that it is designated within the Draft Local Plan 2023-2041.

Clarification: The absence of a designation does not serve to remove the area from the larger physical woodland that composes Speckled Wood. For the avoidance of doubt, the council will refer to designated Local Green Space parcels by their parcel name within the written statement, as opposed to the composite name 'Speckled Wood Local Green Space'

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8. Conclusion

- 8.1. The purpose of this review has been to test whether existing designated Local Green Spaces remain justified when considering the 'no stone unturned' approach to meeting Local Housing Needs. The review was also used to assess new sites which have been presented to the council as having potential for designation.
- 8.2. The review demonstrates that Local Green Space designation should be applied where all criteria within paragraphs 106 and 107 of the National Planning Policy Framework are satisfied. The assessment has considered whether nominated sites are demonstrably special to their communities, local in character, reasonably proximate to the communities they serve, capable of enduring beyond the plan period and whether designation would be consistent with sustainable development objectives.
- 8.3. Having completed the review, the Council finds that a limited number of sites continue to meet, or are capable of meeting, the tests for designation as Local Green Space. A larger number of nominations have not been recommended for designation due to existing protections, failure to demonstrate particular local significance, operational constraints, allocations for development or failure to satisfy one or more NPPF criteria.
- 8.4. The review therefore concludes that Local Green Space designation should be retained or applied only where clearly justified by evidence.

Appendix A: List of nominated areas

WSL/LGS/17	South Saxons Wetlands
WSL/LGS/02	Old Bathing Pool Site with Car Park
WSL/LGS/15	Brick Boat Island, Bexhill Road
WSL/LGS/09	West Marina Cliff and Railways Siding
WSL/LGS/18	Hollington Stream and Schools Wood
WSL/LGS/08	Coastal Strip with Little Galley Hill
WSL/LGS/27	Combe Valley Countryside Park (within Neighbourhood Area)
WSL/LGS/07	West Marina Gardens
WSL/LGS/24	Marsh Wood
WSL/LGS/25	Dogkennel Wood
WSL/LGS/14	Glyne Gap Reed Beds
WSL/LGS/01	Bulverhythe Lower Tier Recreation Ground
WSL/LGS/16	St Marys Church (Chapel) Bulverhythe
WSL/LGS/10	Marina allotments
WSL/LGS/03	West Hill Road Cliffs
WSL/LGS/20	Harley Shute Allotments
WSL/LGS/26	Heron Close
WSL/LGS/22	Newts Way Playground
WSL/LGS/11	St Leonards Court, West Hill Road
WSL/LGS/12	St Leonards Court path West Hill Road to Essenden Road
WSL/LGS/13	land opposite 60-72 West Hill Road
WSL/LGS/21	Bunting Close Fieldway
WSL/LGS/23	Porters Grove Wood
HS/LGS/01	Land at the Corner of Harley Shute Road and Edinburgh Road
WSL/LGS/19	Edinburgh Road verges and green spaces
SW/LGS/01	Land at Victoria Avenue
SW/LGS/02	Ore Stream Valley and Wet Woodland
SW/LGS/03	Southern Valley
SW/LGS/04	Land at Graystone Lane
SW/LGS/05	Land adjoining 9 Victoria Avenue
SW/LGS/06	Land adjacent Arlington Cottages, Victoria Avenue
OV/LGS/01	Red Lake Recreation Ground