

Comments on Hastings Local Plan, Draft Local Plan Preferred Options (Regulation 18) February 2026

Friends of Hastings Country Park Nature Reserve

1. Introduction

1.1 The primary aim of the Friends of Hastings Country Park Nature Reserve (FHCPNR) is to protect, conserve, promote and enhance the natural environment of Hastings Country Park Nature Reserve (HCPNR) – that is, the landscape, habitats, species and ecology - for its many thousands of visitors, now and in the future. FHCPNR was set up in 2007 and currently has nearly 300 members.

1.2 HCPNR is a unique 345 hectare area comprising a complex of habitats including successional cliff face vegetation, vegetated sea cliffs with maritime heath and acid grassland, inland sandstone outcrops, broadleaved and mixed woodland (including Ancient Woodland in the gills), mixed scrub, neutral grassland, amenity grassland and former farmland that is currently being restored to wood pasture and wildflower meadows under the Defra Countryside Stewardship scheme. It stretches 5 kilometres east from Hastings Old Town to Fairlight Cove, with walks along its dramatic cliff top landscape providing magnificent views over the English Channel.

1.3 The site is significant both nationally and internationally for its biodiversity and geology. Parts of it have long been designated a Site of Special Scientific Interest (Hastings Cliffs to Pett Beach SSSI). More recently parts have been designated as a Special Area of Conservation (Hastings Cliffs SAC) and as a Special Protection Area (part of Dungeness, Romney Marsh and Rye Bay SPA). These designations overlap and are described in Appendix 3 of the Statutory and non-statutory designated sites of the Hastings Borough Green and Blue Infrastructure and Biodiversity Net Gain Strategy.

1.4 Part of what is now HCPNR was declared a Country Park in 1971 in recognition of its importance as a green space at the edge of urban Hastings where residents go to enjoy the outdoors and experience nature. It is criss-crossed with public footpaths, some of which form part of the King Charles III England Coast Path.

1.5 In 2006 the whole site was declared a Local Nature Reserve (LNR) further reinforcing not only the importance of its wildlife, habitats and natural features but also the opportunities it provides for education, recreation and research.

1.6 The whole of HCPNR is located wholly within the High Weald National Landscape (NL) (legally an Area of Outstanding Natural Beauty (AONB)), and is the only part of the NL where the High Weald ridge meets the sea.

1.7 The most westerly part of the site, known as the East Hill, is a Scheduled Ancient Monument (SAM).

1.8 HCPNR is a place that is central to Hastings' identity, the jewel in the crown of its natural open spaces. It is imperative that it is properly safeguarded and protected as the town changes and grows (Introduction paragraph 2.2). FHCPNR is therefore particularly concerned with policies in the draft Local Plan which might affect it.

2. Strategic policies

2.1 Strategic Policy 1 (SP1): Directing Growth – a Spatial Strategy

2.11 We welcome the commitment in the draft Plan's growth strategy to protect designated sites (number 7 page 21):

7. Areas that have been designated for their natural environmental quality, landscape character, sporting, recreation and amenity value will be protected and enhanced.

2.12 As described in section 1, HCPNR is covered by a variety of statutory designations – SAC, SPA, SSSI, NL (AONB), Country Park, LNR and SAM. These designations provide the highest levels of protection in the planning system and impose stringent legal and policy tests that severely restrict development and normally ought to preclude development.

2.13 We acknowledge that there are no proposals in the draft Plan for development within HCPNR (or indeed within any statutorily protected sites in the borough). We also welcome the safeguards detailed in chapter 7 Sustainable Communities which sets out the Council's approach to planning regarding specific issues, and provides detailed guidance for conserving and enhancing landscape, habitats, species and ecosystems.

2.14 However these policies (SC9, SC 10, SC11 and SC 12) do not in themselves provide sufficient assurance that HCPNR will be fully protected in the future, while growth policy SP1 number 7 above is too vague to ensure that these protective designations will definitely be respected.

2.15 The Strategic Housing and Employment Land Availability Assessment (SHELAA) explains how sites for development and housing have been selected. It rejects development on some types of statutorily protected sites; those that are located wholly on land designated Ancient Woodland, SSSI, SAM and SAC will not be taken forward (paragraph 4.19).

2.16 The National Planning Policy Framework (December 2024) rules out development on designated sites in all but exceptional circumstances. It states that great weight should be given to conserving National Landscapes, and that major developments should be refused except in demonstrably exceptional circumstances (paragraphs 189, 190). In respect of SSSIs, SPAs, SACs and irreplaceable habitats such as Ancient Woodland, developments that would result in their loss or deterioration should also be refused (paragraphs 193, 194; SPAs and SACs are known as habitats sites, see NPPF page 78). The draft National Planning Policy Framework (December 2025) further clarifies that only exceptional circumstances justify development of protected landscapes (N4 page 91) and that areas of particular importance for biodiversity should not normally be approved for development (N6 page 92); it specifically includes LNRs in this category (paragraph 1c).

2.17 As legally required, the draft Plan has been subject to a sustainability appraisal (Hastings Draft Local Plan Interim Sustainability Appraisal February 2026) The Sustainability Appraisal/ Sustainable Environmental Assessment (SA/SEA) determined that it would not be reasonable to remove green space protections from sites in order to enable development for housing and employment (SHELAA paragraphs 4.60 and 4.61).

2.18 Paragraphs 2.15, 2.16 and 2.17 show how unambiguous protection from development for HCPNR can be ensured over the lifetime of the Plan, by amending policy SP1 number 7 to clarify what is meant by designation and what is meant by protected.

2.18 Proposed amendment to policy SP1 number 7 (changes in **bold**):

7. Areas that have **statutory** designations for their natural environmental quality, landscape character, sporting, recreation and amenity value will be protected and enhanced. **Applications for developments on such areas will be rejected unless it can be clearly demonstrated that all statutory protections are met and green space protections will not be removed in order to facilitate development.**

2.2 Strategic Policy 6 (SP6): Renewable and Low Carbon Technologies

2.21 Climate change is one of the main drivers of biodiversity loss (State of Nature 2023, State of Nature Partnership, page 27, available from <https://stateofnature.org.uk/>) so FHCPNR supports policies to meet the challenge of climate change (SP5) and to meet local energy requirements using renewable and low carbon technologies (SP6).

2.22 However, while we welcome Council support for proposals that will deliver cleaner energy solutions (paragraph 4.84), we are concerned that there are no explicit restrictions on where such solutions can be located. We believe that it is not enough that such proposals will be considered alongside any harmful impacts on the natural or built environment (paragraph 4.84). Rather, land designated for its biodiversity and landscape (as specified in section 2.1, and including Local Nature Reserves) should be specifically excluded within policy SP6.

2.23 Therefore paragraph 4.84 should be amended as follows (amendment in **bold**):

The council is supportive of proposals that will deliver cleaner energy solutions at any scale, **provided such proposals avoid harm to designated land (such as Hastings Country Park Nature Reserve), are subject to assessment of any harmful impacts on the natural or built environment, and only supported where any impacts are fully mitigated.**

2.24 To be consistent, policy SP6 number 2 (page 46) should also be amended (amendment in **bold**):

The council will:

2. Support proposals for decentralised energy generation and distribution and community led initiatives **that are located outside designated land**, subject to minimising environmental impacts.

2.3 Strategic Policy 8 (SP8): Protecting and Enhancing the Natural Environment

2.31 We support this policy which acknowledges the richness of Hastings' natural environment and demonstrates the commitment of the Council to improve Hastings' natural environment, and especially to reverse declines in biodiversity.

2.32 Paragraph 4.96 lists some of Hastings' wildlife sites. However the text could be misleading because it does not distinguish between statutory and non-statutory designations. Unfortunately Local Wildlife Sites are non statutory, although they are a material consideration when it comes to development. The list is also incomplete. The Green and Blue Infrastructure and Biodiversity Net Gain Strategy paragraphs 4.13 and 4.14 provide a full count of the number of each type of designated site.

For clarity we suggest this paragraph is amended to list all designated sites within the Borough, to distinguish between statutory and non-statutory, and to note that any designated sites is a material consideration when it comes to planning applications.

2.33 We are particularly pleased that the Council acknowledges that the Local Nature Recovery Strategy (LNRS) should play a role in decision making. This is relevant to HCPNR because the draft LNRS recognises it as an Area of Particular Importance for Biodiversity (APIB), and adjacent to much of HCPNR's land boundary are Areas that Could become of Importance for Biodiversity (ACIB) (East Sussex and Brighton and Hove Local Nature Recovery Strategy Part 2 draft, maps page 155 and 160, access via <https://yourvoice.westsussex.gov.uk/lnrs-east>). ACIB areas are those where habitats can be enhanced or created to produce more joined-up and resilient ecological network of habitats between and around APIBs. Policy HS18 proposes development on part of Tilekiln Fields, an ACIB that is adjacent to HCPNR.

2.34 This approach to nature restoration will be crucial to the achievement of the aims of policy SP8. Proposals that align with the objectives of the LNRS should thus be supported, but the corollary is that proposals that might impact on the potential of an ACIB should be considered in the context of wider nature restoration.

2.35 Thus SP8 g should be amended as follows (amendment in **bold**):

g Supporting proposals that align with the objectives of the Local Nature Recovery Strategy or its successor **and assessing all development proposals in the context of their wider nature restoration potential.**

3 Sustainable communities (SC)

3.1 This section of the Plan sets out the council's planning approach on a range of issues. Particularly relevant to HCPNR is the approach and detailed guidance regarding conserving and enhancing landscapes, habitats, biodiversity, and the town's blue-green infrastructure (SC9, SC10, SC11 and SC 12). Overall we welcome these policies but we do have some specific concerns.

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

3.11 As paragraph 7.220 describes, the whole of HCPNR falls within the High Weald National Landscape (NL). However it is important to note that most of HCPNR is also surrounded by the High Weald NL, so development on land close to HCPNR could have an impact on the site, especially major developments (as defined in the NPPF December 2024).

3.12 We welcome the approach taken in policy SC9. It is particularly important that it is recognised that major developments should not take place in the NL except in exceptional circumstances (paragraph 7.221). However the NPPF (December 2004), as well as giving great weight conserving and enhancing landscape and scenic beauty in National Landscapes (paragraph 189), also requires that permission for major developments be refused unless the circumstances are exceptional and it is explicitly demonstrated that the major development is in the public interest. Furthermore, an assessment should be made of whether the development could be sited elsewhere, or the need for it met in some other way (paragraph 190). (Major developments are defined as in the NPPF as proposals where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more (housing), although in practice (Glossary page 75).

3.13 The detailed guidance provided on page 304 of the Plan needs to incorporate both of these requirements, as follows:

5. Proposals for major development within the NL must be accompanied by an explanation detailing why the development is in the public interest, and why it cannot take place outside the NL.

3.2 Policy SC10 Habitat Protection, Biodiversity and Net Gain

3.21 The NPPF under the heading 'Habitats and Biodiversity' provides clear guidance on what plans should do to protect and enhance biodiversity and geodiversity and sets out the principles that planning authorities should apply when determining planning applications (paragraphs 192 and 193).

3.21 Paragraph 192 a) refers to identifying, mapping and safeguarding "components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation". Paragraph 192 b) refers specifically to promoting "the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity".

3.22 The identifying and mapping element is covered in the Hastings Borough Green and Blue Infrastructure and Biodiversity Net Gain Strategy (GIB-BNGS, Surrey Wildlife Trust Ecology Services 2023). We note that it will be important to update this document as appropriate. **We recommend that the Council develops its own comprehensive database of species and habitats found within the Borough, to be added to the Plan as a consultable Appendix.** In particular this would inform the focus on priority habitats, priority species and ecological networks

referred to in paragraph 192 b). Such a database would also assist developers in producing better informed ecological reports.

3.23 NPPF paragraph 192 a) refers to identifying all the components of local wildlife-rich habitats and wider ecological networks. These are described in the GIB-BNGS but because the NPPF stresses the importance of all designated habitats all of these should be specifically identified in this policy. That said, it is also very important to stress the importance of LNRs and Local Wildlife Sites (LWS) for people as well as wildlife, as in paragraphs 7.229 and 7.230. The following text should therefore be inserted before paragraph 7.229.

Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI) and Local Nature Reserve are statutory designations which identify areas of critical importance for biodiversity and must be protected.

3.24 We welcome paragraph 7.228 but we feel that guidance regarding professional standards would ensure high quality reports, not only Preliminary Ecological Appraisals but also Ecological Constraints and Opportunities Plans. We therefore suggest adding the following to the detailed guidance.

8. Authors of Preliminary Ecological Appraisals and Ecological Constraints and Opportunities Plans. will be expected to be suitably qualified and experienced ecologists; for example full members of the Chartered Institute of Ecology and Environmental Management (CIEEM).

3.25 Paragraph 7.232 states that proposals must consider whether an intervention in one location impacts negatively on another location, but only in relation to geological systems. Ecological networks, the conservation, restoration and enhancement of which must be promoted according to paragraph 192 b) of the NPPF, are also susceptible negative impacts from intervention in a neighbouring location; the same applies to priority habitats and priority species. For example, the hazel dormouse (*Muscardinus avellanarius*) is a priority species (<https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>) found in HCPNR. The loss of hedgerows and woodlands on adjacent land could isolate HCPNR populations, resulting in loss of genetic diversity and greater vulnerability to local extinction. The following should therefore be inserted before paragraph 7.231.

Proposals must consider whether an intervention in one location may impact negatively on ecological networks, priority habitats or priority species in an adjacent or nearby site, and whether mitigations within a proposal site might have negative effects elsewhere.

3.26 Paragraph 7.235 states that there will be a minimum 10% threshold for Biodiversity Net Gain (BNG) and SC10 paragraph 5 c) and d) state that on-site mitigation is preferred, with off-site compensation only if net gain cannot be achieved on site. This risks inappropriate off-setting on land elsewhere in the borough. specially on land that could become important for biodiversity (ACIB; paragraph 2.33 above). **We recommend that the Council develops a spatial strategy for BNG to protect against inappropriate offsetting.**

4 Site Allocation Policies

4.1 Appropriate assessments

4.11 If a proposed plan or project is considered likely to have a significant effect on a protected habitats site, such as an SAC or SPA, either individually or in combination with other plans or projects, then an appropriate assessment (a Habitats Regulations Assessment (HRA)) of the implications for the site, in view of the site's conservation objectives, must be undertaken (Part 6 of the Conservation of Habitats and Species Regulations 2017) (<https://www.gov.uk/guidance/appropriate-assessment#when-may-appropriate-assessments-be-required-in-the-planning-process>). An appropriate assessment is a detailed scientific assessment that a Council must carry out if the Plan could have a significant adverse effect on a protected habitat site, that is, an SPA or an SAC, and that effect cannot be ruled out on the basis of objective information at the screening stage.

4.12 Paragraph 9.2.8 of the SA/SEA states: “Several allocations are also located within proximity of the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA). However, these sites are all situated within the existing built-up area of Hastings and therefore have limited potential to give rise to functionally-linked land or disturbance pathways to the SPA. As such, significant adverse effects are unlikely”.

4.13 This statement is not sufficient to lawfully rule out significant adverse effects on the Dungeness, Romney Marsh and Rye Bay SPA. It relies on a general assertion, that “adverse effects are unlikely” from development sites located “within the existing built-up area”, without identifying or assessing the actual impact pathways as required under the Conservation of Habitats and Species Regulations. In particular, this leads to a failure to consider recreational disturbance, a well-established pathway for disturbance of coastal SPAs, and in-combination effects from cumulative housing growth. Under the legal test as set out in the Waddenzee case, such effects can only be ruled out where there is no reasonable scientific doubt, (<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62002CJ0127:EN:PDF>) a threshold this paragraph clearly does not meet.

4.14 In legal terms, this means the draft Plan has not yet demonstrated compliance with the Habitats Regulations in respect of potential adverse impacts on the Dungeness, Romney Marsh and Rye Bay SPA.

4.15 The SA/SEA must therefore provide sufficient evidence that development sites in the Plan have been thoroughly screened for significant harmful effects on the Dungeness, Romney Marsh and Rye Bay SPA. Where significant effects cannot be ruled out, an HRA must be undertaken.

4.2 HS18: Land at Tilekiln Farm

4.21 Site Allocation HS18 proposes developing land at Tilekiln Farm to provide a minimum of 70 to 100 dwellings, far above the threshold for a major development as defined by the NPPF (paragraph 3.12 above). The Bourne stream, which makes the boundary to the development site is at its closest about 160 m from the HCPNR boundary (as estimated using Google Earth Pro). As such, were the proposal to be approved it has the potential to have an impact on HCPNR.

4.22 The site is described as *occupied in part by a former agricultural building towards the north-eastern corner of the site with the remainder being open grassland which has previously been farmed but now lies fallow* (paragraph 6.95). **This is not an accurate description.** Nearly half the site remains grassland while nearly half of what was once open land has been allowed to scrub over, comprising mostly blackthorn and bramble. The site includes hedges, a tree belt alongside the Bourne stream, and some woodland, features, all of which are clearly visible on Google Earth Pro. The attached report by Dr Owen Johnson (Some wildlife habitats within Tilekiln Farm Fields proposed development site) provides further information about the habitats present.

4.23 Appropriate assessment

4.231 The statement in the SA/SEA (paragraph 4.13 above) fails to consider whether there are plausible pathways for impact from development sites that are located further away from the SPA. That a site is not within the Impact Risk Zone (IRZ) does not necessarily remove the need to screen the development for potential adverse impacts on the SPA, Site allocation HS18 is outside the IRZ but, for example, the area prone to flooding and poor water quality could have knock on effects

4.232 The Tilekiln site is acknowledged as falling within the IRZ of Hastings Cliffs SAC (paragraph 6.103), being 642 metres away (SA/SEA paragraph 9.2.6). As noted in paragraph 4.11 above, if a proposed plan or project is considered likely to have a significant effect on an SAC then an HRA must be undertaken.

4.233 The Council has not provided an HRA at this stage of the Plan (Regulation 18). Rather it is intended to submit an HRA at the Regulation 19 stage (Habitats Regulation Statement Interim to accompany Hastings Local Plan Regulation 18 Preferred Options 2026). There is no statutory requirement for an HRA to be undertaken at Regulation 18 stage and the Plan can proceed to the next stage, but it cannot be lawfully adopted without an HRA that provides a clear conclusion as to

whether there would or would not be an adverse impact on the Hastings Cliffs SAC from developing the Tilekiln Fields site.

4.234 The omission of an HRA in respect of Hastings Cliffs SAC at the Regulation 18 stage also has implications for the SA/SEA as the Tilekiln Fields site could not be fully assessed within this appraisal. The SA/ SEA has also not considered potential impacts of this development on the Dungeness, Romney Marsh and Rye Bay SPA.

4.235 Government guidance on plan-making states that “Where sites are proposed for allocation, **sufficient detail** should be given to provide clarity to developers, **local communities** and other interested parties about the nature and scale of development” (<https://www.gov.uk/guidance/plan-making> Reference ID: 61-002-20190315, our emphasis). The HRA in respect of Hastings Cliffs SA is a crucial document and so sufficient detail has not been provided. Sufficient detail is also lacking in respect of any potential impact on the Dungeness, Romney Marsh and Rye Bay SPA because this issue has not been addressed.

4.236 Moreover government guidance on plan-making states that “Local planning authorities **must make available each of the proposed submission documents that they intend to submit to the Planning Inspectorate** for examination to enable representations to come forward that can be considered at examination, under regulation 19 of the Local Plan Regulations” (<https://www.gov.uk/guidance/plan-making> Reference ID: 61-002-20190315, our emphasis). The Council intends to carry out an HRA which will be submitted at Regulation 19 stage of the planning process so has **not** made available a proposed submission document at the Regulation 18 stage.

4.237 We are particularly concerned about further recreational pressure on HCPNR and the SAC. With as many as 100 new houses so close by there is likely to be increased footfall and hence an increased risk of, among other issues, contamination from dog excrement, trampling on sensitive habitat, fires, and accidental transfer of weeds and invasive species. Natural England notes that weeds / invasive species constitute a potential high risk pressure on the SAC (<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002885&SiteName=Hastings%20Cliffs&countyCode=&responsiblePerson>). Had an HRA been provided we would have been in possession of sufficient detail about recreational disturbance pathways and whether these would or would not result in an adverse effect on the SAC.

4.238 The lack of sufficient detail at the Regulation 18 stage limits the ability of FHCPNR to make an informed representation regarding site allocation SH18. FHCPNR thus has no option but to oppose development at Tilekiln Fields on the grounds that it might have an adverse impact on the SAC in HCPNR. We have not been provided with enough evidence to come to any other view.

4.24 Development within the High Weald National Landscape

4.241 The Tilekiln Fields proposal would constitute a major development within the protected High Weald National Landscape.

4.242 We note that policy SC9 3 requires that “development in the NL should conserve and enhance the landscape and scenic beauty of the area”, reflecting the duty of local authorities under section 85 of the Countryside and Rights of Way Act 2000: “In exercising or performing **any functions** in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority must seek to **further the purpose of conserving and enhancing the natural beauty** of the area” (Advice Note, Legislation and Planning Policy in the High Weald National Landscape (AONB), January 2025; our emphasis).

4.243 Site allocation HS18 provides a wealth of detail regarding the nature of the site and matters that must be addressed in any planning application, but it is unclear how this advice will ensure that the development will further the purpose of conserving and enhancing the natural beauty of the area in accordance with policy SC9. On the contrary, 70 to 100 homes cannot, by definition, further the **natural** beauty of the area.

4.25 Nature restoration potential

4.251 Policy SP8 states that the LNRS should play a role in decision making. As we have already noted (2.33) the East Sussex LNRS categorizes much land adjacent to HCPNR as ACIB. This

includes the whole of the Tilekiln valley; that is Tilekiln Fields as identified in the Plan plus land between the Bourne stream and Pinders Shaw where Tilekiln valley abuts HCPNR

4.252 The Tilekiln area may already be important for biodiversity. The proposed development site includes a good range of habitats (paragraph 4.22 above). Pinders Shaw is an Ancient Woodland (<https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england/explore?location=52.900079%2C-2.004678%2C7>). Information provided by the Sussex Biological Records Centre (SxBRC), while it includes records from an area a good deal larger than the Tilekiln valley, nonetheless indicates the range of species that could be present (see attached summary, SxBRC Report Tilekiln Farm Fields). However it is not known how important the Tilekiln area might be because no full habitat assessments or systematic species surveys have been carried out.

4.253 This evidence regarding biodiversity on the Tilekiln site, combined with its ACIB status suggests that Tilekiln valley could be an appropriate site for nature restoration. Restoring it would accord with principle 2 of the East Sussex LNRS, *Create a network of 'bigger, better, more and joined-up' wildlife-rich spaces across our rural and urban landscapes*. (East Sussex and Brighton & Hove Local Nature Recovery Strategy Statement of Biodiversity Priorities Part 2 – Priorities, Measures and the Local Habitat Map Draft for consultation) page 10). Restoring it would also expand the core Green and Blue Infrastructure Network Policy in line with the aspirations of policy SP12, which *supports the overarching vision derived from the strategy to protect, develop and enhance a network of multi-functional, highly connected green and blue infrastructure across Hastings Borough, designed to incorporate climate adaptation, is financially sustainable, benefits wildlife and Hasting Borough's diverse local community* (paragraph 7.243).

4.254 For this reason the whole of the Tilekiln valley (from Tilekiln Lane to Harold Road) should be scheduled as open space in the Plan, an open space that could in the future become important for biodiversity (that is, an APIB). If the valley is found to be important for biodiversity and nature restoration then incorporation into HCPNR should be considered.

4.255 HS18 does not specifically acknowledge that Tilekiln Fields is located within an ACIB, although the detailed guidance (HS18 i) does state that the ECOP should not only include the results of site surveys but also reference to other nearby areas of wildlife sensitivity.

If HS18 remains in the Plan, this detailed guidance should additionally require the ECOP to **carry out habitat and species surveys of the whole of the Tilekiln Valley** (from Tilekiln Lane to Harold Road).

4.26 Conclusions

4.261 FHCPNR **opposes** development of Tilekiln Fields because we do not know whether or not this might have an adverse impact on the Hastings Cliffs SAC and/ or the Dungeness, Romney Marsh and Rye Bay SPA; and because of the potential of the site for nature restoration and increasing biodiversity.

The Tilekiln Fields site allocation should be removed from the Plan unless and until it can be shown that there is no risk of adverse impact on the Hastings Cliffs SAC or the Dungeness, Romney Marsh and Rye Bay SPA, and the potential of the Tilekiln valley for nature restoration is comprehensively assessed.

4.262 Until the results of these assessments are known HS18 should be removed from the Plan's site allocations.

Tilekiln Fields site should be scheduled as open space and the whole of the Tilekiln valley recognised as an ACIB and noted as a possible future extension to HCPNR.

4.263 The Council did not make available an HRA for Tilekiln Fields and so did not provide all documents despite the plan-making guidance that it **must** do so (see 4.35). It will not be supplied prior to the Regulation 18 consultation deadline of 7 April 2026.

We therefore expect that the Council will provide an opportunity for further Regulation 18 consultation regarding site allocation HS18 when the HRA, and any other relevant information not provided at the Regulation 18 stage, does become available.

