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Dear Sir / Madam,

Draft Hastings Local Plan

Railfuture is Britain's leading, longest-established, national independent voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities.

We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in development and transport planning.

Railfuture seeks to ensure that all new transport initiatives make the best possible contribution to improving local quality of life and reducing social disadvantage. We therefore much welcome the draft Local Plan's emphasis on the need for better strategic connectivity with London and commitment to reducing car travel through more focussed bus services and better facilities for walking and cycling. These aspirations are well geared to strengthening the town's economic base and making better connections for people to access local jobs, and training and further education opportunities.

We are very closely involved with the roll-out of Transport for the South East's adopted Transport Strategy. Given the symmetry between TfSE's regional goals and the local aspirations portrayed in the draft Local Plan we are keen to explore how our inputs to TfSE's work could best add support for Hastings' overarching ambitions to overcome the entrenched social and economic constraints addressed in the draft Local Plan. We therefore look forward to having future contacts with Hastings Borough Council in this context.

We respond in more detail to some particular consultation issues in the following Appendix.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS
Railfuture
Vice-Chair, London & South East regional branch
Director for Infrastructure & Networks, national Board

www.railfuture.org.uk www.railfuturescotland.org.uk www.railfuturewales.org.uk
www.railwatch.org.uk

Appendix

1. Introduction

Laws and national policies on how plans are prepared

1.9 We note that the housing requirement of 430 additional homes per year, or 8600 across the 20-year Local Plan period, would equate to anything between a 20% and 25% potential increase in the Borough's population – and its associated travel demand.

2. Hastings in Context

2.3 It is in our view regrettable that despite Hastings being at the confluence of three rail links with London only one, the least direct and slowest, is mentioned here; the journey time cited is for Gatwick, not London as might be inferred. Projecting an image of Hastings as an outward-looking and well-connected place attractive to ambitious and aspirational people and businesses requires that the other two links should also be highlighted here, before they are referenced in 2.7. They are, first, via Ashford International and HS1 with Ebbsfleet Garden City and the planned nearby London Resort, Docklands via Stratford International, and north central London and beyond at St. Pancras International, and also via Ashford International with mainland Europe, and second via Tunbridge Wells with the City of London at London Bridge and Cannon Street, as well as with the West End at Charing Cross.

3. Development Strategy

Tackling Climate Change

3.2 'Moving to more sustainable transport options' has to in our view include significant mode shift to rail as well as to walking and cycling, noting that the Transport Strategy adopted by Transport for the South East foresees a 108% increase in rail use by 2050.

New Homes

3.14 Even the lower provision of 4275 new homes across the plan period, compared with the 8600 mentioned in para. 1.9, would generate a c.12% increase in Hastings' population.

Overarching Strategic Policy 1 (OSP1): Tackling Climate Change

1.A. We whole-heartedly endorse the commitment to "Focus largest scale development in areas with existing or potential good public transport accessibility ..."

1.C. We endorse "Encourage a shift from reliance on car journeys by improving the walking and cycling environment across the borough and better integrating this with public transport to make this a more attractive transport option" with the rider that a focus on user-friendly and high-quality routes to and from the Borough's four rail stations will play a vital part in supporting achievement of the necessary doubling of rail use mentioned in 3.2 above.

Strategic Policy 7 (SP7): Managing Coastal Erosion and Flood Risk

3. It is important for the resilience of the Borough's strategic transport infrastructure that consideration be given to improving the existing protection measures in the Bulverhythe area, to ensure that the East Coastway rail line linking Hastings with Eastbourne, Lewes, Brighton, Gatwick Airport, and London, and Brighton, Lewes and Eastbourne with Ashford, is securely maintained.

Strategic Policy 8 (SP8): Transport Infrastructure

1. The Council can count on Railfuture's support for implementation of this policy. The GTR / Southern timetable changes in May 2018, which increased services west of Hastings from 3 to 4 trains per hour and included all-day / every day Marshlink services for Ore, began as a Railfuture initiative rewarded with two successive years of record-breaking station usage.

2. While we endorse "Enhancements that support increased rail capacity and high-speed services to London will be supported including:

B. Infrastructure improvements on the Marshlink line and at Ashford International to enable high speed rail services to run to Eastbourne via Rye, Hastings and Bexhill"

we advocate the addition of an important clarifying supplement "in addition to the retention and development of the all-stations local Marshlink services."

8. We propose the specific example of former railway land by Ore station as a car park for rail users, to encourage modal shift to rail and help boost usage of Marshlink services, and thereby support the case for investment in enhancements referred to in sections 2. A and B.

4. Development Focus Areas

4.2 It is welcome that three of the four Focus Areas are well-located to be able to exploit their proximity to rail stations, the exception being Little Ridge and Ashdown House.

Focus Area Policy 1 (FA1): Hastings Central

We particularly endorse the emphasis given to improving the quality of the built and street environments, as creating and maintaining a quality public realm is such a vitally-important feature of successful place-making, in turn a core ingredient of transformational and enduring urban regeneration. The significance of the impact on visitors and on potential future residents and business representatives of first impressions of a place based on their views of new developments from an arriving train cannot and must not be under-estimated.

Focus Area Policy 2 (FA2): Bohemia

We likewise endorse the emphasis given to improving the quality of the built and street environments in general and connectivity with the nearest rail station in particular.

Focus Area Policy 4 (FA4): West Marina and West St. Leonards

We again endorse the emphasis given to improving the quality of the built and street environments in general and connectivity with the nearest rail station in particular, and must re-state the significance of first impressions gained from the vantage-point of the railway.

5. Development Policies

5.1 We welcome the tone set by the opening sentence.

Development Policy 1 (DP1): Design – Key Principles

1. We welcome the tone again set by the opening sentence.

Development Policy 8 (DP8): Planning Obligations (Section 106)

1. and Table 5.2. We are pleased to see inclusion of 'Public transport contributions' in (C) and recognize the challenges of securing even short-term revenue support eg for improved bus services for Little Ridge and Ashdown House, rather than one-off capital spend.