



Sussex
Wildlife Trust

By email only

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Dear Mr Horan

Draft Corporate Plan consultation 2020 - 2024

Having read the Draft Corporate Plan available via the Hastings Borough Council website, the Sussex Wildlife Trust (SWT) would like to submit the following comments for consideration. We would appreciate a response from Hastings Borough Council (HBC) to the questions we raise.

We encourage HBC to recognise the position we all find ourselves in with regards to the climate and biodiversity emergency and ensure that action to address this is reflected ambitiously in the Corporate Plan.

We are encouraged that this document states that Hastings has a vision to be a green town with a zero carbon footprint, alongside the need to protect their natural environment. However, we do not feel the document sufficiently embeds the important role biodiversity and natural solutions can play in HBC's priority to be carbon neutral.

As a council you declared a climate emergency in February 2019. What concerns the Sussex Wildlife Trust is that there needs to be a strong recognition of the link between the climate crisis and the biodiversity crisis, which we feel is lacking in this document. The recognition of this is imperative at all levels within HBC. The delivery of an ecological network will be fundamental to delivering the vision of carbon neutrality. How land is used directly correlates with climate impacts, which in turn means that climate change impacts on land use.

Outcomes

SWT encourages HBC to be ambitious in its commitment to the natural environment. Biodiversity is not currently sufficiently reflected in this section.

One of the current outcomes is: "*A pleasant well maintained borough that we protect and invest in*".

This does not recognise the value of the natural environment or the reality that Hastings will need to actively adapt to ensure resilience to climate change. We encourage HBC to adopt an approach that is fit for purpose in this current climate. We suggest an outcome of:

A resilient and adaptable landscape where we have protected and invested in our natural environment.

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Priorities

This section has six distinct areas of priority. We do recognise that one of these sections refers to *Minimising environmental and climate harm in all that we do*. However, the bullet points that underpin this statement fail to consider biodiversity or the natural solutions that may be vital in delivering this priority.

We recommend an additional, succinct bullet point to ensure the value of the Borough's natural environment in delivering natural solution to climate resilience is recognised:

- *Identify, protect and invest in the Borough's natural capital assets to enable a resilient and adaptable landscape fit for wildlife and people.*

We also wish to draw attention to the priority: *Making best use of our buildings, land and public realm assets*.

The first bullet point is:

- *Ensuring public assets the council is responsible for remain safe, secure and fit for purpose e.g. our cliffs and reservoir*

The next bullet point states:

- *Maximising return on investment on these assets through rent, sales, maintenance and development.*

We are concerned that these two points have the ability to conflict, in particular in relation to what 'fit for purpose' means. Open spaces and green infrastructure can be 'fit for purpose' in terms of the benefits they provide such as biodiversity, air quality and carbon sequestration. However, this may not be reflected in the purely monetary returns that we assume the second bullet point above refers to. HBC must ensure that maximising returns on investment considers investment in Natural Capital, not only financial capital. This should be expressly stated in the Corporate Plan.

Key Activities during 2020/21

SWT has a number of questions about this section:

Tackling poverty, homelessness and ensuring quality housing

The fourth bullet point under this heading refers to 192 homes at Bulverhythe. SWT would like to ask if this bullet point is a direct reference to the Lower Tier Road site, off Bexhill Road.

If this bullet point does specifically mean the Lower Tier Site, why is such a bold commitment being made to this site which is currently unallocated in the Local Plan and which sits in Flood Risk Zone 3b. This is especially concerning given that no detailed formal information regarding environmental impacts has been presented for consultation and there is no clarity on the likely effectiveness of flood risk prevention plans.

Keeping Hastings clean and safe

The third bullet point in this section talks about delivering a full strength warden service to tackle anti-social behaviour and enviro crime. Does this mean a warden service that will also consider habitat management and monitoring of the Borough's natural resources? The budget seems to suggest that ecology will receive less money than previously.

Making best use of our buildings, land and public realm assets

SWT is concerned that it is difficult to provide comments about the suitability of the bullet points within this section, as again we are not clear what they will involve. For example under *bringing forward the improvements to the delivery of our grounds maintenance arrangements*, we are unclear what this will involve. Will the changes seek to protect and enhance the biodiversity value that might be captured in grounds maintenance work?

Additionally it is not clear what 'best use' means and what it will consider. Given the biodiversity and climate emergency, impact of decisions on the Borough's natural capital must be considered and accounted for at an early stage. Whilst HBC might be keen to use its public assets to combat and adapt to climate change, this must be done sensitively in a way that enhances natural capital assets not harms them.

Minimising environmental and climate harm in all that we do

We are encouraged by the commitments HBC is making in the section. HBC should ensure biodiversity and climate resilience are now at the forefront of all decision making within the Borough. This could be reflected by adding a further bullet point.

- *Ensure biodiversity and climate resilience is at the forefront of all decision making within the Council*

Ensuring the council can survive and thrive into the future

One particular bullet point that has drawn our attention states: *Lead on and develop a new town wide narrative and plan, plugging the gaps with partners where HBC can no longer afford to deliver directly.*

HBC state that since 2010 it has lost £9.3 million of funding from the government. SWT recognises that budgets are extremely tight and that funding is a big constraint for HBC. Natural solutions to climate change can be an extremely cost effective method of adaptation that provides multiple benefits to residents. We urge HBC to maintain a commitment to its vision and its climate emergency declaration when considering opportunities for savings and / or funding.

Our Approach

We are supportive of HBC clearly stating that they intend to regularly review their commitments and ensure transparency. In turn we hope this monitoring feeds back into the process to ensure that the plan adapts as necessary given the evolving impacts of climate change that will be occurring.

In conclusion

SWT welcomes the opportunity to comment on this draft corporate plan. Whilst we appreciate this document does acknowledge the importance of carbon neutrality, we do not consider its current form to be ambitious in the role the natural environment can and needs to play in making this a reality. By making a clear commitment to biodiversity throughout the document, HBC will help to demonstrate that they recognise the value natural solutions and natural capital can play in the future of Hastings.

We note that the consultation page on the HBC website states that '*All comments received will be summarised and reported to the Council's next Cabinet meeting on 10 February 2020. After which the draft plan and budget will be put before full Council for approval on 19 February 2020*'. Given that the deadline for comments is Friday 7th February, this seems to be a very tight timeline for summarising, reporting on and considering comments. It is vital that HBC takes proper time to consider comments and incorporate resulting changes to ensure that the validity of the whole consultation process is not brought into question.

Yours sincerely,

Laura Brook
Conservation Officer