

**Hurst Green
Neighbourhood Plan
2021 to 2028**

Consultation Statement

***Presented by
Hurst Green Parish Council***

***How we involved the local community in preparing
the neighbourhood plan, what was said, and how
it was taken into account***

October 2024

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1 INTRODUCTION

About this document

- 1.1. This Consultation Statement sets out the background of how the Hurst Green Neighbourhood Plan (HGNP) 2021 to 2028 has been developed and provides, in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012:
- details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - how they were consulted;
 - a summary of the main issues and concerns raised by the persons consulted; and
 - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.
- 1.2. Hurst Green Parish Council (HGPC) and the HGNP Steering Group, under the direction of the Council has undertaken consultation activities with parishioners and statutory and non-statutory organisations. Stakeholders, businesses, and other interested parties were also consulted to enable extensive engagement and involvement in the preparation of the HGNP.
- 1.3. This Consultation Statement sets out details of the events and activities carried out in the Parish and with parishioners and key stakeholders.
- 1.4. All activities were carried out to ensure full inclusivity in the decision-making throughout the development of the plan.

The Hurst Green Neighbourhood Plan Steering Group

- 1.5. The Parish Council is the qualifying body for the HGNP. It set up a Steering Group comprising of councillors and volunteers from the community to oversee the work.
- 1.6. The Steering Group has met regularly (at its peak, monthly) throughout the process with all meetings open to the public to attend. Some meetings were held remotely on Zoom, to take account of the Covid-19 arrangements.
- 1.7. A Terms of Reference was agreed, a copy of which can be found in Appendix A.
- 1.8. Minutes from the meetings were taken and stored on the [HGNP website](#).
- 1.9. A series of Task Groups were established, comprising local volunteers. Each was led by a Steering Group member, so that progress could be reported to the Steering Group.

2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

High level summary of the engagement process

2.1. A high-level summary of the engagement and consultation activity is shown in Table 1.

Table 1: High level summary of the Plan process

Date	Milestone	Key activities
2017	Parish Council decides to develop a plan	<ul style="list-style-type: none"> • Preparation for undertaking the Plan. • Community engagement activity to understand the aspirations for the area.
2018 - 2020	Evidence collection	<ul style="list-style-type: none"> • Local engagement • Evidence collection • Surveys
2021	Draft Plan created	<ul style="list-style-type: none"> • Additional evidence and surveys • Housing sites and landscape assessments • Evidence collection • Local consultation on informal draft Plan and potential sites for inclusion
2022	Draft Plan completed Formal consultation on the Plan	<ul style="list-style-type: none"> • Local engagement • Evidence collection • Finalising the Strategic Environmental Assessment • Regulation 14 consultation
2023 - 2024	Formal consultation on the Plan Referendum	<ul style="list-style-type: none"> • Local engagement • Regulation 16 consultation • Examination • Referendum

2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan's preparation. This is divided into four stages, with approximate dates provided:

Stage I: Engaging the local community to understand main issues (2017 to 2020)

Stage II: Developing and testing the emerging planning policies (2020 to 2022)

Stage III: The Regulation 14 (Phase 1) Pre-submission plan consultation (2022)

Stage IV: Finalising the Submission (Regulation 16) Plan (2023 to 2024)

Stage I: Engaging the local community to understand main issues (2017 to 2020)

- 2.3. The idea of undertaking the HGNP project was first promoted in early 2017 by the Parish Council. A decision was taken at the full council meeting on 28 March 2017 to progress with a Plan to cover the whole parish and an application was approved by Rother District Council (RDC), as the local authority, to that effect on 10 April 2017. The [neighbourhood area](#), coinciding with the parish boundary, was formally designated on 8 June 2017. A copy of the designation letter can be found on the [RDC website](#).
- 2.4. Information for the community about the decision to develop a neighbourhood plan was placed in the Hurst Green magazine, *theHurst*, and the project was also promoted at the Annual Parish Assembly. Members of the community were invited to take part and to consider joining the steering group and the various tasks group.
- 2.5. The Council hosted two Kick-Off Public Engagement Events to formally launch and publicise the plan process. These took place in the Village Hall in February 2018, on a Friday evening and a Saturday afternoon, to allow all those who wanted to attend to do so. The kick-off events were very successful with 115 residents attending. As well as hearing about the purpose of the neighbourhood plan, attendees took part in workshops where all attendees were invited to provide comments about the key issues facing the parish. Challenges associated with the A21, as well as streetlighting, received a great deal of commentary. The comments were collated to be used by the emerging Steering Group and subsequent Task Groups, as well as forming the start of the vision for Hurst Green. The HGNP website contains a [report of the hundreds of comments received](#).



Flier distributed to all households promoting the HGNP launch events



Online survey aimed at recruiting volunteers depending on their interests



Photographs from the two Kick-Off events, February 2018

2.6. A Terms of Reference (Appendix A) was drawn up by the Parish Council to be considered by the Steering Group, once formed. A Volunteer Information Evening was held on 17 April 2018 to share feedback from the launch events, to talk through the stages of the neighbourhood plan and to seek volunteers to join the Steering Group. This led to 12 people volunteering onto the following Task Groups:

- Education and Training
- Economy, Business and Tourism
- Leisure Facilities, Parks and Open Spaces
- Infrastructure
- Housing

2.7. Each Task Group would focus on gathering evidence and feedback on their particular topic area, with a lead appointed to sit on and report progress to the Steering Group on a monthly basis. The first official Steering Group meeting took place on 17 July 2018. All those recruited to the Steering Group were asked to complete a Register of Interest to ensure that no conflicts of interest would occur. The Terms of Reference was also formally passed by the Council.

2.8. During this early stage of the process, RDC was preparing its Development and Site Allocations Local Plan (DaSA) (adopted in December 2019) and the Parish Council regularly met with planning officers to discuss the implications for Hurst Green. It was agreed that sites would be pursued through the Neighbourhood Plan as opposed to the through the DaSA. Within this context, the Parish Council initiated a Local Call for Sites to run to 28 July 2018, which was promoted to residents, landowners and other

interested parties. A map collating the sites submitted was presented to the Parish Council in September 2018. At this time, RDC was approached to prepare a screening opinion of the emerging HGNP, in the context of it being likely to allocate sites. The [Screening Opinion letter](#) was published in December 2018, confirming that an SEA would be required.

- 2.9. To support the work on housing allocations, which would form a major part of the emerging HGNP, in November 2018 the Parish Council commissioned AECOM (via the Locality Technical Support programme) to prepare both a [Local Housing Needs Assessment](#) for the parish (which was published in 2019) and an initial Site Assessment report of all potential sites in the parish. Further information on the sites can be found in the [evidence base](#) on the HGNP website.
- 2.10. The Task Groups themselves (see photographs below of some of the task group meetings) were undertaking a great deal of work in researching their topic areas and gathering information, including:



- 2.11. **Vision, Aims and Objectives Workshop:** In March 2019, external consultants were commissioned to prepare and host a workshop with the Steering Group and Task Group members to enable a draft vision, aims and objectives to be created for the parish that was based on the resident workshops held at the kick-off sessions. The session lasted approximately 2 hours and involved two practical workshops to share thoughts as well as record ideas. It was important that everyone attending was able to get involved in all the discussions.
- 2.12. These workshops were followed by via an electronic survey promoted on the village's social media page (with over 2000 followers) to further prioritise the aims and objectives of the plan, over 130 residents took part in the initial prioritisation process.



Banner promoting the Aims, Vision and Objectives workshops

- 2.13. The findings from the event and social media survey can be viewed in the [Aims, Vision and Objectives Consultation Report](#).
- 2.14. In the autumn of 2019, a further extended consultation on the aims, vision and objectives was undertaken which saw every household in the parish receive a printed colour booklet containing the result of 18 months development of the draft aims, vision and objectives. This exercise generated several additional responses, which were taken into consideration in producing the final aims, vision and objectives for the Hurst Green Neighbourhood Plan.
- 2.15. The emerging draft was shared with the community and ultimately was refined to form the [Vision for 2030](#) document, which has been an important piece of work in informing the scope and content of the HGNP.
- 2.16. **Business database:** Details of local businesses operating in the area were collated to enable future engagement with them (see Business Survey).
- 2.17. **Parking survey:** A visual survey of Hurst Green village was undertaken to understand issues associated with car parking in the village. This was accompanied by an online survey asking residents to share their experiences of parking. The [2019 Local Parking Survey Results](#) provides a summary of comments received. This evidence was supplemented over 2021-2022, with data collected by AR Urbanism as part of their commission to produce their masterplanning input for Hurst Green.
- 2.18. **Highways data:** Information from National Highways was sought to explore traffic speeding along the A21, an issue that had been highlighted as a key cause of concern among residents attending the initial launch events. The findings can be found in the [Analysis of Highways England Average Speed Data collected from sensors located in Hurst Green, East Sussex](#). To note, an updated version of the speed data was provided in the 2021 report: [Analysis of 2021 Speed Data Through Hurst Green and History of A21 Upgrades](#).
- 2.19. **PlaceCheck walkabouts:** Volunteers and Parish Councillors walked different areas of the parish to record interesting aspects, such as notable trees and hedgerows.
- 2.20. **Walking to School:** In 2016, a local resident had created the following petition: “*I would like to have a safer walk to school for our children. Slow the traffic down by having an extended 20mph zone, make road users more aware that it is a school zone and to create safer footpaths along the A21*”. The report, [Residents comments received](#)

[regarding the A21 School Route petition](#), was used by the Education and Training Task Group to inform their evidence base concerning road safety and access.

- 2.21. **Local Housing Survey:** To add additional local detail to the commissioned Local Housing Needs Survey (being prepared by AECOM) the Steering Group undertook their own [Local Housing Demand Survey](#) during March to May 2019. The survey was available to complete online and paper copies were also delivered to all households, with return points identified in locations across the parish. The intention of the survey was to provide a snapshot of local need, to support the information gathered by AEOM in terms of type and mix of homes required locally. Over 40% of households completed the survey and comments received can be found in the report, [Residents comments received during the Hurst Green Neighbourhood Plan Housing Demand Survey](#), and were used by the Housing Group to inform work on their topic and the emerging Local Housing Needs Assessment.



Hurst Green Housing Survey

Dear Local Resident,

Thank you for participating in the Hurst Green Neighbourhood Plan housing needs survey. This questionnaire seeks to gather further information about your home and if you are looking to move.

We estimate completing this survey will take most people just a few moments. Please complete just one survey per household. The survey is anonymous, there is no way we are able to identify individuals from the answers. As part of the Neighbourhood Plan your answers will help set housing policies for our area that meet local needs.

By completing this survey online you have saved our community postage and printing costs.

Front page of the Housing Demand Survey (online version) and printed copy (top image above) of survey distributed to every household in the parish

- 2.22. **Local Tourism Survey:** In total, 62 residents responses to the local tourism survey prepared by the Business, Economy and Tourism Task Group and launched in January 2020. It sought to understand support for tourism related activities in the parish. The [2020 Local Tourism Survey Results](#) provides an overview of the findings, which informed the tourism policy in the HGNP.
- 2.23. **Business Survey:** A broad survey aimed at business owners locally was prepared and launched in June 2020. The [2020 Local Business Survey Results](#) summarises the findings.
- 2.24. **Environmental surveys:** A range of data gathering took place to understand the environmental aspects of the parish. This includes information on protected trees, agricultural land, flooding, priority habitats, a rapid grassland assessment, and a report on habitats and species prepared by the Sussex Wildlife Trust. Documents relating to these topics can be found in the Evidence section on the [HGNP website](#).

- 2.25. **Community projects:** In parallel with the HGNP, the Parish Council has been pursuing a number of [community projects](#). Some of these would be underpinned by a planning policy while others were standalone projects. They included upgrading the children's park at Lodge field, developing a new nature reserve at Stage field (Silver Hill) and providing new sporting facilities at Drewett's field. Progress on these projects has been closely related to the HGNP.
- 2.26. In addition to the active engagement undertaken during this phase of the project, the Steering Group was keen to ensure that progress on the emerging HGNP was communicated as effectively as possible locally:
- 2.27. **Website:** A website dedicated to the HGNP - <https://hurstgreen2030.uk> was established in August 2019 to store information relating to the HGNP. This has been maintained throughout the HGNP process, and the homepage features news articles relating to the plan's progress (see screenshot below).



District Council approve 26 new homes

The developers behind the London Road (north) site have obtained planning permission ahead of the Neighbourhood Plan being completed.

[Continue Reading](#)



Updated London Road (south) application

The developers behind the London Road (HG22/43) site have applied for planning permission ahead of the Neighbourhood Plan being completed.

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Council runs formal Public Consultation

Hurst Green Parish Council have completed a formal public consultation on the draft of the Neighbourhood Plan, find out more...

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Revised London Road (north) application

The developers behind the London Road (HG8) site have applied for planning permission ahead of the Neighbourhood Plan being completed.

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Council launches formal Public Consultation

Hurst Green Parish Council have launched a formal public consultation on the draft of the Neighbourhood Plan, find out how to have your say...

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Revised London Road (south) application

The developers behind the London Road (HG22/43) site have applied for planning permission ahead of the Neighbourhood Plan being completed.

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- 2.28. **Logo:** A logo was devised incorporating the parish sign.



NEIGHBOURHOOD
PLAN

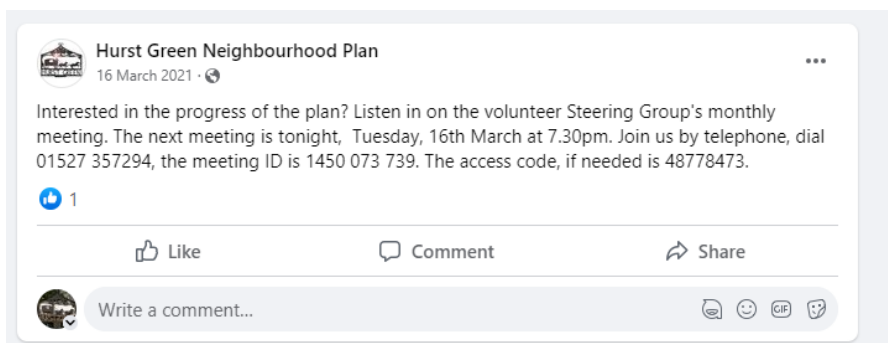
HGNP logo

- 2.29. **Information boards:** In January 2019, to ensure that parishioners were fully aware of the work on the HGNP, an Information Board was placed in the Village Shop and also in the Village Hall, both were regularly updated throughout the process.
- 2.30. **Newsletter articles:** Regular articles were published in the local magazine, *theHurst*, informing residents of progress and how to get involved.

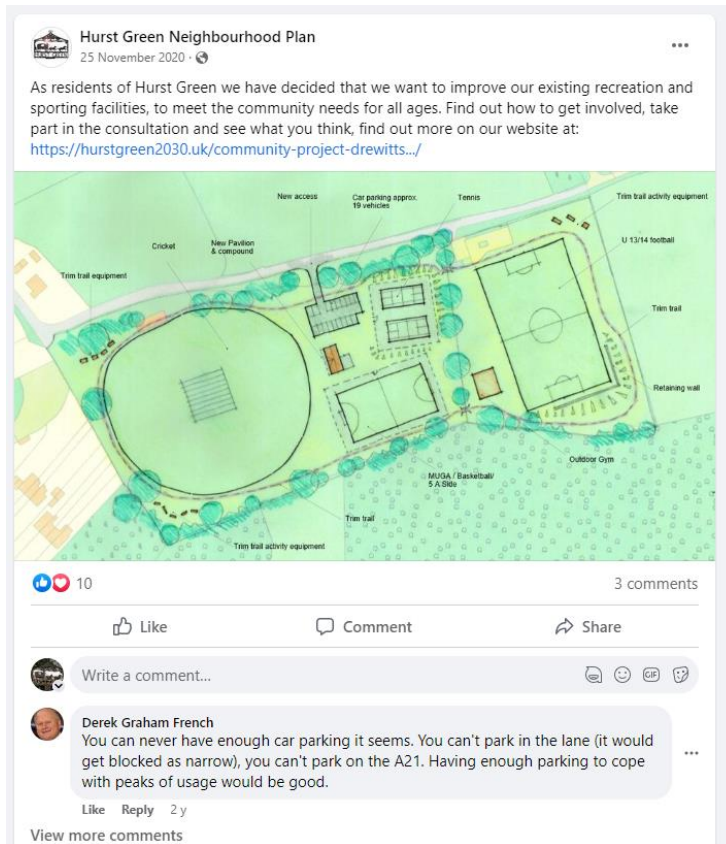


A selection of articles from the newsletter, *theHurst*

- 2.31. **Social media:** A [Facebook page](#) was set up to promote the HGNP. It has 149 followers. Social media was used to promote surveys and events, as well as to promote progress and opportunities to get involved in the process.



A typical facebook post promoting the Steering Group meeting in March 2021 (above), and another (below) promoting the work of one of the plan's task groups in November 2020.



2.32. **Regular meetings:** Regular meetings took place between the Parish Council and:

- RDC officers - about the DaSA and progress on the new emerging Local Plan. RDC also provided high level comments on the sites submitted via the Local Call for Sites.
- The High Weald Area of Outstanding Natural Beauty (AONB) Unit – attended a Steering Group meeting in February 2019 to talk about the significance of the AONB and their plans, for instance in bringing forward a High Weald Design Guide. Officers agreed to provide high level commentary on the sites submitted via the Local Call for Sites process, and continued their engagement throughout the process.
- Local landowners and site promoters – updating on their potential proposals and to feed into aspects of the emerging HGNP, all were encouraged to review the developed aims and vision materials.
- Local residents: Aside from being able to attend and watch Steering Group meetings, a number of public update events were held throughout the process. For instance, in July 2019, a series of public meetings were held to share the hard work the Council and volunteers had been undertaking.



Poster advertising one of the village update meetings to share progress on the HGNP

Stage II: Developing and testing the emerging planning policies (2020-2022)

- 2.33. In Spring 2020, HGPC appointed consultants (Alison Eardley and Jim Boot), to support them on the development of the neighbourhood plan policies. They were asked to review the evidence gathered to date and, in the context of the Vision, Aims and Objectives, prepare a skeleton plan setting out where value could be added through the development of a planning policy.
- 2.34. The document that was prepared set out a suite of policies and indicated the evidence that would be required to underpin these. Where evidence was lacking, this was discussed with the Steering Group.
- 2.35. In particular, the work led to the following being undertaken:
- 2.36. **Design Codes for Hurst Green:** The community engagement to date had demonstrated the importance of ensuring that new development – either allocated or coming forward as windfall – should be designed to a high standard and be in-keeping with the prevailing character of Hurst Green Village (as the focal point for development). The Steering Group applied to Locality’s Technical Support programme to commission Design Guidance to be prepared specific to Hurst Green. To inform this project, a workshop was held to discuss what is meant by local character in the Hurst Green context. A series of Character Areas were identified as part of this along with some broad descriptions. AR Urbanism, preparing the Design Codes, used the information to inform a draft set of codes that were subject to further engagement with the local community.
- 2.37. **Masterplanning for Hurst Green:** In parallel with the Design Codes, AR Urbanism were also commissioned to prepare masterplanning input for Hurst Green setting out a strategy to improve the look and feel of Hurst Green village over the course of the plan period. This incorporated ideas gained from the engagement events and surveys, for instance the development of a Village Hub, and was used to formulate and provide input into the content of the HGNP.
- 2.38. **Topic Area workshops:** A series of detailed workshops were held in October 2020 on key areas of the HGNP to demonstrate potential policy options for the Plan. For instance, policies to support the tourism industry locally, designate local green spaces and

important views. Information from the community surveys and village meetings was used to inform discussions and focus attention on where additional evidence was required. Detailed information to justify local green spaces and views, and other policies was gathered.

- 2.39. This additional work enabled the consultants to support the Steering Group and HGPC in developing a draft Plan.
- 2.40. **Work on site allocations:** In parallel with the work detailed above, further work was carried out to inform the site allocations contained in the HGNP. Notably, whilst AECOM's [Site Options and Assessment Report](#) (2019) work had filtered out sites considered unsuitable and unavailable, those remaining were difficult to assess further as all had varying degrees of potential landscape impacts.
- 2.41. To resolve this, a further [Hurst Green Neighbourhood Plan Site Assessments Summary Report](#) was prepared in August 2020 to provide information on the current status of the sites within Hurst Green parish that had been identified as potentially suitable for development. In the majority of cases, the sites that might be suitable were found to have landscape constraints and hence would need to be assessed further to understand the extent of those constraints and whether they might be mitigated to enable development on all or part of the site. The Report set out which sites should be put forward for a more detailed assessment of their landscape impact.
- 2.42. Consultants were employed to carry out a [Landscape and Visual Impact Assessment](#) for each site identified in the Summary Report. The information gathered was used to inform the development of the [Strategic Environmental Assessment](#) (prepared by AECOM), which ultimately would be used, alongside the community engagement, to inform the selection of sites to be included in the HGNP. This work took some months, with the SEA report being published in June 2022, and re-published again in February 2023.
- 2.43. The Design Code and Masterplanning documents were completed in draft and a full draft of the HGNP was prepared.
- 2.44. The draft HGNP was sent to RDC and the High Weald AONB (now called the High Weald National Landscape) Unit for informal comment.
- 2.45. A highly promoted public event was organised and held in October 2021. The purpose was to share the proposed policies and gain any additional comments from residents and interested parties, so that the Pre-Submission draft could be formalised.



Photograph showing the layout for the October 2021 policy exhibition prior to the event opening

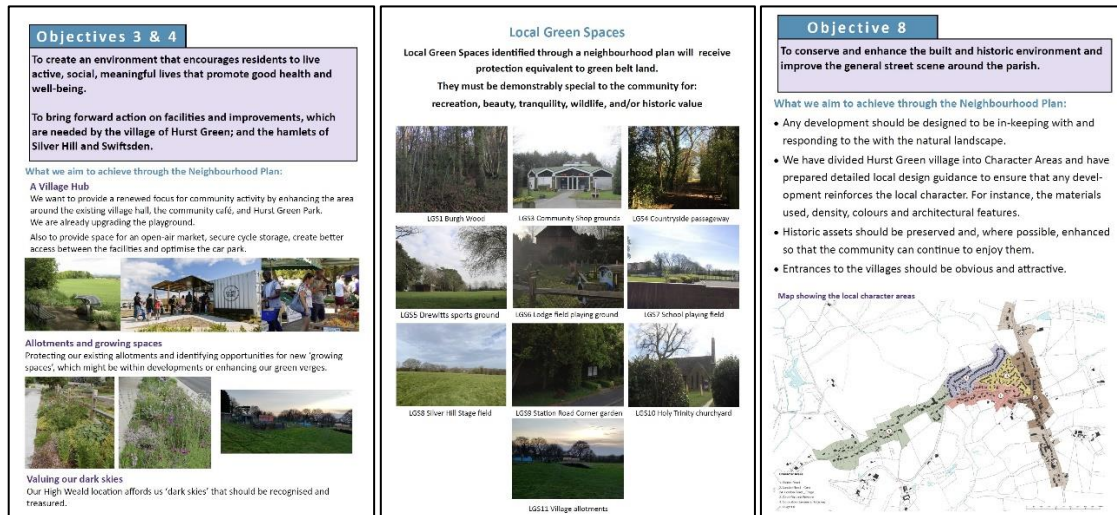


Photograph of Parish Councillors speaking with members of the public at the exhibition

2.46. The exhibition included:

- A rolling powerpoint display setting out key information about Neighbourhood Planning and the next steps for the HGNP;
- Display boards about the vision and objectives;
- Display boards for each topic area covered in the Plan, the associated objective and the proposed policy intent to achieve that objective;
- A display about the process undertaken to consider housing allocations and how decisions had been taken. Each site promoter was also invited to display material about their proposals;
- Information about the community projects taking place locally, some of which would be underpinned by HGNP policies; and
- Copies of the draft Hurst Green Design Codes and masterplanning work.
- Opportunity for attendees to speak informally and one-to-one with Steering Group members and Parish and District Councillors about the plan.

- 2.47. Throughout the event, members of the Parish Council, the Steering Group and Hurst Green's Neighbourhood Plan Consultant were on hand to answer questions. Attendees were provided with a survey (see Appendix B) to be filled in while viewing the boards, or to take away and completed later. This enabled detailed comments to be gathered.
- 2.48. Over 120 residents attended the event. A 67-page [Resident Consultation/ Exhibition Report](#) was published detailing the findings of the survey and comments received over the day. It includes a summary of the response provided by the Steering Group as to how that comment would be incorporated into Pre-Submission Version Neighbourhood Plan.



Examples of the displays from the October 2021 Exhibition

- 2.49. In February 2022, informal comments on the draft Plan were received from RDC. These were carefully considered by the Steering Group and the Parish Council. Over the following months, the Pre-Submission Version Plan and supporting documents were updated ready for regulation 14.

Stage III: The Regulation 14 (Phase 1) Pre-submission plan consultation (2022)

- 2.50. The Pre-Submission HGNP was approved by HGPC at the [Full Council meeting](#) of 28th June 2022.
- 2.51. The Pre-Submission (Regulation 14) consultation took place between 27 July 2022 and 17 September 2022 (the six-week statutory period was extended to take account of the summer holidays). The HGNP and all supporting documents were uploaded onto the HGNP website on a page dedicated to the consultation.
- 2.52. For residents, every household in the parish and in the adjoining area received a 2 page printed letter (sent and delivered by the Gov Notify service, to ensure that no addresses were missed) explaining about the HGNP and inviting participation in the consultation. See Appendix C.
- 2.53. In addition, the consultation was promoted on social media (Facebook), via the Neighbourhood Plan mailing list (comprising those who had attended events and

requested to be kept informed of progress), articles in *theHurst*, and four large waterproof banners positioned around the parish and with posters at public locations, such as at the village hall.

- 2.54. A Feedback Form was available to complete online to provide comments on the individual policies. A copy of this is included in Appendix D. Residents had the option to download this form and return it by post or email to the Parish Council. Hard copies of the form were available to collect from the Village Hall and from local businesses. Hard copies of the Plan documents were available to view at locations around the village, including the village hall, Hurst Green Social Club and the Burghwood House retirement home.

Public Consultation on the draft Hurst Green Neighbourhood Plan

After several years of evidence gathering, public events and resident consultation the Parish Council is pleased to present the 'pre-submission draft of the Hurst Green Parish Neighbourhood Plan' for public consultation. Just in case you happen to have missed the banners, the letter, posters, and the social media activity, the Parish Council is currently running a public consultation on the pre-submission version of the Neighbourhood Plan, which runs until 5pm on the 17th of September 2022.

Designed to provide guidance and influence over how Hurst Green should be developed in the future, the draft plan is a big achievement, and the Parish Council is grateful to the volunteers and councillors who freely gave their time to the preparation of this plan, and for the commitment of the hundreds of residents and stakeholders who provided feedback as the plan was developed.

Looking inside, the draft plan takes an objective view of the future. Parish councillors understand that not everyone will support everything within it and share the community's frustration that the Parish Council doesn't have any jurisdiction over the much-needed major road and utility infrastructure projects that Hurst Green requires or have control of the housing development numbers for

our area that have been set by successive Governments.

Evidence gathering for the plan has shown there is a local need for additional affordable and market housing, and that road safety concerns, and noise and pollution are high on the list of issues residents want to see addressed. These are closely followed by a need to improve the aesthetics of our residential areas, addressing antisocial behaviour, particularly in public areas such as the park and inconsiderate parking throughout the village.

Positive design themes such as policies to support new parking for homes that were built decades before car use was widespread are included, as well as tackling several decades of poor planning decisions, historical lacklustre housing design and poor area master planning. The housing policies within the plan are the most environmentally sound of any of the options presented and will provide strong foundations and financial contributions for new recreational facilities in the parish.

If you have internet access, the easiest way to view the draft plan and its supporting materials, including the Strategic Environmental Assessment, is online at: www.hurstgreen2030.uk/consultation

You can also view a printed version of the draft plan at the Village Hall and at various locations around the parish. For more information please call 01580 860111 (answerphone and call back service).

YOU CAN COMMENT ON THE DRAFT NEIGHBOURHOOD PLAN IN A FEW WAYS:

- Completing the online survey accessible from the website at: www.hurstgreen2030.uk/consultation
- Picking up and returning a printed copy of the survey form from **Hurst Green Village Hall** or from **local businesses**.
- By email to: clerk@hurstgreen-pc.gov.uk
- By post to: **Hurst Green Parish Council, The Parish Office, Village Hall, Station Road, Hurst Green, East Sussex, TN19 7PL**
- Responses must be received by 5pm on the 17th of September 2022.

Article promoting the Pre-Submission (Regulation 14) consultation in theHurst magazine

- 2.55. In addition to local residents, owners of the proposed local green spaces were contacted, explaining what the designation would mean and seeking comments.
- 2.56. Site promoters and landowners were also written to.
- 2.57. Finally the statutory consultees, contacts for which were initially provided by RDC, were emailed, along with details of how to participate. A list of the statutory consultees written to is provided in Appendix E.
- 2.58. Responses were received from the following statutory consultees:

- East Sussex Country Council – [Regulation 14 response](#)
- Environment Agency – [Regulation 14 response](#)
- Historic England – [Regulation 14 response](#)
- Natural England – [Regulation 14 response](#)
- National Grid – [Regulation 14 response](#)
- National Highways – [Regulation 14 response](#)
- Rother District Council – [Regulation 14 response](#)
- Southern Water – [Regulation 14 response](#)

2.59. Responses were received from the following site promoters/developers:

- Wooldridge Developments Ltd / DHA Planning: Possible housing site HG 6 – [Regulation 14 representation](#)
- Landstrom Group Ltd / SFPlanning: Possible housing site HG 11 – [Regulation 14 representation](#)
- Landstrom Group Ltd / SFPlanning: Possible housing site HG 36 – [Regulation 14 representation](#)
- Millwood Designer Homes Ltd / Gillings Planning: Possible housing site HG 22/43 – [Regulation 14 representation](#)
- Possible housing site HG 45 – [Regulation 14 representation](#)

2.60. As additional feedback, from the community, 20 responses were received to the Feedback Form, which included requested the extent to which respondents supported each individual policy, as well as providing an opportunity to add free text comments. The [Public Feedback Polls Report](#) provides charts detailing relative support for each policy.

2.61. The individual comments received from residents, the statutory consultees, site promoters/developers are included in Appendix F along with a commentary from the Parish Council as to how each comment has been addressed.

2.62. The following paragraphs provide a summary, by topic area, of the comments received during the Regulation 14 Pre-submission Version consultation and how these were integrated into the Submission Plan.

2.63. **General comments:** The residents who responded to the consultation were very supportive of the majority of the policies, as demonstrated by the [Public Feedback Polls Report](#). Some members of the public raised concerns about over-development of housing in the village. The HGPC reiterated the fact that RDC have provided the PC with a housing figure to seek to deliver and the HGNP provides the mechanism to have the greatest influence over where these should be delivered and in what form (e.g. type, tenure, size), so that they bring the most benefits to the parish while minimising their negative impacts. HGPC consider that there has been a great deal of community engagement on this matter in the lead up to the Pre-Submission Version consultation, and the comments received were in the main, from those who would be most affected,

living in close proximity to the proposed housing sites , or near to the Council's recreation and green spaces.

- 2.64. RDC recommended that the start date for the Plan be updated to coincide with the latest available Housing Land Supply figures, which are dated April 2021. This was actioned.
- 2.65. Some comments received, particularly from residents, related to issues outside the scope of the HGNP, such as littering and handing out water during water main bursts. Where these are not included as Non-Policy Actions, the comments have been passed to HGPC to consider as part of their wider remit.
- 2.66. A number of comments sought to understand how Silver Hill had been considered in the HGNP, including access to Hurst Green village. In response, the Steering Group advised that a number of the aspirations identified by the community for Silver Hill within the HGNP objectives have already been achieved by the HGPC. For example the installation of a defibrillator and work on the nature reserve. Silver Hill has been considered for housing, but as it sits outside the settlement boundary, it is deemed by RDC to not be suited to housing site allocations. HGPC are supportive of providing safe access from Silver Hill to the footpath leading to Hurst Green, however the provision of this is outside the scope of the neighbourhood plan. As such, the plan supports the principle of this (Policy HG18) but delivery would be the responsibility of the Highways Authority (National Highways / East Sussex County Council).
- 2.67. The document was checked against the accessibility requirements to ensure that it complied with regulations. The conformity references were double checked and amended where required.
- 2.68. Some maps have been amended for the Submission Version, for instance the local green space map (where two spaces have been removed), and to reflect the removal of Cooks Field (possible housing site, HG 11).
- 2.69. **Vision and Objectives:** Additional text has been added to cross-reference the aims and objectives of East Sussex County Council (ESCC) on a number of issues. For example, inclusion of the Local Cycling and Walking Infrastructure Plan and reference to the need for the HGNP to support the mental and physical health and wellbeing of the population. Reference to this latter point has been included throughout the HGNP, where relevant.
- 2.70. **Spatial Strategy and Housing:** The policy was largely supported. As noted above, there was some commentary mainly from residents raising concerns about the level of development. The Steering Group has sought to ensure that the quantum of development proposed conforms to the requirements as set out by RDC.
- 2.71. At least one comment suggests that the number of homes to be delivered by the Plan is too restrictive and should be seen as a minimum. The Steering Group have confirmed with RDC that the figure of 75 homes (minus the 20 homes already committed at Foundry Close, and the 26 homes at London Road, North) provides an acceptable strategy to work to.
- 2.72. Responses included a call to ensure that affordable housing should be delivered in the parish. Policy HG3 seeks to ensure that housing delivered meets local need, as evidenced in the Local Housing Needs Assessment and Housing Demand Survey. The

wording of the policy has been amended to provide greater clarity, on the advice of RDC, and reference to First Homes has been included.

- 2.73. RDC suggested that Policy HG6 (Energy efficiency and design) could be refined for clarity purposes. The Steering Group has reviewed the policy and, in addition, further supporting evidence has been included in the justification text.
- 2.74. Concerns were raised about whether new housing would contribute to the character of the parish, with examples of nearby recent developments cited. The Steering Group consider that the Design Guide prepared for Hurst Green, which forms an integral part of the HGNP, will help to enable high quality developments that reflect and contribute to local character. This is supported by the fact the National Planning Policy Framework now includes explicit reference to communities having a direct say in the look and feel of their communities.
- 2.75. On the Design Guide, RDC raised a number of points of clarity. These were referred to the consultants (AR Urbanism), who have amended the Guidance accordingly.
- 2.76. ESCC raised the fact that the county as a whole has an aging population and recommended including reference to the RTP1 guidance on planning for dementia, which predominantly (although not exclusively) impacts this age cohort. This has been included in the Submission Version.
- 2.77. **Environment and Green Space:** The policies in this section were strongly supported by residents.
- 2.78. The Trustees responsible for Burgh Wood responded to object to the inclusion of the woodland. Given that the majority of the woodland is designated as ancient woodland, the Steering Group considered it unnecessary to retain in the HGNP and the site has been removed. The Trustees offered to work with the HGPC on opening up additional access to the woods and undertaking a joint conservation project, which is welcomed.
- 2.79. The Hurst Green allotments were proposed as a local green space. The owners responded to note that the Allotment land is rented by them to HGPC on a peppercorn rent and that it is not their intention to change this arrangement. However, that they would not want the land to be registered as a local green space. The Parish Council reflected on this matter and have decided to remove the site from the HGNP.
- 2.80. Some residents asked why additional local green spaces had not been designated. It was considered that the list of green spaces has stemmed from the community consultation and includes those that meet the NPPF criteria. Other spaces have not been included as they are either adequately protected by a different designation or do not meet the criteria.
- 2.81. Policy HG10 (Green infrastructure) has been amended on the advice of ESCC to require green spaces provided by way of development to be welcoming, safe and accessible for all.
- 2.82. There was a comment about potential overlap between Policies HG9 (Protecting the natural features of the Parish) and HG10 (Green infrastructure). These have been reviewed and amended to address this.

- 2.83. **Community Facilities:** The policies in this section were strongly supported. RDC commented on the inclusion of the word 'Green' as part of the Village Hub scheme. The Parish Council consider that this would be in-keeping with the overarching aims around supporting development that helps to mitigate climate change and reflects the content of Policy HG6 (Energy Efficiency and Design). It also creates an effective link back to the name of the parish.
- 2.84. One comment was received from the landowner's agent objecting to Council's reference to a former church / community building held on a 90 year lease by the Council that had been included in the Council's vision for the green village hub. Following the closure of the Community Shop and Café, the Council has chosen to surrender this lease, and has therefore removed references to this building and responded to a further request since the consultation to explicitly clarify this. The HGNP has therefore been amended to explicitly clarify that the policy relates to buildings and land under the control of the Parish Council, and/or other branches of Government.
- 2.85. One comment raised concerns about the time taken to enact changes to local facilities, particularly for younger children and teenagers. The Parish Council advised that the HGNP can provide the framework, from a planning perspective, to enable projects such as the Green Village Hub and updated sporting facilities, but clearly there are associated actions and funding required to bring these ideas to fruition. These are set out in Section 14 of the HGNP. Having a 'made' NP would also enable CIL money to be clawed in, which will be spent locally to enable projects such as the ones referenced in this specific representation.
- 2.86. **Business, Economy and Tourism:** The policies were strongly supported. Residents were keen to support tourism and the HGNP seeks to enable this. There was support too for the policies seeking to enable start-up units/homeworking opportunities.
- 2.87. Policy HG17 (Supporting local employment opportunities) was reworded to reflect the advice of ESCC in terms of broadening out reference to broadband providers. In addition, reference has been included to the pan-Sussex Tourism Initiative within the supporting text for Policy HG16 (Promoting sustainable rural tourism)
- 2.88. **Getting Around – Sustainable Movement:** The policies in this section were strongly supported. Traffic impact was raised by a number of respondents, particularly in relation to the site allocations. The HGNP is seeking to encourage active travel (at least within the parish) although this is not without challenge given land ownership and topography issues. Highways have been consulted in terms of the sites and have raised no initial concerns, although the full detail again would be included at the planning application stage.
- 2.89. ESCC raised a concern that the provision and amount of car parking spaces should be carefully considered and balanced between improving walking and cycling connectivity to any new green space and recognising people may have no other option but to drive if travelling from further afield. The HGNP supports active travel but recognises that this is not optimum or possible for all users. It also recognises the unusual circumstances where connecting roads to surrounding villages do not include pavements or cycle paths. HGPC has been campaigning to National Highways and ESCC to resolve this for many years. The need for car parking provision was raised throughout the engagement phases

of the project and this has been carefully considered by the Steering Group. It is considered important to retain existing space and to support opportunities for additional provision that could help to alleviate current challenges associated with on-street parking. The installation of charging points for electric vehicles is supported at locations around the village in order to encourage a shift to less polluting vehicles, for those who are dependent on motor vehicle use.

- 2.90. **Housing Allocation Policies:** For all sites, Natural England reiterated that any sites must be developed in a way that conserves and enhances the special landscape of the AONB. This is understood by the Steering Group and much work has gone into to understanding the potential landscape impacts and how these can be mitigated. All site allocation policies have been amended to make explicit reference to the High Weald AONB Management Plan principles.
- 2.91. **HGSA1 (Site HG 11):** Concerns were raised about traffic impacts of the site – see para 2.74. In addition, concerns were raised about the visual impact of the site and the impact on biodiversity. The policy was amended to require a Stage 2 Landscape Assessment and Visual Impact Assessment. In relation to comments on wildlife, the applicant would be required to undertake an assessment related to the ecology of the site as part of the planning application preparation. In 2024, following an outline planning application being made relating to the site, and additional consultation undertaken with residents at a public meeting (principally attended by residents of Burgh Hill), the Parish Council have removed the proposed site from the plan.
- 2.92. **HGSA2 (Site HG 22/43):** The housing numbers were amended within the policy to ‘a minimum of 28 dwellings’ to accords with the site promoter’s proposals. These are considered to enable the density as previously sought and take account of the landscape considerations. Inclusion of the ancient treeline as a consideration has been included in the policy. Planning permission, broadly in-line with the proposed policy has already been granted by Rother District Council, so the Council have removed this policy and updated the plan accordingly.
- 2.93. **HG 6:** A comment related to the density of site HG6, particularly near to the ancient woodland (Burgh Wood). The Steering Group advised that the exact nature of the scheme would be considered at the application stage, however an additional requirement has been included for a landscape assessment to be required for all sites in the context of their situation with the AONB. In April 2023, RDC granted planning permission for 26 homes, broadly in-line with the HGNP’s draft policy for the site.
- 2.94. **HG 45:** Comments raised concerns about the impact of development of this site on existing trees. In response, the Steering Group advises that the policy has been directly informed by an independent landscape assessment and a Strategic Environmental Assessment. All development is required to deliver a net gain in biodiversity of at least 10% as required by the Environment Act. There is a balance to be struck between delivering the quantum of housing (as required by government, via Rother District Council) and identifying sites that would have the least environmental impact. In addition, the site promoters have suggested that their proposal would seek to retain much of the existing vegetation on the site.

2.95. Hurst Green Parish Council carefully considered the formal responses to those who had taken the time to part in the regulation 14 consultation. Councillors held a deep dive working session on the 20th April 2023 to carefully agree and review the proposed wording to these, which were first circulated to Councillors in February 2023. The Council approved the representation responses at its meeting on 25th April 2023. Given the passage of time, and the 2023 Council elections (which saw several new Councillors take office), the Council approved an updated version of these in 2024.

Stage IV: Finalising the Submission (Regulation 16) Plan (2023-2024)

- 2.96. Following the changes made to the HGNP as a result of the Regulation 14 consultations and additional consultation with local residents, updated drafts of the proposed submission documentation was shared with Rother District Council during the spring of 2024. Rother District Council (RDC) provided HGPC with minor additional feedback on these, principally reflecting the emerging local plan, which the Parish Council have incorporated.
- 2.97. The Submission Version Plan was formally submitted to RDC who, once satisfied that the correct set of documents have been received, will undertake the Regulation 16 consultation. It will then proceed to Examination and, assuming a favourable outcome, to referendum.

3 CONCLUSION

- 4.1. The Parish Council has undertaken a very thorough engagement programme in order to develop its Neighbourhood Plan. It has set out a comprehensive vision and objectives and guiding principles. In developing the policies to achieve the vision and objectives, the Steering Group and Parish Council has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 4.2. Feedback from the Regulation 14 consultation and the subsequent follow-up with respondents, has been helpful in enabling the Parish Council to make amendments that are considered to improve the HGNP.
- 4.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 4.4. Gratitude is extended to everybody who has contributed to the HGNP's development, either as a valued member of the Steering Group or the Task Groups, as well as to those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the HGNP.

Appendix A – Steering Group Terms of Reference

Terms of Reference for the Hurst Green Parish Council Neighbourhood Plan Steering Group (NPSteering Group)

Relationship between the Neighbourhood Plan Steering Group and Hurst Green Parish Council

1. Hurst Green Parish Council ('the parish council') is the qualifying body for the preparation of a Neighbourhood Plan for the parish.
2. The Hurst Green Parish Council Neighbourhood Plan Steering Group ('the NP Steering Group') is a working group of the Parish Council; it will be accountable for progress of the Neighbourhood Plan and will report regularly to the Parish Council.

Purpose

1. The purpose of the Neighbourhood Plan Steering Group (NP Steering Group) is to oversee the preparation of a sound Neighbourhood Plan for Hurst Green Parish on behalf of the parish council and the community, ensuring that relevant issues are explored, and that public participation and engagement occurs during the process.

Key Tasks

The NP Steering Group will:

1. determine the overall scope and objectives of the Neighbourhood Plan
2. provide strategic management of the preparation of the Neighbourhood Plan, ensuring that key milestones are achieved, and that an appropriate delivery plan to implement an appropriate Neighbourhood Plan is produced
3. Set a target date for referendum and delivery of the final Neighbourhood Plan
4. determine the required level of communication and engagement, so that as many members of the community as possible may be involved, including seeking representation from under-represented sections of the community
5. determine appropriate thematic task groups and also consider whether any sub working groups need to be formed to address specific activities
6. appoint roles that will be necessary to successfully deliver the plan, for example communications officer, street representatives, Swiftsden representative, Silver Hill representative etc. and decide which of these should be part of the NP Steering Group
7. build links with Rother District Council and all other relevant authorities and organisations to maximise their assistance and commitment to the Neighbourhood Plan
8. agree a programme of consultation with relevant statutory bodies as required
9. gather necessary evidence, including commissioning such work to support the evidence base for the Neighbourhood Plan

10. be accountable to the Parish Council for budgeting and controlling expenditure necessitated by the preparation and delivery of the Neighbourhood Plan
11. agree, subject to approval by the Parish Council a final submission version of the Neighbourhood Plan
12. keep under review the legislative requirements around Neighbourhood Planning to ensure the plan meets all requirements
13. set goals for the interim and final reports
14. seek an Independent Examination of the proposed Neighbourhood Plan
15. revise the draft of the Neighbourhood Plan following the internal and external review
16. facilitate the timing and process for the Referendum
17. do such other tasks as are necessary to facilitate the preparation of the Neighbourhood Plan

Key documents - the following will be presented to the full Parish Council for approval / ratification:

1. Steering Group membership list
2. Terms of Reference
3. Project timetable
4. Budgets
5. Proposed scope of the Plan
6. Drafts of the Plan and the final submission version

NP Steering Group Membership

1. Membership of the NP Steering Group will consist of no fewer than five and up to ten volunteers who are committed to the task of producing the Neighbourhood Plan.
2. Such membership will include no fewer than three members of the Parish Council, including the Parish Council Chairperson.
3. Such membership will ideally include the Chairperson of each task group.
4. Where the Chairperson role of a Task Group is shared, each Co-Chairperson shall be a member of the NP Steering Group and shall have full voting rights, unless a conflict of interest applies, where the member shall abstain from taking part in any such vote.
5. Other members may include District Councillors, and people who are able to represent other key parish-wide organisations, residents and/or people who work in the Parish.

6. The Steering Group will be supported by the Parish Clerk (advisory - non-voting).

Meetings

1. The NP Steering Group will aim to meet monthly in public prior to the pre-submission consultation (regulation 14), or when members determine that a meeting is needed.
2. During the coronavirus pandemic, or any such similar event, the NP Steering Group will aim to meet virtually and seek to provide a publicly accessible virtual conferencing facility for use by members of the public.
3. For the purpose of its meetings at its first meeting the Steering Group will elect a Chairperson by means of a secret ballot conducted by the Parish Clerk. The ballot shall consist of the names of all members present.
4. Should the member with the most votes proposed be unwilling to serve as the Chairperson, the member with the next number of votes, and who is willing to stand, shall be duly elected.
5. The NP Steering Group will receive reports from each of the neighbourhood plan's task groups and will provide recommendations to assist with delivering the neighbourhood plan successfully according to the objectives, scope, time, quality and cost in accordance with the plan.
6. A minimum of four NP Steering Group members must be present to effect decisions.
7. The NP Steering Group will aim to make decisions by consensus. However, should a vote be required, each member will have one vote and a simple majority, by show of hands, will be required.
8. The Chairperson may give an original vote on any matter put to a vote, and in the case of an equality of votes may exercise a further casting vote whether or not they gave an original vote.
9. The Steering Group will be attended by the Parish Council's Clerk who will capture actions and ensure that appropriate minutes are kept and are sent to members and the Parish Council (in draft form, until confirmed at the next meeting of the NP Steering Group) in a timely manner and no later than 14 working days after the meeting.
10. Minutes and actions of the NP Steering Group will aim to be published on the Parish Council website, or a website dedicated to providing information about the Neighbourhood Plan, following each meeting.
11. As much use as possible is to be made of electronic communications.
12. Members of task groups who are not members of the NP Steering Group shall be encouraged to attend NP Steering Group meetings, as shall residents and the general public, however, NP Steering Group meetings are not public meetings.
13. Steering Group meetings will be suitably promoted and be open to the public and

held in either in the Village Hall, or at another suitable public location and will be subject to the same rules and Adopted Standing Orders as Parish Council Meetings.

14. The NP Steering Group will periodically, at an item dedicated to the purpose, review the expenditure against the allocated and agreed budget to ensure the neighbourhood plan stays within the agreed funding envelope.

Task Groups

The Steering Group will oversee the setting up of thematic task groups whose task will be to prepare and feed into the Steering Group the evidence necessary for the sound preparation of the Neighbourhood Plan and to draft the proposed approaches to be taken for each area. It is however recognised that the NP Steering Group has the authority to decide on both the scope and number of task groups.

The thematic task groups will initially include:

- Housing (including matters such as site allocation, design, affordability)
 - Economy, Business & Tourism
 - Education & Training
 - Environment (including green spaces, air quality, conservation, energy)
 - Leisure facilities (including recreation, footpaths, bridleways, sports facilities)
 - Infrastructure (including rail, roads, parking, broadband)
1. Residents of Hurst Green Parish will be encouraged to volunteer to join and participate in the thematic task groups related to areas that they are interested.
 2. It is anticipated that a task group could consist of as many members as is necessary to support the group.
 3. It is hoped that a Hurst Green Parish Councillor would be a member of each task group to ensure strong links to the Parish Council, but there is no expectation that they be the Chairperson.
 4. Meetings of thematic task groups will not need to be open to the public, and can be held at any location deemed mutually acceptable to the group.
 5. Task groups will meet i as required prior to the pre-submission consultation (regulation 14) or when members determine that a meeting is needed.
 6. For the purpose of its meetings at its first meeting a task group will elect a Chairperson by means of a secret ballot. The ballot shall consist of the names of all members present.
 7. Should the member with the most votes proposed be unwilling to serve as the Chairperson, the member with the next number of votes, and who is willing to stand,

shall be duly elected.

8. The Chairperson of each task group should be willing to serve on the NP Steering Group to represent the task group.
9. In the event that a task group's Chairperson is unable to make a meeting of the NP Steering Group, they have the authority to send a delegate to any meeting. The delegate shall have the same voting power as the Chairperson. The delegate must however be a recognised member of the task group (as determined by the NP Steering Group) that they are representing.
10. In the interests of good governance and to share progress, where appropriate task groups should appoint a member, if not the Chairperson to capture agreements of their decisions which should be sent to the task group members and copied to the Steering Group in a timely manner following any meeting.
11. Task group's should aim to make decisions by consensus. However, should a vote on any proposed action or recommendation be required, each member will have one vote and a simple majority, by show of hands, will be required.
12. The Chairperson may give an original vote on any matter put to a vote, and in the case of an equality of votes may exercise a further casting vote whether or not they gave an original vote.
13. Should a task group consider that a particular meeting of the task group would likely be of interest to Hurst Green residents and the general public, the Chairperson should give consideration to notifying the Chairperson of the NP Steering Group who will make the necessary arrangements for such a meeting.
14. As much use as possible is to be made of electronic communications.

Standards and Declaration of Interests

1. All members of the NP Steering Group and Task Groups must recognise that their role is to move forward the Neighbourhood Plan in a way that benefits the whole community.
2. Members of the NP Steering Group must agree to follow the Seven Principles of Public Life upheld by the Committee on Standards in Public Life (see Appendix 1)
3. Members of the NP Steering Group and those of the Task Groups will be strongly encouraged to complete a Declaration of Interests form, similar to that of the Parish Council.
4. Members of the NP Steering Group and those of the Task Groups will recognise and declare any conflicts of interest; in situations where interests and roles are in conflict they must be declared before the business is discussed and the member should leave the room for that item.

Finance

The accountable body for the purpose of producing a Neighbourhood Plan will be the Parish Council.

1. To aid with proper accounting, any task group who anticipates spending money, will be responsible for producing a planned budget and submitting this to the NP Steering Group for ratification and approval.
2. The NP Steering Group will provide the parish council's Responsible Financial Officer (RFO) with budgetary information, so that all proposed spending on the preparation of the Neighbourhood Plan is dealt with in an open and transparent manner. Budgets and amended budgets will be presented to the Parish Council for approval.
3. All expenses over £500 will be approved prior to their actual expenditure; this approval shall be a majority vote of the NP Steering Group members during their monthly meeting. .
4. No requests for expense approval shall be submitted for approval to the NP Steering Group unless the budget area the item relates to is clearly identified with the request and an approved budget exists to cover the planned expense.
5. Chairperson's of the Neighbourhood Plan's task groups shall ensure they maintain visibility and good control over their task group's budget and any associated expenses.
6. All receipts and payments associated with the production of the Plan will be processed through the parish council's accounting system.

7. Invoices will, wherever possible be made out in the name of the parish council's.
8. All grants and funding will be held by the parish council, who will ring-fence the funds for Neighbourhood Plan purposes only.

Changes to these Terms of Reference

1. Proposed changes to these terms of reference may be amended with the support of at least (two-thirds) of the current membership of the NP Steering Group at a NP Steering Group meeting.
2. Any proposed changes to these terms of reference, once voted in favour of doing so by the NP Steering Group must then be presented to the parish council for ratification.

Dissolution

1. The NP Steering Group will be dissolved once its objectives have been attained and when the parish council consider its services are no longer required.
2. The parish council will then dispose of any remaining funds held in accordance with any conditions imposed by the grant funders and in the best interests of the parish.

Appendix 1 - Seven Principles of Public Life

1. Selflessness - Holders of public office should act solely in terms of the public interest.
2. Integrity - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
3. Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
4. Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
5. Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
6. Honesty - Holders of public office should be truthful.
7. Leadership - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

APPENDIX B – Survey provided at the Policy Options Open Day, October 2021

Hurst Green Neighbourhood Plan – Feedback Form

As you visit each of the display areas today, please let us know to what extent you agree with our intentions for the Neighbourhood Plan by ticking the relevant box below.

If you have any further comments on the objectives, please provide these in the space below (or continue on a new sheet as required).

Objective / Policy Area	Agree	Disagree	Not sure
Objective 1: To protect against inappropriate and speculative development and to provide guidance and greater influence over how Hurst Green should be developed in the future.			
Policy: We should direct development to the most sustainable (near to facilities) parts of the Parish – i.e. Hurst Green village itself.			
Policy: Sites allocated in the Neighbourhood Plan should offer something back to the community – e.g. green spaces, community facilities, public car parking etc.			
Policy: Homes delivered should contribute towards housing needs of the Parish – e.g. homes for those wishing to downsize, family homes and first homes.			
Policy: Developments should be designed to incorporate sustainable features – e.g. energy saving, thermal insulation, on-site energy generation etc.			
Comments:			
Objective 2: To improve public safety and reduce the harmful impact of road traffic, while providing sufficient parking for the community.			
Policy: Any new homes should be in places that link up with the rights of way network to enable people to reach local facilities by foot/bike if they wish.			
Policy: Existing public car parking should be safeguarded.			
Policy: Provide for sustainable transport modes – electric charging points in public places, cycle storage etc.			
Policy: Make sure there is adequate provision of off-road parking alongside new residential development.			
Comments:			

Objective / Policy Area	Agree	Disagree	Not sure
Objective 3: To create an environment that encourages residents to live active, social, meaningful lives that promote good health and well-being.			
Policy: Safeguard the existing allotments and support the provision of additional 'growing spaces'.			
Policy: Recognising our 'dark skies' and protecting these from unnecessary light pollution.			
Policy: Improving provision of sports and recreational facilities, including at Drewett's Field, and facilities aimed at teenagers.			
Comments:			
Objective 4: To bring forward action on facilities and improvements, which are needed by the village of Hurst Green; and the hamlets of Silver Hill and Swiftsden.			
Policy: Enhance the area around the village hall, village shop and playground to create a welcoming 'village hub'.			
Comments:			
Objective 5: To improve the visual appearance and overall perception of Hurst Green as a place where people want to live, work and visit.			
Policy: Improving connectivity around the Parish – and its facilities - by foot and by bike. This might include upgrading paths and adding new connections where possible.			
Policy: Improving the public realm through planting, trees etc.			
Policy: Providing accessible green space within any new developments.			
Policy: Identifying longer term traffic calming measures, e.g. new pedestrian crossings, village 'gateways' etc.			
Comments:			

Objective / Policy Area	Agree	Disagree	Not sure
Objective 6: To enhance our existing, and create new, open green spaces and improve access to the countryside.			
Policy: Protecting and improving the natural features of the parish and, where possible, incorporating such features within development areas.			
Policy: Mapping our Green Infrastructure Network, which provides valued habitats for flora and fauna.			
Policy: Protecting particularly special 'Local Green Spaces' against inappropriate development.			
Policy: Safeguarding important views and vistas from inappropriate development.			
Comments:			
Objective 7: To increase business, retail and tourism opportunities to encourage local employment, and grow the local economy.			
Policy: Promote sustainable rural tourism.			
Policy: Support local employment, through safeguarding existing employment sites and enabling opportunities such as home working and start-up units.			
Comments:			
Objective 8: To conserve and enhance the built and historic environment and improve the general street scene around the parish.			
Policy: Development should be in-keeping with the existing character of the Parish.			
Policy: Heritage assets should be conserved and enhanced.			
Comments:			

The potential sites for allocation

We have to allocate sites within the Neighbourhood Plan to accommodate at least 55 homes. We would be grateful for your views on the individual shortlisted sites as well as the proposed allocation options, which have been prepared by our environmental consultants.

Bearing in mind that we need to allocate at least 55 homes, would you be supportive of this site for development?

	Yes	No	Not sure
HG06: Land at London Road			
HG11: Cooks Field Burgh Hill			
HG22/43: Land opp. the school			
HG30: Land adjacent to Mill Barn (Silver Hill)			
HG40: Land behind Foundry Close (TN19 7QW)			
HG42: Land behind Foundry Close (TN19 7PN)			

Do you think that the scheme, as proposed by the site promoter, is acceptable?

	Yes	No	Not sure
HG06: Land at London Road			
HG11: Cooks Field Burgh Hill			
HG22/43: Land opp. the school			
HG30: Land adjacent to Mill Barn (Silver Hill)			
HG40: Land behind Foundry Close (TN19 7QW)			
HG42: Land behind Foundry Close (TN19 7PN)			

Do you have any comments about any of the sites?

Site options to deliver the required number of homes

Independent consultants have reviewed a range of potential options to deliver the required homes against a series of environment factors, to understand the extent of negative impact that site might have.

The options assessed are:

Option A: Delivery of the housing target through allocations at Site HG11, Site HG22/43 and Site HG40. The total homes delivered through this option would be in the region of **58 dwellings**.

Option B: Delivery of the housing target through allocations at Site HG06, Site HG11 and Site HG22/43. The total homes delivered through this option would be in the region of **77 dwellings**.

Option C: Delivery of the housing target through allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42. The total homes delivered through this option would be in the region of **72 dwellings**.

Option D: Delivery of the housing target through allocations at Site HG11, Site HG22/43 and Site HG30. The total homes delivered through this option would be in the region of 65 dwellings. In addition to sites in Hurst Green village, this would also deliver a Site HG30, which is located in Silver Hill. Whilst outside the development boundary, there is merit in exploring the capability of HG30 from an SEA perspective as it could in theory contribute to the vitality of this smaller hamlet.

The assessments find that Option A would have the least environmental impacts, followed by Option B, Option D and finally, Option C.

Which of the following site options would you be most likely to support?

	Yes	No	Not sure
Option A: HG11, HG22/43 and HG40: 58 dwellings			
Option B: HG11, HG22/43: 77 dwellings			
Option C: HG22/43, HG40, HG42: 72 dwellings			
Option D: HG11, HG22/43, HG30: 65 dwellings			

Do you have any comments on the site options?

APPENDIX C – Letter posted to all parish households at Regulation 14



000_000_0000000_000000_0000_00000

address line 1
address line 2
address line 3
address line 4
address line 5
address line 6
address line 7



Hurst Green Parish Council
The Parish Office, Village Hall,
Station Road, Hurst Green,
East Sussex,
TN19 7PL

20 July 2022

Invitation to comment on the Pre-Submission Version of the Hurst Green Neighbourhood Plan

In accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended), notice is given that a formal public consultation on the Pre-Submission Version of the Hurst Green Neighbourhood Plan will run from 9am on Wednesday 27 July to 5pm on Saturday 17 September 2022.

About the draft plan

In 2017, Hurst Green Parish Council agreed to proceed with a Neighbourhood Development Plan. A steering group comprising of local Councillors and volunteers from the community was set up to lead the project to develop the Hurst Green Neighbourhood Plan.

The Neighbourhood Plan is a formal document that sets out planning and land-use policies relating to the Hurst Green neighbourhood area. It sets out, in development terms, how land should be used within the parish, as well as planning policies to influence development proposals.

As ultimately it will form part of the development plan for Rother (sitting alongside the Local Plan) the Neighbourhood Plan must undergo a rigorous process, including a series of consultations, an independent examination and finally a local referendum.

If adopted, the plan will be used by Rother District Council alongside the Local Plan policies to determine the outcome of planning applications within Hurst Green.

After several years of investigation, public events and consultation the Parish Council is pleased to present you with a draft of the Hurst Green Neighbourhood Development Plan, which we are now consulting on.

How to view a copy of the draft plan

If you have internet access, the easiest way to view or download the plan and its supporting materials, including the Strategic Environmental Assessment, is online at: www.hurstgreen2030.uk/consultation

You can also view a printed version of the draft plan at the Village Hall and at various locations around the parish. For more information please call 01580 860111.

How to comment on the draft Neighbourhood Plan

You are invited to submit your comments on the plan by:

- Completing the online survey accessible from our website at: www.hurstgreen2030.uk/consultation
- Picking up and returning a printed copy of the survey form from Hurst Green Village Hall or from local businesses.
- By email to: clerk@hurstgreen-pc.gov.uk
- By post to: Hurst Green Parish Council, The Parish Office, Village Hall, Station Road, Hurst Green, East Sussex, TN19 7PL

All responses must be received no later than 5pm on 17th September 2022.

The cost of producing and sending this letter has been funded by a grant to the Parish Council from the Department for Levelling Up, Housing and Communities.

yours faithfully,

Cllr Andrew Brown
Hurst Green Neighbourhood Plan
pp Hurst Green Parish Council

APPENDIX D - Copy of Feedback Survey accompanying Regulation 14 consultation

**Invitation to comment on the Pre-Submission Version of the
Hurst Green Neighbourhood Plan**

Question 1: To what extent do you agree with the following policies?

Proposed Spatial Strategy and Housing Requirements policies	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HG1: Location of development					
Policy HG2: Housing Strategy					
Policy HG3: Meeting local housing needs					
Please add any comments you have on the proposed Spatial Strategy and Housing Requirements policies.					

Proposed Character, Heritage, and Design policies	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HG4: Character of development					
Policy HG5: Design of development					
Policy HG6: Energy efficiency and design					
Policy HG7: Enhancing the public realm					
Policy HG8: Protecting Hurst Green's dark skies					
Please add any comments you have on the proposed Character, Heritage, and Design policies.					

If you require extra space, there is a space for additional comments on page 5.

Question 2: To what extent do you agree with the following policies?

<i>Proposed Environment and Green Space policies</i>	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HG9: Protecting the natural features of the parish					
Policy HG10: Green infrastructure					
Policy HG11: Local Green Space					
Policy HG12: Protection of locally significant views					
Please add any comments you have on the proposed Environment and Green Space policies.					

Question 3: To what extent do you agree with the following policies?

<i>Proposed Community Facilities policies</i>	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HG13: A village hub for Hurst Green					
Policy HG14: Sports and leisure facilities in Hurst Green					
Policy HG15: Allotments and community growing spaces					
Please add any comments you have on the proposed Community Facilities policies.					

If you require extra space, there is a space for additional comments on page 5.

Question 4: To what extent do you agree with the following policies?

<i>Proposed Business, Economy and Tourism policies</i>	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HG16: Promoting sustainable rural tourism					
Policy HG17: Supporting local employment opportunities					
Please add any comments you have on the proposed Business, Economy and Tourism policies.					

Question 5: To what extent do you agree with the following policies?

<i>Proposed Community Facilities policies</i>	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HG18: Encouraging active travel					
Policy HG19: Public car parking					
Policy HG20: Residential parking provision					
Policy HG21: Highway capacity at key road junctions					
Please add any comments you have on the proposed Community Facilities policies.					

If you require extra space, there is a space for additional comments on page 5.

Question 6: To what extent do you agree with the following policies?

<i>Proposed Housing Allocations policies</i>	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
Policy HGSA1: Site HG11: Cooks Field, Burgh Hill					
Policy HGSA2: Site HG22/43: Land opposite Hurst Green School					
Policy HGSA3: Site HG6: The Field Opposite the Lodge, London Road					
Policy HGSA4: Site HG45: Land adjacent to Iridge Place TN19 7PN					
Please add any comments you have on the proposed Housing Allocations policies.					

If you require extra space, there is a space for additional comments on page 5.

Question 7: Do you have any comments on the (non-policy) projects proposed in Section 14 of the Neighbourhood Plan and outlined in the Vision to 2030 document?

Question 8: Are there any other comments you wish to make on the proposed Hurst Green Neighbourhood Plan?

The Parish Council will process your details in relation to the preparation of the Neighbourhood Plan only. All comments and your name or organisation (but not your contact information) will be made publicly available. Personal information provided will be confidential and processed in line with the Data Protection Act and the General Data Protection Regulations.

Question 9: Anonymous comments cannot be accepted, so please tell us who you are?

Full name:	
If you are providing a response on behalf of an organisation, please give us the organisation's name:	
Your address:	
Your telephone number:	
Your email address:	

	Yes	No
Question 10: Are you happy for the Parish Council to contact you in relation to your comments?		
Question 11: Are you happy for the Parish Council to pass your contact details on to Rother District Council, so that they are able to contact you if required?		

Thank you for completing the survey, please return this survey by 5pm on the 17th September 2022:

By e-mail to: clerk@hurstgreen-pc.gov.uk

By post to: Hurst Green Parish Council, The Parish Office, Village Hall, Station Road, Hurst Green, East Sussex, TN19 7PL

By hand: you can post your survey into the Parish Council's green letter box, located immediately adjacent to the entrance of Hurst Green village hall.

APPENDIX E - List of statutory consultees consulted at Regulation 14

		Contact Information:
1a)	N/A - not a London Borough	
1b)	Local Authorities:	
	Rother	planning.strategy@rother.gov.uk
	Hastings	kculbert@hastings.gov.uk
	Wealden	planningpolicy@wealden.gov.uk
	Tunbridge Wells	Planning.Policy@Tunbridgewells.gov.uk
	Ashford	planning.policy@ashford.gov.uk
	Folkestone & Hythe	adrian.tofts@folkestone-hythe.gov.uk
		planning.policy@folkestone-hythe.gov.uk
	County Councils:	
	ESCC	chris.flavin@eastsussex.gov.uk
	Kent	strategicplanning@kent.gov.uk
	Parish Councils:	
	Salehurst & Robertsbridge	clerk@salehurst-pc.org.uk
	Etchingham	paulette.etchinghampc@gmail.com
	Ticehurst	clerk@ticehurstparishcouncil.co.uk
	Hawkhurst	parish.clerk@hawkhurst-pc.gov.uk
	Bodiam	clerkbodiam@hotmail.com
1d)	Homes England	enquiries@homesengland.gov.uk
1e)	Natural England:	consultations@naturalengland.org.uk
1f)	Environment Agency:	kslplanning@environment-agency.gov.uk
1g)	English Heritage	e-seast@historicengland.org.uk
1h)	Network Rail:	elliott.stamp@networkrail.co.uk
		TownPlanningSouthern@networkrail.co.uk
	South Eastern Rail:	george.paterson@southeasternrailway.co.uk
	Southern Rail:	yvonne.leslie@southernrailway.com
		GTRPublicAffairs@gtrailway.com
1i)	Highways England:	planningse@highwaysengland.co.uk
		Kevin.Bown@highwaysengland.co.uk

1k)	Electronic Communications:	philip.jansen@bt.com
		public.affairs@ee.co.uk
		emf.enquiries@ctil.co.uk
		borje.ekholm@ericsson.com
		jane.evans@three.co.uk
1l) (i) (ia)	CCG & NHS Commissioning Board:	richard.watson6@nhs.net
		mathew.chetwynd@nhs.net
		mark.adams@property.nhs.uk
		fiona.kellett@nhs.net
1l) (ii)	Licence under Electricity Act:	nationalgrid.uk@avisonyoung.com
		box.landandacquisitions@nationalgrid.com
		david.bible@gtc-uk.co.uk
		katy.taylor@gtc-uk.co.uk
		bscarsella@ukpowernetworks.co.uk
		developer@edfenergy.com
		veronique.martre@ukpowernetworks.co.uk
		plans@ukpowernetworks.co.uk
1l) (iii)	Licence under Gas Act:	Simon.harkins@sgn.co.uk
		Peter.morgan@sgn.co.uk
1l) (iv)	Sewerage Undertaker:	planning.policy@southernwater.co.uk
1l) (v)	Water Undertaker:	wre@southeastwater.co.uk
		lee.dance@southeastwater.co.uk
		david.hinton@southeastwater.co.uk
1l)(m)(n)	Rother Voluntary Action	office@rva.uk.com
(o) (q)		claire.cordell@rva.uk.com
1l (m)(p)	Action in Rural Sussex	info@ruralsussex.org.uk
1l(m)	High Weald Joint Advisory Committee	info@highweald.org
		claire.tester@highweald.org
1l(p)	WARR Partnership	leader@plumpton.ac.uk
	Optional	
NA	Coal Authority	
NA	Marine Management Organisation:	

APPENDIX F - Summary of Regulation 14 feedback from the community, statutory consultees, site promoters/developers and other interested parties

#	Type:	Area:	Made by:	Representation	Hurst Green Parish Council response:	Plan updated	Summary of action taken:
1	Statutory Consultee	Vision and Objectives	East Sussex County Council	<p>1.5 Chapter 10 – Getting Around: Careful consideration has been given in the Plan on how to improve pedestrian and cycling access and connectivity within the village including forthcoming housing development, as well to key destinations such as Etchingam Station to the west of Hurst Green. 1.6 The importance of providing safe access across the A21 is an issue which needs to be sensitively considered. This includes near Hurst Green School which is situated on the A21 and where parents park along this strategic road which creates conflict between parents at pick up and drop off times, and those travelling along the A21 for other purposes. The use of maps within the NP are a useful tool which provide a clear visual representation of what the NP is seeking to achieve in terms of walking and cycling connectivity improvements. 1.7 The inclusion of electric vehicle charging within the document is supported. 3. Public Health 3.1 We welcome the emphasis the draft Neighbourhood Plan has on improving health and wellbeing and acknowledge that policies will have positive impacts, as concluded in the Strategic Environmental Assessment Report. We particularly welcome and support the strong approach to high quality design including reference to 'Building for a Healthy Life' and the proposed improvements to the public realm which will increase physical activity, reduce social isolation, and provide increased connections to nature. The following comments further highlight the links and strengthen the health and wellbeing benefits in the plan: 3.2 About Hurst Green a. Health intelligence should be weaved into the information on page 10 reflecting the characteristics of the community/local population including data on population demographics and health inequalities. Please refer to area profile on the East Sussex in Figures website for Hurst Green: https://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=area&subm_ode=result&areaname=Hurst+Green&areatype=PA</p>	Noted. Additional wording has been added throughout the HGNP to greater emphasise the need for the policies to address and support physical and mental health and wellbeing.	Yes	As per Parish Council response. The link to the Hurst Green Area Profile has been added to the 'About Hurst Section'.
2	Statutory Consultee	Vision and Objectives	East Sussex County Council	<p>3.3 Vision and Objectives b. The challenges and opportunities facing the parish in paragraph 3.1 should include adapting and providing for an aging population and improving health and wellbeing particularly around mental health issues associated with social isolation and a lack of social cohesion within the villages. c. It is suggested that the vision and objectives could further highlight and make links to health and wellbeing by including the following additional text in bold: 3.4 Travel and Transport 'We will support proposals that help to create an environment that will encourage walking, cycling and low carbon transport over car-use, particularly for shorter journeys in and around the Parish improving both physical health and mental wellbeing. We will also work with partners to explore ways to reduce the impact of the A21 on the parish.'</p>	Additional wording has been added as suggested.	Yes	As per Parish Council response.

3	Public Representation	Policy HG1: Location of development	Angie Loveless	Building on greenfield sites is not the solution to our climate crisis.	The Parish Council were the first Parish to declare a Climate Emergency in Rother District. As the Council does not set National Planning Policy or the housing allocations set by Rother District Council, the Parish Council is unable to change whether or not Hurst Green receives new housing. The HGNP does prioritise the development of brownfield sites above greenfield, however there are no brownfields sites available for development in the parish that have come forward in the local Call for Sites, or that responded to the Parish Council specific enquiries.	No	None.
4	Public Representation	Policy HG1: Location of development	Alison Shaw	I strongly object to the boundary proposed. There is no need to pack in further development to our small village at the detriment of the local feel and wildlife which the plan promotes in a later section. Developments could make much better use of the built up areas e.g. in Swiftsden or Silverhill. Whilst I agree that there are local housing needs it also needs to be taken into account that the infrastructure to this village is poor currently and further housing just adds to the burden on the village. The plan later states that a large proportion of people do not think that Hurst Green is a good place to live due to this.	The development of Swiftsden or Silver Hill is not supported by Rother District Council, which the HGNP must be in conformity with.	No	None.
5	Public Representation	Policy HG1: Location of development	Angie Loveless	There is insufficient infrastructure to support more housing. There is a shortage of water. The doctors and schools are full. The village is congested with traffic and parking, causing delays, hazards and air pollution. The plans are not environmentally robust. Building accounts for 40% of carbon emissions.	Under current National Planning Policy, infrastructure improvements are not considered to be material planning considerations. As the Council does not set National Planning Policy, the Parish Council is unable to change this. The Council has been guided by professional evidence, including within the Strategic Environmental Assessment (SEA) prepared by advisors appointed by the Department for Levelling Up, Housing and Communities.	No	None.

6	Public Representation	Policy HG1: Location of development	Jean King	Nothing for Silverhill.... no crossing to access footpaths on other side of A21	<p>A aspirations identified by the community for Silver Hill are included in the HGNP objectives, and a number of these have already been achieved by the Parish Council. For example the installation of a defibrillator. Silver Hill has been considered for housing, but as it sits outside the settlement boundary, it is deemed by Rother District Council to not be suited to housing site allocations.</p> <p>The Parish Council are supportive of providing safe access from Silver Hill to the footpath leading to Hurst Green, however the provision of this is outside the scope of the neighbourhood plan. As such, the plan supports the principle of this (Policy HG18) but delivery would be the responsibility of the Highways Authority (National Highways / East Sussex County Council).</p>	Yes	Vision and Council aspirations undated to highlight a desired crossing point between Silver Hill and Hurst Green.
7	Site Promoter/Developer Representations	Policy HG1: Location of development	Wooldridge Developments Ltd / DHA Planning	Policy HG1 (Location of Development) sets out that development in Hurst Green shall be focused within an amended development boundary to include several new housing sites. Policy HG2 (Housing Strategy) proposes to allocate four new housing sites which will equate to approximately 75 new dwellings in the village. Our client is supportive of these proposals which would accord with the spatial strategy of the adopted District Local Plan for RDC and help to provide much needed market and affordable housing in an area of severe need. 'Land at London Road' is allocated for 26 dwellings which aligns with the proposals that have been submitted as part of the planning application.	Noted.	No	None.

8	Statutory Consultee	Policy HG1: Location of development	Natural England	<p>Thank you for your consultation on the above dated 14 July 2022 which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We have reviewed the Pre-Submission Consultation Draft of the Hurst Green Neighbourhood Plan. The draft neighbourhood plan includes a number of site allocations which are expected to provide 55 new dwellings in total. Hurst Green has been provided by Rother District Council with a target of 75 new homes to accommodate through its neighbourhood plan policies. Planning permission has been granted for 20 homes within the designated neighbourhood planning area outside of the neighbourhood planning process and as a result the housing figure for Hurst Green Neighbourhood Plan has been reduced to 55 dwellings. Alongside reviewing the emerging Hurst Green Neighbourhood Plan, Natural England has reviewed the existing and emerging Rother District Council development plan documents and note that there are no further housing allocations located within the designated neighbourhood plan area in the adopted development plan. The emerging Local Plan is at an early stage and does not currently include any site allocations. None of the proposed housing allocation sites lie within the Impact Risk Zone of any SSSI or Habitats Sites. As a result Natural England has no objection to the emerging Hurst Green Neighbourhood Plan in terms of impact on designated nature conservation sites. Hurst Green is located in its entirety within the High Weald Area of Outstanding Natural Beauty (AONB). The NPPF is clear in paragraph 176 that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs and that the scale and extent of development within these designated areas should be limited. Paragraph 177 further sets out that permission for major development within an AONB should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.</p>	Noted. The Design Guidance, which forms an integral part of the Plan, seeks to ensure this.	No	None.
9	Statutory Consultee	Policy HG1: Location of development	Rother District Council	<p>HG1 Location of Development - As advised previously, Criterion A only is necessary in this policy. The other criteria risk diluting the Local Plan countryside policies and a better approach would be to refer to the Local Plan policies. As written, there is a risk of conflicting with the PPG advice that NDPs should not undermine the deliverability of the Local Plan.</p>	The Parish Council do not believe that this dilutes the deliverability of the emerging Local Plan, particularly as RDC have not made the Parish Council aware of what may or may not be in the plan - therefore the Parish Council consider it important to retain these clauses. Otherwise it would be diluting HG1.	Yes	Minor amendments have been made to the clauses.
10	Statutory Consultee	Policy HG1: Location of development	Natural England	<p>We note that Policy HG1: Location of Development acknowledges the neighbourhood plan's location within the High Weald AONB and stresses the importance of conserving this nationally important landscape.</p>	Noted.	No	None.

11	Site Promoter/Developer Representations	Policy HG1: Location of development	Landstrom Group Ltd / SFPlanning	<p>This representation is made on behalf of our client, Landstrom Group Ltd, in response to the consultation being run on the Hurst Green Neighbourhood Development Plan, which is a regulation 14 consultation. This representation relates to land to the south east of the proposed allocation at Cooks Field (north west of the A265). Landstrom Group Ltd have entered into a promotion agreement with the landowners. The Neighbourhood Plan is proposing to help meet housing need through the housing allocations. The housing requirement for the NDP area is 75 dwellings which has been derived from the Core Strategy, policy RA1. This was based on evidence available at that time, specifically the Strategic Market Housing Assessment (SHMA) which dates back to 2013. The SHMA pre-dates the introduction of the standard method for calculating housing need, which will need to be used to inform housing need in the review of the Core Strategy. Whilst being informed by now out-of-date evidence, presently the Core Strategy is failing to provide sufficient homes, with a housing land supply figure of less than three years. This has recently been confirmed through a planning appeal (PINS ref. APP/U1430/W/21/3283287) when the appeal inspector described the housing supply deficit as “acute”. Due to the lack of housing supply in the area, the policies in the Core Strategy are now considered out-of-date. The review of the Core Strategy will enable the Council to address this issue and identify further land for housing development to meet the needs of the area. However, the review timetable has already experienced delay, and the next informal consultation is not expected until February 2023. Following this consultation at least one further public consultation will need to take place before the plan can be submitted for examination in public. Dependent on the issues identified through the plan-making process and availability of resources, this could realistically mean the plan is unlikely to be adopted before 2025. This leads to an acute shortage of housing supply in the area now, with no immediate opportunity for the District Council to address this issue. Therefore, all opportunities to provide housing in a sustainable location should be considered. Furthermore, the wider District is heavily constrained by environmental designations, which limits the number of locations that would be considered sustainable for housing development; especially locations that would not cause substantial harm to the AONB.</p> <p>Proposed Site: The site at Cooks field (the proposed allocation) is bordered to the southeast by a wider area of land that is also now being made available for housing development, which is shown in the image below. This parcel could support a capacity of 8 dwellings without causing substantial harm to the AONB. Development of this site could be restricted to the eastern portion of the field with the remaining western side of the parcel opened up for public open space and biodiversity enhancement. Built development in the eastern portion would be located adjacent to the existing settlement and is well-screened, and therefore, minimise potential for landscape impacts. With the proposed capacity for this site, the existing settlement would not be overpowered by new</p>	<p>The housing number for Hurst Green has been confirmed by RDC.</p> <p>The potential site mentioned in the representation to the south of HG 11 was ruled out at an early stage as part of the site assessment work. These assessments and reports are available on the HGNP website.</p>	No	None, noting that potential site HG 11 has been removed from the HGNP.
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				<p>development, and the development would help to meet the objectives of both the Neighbourhood Development Plan and the AONB management plan. The site is available for development immediately, or it could be allocated as a reserve site for housing development, meaning that it could be identified for development in the future. This could help to future-proof the Neighbourhood Plan, should the housing requirement for the Hurst Green area increase in the future to help meet wider housing needs. Initial investigations have suggested that access could be provided via the A265, which could enable the creation of a new pedestrian link and crossing at that location. This would align with the Neighbourhood Plan aspiration to “promote opportunities for more sustainable modes of travel in and around the Parish” and also helps to “create an environment that encourages residents to live active, social and meaningful lives”. This would also help to meet the aspirational improvements to the rights of way network shown in figure 10.3 of the Neighbourhood Plan.</p> <p>Conclusion and Recommendation: It is recommended that this site is considered for allocating either to help meet housing needs now, or in the future through a reserve site. This site could help meet the objectives of the Neighbourhood Plan through improvements to rights of way and potential provision of green open space. The site could provide 8 dwellings, without significantly harming the AONB, through development being limited to the eastern portion of the field which is more sheltered and adjoins existing development, this would also avoid degrading any separation of settlements.</p>			
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12	Public Representat ion	Policy HG2: Housing Strategy	Alison Shaw	<p>I am saddened that any development sites are being promoted so enthusiastically by the plan. Many villages use this space to make it clear that they are opposed to the housing numbers proposed by Brother [Rother District Council?]. Our village has poor infrastructure. We are not equip for more homes, people and cars and they will only add to the burden. Over the summer on several occasions There have been no power and no water. How can proposals for more houses be put in place when we can't even provide water for the ones we have. There is no local doctor, dentist, poor bus routes, no large shop and the school has had to reduce to only 4 classes this year owing to staff funding. This is an Area of Outstanding Natural Beauty and we should embrace this and not try to change it! It seems strange that so much of this plan has been dedicated to promoting new housing when the planning applications for the proposed sites are already lodged within the counsel and will have been decided long before any agreement is made on anything else within this plan.</p>	<p>The Parish Council wish to clarify that the Plan is not enthusiastically promoting sites. However, the Parish Council has to deliver a certain number of dwellings as set out by Rother District Council (who in turn have a requirement to deliver a certain number of homes as set out nationally). If the Parish Council were not to include sites in the HGNP, that would not prevent sites from coming forward, rather the decisions would lie wholly with RDC and the Parish Council would have little influence.</p> <p>In relation to planning applications coming forward ahead of the HGNP being completed, the Parish Council has no control over this.</p>	No	None.
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13	Public Representat ion	Policy HG2: Housing Strategy	Jo Lee	<p>1. Site of The Royal George, Hurst Green, East Sussex</p> <p>The Hurst Green Neighbourhood Plan as submitted appeared not to have any significant discussion or debate regarding the role that the site of The Royal George, Hurst Green could play in the overall plan.</p> <p>The Royal George is a grade 2 listed building on the A21. Over the last 26 plus years, the present landowner had safeguarded the fabric of the building.</p> <p>Elsewhere in East Sussex County, such buildings had suffered deterioration of use and lost the commercial and business roles within a rural parish like Hurst Green. Since 1996; with the tremendous change in the public house industry, e.g. the scandal of the London Pubs Company, which caused significant losses of the local amenities like those offered by The Royal George. Since 1996, the parish had lost all its public house facilities with the exception of The Royal George</p> <p>The Royal George sits on the only brownfield site in the centre of the village. It is, therefore, an ideal site, to play a significant role in the formulation of the Hurst Green Neighbourhood Plan, by providing 'affordable housing' to those in need of such facilities/ housing. It is, also, an ideal site, to provide housing to those who are downsizing, which will free up family housing, which would be beneficial for the community. As it is in the centre of the parish, The Royal George, could play an important role in the social engineering of the housing within the parish</p> <p>The Royal George is a large Georgian building, with sufficient footage to build 5/6 apartments; studio, one or two bedrooms in the main building. This could be done and yet retain the essential public house role and protect the grade 2 building.</p> <p>The site also had sufficient land area to provide 4 to 6 units, on the land to the back of The Royal George; designed appropriately, in keeping with the grade 2 listing of the main building. All these units would be within the 'affordable housing criteria' which is much needed in the Rother District locality, whereby housing had not been affordable to most young people and not enough housing for small households, e.g. older residents.</p>	This site was not put forward in the public Call for Sites or previously. It is within the existing development boundary, so this site could be put forward for development.	No	None.
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14	Public Representation	Policy HG2: Housing Strategy	Jo Lee	<p>2. The Future Role of The Royal George and the survival of the grade 2 listed building, and the protection of the essential social amenities of The Royal George.</p> <p>A survey of the Rother District, would conclude that the survival of The Royal George as a public house to this day, would be classified as 'beyond expectations' due to its location and size; as well as age; and not accounting for the public house industry / marketplace in the economic climate since 1996. The changing lifestyle of the community; including the demographic changes of the parish residents, have to-date seen the closure of all the public houses in Hurst Green with the exception of The Royal George.</p> <p>The Royal George as a building is not the 'picture ' of a cozy rural country pub'</p> <p>The building is too large, to be financially viable as a public house.</p> <p>The building is also too small to be a 'country house hotel' and would not be financially viable to be of interest to investors.</p> <p>The location of the building on the A21; does not do the building any favours. Some persons might be interested in purchasing The Royal George as a private residence. However, its location on the A21, will be its hindrance.</p> <p>It had been suggested by some local residents that Mcdonald or Weatherspoon might be interested. However, this would be 'pie in the sky'; as the building do not fit their corporate image. Moreover, this would not be beneficial to the building or the parish.</p> <p>The ideal solution to protect the amenities of The Royal George and the grade 2 building would be to use the site for 'affordable housing'; and maintaining a smaller public house amenity on site.</p>	Noted.	No	None.
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15	Site Promoter/Developer Representations	Policy HG2: Housing Strategy	Millwood Designer Homes Ltd / Gillings Planning	<p>Q1 - Proposed Policy HG2: Housing Strategy – Object / Strongly Disagree</p> <p>Quantum of Housing</p> <p>Core Strategy compliance - The housing requirement for the Local Plan is clearly derived from the Core Strategy. However, the Core Strategy is clear in that the overall spatial development strategy is to plan for 'at least' 5700 homes. The use of 'at least' is critical. This should therefore be considered as a minimum.</p> <p>The figure of 75 is derived from the figure for the Villages of 1,670 in Figure 8 of the plan – which should be expressed as a minimum. This is further expressed in Figure 12 which refers to an allocation of 75 to Hurst Green. However, again, this must be understood as a minimum.</p> <p>This is not reflected in the Neighbourhood Plan, where references to 75 are expressed either in absolute terms or as a 'target' (particularly at paragraph 5.2, 5.7 and 5.8). This should be corrected</p> <p>Need for a robust plan - It is accepted by all that the Core Strategy is out of date, being more than 5 years old, particularly in the context of less than 5 years supply of housing. Thus the 'requirement' of 75 is also out of date. It may therefore be appropriate for the Local Planning Authority to provide a revised and updated indicative housing requirement figure to use. For example, Rother are in the process of preparing a new Local Plan, albeit this is in its early stages. Work on the evidence base has commenced however and the Housing and Economic Development Need Assessment (2020) prepared by GLHearn indicates that the standard method results in a need for 727 dpa in Rother which is a significant increase on the recent average delivery rate of 197 dpa (also noting the significant lack of housing land supply with a 5 year supply of 2.89 years in 2021). Whilst it is acknowledged that this evidence base has not yet been tested, it very likely that the eventual outcome will be an increase (probably significant) in the overall need for housing within the District. In the event that no new requirement figure is provided, it is critical that the Neighbourhood Plan provides for flexibility – which can be achieved by allocating sites beyond 75 dwellings.. Allocating for above this number will ensure the plan is more robust and ensures greater certainty over a longer period of time and reduces the likelihood of needing additional sites in the near future if/when housing requirements increase</p> <p>Guidance supports exceeding requirements – This approach is supported by guidance and the Planning Practise Guidance notes: "Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale.".</p> <p>(PPG para 103 Reference ID: 41-103-20190509)</p> <p>As such, we propose that the allocations be increased, as set out below.</p> <p>Proposed Amendment Text</p>	Noted, RDC have confirmed that the number of homes to be delivered by the NP (if possible) is 75.	No	None.
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				<p>- All references to 75 must be prefaced with 'at least' Policy HG2</p> <p>- Amend to read "Over the period 2021 to 2039, in addition to consents that pre-date this Plan, new residential development of approximately at least 55 dwellings will be accommodated on the land now allocated as below, with the detail provided in and in accordance with the related Policy as referenced.... • Site HG 22/ HG 43: Land Opposite Hurst Green School (Policy HGSA2) –at least 36 22 dwellings</p>			
16	Statutory Consultee	Policy HG3: Meeting local housing needs	Rother District Council	<p>HG3: Meeting local housing needs – Criterion A does not read well and is difficult to follow. Recommended text: 'The mix of housing sizes, types, tenures and affordability in proposed development should assist in meeting needs identified in the most recently available Hurst Green Local Housing Demand Survey as reasonably practicable and subject to viability considerations.' Criterion B – Thank you for amending to DHG1</p>	<p>The Parish Council has considered the policy carefully and has made additional reference to the Local Housing Needs Assessment (prepared by AECOM), which underpins the policy. Additional wording</p>	Yes	As per Parish Council response.

				as previously advised, however earlier comments still apply. This criterion is superfluous and can be deleted.	has been included to reference First Homes.		
17	Public Representation	Policy HG3: Meeting local housing needs	Alison King	We do need more housing, but we need to ensure that there is affordable housing too, I have been told that we are a low income area, so we should be trying to serve the local community first along side enticing new families to the area. However, strongly agree that we need more facilities.	Thank you for this feedback. The Parish Council agree that there is a need for affordable housing, and has evidence to demonstrate this. Affordable housing provision is mandated within the existing RDC policy. We have added an additional clause in Policy HG3.	Yes	The policy has been amended to include an additional clause in Policy HG3, to reflect change at national level policy: "At least 25% of the affordable housing units must be delivered as First Homes, with priority given to those with a local connection to Hurst Green Parish. An uplift to the minimum 30% discount required upon sale will be particularly supported to address the affordability gap evidenced in the Local Housing Needs Assessment."
18	Site Promoter/Developer Representations	Policy HG4: Character of development	Millwood Designer Homes Ltd / Gillings Planning	Q1 - Proposed Policy HG4: Character of development - Comment There is concern over the proposed approach to the Hurst Green masterplan and Design Codes. If they are proposed to be considered part of the Plan they will become part of the Statutory Development Plan and should be duly consulted upon. They do not appear to have been specifically available for consultation. Proposed Amendment - Reconsideration of the approach of the Design Codes and Masterplan and their status. If they are to be included within the NP and consulted upon accordingly, we reserve the right to make full further comment at Regulation 16 stage.	The Design Guidance and Masterplan were showcased at the public exhibition, published on the website, and were an integral part of the Regulation 14 consultation (as demonstrated by this representation).	Yes	The Council has removed references to the Hurst Green masterplanning work undertaken by AR Urbanism.

19	Statutory Consultee	Policy HG4: Character of development	Rother District Council	<p>HG4: Character of Development - The supporting text for this section is thorough and has regard to existing guidance from the AONB Unit and RDC. The character areas are well defined and clear to a decision maker. B. (i) – previous comments still apply. The text of criterion (i) is already correctly located within the supporting text and not needed again in the policy. C. – This criterion does not add value to the existing Local Plan heritage and listed building policies EN1,2 and 3, however while the policy doesn't add significantly to existing national and local plan policy, it highlights an important consideration and we do not object to its inclusion. D. – As above.</p>	<p>It is considered to be vital that the Design Guide is not seen as supplementary guidance, rather that it is integral to the policy, carrying additional weight. For this reason, the Parish Council would like to retain this clause as drafted. We do not agree with RDC's advice to remove this clause due to overlap with the supporting text, because inclusion in policy, with suggested wording amendment, has a stronger impact than inclusion in the supporting text.</p>	No	None.
20	Statutory Consultee	Policy HG4: Character of development	Natural England	<p>"Policy HG4: Character of Development sets out that development should be guided by the principles included in the High Weald Management Plan, the High Weald Housing Design Guide, the Rother District Council Key Design Principles and the Hurst Green Design Codes. It should be clarified that this is the High Weald AONB Management Plan. We recommend that the site allocation policies included within the emerging neighbourhood plan make greater reference to their location within the High Weald AONB and the fact that any development on these sites must be appropriate for its location and be guided by the principles included in the High Weald AONB Management Plan."</p>	<p>The Parish Council have amended all site allocation policies to make explicit reference to the High Weald AONB Management Plan principles.</p>	Yes	As per Parish Council response.
21	Site Promoter/Developer Representations	Policy HG5: Design of development	Millwood Designer Homes Ltd / Gillings Planning	<p>Q1 - Proposed Policy HG5: Design of development – Object/Strongly Disagree HG5 provides an overall design based policy. Whilst the overall intention of this policy is acknowledged and supported, the policy is objected to on the basis of two points:</p> <ul style="list-style-type: none"> - Point (v) – requires triple glazing and is overly prescriptive. The potential for an environmental impact from the road is accepted however a range of mitigation approaches may be acceptable and the policy should be worded to facilitate this rather than specifying one preferred solution. - Point (vi) – There is inconsistency in the Plan in the reference to superfast broadband. Provision is not always in the control of housing providers. The wording should be amended to reflect that in HG 17 and therefore be consistent, or deleted as unnecessary repetition. <p>Proposed Amendment</p> <ul style="list-style-type: none"> - v. Residential development proposals adjacent to the A21 to be set back from the road with screening, provided to guard against road noise, intrusive (high-sided) vehicles and air pollution. - vi. All new residential, commercial and community properties within the Parish should be served by a superfast broadband (such as full- fibre) 	<p>Point v - Noted. Retain the wording but add in (or equivalent solution) to the policy wording. Point vi - Amended.</p>	Yes	As per the Parish Council response.

				connection where possible (in accordance with Policy HG17: Supporting Local Employment Opportunities).			
22	Statutory Consultee	Policy HG5: Design of development	Rother District Council	HG5- Design of Development – This is a strong design policy with good references to other national and local policy. Whilst the policy doesn't add significantly to existing national and local plan policy, it highlights an important consideration and we do not object to its inclusion.	Noted.	No	None.
23	Statutory Consultee	Policy HG5: Design of development	Natural England	Natural England's view is that any development within the AONB must be sensitively designed and modestly scaled. Sensitive design can include reflecting the local vernacular in terms of built design and materials, respecting existing settlement morphology, and how that settlement relates to the wider landscape both visually and in terms of physical connectivity, and being supported by appropriate green infrastructure. Further, any development must be consistent with the objectives of the AONB Management Plan. Natural England further advises that the High Weald AONB Unit is consulted at an early stage on any proposed development that comes forward on the housing site allocations within the emerging Hurst Green Neighbourhood Plan to ensure that landscape and visual impact are considered from the outset. Should the proposal change, please consult us again.	Noted.	No	None.
24	Statutory Consultee	Policy HG5: Design of development	East Sussex County Council	3.6 Policy HG5: Design of development d. It is suggested that as well as reference to the Housing our Ageing Population Panel for Innovation (HAPPI) principles reference is also included to the guidance by RTPI https://www.rtpi.org.uk/media/6374/dementiatownplanningpracticeadvice2020.pdf e. Also to reflect older people's needs especially in relation to dementia reference in the supporting text could be made to the East Sussex Dementia Joint Strategic Needs Assessment http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna/media/documents/comprehensiveneedsassessment/ESCCdementiaJSNAA.pdf f. Policy and supporting text should refer to the health and wellbeing benefits of good neighbourhood design, both physical and mental.	Amended.	Yes	Amended.

				Proposals should reduce social isolation and improve social cohesion by providing places for people to meet.			
25	Public Representation	Policy HG5: Design of development	Alison Shaw	Any development must be in character of the traditional village feel. Sadly the proposed housing is the usual box job that is being built sussex wide with plastic fronting and limited sustainability. More needs to be done to keep the villages traditional feel.	The HGNP includes a Design Codes that forms a part of the policy and which must be used to inform development.	No	None.
26	Public Representation	Policy HG6: Energy efficiency and design	Angie Loveless	Propose eco houses that are carbon neutral and lay down a proper legacy for the next generation.	The Plan strongly supports development that is sustainably designed, although application is restricted by building regulations. The Future Homes Standard is being introduced by Government, which will require new homes built from 2025 to produce 75-80% less carbon emissions.	No	None.
27	Statutory Consultee	Policy HG6: Energy efficiency and design	Rother District Council	HG6: Energy efficiency and design – This is a very long policy and would benefit from being more concise for ease of interpretation by decision-takers. Criterion A – Delete ‘...where measures will not have a detrimental impact on character, landscape and views’ as this is covered in the first part of the sentence. Criterion C - Reword as: ‘Development proposals for renewable, community-scale energy schemes that contribute towards reducing greenhouse gas emissions and carbon zero targets where it can be demonstrated that the proposal’ etc.	The Parish Council has carefully reviewed the policy to explore ways to streamline it and reduce duplication. Additional evidence references have been provided. The final criterion regarding community-scale energy has been reworded.	Yes	Amended as per Parish Council response.
28	Statutory Consultee	Policy HG7: Enhancing the public realm	Rother District Council	HG7: Enhancing the public realm – We’re pleased to see the addition of this new policy, however the policy is still focussed on the public realm associated with development proposals; we would recommend expanding the policy to cover the other public realm works/improvements (as set out in para 6.28) that aren’t necessarily associated with development, e.g. those that come under the remit of ESCC, such as pedestrian crossings and footpath design.	The Parish Council has amended the supporting text to make clear that the policy relates to the village and wider parish.	Yes	Amended as per Parish Council response.

29	Statutory Consultee	Policy HG7: Enhancing the public realm	East Sussex County Council	1.3 Policy HG7 – consideration has been given to the public realm and the importance of improving access within the village by means of active travel. The use of wayfinding and signage is supported where appropriate, although where this could be introduced it should not clutter the local street environment and be sensitively located where a clear need has been identified. The provision of green space in the village is also supported. However, the provision and amount of car parking spaces should be carefully considered and balanced between improving walking and cycling connectivity to any new green space and recognising people may have no other option but to drive if travelling from further afield.	Noted. The HGNP supports active travel, but recognises that this is not optimum or possible for all users, and also recognising the unusual circumstances where connecting roads to surrounding villages do not include pavements or cycle paths. The Parish Council has been campaigning to National Highways and ESCC to resolve this for many years. The need for car parking provision was raised throughout the engagement phases of the work and this has been carefully considered. The installation of charging points for electric vehicles is supported at locations around the village in order to encourage a shift to less polluting vehicles, for those who are dependent on motor vehicle use.	No	None.
30	Statutory Consultee	Policy HG8: Protecting Hurst Green's dark skies	Rother District Council	HG8: Protecting Hurst Green's Dark Skies – Criterion iii) – 'as sensitively as possible' is subjective and will be difficult for a decision-taker to interpret. We suggest this is re-worded as 'within a site, locating and orientating development to minimise light pollution.'	Noted and amended.	Yes	Amended as per Parish Council response.
31	Public Representation	Policy HG8: Protecting Hurst Green's dark skies	Alison Shaw	Regarding dark skies more needs doing to conserve these for the village particularly the development proposed in the field opposite the lodge. Any lighting in this field is going to have a direct impact on the woods and prove very damaging to the wildlife which this plan boasts in later sections.	The dark skies policy has been developed in partnership with the AONB Unit, using their advised and recommended wording.	No	None.

32	Site Promoter/Developer Representations	Policy HG9: Protecting the natural features of the Parish	Millwood Designer Homes Ltd / Gillings Planning	<p>Q2 - Proposed Policy HG9: Protecting the Natural Features of the Parish and HG10: Green Infrastructure – Object/Strongly Disagree</p> <p>The comments below relate to biodiversity. The Plan is incorrect on page 45 in its definition of biodiversity net gain. We agree net gain involves a post development increase in biodiversity units, but critically, 'a net gain' does not equate to 10% net gain. Net gain is simply that, any net gain. The Neighbourhood Plan can not (yet) require 10%. That will be delivered in the Environmental Act at a national level and would contradict with the Local Plan and would be unnecessary repetition of national policy if included at this stage.</p> <p>There is also inconsistency within policies HG9 and HG10 in the way that the threshold for biodiversity net gain is assessed. Policy HG9 seeks to "particularly support" proposals that would achieve a net gain in biodiversity that accords with Policy HG10. Policy HG10 however notes that schemes that do not achieve 10% net gain should be refused. This should be corrected to the wording in HG9.</p> <p>Proposed Amendment Box on page 45: - Amend to read " net gain involves a post development increase in biodiversity units of 10%. Natural England considers this to be the most appropriate mechanism for determining current ecological value and delivering biodiversity net gain" HG 10 - A – amend footnote 25 to read "and the consequent measures required to ensure measurable net gain. Net gain involves a post development increase in biodiversity units Natural England considers this to be the most appropriate mechanism for determining current ecological value and delivering biodiversity net gain.... - C (i) – amend to read: " The appraisal should demonstrate: i. a measurable biodiversity net gain by utilising the Defra biodiversity metric (or as amended).</p>	The Parish Council wish to retain this clause and believe it is an appropriate requirement.	Yes	As per Parish Council response.
33	Statutory Consultee	Policy HG9: Protecting the natural features of the Parish	Rother District Council	<p>HG9: Protecting the natural features of the parish - Criterion vii) – this can be deleted as dark skies are covered in HG8 and this criterion does not add to this. Overall, there are many criteria in this policy and deleting any repetition will make it more accessible to a decision-taker.</p>	The policy has been reviewed - including this clause - and amended to improve clarity and to reduce duplication.	Yes	Amended as per Parish Council response.
34	Public Representation	Policy HG10: Green infrastructure	Angie Loveless	<p>Plant at least a forest of indigenous trees to balance the devastation to the fields and the creatures that live in them, including the endangered dormice.</p>	This is outside the scope of the plan, although the Council notes large scale tree planting is taking on a field under the Council's control at Stage Field.	No	None.
35	Statutory Consultee	Policy HG10: Green infrastructure	Rother District Council	<p>HG10: Green infrastructure – As commented previously, the policy is comprehensive and would benefit from identifying more potential sites or projects in the parish.</p>	Reference has been made to the RDC Green Infrastructure Plan and the biodiversity opportunity areas contained within this.	Yes	As per Parish Council response.

36	Statutory Consultee	Policy HG10: Green infrastructure	Southern Water	<p>Thank you for consulting Southern Water on the Pre-Submission version of the Hurst Green. Neighbourhood Plan. Southern Water is the statutory wastewater undertaker for the area covered by Hurst Green Parish. We hope that you find our response useful and look forward to being kept informed of progress. Policy HG10 – Green Infrastructure</p> <p>Southern Water understands the intention to protect 'irreplaceable habitats (such as ancient woodland and ancient or veteran trees)' – clause 180.c) National Planning Policy Framework 2021. However, we cannot support the current wording of policy HG10, as it could create barriers to statutory utility providers, such as Southern Water, delivering essential infrastructure required to serve existing and planned development allocated in the District or Neighbourhood Plan. The National Planning Policy Framework (NPPF) (2021) establishes in paragraph 180.c) that: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons* and a suitable compensation strategy exists. * For example, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat. This paragraph explains that exceptional reasons exist if the potential harm of an infrastructure development proposal is clearly outweighed by other considerations. Southern Water therefore considers the current wording of Policy HG10 may be contrary to National Planning Policy as it does not make allowances for development in 'exceptional reasons'. We also consider that, should the need arise, exceptional reasons include the provision of essential water or wastewater infrastructure works required to serve new and existing customers. As the infrastructure would need to connect into existing networks, there can be limited options available with regard to location.</p> <p>Proposed amendments To ensure consistency with the NPPF we recommend the following change to your Policy HG10 (additional text underlined): Development proposals should be designed to create, conserve, enhance and manage green spaces and connect chains of green infrastructure, as identified in Figure 5, with the aim of delivering a measurable net environmental benefit²⁵ for local people and wildlife. Development which would result in the loss of ancient woodland, aged trees or veteran trees will not be supported, unless there are wholly exceptional reasons.</p> <p>New Policy to support the provision of infrastructure Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward in order to deliver or maintain necessary infrastructure. Apart from a brief inclusion</p>	Noted, Policies HG9 and HG10 have been amended to reduce overlap and provide greater clarity.	Yes	As per Parish Council response.
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				<p>in policy HG1, we could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2021) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.</p> <p>Although the Parish Council is not the planning authority in relation to water or wastewater development proposals, support for essential infrastructure is required at all levels of the planning system. Proposed amendments To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.</p>			
37	Statutory Consultee	Policy HG10: Green	East Sussex County Council	3.7 Policy HG10: Green infrastructure g. The reference in the policy to benefits for local people should be expanded to include a requirement that green spaces are welcoming, safe and accessible for all.	Amended.	Yes	Policy HG10 amended to include "green spaces are

		infrastructure					welcoming, safe and accessible for all"
38	Public Representation	Policy HG11: Local Green Space	Alison Shaw	Again this is contradictory to the areas proposed for development. The plan states it should promote and conserve the wildlife and green space that we have and yet our major asset of Burgh woods is under direct threat from one of these proposals. The suggested Green spaces don't go far enough. How can a school playing field be considered a designated green site and yet an ancient grazing field beside the woods not?	Burgh Woods is designated as Ancient Woodland and is not under direct threat from development. Ancient Woodland is protected within the NPPF. The policies relating to Site HG6 include provision for a buffer, which follows national guidance. Additionally, the policy has been updated to require an additional landscape assessment and visual impact assessment. The Local Green Space designation is a mechanism to identify spaces that are demonstrably special and meet very strict criteria. It is not a suitable designation for most spaces.	Yes	Minor amendments made to the policy to reflect broader comments on this policy.
39	Public Representation	Policy HG11: Local Green Space	Bellhurst Wood Trustees	I write to let you know I recently had a very productive and enjoyable meeting to discuss the Parish Council's proposal to designate some of our land as a Local Green Space. Following this discussion, we would like to confirm we do not want our land to be designated as a Local Green Space and would ask the Parish Council to remove our land from any proposal to designate it as Local Green Space. However, we do appreciate the efforts taken to understand our position, and we look forward to discussing how we might work collaboratively with the Parish Council in the future.	The Parish Council has removed Burgh Wood as a Local Green Space as it is already protected by way of being ancient woodland. We welcome the trustees offer to work with the Parish Council on opening up additional access and joint conservation projects.	Yes	Burgh Wood removed as an LGS from the Plan and Appendix, plus related maps.
40	Public Representation	Policy HG11: Local Green Space	Jane & David Pennock	We note in the Village Plan that the site of the Allotments, LGS8, is proposed as a Local Green Space. You will be aware that the Allotment land is rented by us to the Parish on a peppercorn rent. It is not our intention to change this but at the same time we do not want the land to be registered as a Local Green Space.	The Parish Council are grateful for use of this land for village allotments. The Parish Council have agreed to remove the allotments as a Local Green Space as they are not considered to be under threat and are outside the development boundary.	Yes	LGS has been removed from the relevant sections.

41	Statutory Consultee	Policy HG11: Local Green Space	Rother District Council	HG11: Local Green Space – ‘Amend Green belt’ to ‘AONB’.	The words 'Green Belt' are included as the LGS designation would bring these sites to the same designation as Green Belt.	No	None.
42	Public Representation	Policy HG12: Protection of locally significant views	Alison Shaw	I have lived in Hurst Green for nearly 5 years and have never once had mentioned to me the two special views detailed in the plan. There are many more views however which I have seen and admire regularly. Proposing we only have 2 views worthy of protection is an insult to the village.	The views identified have been consulted on with the community at a variety of events, including a public exhibition, the annual parish assembly, surveys and the village magazine. In addition, along with local publicity, every household also received a letter sent to them by post alerting them to this Reg 14 consultation.	No	None.
43	Statutory Consultee	Policy HG12: Protection of locally significant views	East Sussex County Council	3.8 Policy HG12: Protection of locally significant views h. The policy justification could include the mental health and wellbeing benefits of protecting and creating significant landscape views.	Amended.	Yes	Added in wording as suggested to the supporting text.
44	Statutory Consultee	Policy HG13: A Green Village Hub for Hurst Green	Rother District Council	HG13: A village hub for Hurst Green – This will be a great asset to the village. We understand the need for the existing criteria, but think there is also scope for criteria to promote and support opportunities to include renewable energy e.g. solar panels, ground source heat pumps to the pavilion and car park and educational interactive play equipment, which may allow the Parish Council to apply for 'green' funding: a 'Green Village Hub'.	The Parish Council has changed this to refer to a Green Village Hub, which aligns with feedback from the wider community.	Yes	As per Parish Council response.
45	Statutory Consultee	Policy HG13: A Green Village Hub for Hurst Green	Rother District Council	HG13: The associated map (Fig 10.1) indicates the Hub as being in a different location.	The hub is in the same location in Fig 10.1 - the area shown is the entire boundary of the hub (inc. buildings and park).	No	None.
46	Statutory Consultee	Policy HG13: A Green Village Hub for Hurst Green	East Sussex County Council	East Sussex Cultural Strategy 5.2 We welcome the proposal for a village hub for Hurst Green - proposed improvements including an outdoor stage support the East Sussex Cultural Strategy: Priority One (create an environment where great cultural experiences are available to everyone to enhance their quality of life). Audience surveys suggest that post-pandemic, people are still most confident to attend outdoor events and the cost-of-living crisis also indicates that free outdoor events will be popular in the foreseeable future. An outdoor performance space is timely and an affordable proposal with low-cost maintenance.	Noted.	No	None.

47	Statutory Consultee	Policy HG13: A Green Village Hub for Hurst Green	East Sussex County Council	3.9 Policy HG13: A village hub for Hurst Green i. The policy proposals and Masterplan Objectives are supported and should emphasise the physical and mental health benefits of providing additional community facilities and connected accessible places for all to meet reducing social isolation and improving the social cohesion of the area.	Amended.	Yes	Added in wording as suggested to the supporting text.
48	Statutory Consultee	Policy HG14: Sports and leisure facilities in Hurst Green	Rother District Council	HG14: Sports Leisure facilities in Hurst Green – We are pleased to see the site specific Drewett's Field criteria.	Noted.	No	None, general comment with no change required.
49	Public Representation	Policy HG14: Sports and leisure facilities in Hurst Green	Alison Shaw	Whilst I support greatly the prospect for a village hub and more leisure facilities I find it quite alarming that the village is taking so long to update the park for the younger children, sort out what its doing with the old church and think that a smoking shelter is adequate for teenagers and classed as leisure. More needs to be done e.g. installation of a skate ramp to give teenagers something to do and hopefully reduce bored vandalism throughout the village. The proposal to develop the cricket pitch into a multisports ground is a pipe dream in relation to the practicalities of simply sorting out a small park which is posing such a challenge to the community. The funding necessary for such a sports development would be enormous in comparison and therefore not even remotely a possibility.	The NDP document is able to provide the framework, from a planning perspective, to enable projects such as the Green Village Hub. The associated actions and funding will be required to bring these ideas to fruition. These are set out in Section 14 of the HGNP. The Parish Council notes that having a 'made' NP will also enable CIL money to be spent locally to enable projects such as the ones referenced in this representation.	No	Respondee invited to join the Parish Council playground enhancement working group.
50	Public Representation	Policy HG14: Sports and leisure facilities in Hurst Green	Angie Loveless	Please keep sports fields away from residential areas to reduce noise pollution.	The Parish Council notes that the sports field has existed for many years, and the Parish Council has no plans to relocate it. The Parish Council are not aware of any incidents of noise pollution.	No	None.
51	Public Representation	Policy HG14: Sports and leisure facilities in Hurst Green	Alison King	I am fully supportive of better active facilities for the village and the young people to use.	Thank you for this feedback.	No	None.
52	Statutory Consultee	Policy HG14: Sports and leisure facilities in Hurst Green	East Sussex County Council	3.10 Policy HG14: Sports and leisure facilities in Hurst Green j. The policy should require play and sports facilities for all ages and abilities.	Amended.	Yes	Added in 'serving all ages and abilities'.

53	Statutory Consultee	Policy HG15: Allotments and community growing spaces	Rother District Council	<p>HG15: Allotments and community spaces – We support the protection of existing allotment spaces and the creation of additional allotments but please note that allotments have different criteria to community growing spaces i.e. allotments are generally much larger, require a water supply, parking and storage space (sheds) for equipment etc. They are usually run by the Parish Council and can serve people from all over the village/town. The policy intent seems to be more focussed towards the concept of community growing spaces, which we also support for the locations mentioned. CGS tend to be much smaller interventions e.g. raised planters, and more local to residents. We are pleased to see that the supporting text suggests community growing spaces for new development, growing spaces within new development would always identify as community growing spaces as allotments are for wider public use. The policy would benefit from identifying a potential site for the new allotment, is the Station Road/ Burgh Hill proposal for an LGS or allotment? It should be included in the policy as could other potential LGS sites.</p>	The Parish Council has not identified a specific site for additional allotment/community growing sites at this time. It is something that would be supported in principle.	No	None.
54	Statutory Consultee	Policy HG16: Promoting sustainable rural tourism	East Sussex County Council	<p>1. Highways Authority 1.1 Transport challenges identified in the plan are agreed and noted. 1.2 Vision for the Neighbourhood Plan: Travel and Transport - We welcome proposals that help to create an environment that will encourage walking, cycling and low carbon transport over car-use, particularly for shorter journeys in and around the Parish. We will also work with partners to explore ways to reduce the impact of the A21 on the parish.</p> <p>1.4 Para 9.7 which states 'Hurst Green's proximity to Etchingham Station should be promoted and there could be potential for bike hire and associated cycle parking, including for electric cycles (which could be particularly welcome given the steep hill between Etchingham and Hurst Green), to support improved sustainable connectivity between the station, accommodation and attractions and wider area' is greatly supported. It is suggested that those wishing to take forward the plan refer to the East Sussex Local Cycling and Walking Infrastructure Plan (September 2020) and liaise with the parish council and local planning authority to see whether any funding might be available to progress this, and to develop a case for such a scheme which might help with future funding opportunities to help deliver such initiatives."</p>	Noted.	Yes	Para 9.7 - text (now para 9.8) has been added regarding the LCWIP. The Parish Council to liaise with ESCC and RDC to identify suitable sources of funding to progress walking and cycling projects.
55	Public Representation	Policy HG16: Promoting sustainable rural tourism	Alison Shaw	<p>Tourism would be wonderful in the village to promote our lovely woods and local walks however with developments all around the woods threatening their beauty why on earth would tourists visit the village?</p>	The policy has been designed to encourage Hurst Green to develop as a hub for tourism. The Parish Council notes that whilst Hurst Green itself may not currently have a large number of sites and attractions for visitors, it is in close proximity to a series of heavily visited attractions.	Yes	Amendments made to the policy to reflect broader comments on this policy.

56	Statutory Consultee	Policy HG16: Promoting sustainable rural tourism	East Sussex County Council	5.Culture and Tourism 5.1 Tourism: We welcome the prioritisation of public realm improvements and plans to promote sustainable rural tourism. We are in the early stages of a pan-Sussex tourism initiative working with West Sussex County Council, Brighton and Hove City Council, existing Destination Management Organisations, and a business leaders advisory group. We are in the process of developing a Sussex story narrative to underpin overseas marketing and Hurst Green's positioning aligns well with that overarching pan-Sussex vision.	Noted - we have added reference to this in the updated NDP.	Yes	Reference included to the pan-Sussex tourism initiative in the supporting text.
57	Public Representation	Policy HG17: Supporting local employment opportunities	Alison Shaw	Little is mentioned in the plan regarding suggestions of spaces locally for young people to set up businesses. It mentions that people are favouring working from home however the realities of this now covid is settling down are already pushing people out to work. There is almost nothing to help people locally with their business other than the village facebook page for advertising.	Thank you for this feedback. Policy HG17 explicitly supports the provision of space for those requiring workspace - not only for homeworking but also business start-up units (for instance). This is also reflected in Policy HG13, which supports the development of a Green Village Hub, which could incorporate business unit space, as set out in the accompanying masterplan document.	Yes	Amendments made to the policy to reflect broader comments on this policy.
58	Public Representation	Policy HG17: Supporting local employment opportunities	Angie Loveless	As almost all of the businesses in Hurst Green have closed in the last 25 years this policy does not seem to dovetail into the proposed requirement for new housing.	The Parish Council is supportive of planning applications coming forward that would enable the delivery of additional employment sites- be they home-based or start-up/smaller business units in the village.	No	None.
59	Statutory Consultee	Policy HG17: Supporting local employment opportunities	East Sussex County Council	4. Broadband (Economy and Local Employment Opportunities) 4.1 In relation to improved broadband connections there is reference at POLICY HG17: SUPPORTING LOCAL EMPLOYMENT OPPORTUNITIES (D) to Openreach: D. All new residential, commercial and community properties within the Neighbourhood Plan area should be served by (or be ready for) a superfast broadband (fibre-optic) connection, unless it can be demonstrated through consultation with Openreach that this would not be either possible, practical or economically viable. 4.3 It should be noted that Openreach is no longer the only supplier of full fibre broadband in the county and there are several very active alternative providers (altnets) with credible plans for investment.	Noted, removed references to Openreach.	Yes	Policy HG17 wording amended.

60	Public Representation	Policy HG18: Encouraging active travel	Alison King	Facilities are what would keep our community here in HG [Hurst Green]. Better movement, safer opportunities to cycle and walk around the village are essential to the wellbeing of the community.	Thank you for this feedback. The Plan seeks to address these important issues, including these which also been raised throughout the engagement with the community.	No	None.
61	Public Representation	Policy HG18: Encouraging active travel	Jean King	Nothing for Silverhill.... no crossing to access footpaths on other side of A21 or paths. We are part of Hurst Green but FORGOTTEN.	<p>A number of the aspirations identified by the community for Silver Hill and included in the HGNP objectives, have already been achieved by the Parish Council. For example the installation of a defibrillator. Silver Hill has been considered for housing, but as it sits outside the settlement boundary, it is deemed by Rother District Council to not be suited to housing site allocations.</p> <p>The Parish Council are supportive of providing safe access from Silver Hill to the footpath leading to Hurst Green, however the provision of this is outside the scope of the neighbourhood plan. As such, the plan supports the principle of this (Policy HG18) but delivery would be the responsibility of the Highways Authority (National Highways / East Sussex County Council).</p>	Yes	Design Codes updated to reference this crossing.

62	Public Representation	Policy HG18: Encouraging active travel	Jean King	Nothing for Silverhill.... no crossing to access footpaths on other side of A21 or path access to Robertsbridge	<p>A number of the aspirations identified by the community for Silver Hill and included in the HGNP objectives, have already been achieved by the Parish Council. For example the installation of a defibrillator. Silver Hill has been considered for housing, but as it sits outside the settlement boundary, it is deemed by Rother District Council to not be suited to housing site allocations.</p> <p>The Parish Council are supportive of providing safe access from Silver Hill to the footpath leading to Hurst Green, however the provision of this is outside the scope of the neighbourhood plan. As such, the plan supports the principle of this (Policy HG18) but delivery would be the responsibility of the Highways Authority (National Highways / East Sussex County Council).</p>	Yes	Design Codes updated to reference this crossing.
63	Public Representation	Policy HG18: Encouraging active travel	Alison King	Safety walking along the A21 with children is paramount. Barriers along the road and traffic calming measures and/or speed cameras.	Noted. The Parish Council has long campaigned for traffic calming measures and average speed cameras throughout the parish and continues to do so. However these issues are outside the scope of the neighbourhood planning legislation.	No	Parish Council to continue talks with National Highways about road safety.
64	Public Representation	Policy HG18: Encouraging active travel	Alison Shaw	<p>The promotion of active travel in the village is difficult given the obvious problems associated with the A21 and station road. These roads are dangerous and for all cycling and walking are important it is hard to promote these in our village when it actively puts people in danger. The local children are clearly desperate for more cycle tracks as per their own home made ramps in the woods. designated areas should be set aside for this to encourage exercise and leisure.</p> <p>Active travel to the school is a major problem owing to the safety of the main road. Promotion of a safer footpath should take priority in this plan.</p>	<p>Noted. The Parish Council has long campaigned for traffic calming measures and average speed cameras throughout the parish and continues to do so. However these issues are outside the scope of the neighbourhood planning legislation.</p> <p>The provision of additional,</p>	No	None.

				All development proposals for the areas directly spilling out more traffic onto the A21 is going to make this road even more dangerous. There were 2 accidents on the A21 only last week. More junctions mean more accidents!	safer footpaths (away from the road) is an aspiration contained within the Hurst Green Masterplan.		
65	Public Representation	Policy HG18: Encouraging active travel	Jean King	Nothing for Silverhill.... no crossing to access footpaths on other side of A21	<p>A number of the aspirations identified by the community for Silver Hill and included in the HGNP objectives, have already been achieved by the Parish Council. For example the installation of a defibrillator. Silver Hill has been considered for housing, but as it sits outside the settlement boundary, it is deemed by Rother District Council to not be suited to housing site allocations.</p> <p>The Parish Council are supportive of providing safe access from Silver Hill to the footpath leading to Hurst Green, however the provision of this is outside the scope of the neighbourhood plan. As such, the plan supports the principle of this (Policy HG18) but delivery would be the responsibility of the Highways Authority (National Highways / East Sussex County Council).</p>	Yes	Design Codes updated to show this crossing as a problem crossing.
66	Statutory Consultee	Policy HG18: Encouraging active travel	East Sussex County Council	"3.4 Travel and Transport 'We will support proposals that help to create an environment that will encourage walking, cycling and low carbon transport over car-use, particularly for shorter journeys in and around the Parish improving both physical health and mental wellbeing. We will also work with partners to explore ways to reduce the impact of the A21 on the parish.' "	Noted.	No	None.
67	Statutory Consultee	Policy HG18: Encouraging	East Sussex County Council	3.11 Policy HG18: Encouraging sustainable movement k. The policy and supporting text should emphasise the physical and mental health benefits of increasing active travel in the area.	Amended.	Yes	Added in to supporting text.

		sustainable movement					
68	Site Promoter/Developer Representations	Policy HG20: Residential parking provision	Millwood Designer Homes Ltd / Gillings Planning	<p>Q5 - Proposed Policy HG20: Residential Parking Provision – Object/Strongly Disagree</p> <p>Policy HG20 relates in part to EV charging. This is supported, but the policy can not include 'affordable' and 'reliable' in its requirements. These terms are insufficiently precise and subjective for inclusion in policy.</p> <p>Proposed Amendment (ii) - Provide infrastructure that enables electric vehicle charging facilities</p>	Amended as proposed, with the addition: 'for residents and visitors'.	Yes	As per Parish Council response.
69	Public Representation	Policy HGSA1: Site HG11: Cooks Field, Burgh Hill	Deirdre Parrinder and Don Nicholls	<p>Policy HGSA1: Site HG11: Cooks Field, Burgh Hil: We welcome most proposals of the Neighbourhood Plan, particularly those relating to enhancing the environment, protecting our trees and encouraging sustainable development.</p> <p>As we live on Burgh Hill we wish to comment specifically on the suggested development of Cook's Field, HG11.</p> <p>1) Cook's Field to our knowledge has never been cultivated or had herbicides or pesticides applied to it. It would be the perfect spot for a community organic nursery/ orchard/ village green (maybe a similar project to Hands of Hope in Hawkhurst).</p> <p>2) Our main concern with any proposed development is that the character of Burgh Hill and the natural environment should be maintained by the retention of the long hedge alongside the field. Without this hedge the nature of the road would change dramatically. There is ample space for development and maybe a footpath behind the hedge. We would stress that the field owners have already, without permission from the Council, removed an ancient hedge that crossed the middle of the field, maybe with the intention of making it easier to get planning permission. This criminal act has been reported to the Council, but as far as we know no action has been taken. The hedge has certainly not been replaced.</p> <p>3) We are concerned about the increase of traffic on the road - maybe 14 cars from 7 houses. Since lockdown Burgh Hill has been used extensively by pedestrians and more traffic should be discouraged.</p> <p>4) We would press for an environmental study to be done on the field prior to development. Great crested newts have been registered as occurring at St John's Lodge, Burgh Hill, and dormouse have been seen on the hill. But most importantly our previous neighbours (living in a house adjacent to the field complex which includes Cook's Field), told us that they had 2 species of snake in their garden, the "Sussex Grey snake" and grass snakes. We dismissed this until we read that a new</p>	<p>The comments are gratefully received and noted and all information will be passed to the site promoter. The HGNP has had to explore site allocations as the Parish Council has been provided, by Rother District Council, a housing figure to seek to deliver. The HGNP has worked hard to consider all potential sites that could deliver this, which has involved a series of independent technical studies. The combination of sites included in the HGNP are the result of this work.</p> <p>Should the Plan be accepted at referendum, the sites will need to apply for planning permission and there are opportunities at this stage to submit your views and representations about the specific application details.</p> <p>In terms of Local Character, the HGNP is underpinned by Design Codes, which has identified and defined the local character areas in the parish, in order to influence any proposals that come forward.</p>	Yes	Site removed from the submission version of the HGNP.

			<p>species of UK snake had been identified, a greyer version of the grass snake, the "barred grass snake, natrix helvetica". We think it essential that Cook's Field is studied for evidence of this snake before development.</p> <p>5) No one knows what archaeological remains may be present under Cook's Field, and since it is believed that the whole of Burgh Hill might once have been a Roman Settlement, it is essential that archaeological remains are looked for before development.</p>	<p>This seeks to ensure that character is in-keeping.</p> <p>Traffic impact is a concern that has been raised by many residents. The HGNP is seeking to encourage active travel (at least within the parish) although this is not without challenge given land ownership and topography issues. Highways have been consulted in terms of the sites and have raised no initial concerns, although the full detail again would be included at the planning application stage.</p> <p>The draft policy was been amended to require a Stage 2 Landscape Assessment and Visual Impact Assessment.</p> <p>In relation to comments on wildlife, the applicant would be required to undertake an assessment related to the ecology of the site as part of the planning application preparation.</p> <p>In 2024, this site was removed from the submission version of the HGNP.</p>	
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70	Site Promoter/Developer Representations	Policy HGSA1: Site HG11: Cooks Field, Burgh Hill	Landstrom Group Ltd / SFPlanning	<p>This representation is made on behalf of our client, Landstrom Group Ltd, in response to the consultation being run on the Hurst Green Neighbourhood Development Plan, which is a regulation 14 consultation. This representation relates to the emerging allocation ref. HGSA1 Cooks Field, Burgh Hill and its suitability for residential development. Landstrom Group Ltd have entered into a promotion agreement with the landowners.</p> <p>The emerging allocation The site at Cooks Field is being proposed as an allocation for residential development for an estimated capacity of 7 dwellings. This allocation is supported by our client, and through this representation confirms the site's availability for this use. There is a possibility of an increased capacity on this site which could be considered through the detailed design and layout, although this would not be a large increase from the estimated capacity in the neighbourhood plan currently.</p> <p>The site is very suitable for residential development, being surrounded on three sides by existing residential uses. The site has one constraint; its location within the High Weald Area of Outstanding Natural Beauty. However, the entire Neighbourhood Plan Area is covered by this designation, including the existing settlements. The allocation site lies adjacent to the existing built-up area of Hurst Green, which enables its development to minimise any impact on harm to the AONB. The High Weald AONB management plan has a settlement objective (S2) which is: "To protect the historic pattern and character of settlement". Through the allocation of Cooks Field, the NDP will be supporting this objective, as the pattern of development will likely continue along the line of the road and would not degrade any separation between settlements.</p> <p>Furthermore, the AONB management plan is supportive of development within settlements providing it corresponds with the design guidance. This of course can be achieved through the development management process. Detailed landscape work will be undertaken prior to any application being submitted, along with other evidence in the form of technical reports to ensure any development will be sustainable.</p> <p>Conclusion and Recommendation Support is given to the emerging allocation at Cooks Field, in the Neighbourhood Development Plan. This representation confirms that the site is suitable, available and achievable for residential development.</p>	Noted. The proposed capacity of the site within the HGNP has been assessed and is considered to be in-keeping with existing density and local character.	Yes	Site removed from the submission version of the HGNP.
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71	Statutory Consultee	Policy HGSA1: Site HG11: Cooks Field, Burgh Hill	East Sussex County Council	<p>1.8 POLICY HGSA1: SITE ALLOCATION – COOKS FIELD, BURGH HILL (HG11) - A. (site proposed to be allocated for residential development with an estimated capacity of 7 dwellings).</p> <p>1.9 The Cooks Field Site (HG11) is located on Burgh Hill, which mainly serves large, detached dwellings and has a speed limit of 30mph. There are limited footways and no dedicated passage for non-motorised users to reach the village where there are limited amenities/public transport on the A265 and A21. It should be recognised that there is limited scope to improve pedestrian facilities towards Station Road, unless third party land is acquired, which will mean that delivering “pedestrian access along Burgh Hill where none currently exists” (referencing para xi of the policy) may be difficult to achieve. Should this be the case, the development is likely to generate predominantly car-based trips.</p>	Noted. A pedestrian access solution is explicitly requested within the policy.	Yes	As per response. Noting also that this site has been removed from the submission version of the HGNP.
72	Statutory Consultee	Policy HGSA1: Site HG11: Cooks Field, Burgh Hill	Rother District Council	<p>Policy HGSA1: Cook Field Burgh Hill - The prevailing character and pattern of built form here is directly lining Burgh Hill, i.e. frontage development to the upper part of the site. Lower siting would represent greater incursion into the countryside. We recommend making this restriction more robust in the policy. The policy would benefit from some clarity regarding which is the ‘lower’ part of the site.</p>	The policy has been reviewed and a requirement for a Stage 2 landscape assessment has been included to ensure that the sensitivities of the site are fully understood and that any housing can be accommodated accordingly.	Yes	As per response. Noting also that this site has been removed from the submission version of the HGNP.
73	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>These representations have been prepared by Gillings Planning on behalf of Millwood Designer Homes (MDH) whose interests relate to Site HG22/43, Land opposite Hurst Green School/London Road which is currently the subject of a live planning application for 36 dwellings (reference RR/22/1526/P). Background to the site</p> <p>The site known as HG22/43 has been the subject of ongoing discussions with both the Local Planning Authority and Hurst Green Parish Council for some time.</p> <p>A previous planning application was submitted on behalf of Millwood Designer Homes in July 2021 (ref RR/2021/1816/P) for 36 dwellings, however this application was later withdrawn.</p> <p>The current planning application, also for 36 dwellings, is being considered by the Local Authority. This scheme represents an amendment to the previous proposals in response to the comments from Historic England, the Parish Council and local residents.</p> <p>In terms of consultee responses, importantly, Historic England have confirmed no objection to the application and state: “We consider that the current layout of the proposed housing development has succeeded in minimising the previously perceived adverse heritage impact on the significance of Iridge Place through change of its setting”.</p> <p>The County Landscape Architect has also confirmed “no objection’ on the basis of the 10m landscape buffer now provided.</p>	Noted.	No	None.

				<p>We also understand 'no objection' (subject to minor design points) has been raised by the Parish Council. Clarification of this is awaited.</p> <p>Representations</p> <p>MDH is generally supportive of the Neighbourhood Plan and its intention to allocate the site however some concerns and objections are raised in relation to the detailed wording of policies and we set out further comments on this below.</p> <p>Where we have not noted a specific policy then we have no comment to make.</p>			
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74	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>Q6 - Proposed Policy HGSA2: Site Allocation – Land Opposite Hurst Green School - Object</p> <p>Whilst the principle of allocating the site for residential development is supported, MDH has a number of concerns with the wording of the policy and the interpretation of the evidence base.</p> <p>Estimated Capacity</p> <p>Following on from comments made in relation to Policy HG2 above, MDH object to the 'estimated capacity of 22 dwellings' of the site as unjustified for the following reasons:</p> <ol style="list-style-type: none"> 22 appears to have been calculated on a pure numerical basis and not on evidence ie: <ul style="list-style-type: none"> - Requirement = 75 - 75 minus existing commitments of 20 = 55 - 55 minus 7 dwellings (HG11) minus 26 dwellings (HG 6) = 22 (noting that HG45 for 4 dwellings does not contribute as it is below the threshold) <p>This is not an evidence based nor a true capacity assessment and as such is not justified. 2. 22 would not make best use of the site. Figure 56 in the High-Level Landscape Assessment prepared by Harper Landscape Architecture broadly indicates the 4 areas of the site that are considered to be 'developable'. These areas cover an area of approximately 1.4 hectares. A development of 36 dwellings would equate to a dwelling density of 26dph across 1.4 hectares. A density of 26dph is appropriate in this location on the edge of the settlement and represents a reasonable balance between the needs of the community and the efficient use of land with the site's edge of settlement location. A development of 22 dwellings would be only 15dph. This does not represent an efficient use of the land, even taking into account the AONB.</p> <p>Whilst the Hurst Green Design Code document provides some assessment of existing dwellings densities within the settlement, no assessment is made for the allocated sites. Indeed, this document refers back to the Local Plan and indicates that "New development should take a design-led approach to density, following requirements for residential density within the Rother District Plan...". The Rother District Plan advises that density should be appropriate to its context, having regard to key design principles (Policy OSS4).</p> <ol style="list-style-type: none"> Reflecting the Core Strategy, the allocation should be expressed as 'at least' <p>Conversely, there is considerable site-specific evidence available to support the 36 dwelling capacity in the form of the current planning application and the supportive responses received to date from key consultees such as Historic England and the County Landscape Architect. It is also understood that the Parish Council voted to support the scheme at 36 homes at the most recent committee (subject to design points).</p>	The site promoter has submitted an application update for 28 dwellings. As this is within the densities noted in the various assessments relevant to the HGNP, the policy has been amended to reflect this.	Yes	Amended policy capacity to a 'minimum of 28 dwellings'. Site also removed from the HGNP as planning permission has already been granted.
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75	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>In addition, the 36 home scheme reflects the Landscape Assessment provided. By way of illustration, the image below provides an overlay of the current proposal and Figure 55 Landscape Appraisal Plan of the Harper Landscape Assessment (with as close an overlay to boundaries as possible). As can be noted, the proposal reflects the areas identified for development (as discussed below).</p> <p>As such, and in the absence of any evidence supporting the 'estimated capacity of 22 units', it is suggested that the capacity of this site is amended to 'at least 36'.</p> <p>In the event that the policy is not amended to reflect the evidence to support 36, then it should be amended to be "at least 22" to reflect the terminology and approach of the higher level policy.</p> <p>Reference to 'Sensitive Areas' of the site and Location of Green Space Para 11.32 states that the 'most sensitive part of the sites is located on the southern and eastern areas' and Part C (v) references the provision of an accessible green space that should be "located in the most sensitive part of the site to the south and south-east, to minimise impacts on views and the setting of the heritage asset".</p> <p>This directly conflicts with the evidence base (Harper Landscape document) which clearly indicates that the most sensitive part of the site is the north and east of the site and that this is where the green space should be located, providing a buffer to Iridge Place, as set out in Figure 56, reproduced below. The areas to the south and south east are identified as 'Developable Areas'. The southern part of the site is therefore clearly identified for development. To have a policy which directly contradicts the evidence base is irrational.</p>	<p>We recognise the sensitive nature of the site and have add the requirement to obtain a detailed Stage 2 landscape assessment and Visual Impact Assessment. We have amended references to refer simply to the most sensitive parts, which will be identified through the detailed landscape assessment.</p> <p>Discussions with the site promoter have confirmed that their intention is to submit an application update for 28 dwellings. As this is within the densities noted in the various assessments relevant to the HGNP, the policy has been amended to reflect this.</p>	Yes	As noted in Parish Council response.
76	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>Clarification on Tree Line</p> <p>Para 11.32 states there is a historic tree line that runs diagonally across the site from Gravel Banks to Iridge Place, which should be reinstated. Any development on the site should be to the west of this tree line. Clarity is required here. This element seeks to ensure the eastern part of the site is kept free from development. This largely reflects the Harper Landscape document. Importantly however, the tree line does not extend beyond Gravel Banks. It therefore has no bearing or limitation on development in the southern section of the site and the policy should be amended to provide this clarity. Development can still be proposed in the south of the site (Development Area 4) and not conflict with the requirement to keep development to the west of the tree line. The two are no mutually exclusive.</p>	Noted - we have removed the final sentence of Para 11.32.	Yes	Final sentence of 11.32 removed.

77	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>Car Parking</p> <p>Part C (ii) of the draft policy notes that “Car parking in driveways and on the road is more visually intrusive and suburbanising than discretely located and easily accessible block parking. The former should be avoided with a preference for the latter wherever possible”.</p> <p>MDH object to this on the basis that it is overly prescriptive and inflexible and there is no evidence to support it. Indeed, the Design Code evidence document advises the opposite “...minimised vehicular circulation and car parking should be encouraged; e.g. on plot side parking and on-street parking, instead of excessive tarmacked car parking areas</p> <p>Title of (ix)</p> <p>The title 'biodiversity net gain' should be amended to better reflect the text below it as it is a misleading title. For example, it could be labelled 'green infrastructure'.</p>	This contradiction was not intended. The Hurst Green Design Codes is being updated to reflect this.	Yes	The Design Codes has been updated.
78	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>Shared Surface</p> <p>There is no evidence to indicate that all dwellings must be accessible by a separate pedestrian access. Indeed, the Design Code evidence document indicates that shared surfaces can be an appropriate solution. As such, this wording is overly prescriptive and inflexible. Pavements could certainly be 'encouraged' however.</p> <p>Proposed Amendments</p> <p>Para 11.32 – the most sensitive part of the sites is located on the southern and eastern areas, are as defined in the Harper Landscape Assessment, in the north, east and centre of the site, where there are good quality views to the High Weald ridge line to the east and also where there is parkland character.... There is a historic tree line that runs diagonally across the site from Gravel Banks to Iridge Place, which should be reinstated. Any development on the northern part of the site should be to the west of this tree line</p>	The Parish Council disagrees and further references have been included within the updated plan to reflect this.	Yes	Additional references and evidence included in the Plan.
79	Site Promoter/Developer Representations	Policy HGSA2: Land opposite Hurst Green School	Millwood Designer Homes Ltd / Gillings Planning	<p>HGSA2</p> <ul style="list-style-type: none"> - A – The site is allocated for residential development with capacity of at least 36 (or) - A – the site is allocated for residential development of at least 22 dwellings – although note this is only proposed in the scenario that the number is not amended. - C (ii) - ii. A car parking strategy should be agreed at the outset with an aim of reducing landscape and visual impacts (specifically avoiding glint and glare impacts for views back in from the High Weald to the south). - C (v) - should be located at the most sensitive part of the site to minimise impacts on views and the setting of the heritage asset. - C (ix) - retitled to read “Green Infrastructure” - C (x) - Pedestrian access by pavements is encouraged. 	<p>A - The capacity of the site has been amended to an estimated capacity of 28, as reflected in the site promoter's live planning application.</p> <p>C (ii) - Noted.</p> <p>C(v) -Amended as proposed.</p> <p>C (ix) - The Parish Council have agreed to retain the subheading as is.</p> <p>C (x) - Not amended - this is incompatible with a number of policies in the plan.</p>	Yes	As per the Parish Council response.
80	Statutory Consultee	Policy HGSA2: Land opposite	Rother District Council	Policy HGSA2: Land opposite Hurst Green School – This site is the subject of an extant planning application.	Noted.	No	None, general comment with no change required.

		Hurst Green School					
81	Public Representation	Policy HGSA3: Site HG6: Land opposite the Lodge, London Road	Alison King	HG6 is too densely packed towards one end of the field and too close to an ancient woodland.	Noted. The exact nature of the scheme would be considered at the application stage. The site has been considered from a landscape impact assessment and the policy reflects the findings and recommendations of this in terms of impact on the ancient woodland (with a buffer required in accordance with national guidance) and density. The policy has been amended to require an additional landscape assessment.	Yes	The policy has been amended to require an additional landscape assessment.
82	Site Promoter/Developer Representations	Policy HGSA3: Site HG6: Land opposite the Lodge, London Road	Wooldridge Developments Ltd / DHA Planning	<p>Our client supports the principle of bringing forward a Neighbourhood Plan in Hurst Green and recognises the benefit such Plans bring to the local community. Wooldridge welcomes this opportunity to express their views where they would be helpful.</p> <p>Wooldridge note and support the HGNP's visions and objectives, specifically where they relate to new development. For instance, it is considered appropriate that the HGNP supports sustainable and landscape-sensitive housing development that enables the delivery of the HGNP's vision and objectives.</p> <p>Our client has land interests in the site known as 'Field Opposite the Lodge, London Road' which is proposed to be allocated for 26 residential dwellings in the HGNP, under policy HGSA3 (Site HG6). It is considered positive that the HCNP wishes to create an environment that encourages residents to live active, social and meaningful lives, by bringing forward action on facilities and improvements, which are needed by the village of Hurst Green. A Neighbourhood Plan creates an opportunity to ensure that new developments are able to help meet these needs, delivering community infrastructure and facilities as appropriate.</p> <p>A planning application was submitted to Rother District Council (RDC) in November 2021 by our client on the site for: "development of site to provide 26No dwellings with associated hard standing, car parking, landscaping, public open space and provision of a car park for the Church" under the LPA reference RR/2021/2798/P. The site name differs from that given to it by the HGNP and is referred to as 'Land West of London Road, Hurst Green' in the application. The application has been informed by extensive engagement with the Parish Council which will</p>	Noted.	No	None.

				remain the case going forward. The application is currently undecided by RDC but we have recently submitted an amended set of plans to respond to the comments made by consultees and local residents.			
83	Site Promoter/Developer Representations	Policy HGSA3: Site HG6: Land opposite the Lodge, London Road	Wooldridge Developments Ltd / DHA Planning	Policy HGSA3 (Site Allocation: Field Opposite the Lodge, London Road (HG6)) provides detailed guidance for the site considerations and design of the proposals. This includes (among other things) compliance with the High Weald Design Guide; the provision of open space and allotments; and the provision of car parking to serve the village church. The proposals that have already been put forward by our client aligns well with HGSA3 as a whole and Wooldridge are therefore supportive of this policy.	Noted.	No	None.
84	Site Promoter/Developer Representations	Policy HGSA3: Site HG6: Land opposite the Lodge, London Road	Wooldridge Developments Ltd / DHA Planning	Wooldridge specifically welcome the feedback the Parish Council have provided through the planning process, which has helped to influence the emerging proposals in a significant way, for example through the incorporation of a large central open space which accords with objective 5 which seeks to create new, open green spaces and ways to support and enhance biodiversity. Importantly, the application now features a community orchard, to ensure it complies with policy HG15 which states that development proposals that incorporate new community growing spaces of a size appropriate to the development, will be supported. In its current form, Wooldridge Developments Ltd are supportive of the draft Neighbourhood Plan. It sets out a positive vision for an attractive future for the village, and its policies appear well thought out and justified, ensuring the vision and objectives can be met and delivered. If submitted in its current form, we would consider that an Examiner will find in favour of the HGNP, allowing it to proceed to a local referendum. If you would like to discuss any of the above, we would be very happy to do so.	Noted.	No	None.

85	Statutory Consultee	Policy HGSA3: Site HG6: Land opposite the Lodge, London Road	Rother District Council	HGSA3: Land at London Road – This site is the subject of an extant planning application.	Noted.	No	None, general comment with no change required.
86	Public Representation	Policy HGSA4: Site HG45: Land adjacent to Iridge Place, London Road	Anthony Tiernan	On every conceivable level this policy (HG45) flies in the face of current ecological reasoning. You are essentially proposing the destruction/manipulation of established woodland that has remained untouched for hundreds of years. The Oak and Silver Birch trees in this woodland support a staggering amount of biodiversity that would be lost forever by any development. Central government is constantly reminding us of the need to replant more trees and here we have a government agent proposing the removal of a very important green space for nature....you only have to view a satellite image to understand this. This woodland, amongst a multitude of positives, provides atmospheric absorption of pollutants from the A21 traffic going through the village.... I would imagine that to be very important to parents of the nearby school as well as residents. For the sake of three to four dwellings the trade off is most definitely not worth it....nature needs space and in the current global climate that is absolutely paramount.	The policy has been directly informed by an independent landscape assessment and a Strategic Environmental Assessment. All development is required to deliver a net gain in biodiversity of at least 10% as required by the Environment Act. There is a balance to be struck between delivering the quantum of housing (as required by government, via Rother District Council) and identifying sites that would have the least environmental impact. The policy has been amended to require a Stage 2 landscape assessment and a Visual Impact Assessment, Tree Survey and Heritage statement.	Yes	Policy has been amended as per the Parish Council response and broader comments received in relation to this policy.
87	Site Promoter/Developer/Representations	Policy HGSA4: Site HG45: Land adjacent to Iridge Place, London Road	Andrew and Steve Gasson	This representation is made by the owners of Site HG45 which is the subject of Policy HGSA4: 'Land Adjacent to Iridge Place' in the Pre-Submission Draft Version of the Hurst Green Neighbourhood Plan (HGPN). We are very supportive of the Neighbourhood Plan process because it brings together all stakeholders involved in the growth and development of Hurst Green, and we recognise the many benefits it brings to the local community. We have found members of the Parish Council very approachable and able to outline and explain the detail of the HGPN. The studies commissioned by the Parish Council have been informative and useful, particularly the 'Landscape Assessment Report' prepared by Harper Landscape Architecture, and the 'Site Assessments Summary Report', prepared by Alison Eardley Consulting. Likewise, the enquiries made by the Parish Council to stakeholders on behalf of all developers, such as to 'Highways England' (now 'National Highways')	Noted.	No	None.

				regarding new accesses on to the A21, have been very helpful. We were pleased to participate in the Public Exhibition held in October 2021, which gave us the opportunity to present a sketch of a Design Concept for our Site.			
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88	Site Promoter/Developer Representations	Policy HGSA4: Site HG45: Land adjacent to Iridge Place, London Road	Andrew and Steve Gasson	<p>We welcome the opportunity that the Regulation 14 Consultation now offers to make further comments on the draft Plan.</p> <p>New Housing: Providing housing for a growing population is a core part of the HGNP and we fully support the approach to site selection described in 'Policy HG2 Housing Strategy 5.5', that sites should be 'sustainable from primarily an ecological and landscape perspective and also from a social perspective in terms of any community benefits a given site may provide'. New Public Footpath: Significantly, we are committed to providing 'a new footpath link between the A21 London Road and Drewetts Field' Policy HGSA4 vii. We propose that the new footpath will commence where the existing pavement terminates (at the driveway to Number 70, London Road) and continue through the site to Drewetts Field. The footpath will provide an alternative to the only existing access to Drewetts Field via the rough track (Public Right of Way 31) which is shared with motorists. The benefit to the community will grow as the sports facilities are expanded (Policy HG14 Sports and Leisure). We believe this footpath will go some way to satisfying the 'Vision for Hurst Green' by 'making movement by foot less challenging', 'improving walking opportunities' and 'not exacerbating car parking problems' which is expressed in Policy HG7 Enhancing the Public Realm A iii and Policy HG18 Encouraging Sustainable Movement.</p> <p>Scale of Development: We acknowledge that the scale of our proposed residential development on Site HG45 (of no more than 4 dwellings) means that the housing provision will be 'considered windfall' by Rother District Council (Policy HG2 Housing Strategy 5.10), as far as the Council's target is concerned; none the less, we support the design objective that residential development 'relates to the local character and is appropriate to its rural location and avoids a suburban feel' Policy HGSA4 C i Design. Access from the A21 London Road: As the A21 is part of the Strategic Road Network, the design of the new access will conform to the standards set out in the Design Manual for Roads and Bridges (DMRB).</p> <p>Sustainable and Landscape-sensitive Housing Development: We support the desire for 'sustainable and landscape-sensitive housing development' expressed in the 'Vision for the Neighbourhood Plan 3.2' and we reflected this in the sketch of our Design Concept presented at the Public Exhibition in October 2021. Specifically, we have set back the new building away from the A21 (HGSA4 11.56 and Policy HG5 Design of Development V), retained as much existing tree cover as possible at the front of the site and created a dog-legged driveway between the retained trees to lessen the visual impact (HGSA4 11.55). We also envisage the retention of trees at the rear of the site abutting the Drewett Sports Ground, together with new planting along parts of the boundary with neighbouring properties (HGSA4 11.56), which will all sustain the high-quality sense of place and minimise the impact on inter-visibility between properties and views in. On-site Biodiversity: We are mindful that development proposals should maintain and enhance 'the natural environment and landscape features' and 'existing on-site biodiversity</p>	Noted.	No	None.
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				<p>assets and make provision for wildlife needs' (Policy HG9 Protecting the Natural Features of the Parish) and we have already commissioned a Phase 1 Ecology Survey and follow-up surveys relating to protected species. We are confident that the small scale of the development on our site and the retention of existing vegetation where possible, together with new planting of indigenous species, will ensure these objectives are satisfied. Informal Public Amenity Space: In the sketch presented at the Public Exhibition, we also identified an informal public amenity space in the south-west corner of the site, which today includes part of a rather overgrown seasonal pond, shared with the neighbouring property at Number 74 London Road. The possibility of developing this as a permanent wildlife pond will be explored, together with an appropriate attenuation strategy in respect of the surface water generated by the new buildings and hard landscaping (Policy HGSA4 ii and v). In conclusion, we very much share the exciting new vision for the village presented in the Hurst Green Neighbourhood Plan. We look forward to seeing its further development and to continuing our family's relationship with the village, which dates to the early 19th century and was centred on the bakery at Number 81, London Road.</p>			
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89	Statutory Consultee	Policy HGSA4: Site HG45: Land adjacent to Iridge Place, London Road	Rother District Council	HGSA4: Land adjacent to Iridge Place – The site has substantial tree coverage and labelled 'deciduous woodland' in NP map 7.1. Development on this site would involve extensive tree removal which would conflict with Core Strategy policies and the High Weald Management Plan as well the NDP's Policy HG9.	This is an important concern. The site promoters have proposed that important (mature/veteran) tree coverage can be largely retained. The landscape assessment concurs with this assessment. An additional clause has been added to the policy requiring trees to be retained where possible, and replaced if not.	Yes	Included a clause to retain existing trees/ plant new ones to replace existing trees.
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90	Public Representation	Strategic Masterplan Document	Ned Pakenham and Sarah Pakenham	<p>Right now all residents of Hurst Green are being urged in a pamphlet blitz to comment on the draft Neighbourhood Plan. This is a particularly sensitive time because simultaneously local opinion is being solicited by the parish council as to the future of the community shop site. Residents' opinions on whether to retain a community-leased shop site or cash it in will naturally be strongly influenced by ideas contained in the Neighbourhood Plan. And since the Masterplan is published alongside the Neighbourhood Plan, and there is constant approving reference in the latter to the former, especially for those seeking detail about the village hub proposals, residents are naturally are going to consult the Masterplan too.</p> <p>Yet Sarah and I know, and the Parish Council seems to privately accept, that the most important idea still in both the draft Neighbourhood Plan and Masterplan is actually a non-starter. That is to open up the boundaries between the community shop site and neighbouring sites. This is of course implicit in the idea of a 'village hub', the big theme of the documents. As everyone should know, there can be no village hub without destroying existing property rights of adjacent property owners (namely us). There can be no village hub without destroying the boundary-related conditions of the lease for the community shop . Nowhere in your parish-published plans is any acknowledgement of this fundamental point.</p> <ol style="list-style-type: none"> 1. You suggest removing the boundary fence between the village car park and the former community shop to allow free access between the sites. This is forbidden in Clause 23.1 of the lease. 2. You suggest removing trees and hedging between the playground and the former community shop to create a new access route between these sites and to create additional parking in our existing shared access route from Station Road to our fields. Again, this is forbidden in Clause 23.1. 3. You suggest installing a repurposed shipping container large enough to house a separate stand-alone business (e.g., bike repair shop) along our boundary fence. This would count as an addition to the property, so would fall foul of Clause 23.1 as well. This would also likely require planning permission (itself blocked by Clause 27.4) because of the site's location in an AONB and because it would presumably operate for more than 28 days a year and would therefore not be considered a 'temporary' structure. Finally, it would be in breach of the permitted use for the site as set out on page 4 of the lease. 4. You suggest creating a long public footpath through our fields and garden to connect the school to the former shop. We do not consent to this. The parish council has been aware of our non-consent to this for several years, indeed for as long as the idea has been floated. <p>We think it is inappropriate to consult people about a village hub when there is no legal possibility for the parish council to make it happen. We think it is inappropriate to include references to and drawings of bicycle</p>	The green village hub concept covers an area greater than the footprint of the former community shop. Following the closure of the Community Shop and Café, the Council has chosen to surrender this lease, and has therefore removed references to this building and responded to a request since the consultation to explicitly clarify this. One of the respondents has joined the Parish Council.	Yes	<p>Following the closure of the Community Shop and Café and the Council's handing back of its 90 year lease in May 2024, these documents have been updated where relevant, and the HGNP has been amended to explicitly clarify that the policy relates to buildings and land under the control of the Parish Council, and/or other branches of Government.</p> <p>The Design Codes have been updated to remove references to this building/area.</p> <p>The Strategic Masterplan is an ongoing piece of work for the Council supported by professional masterplanning advisors - some of its concepts have fed into the HGNP, but the draft document is no longer an integral part of the HGNP and references within the HGNP have been updated to reflect this.</p>
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				<p>repair container-sites, to commission photos and mockups of bicycle repair shops, when there is no legal right to install one. We think it is inappropriate to publicise and celebrate 'future opportunities' in relation to buildings when there is explicitly in your lease no such future opportunity. It is inappropriate to tell us privately one thing, but mislead the public by telling them something very different. Therefore it seems clear to us that a village consultation about fundamentally misleading plans cannot be a worthwhile exercise. So, we politely request again that the Masterplan and Neighbourhood Plan are taken down from the 2030 website and not reposted until either 1) the future of the community shop has been settled with us or 2) the Masterplan and Neighbourhood Plan have been amended to remove all reference to a 'village hub' and its associated connective drawings and suggested new buildings like a bicycle repair shop.</p> <p>We accept that the Neighbourhood Plan and Masterplan are not the work of a single individual. None of that changes the fact that they are seriously misleading.</p>			
91	Statutory Consultee	Strategic Masterplan Document	Rother District Council	<p>The document generally has good strategic/place-making intentions. Page 8 map - The new proposed 'new connection' on A265 (linking to south of site HG11) seems unappealing for pedestrians, and are there landscape/topographical issues? We also do not support the 'new connection' on southern side of site HG11 and (8) 'potential small viewing space on new pedestrian link' – this introduces activity on the countryside edge of this allocation, see Policy HGSA1 comments above.</p>	<p>The Parish Council have considered this representation as it is contradictory to other representations by RDC (and others). The intention within the policy supports greater access to the countryside, which the Parish Council is fully supportive of.</p>	No	<p>None. The Strategic Masterplan is an ongoing piece of work for the Council, some of its concepts have fed into the HGNP, but the document</p>

							is not an integral part of the HGNP.
92	Statutory Consultee	Strategic Masterplan Document	Rother District Council	Page 8 map - crossings (4) and (5) on A21 will require discussion with Highways England.	Noted.	No	None.
93	Statutory Consultee	Strategic Masterplan Document	Rother District Council	The 'Village Green' concept seems to be divided between two locations; one green space at Village Hub, and one proposed associated with allocation site HG22/43. How does this work – does it dilute the concept?	The Village Green refers to the space to be incorporated into HG22/43. The Green Village Hub includes the existing green space (village park). Both spaces, whilst incorporated green space, are intended for different purposes and, give their locations, will likely serve different residents.	No	None.
94	Statutory Consultee	Strategic Masterplan Document	Rother District Council	There is no clear mention of potential public realm improvements to streets/roads to improve access and pedestrian experience – particularly with regard to Station Road and A21 – Is there an opportunity to use the NP to engage with Highways England on potential improvements in the built core of the village?	The Masterplan outlines potential improvements that could be made to the streets/roads. The Parish Council look forward to dialogue with RDC, ESCC and National Highways to enable these. We note that the provision of such improvements would be a 'project' as opposed to a policy.	No	None.

95	Statutory Consultee	Various	National Highways	<p>"Thank you for your notification dated 27 July 2022, inviting National Highways to comment on the Neighbourhood Plan Pre-submission Consultation, seeking a response no later than 17 September 2022.</p> <p>We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Hurst Green Neighbourhood Plan (HGNP), our focus will be on any potential impact to the A21 in the vicinity of Hurst Green.</p> <p>We observe that the HGNP broadly aligns with the appropriate Rother District Local Plan documents. With the A21 running through the parish, we support the HGNP plans to consult us on the necessity of any new accesses and crossing points on the A21 as consequence of allocated residential development. However, we also highlight that any sites that abut the SRN will need to consider the following matters:</p> <p>Any applicant would need to consider the interface between the site boundary and the highway boundary and the existing built up environment and come forward with an appropriate and safe design. These details will need to be considered and approved by National Highways prior to consent or would form part of a conditional response made by ourselves. The applicant will also need to consider the construction/use/maintenance of such proposals.</p> <p>If acoustic or other bunds are proposed then we will need to consider the details of those noting that any changes of levels could impact on site drainages and hence could impact on the SRN. Please note that geotech and structural stability will need to be considered as part of any submission.</p> <p>Planting care and maintenance. Proposals/governance/funding. Any proposals should seek to avoid, where possible, the need for staff/plant/materials to enter highway land, nor should lead to ongoing maintenance liabilities e.g. the need to cut back vegetation in order to maintain sightlines from the site and access to the trunk road, its signage, or inhibit access to our assets.</p> <p>Details of street lighting and how this interphases with any existing street lighting and ensuring that any new street lighting does not create an unsafe environment on the trunk road. Site and highway drainage.</p>	Noted.	No	None.
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				<p>Please note that no surface water runoff will be permitted to enter the public highway nor will there be any connection into our drainage network even if one currently exists. Prospective applicants are able to seek free pre-application advice from National Highways which will cover the developments transport impacts as well as those matters listed above.</p> <p>Please do continue to consult us as your plan progresses so that we can remain aware of, and comment as required on its contents. Thank you for consulting us. Should you have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk."</p>			
96	Statutory Consultee	Design Codes Document	Rother District Council	Generally good landscape and streetscape analysis and guidance, the document reflects national and local policy and sits well alongside other design guidance, e.g. the High Weald AONB Housing Design Guide.	Noted.	No	None.

97	Statutory Consultee	Design Codes Document	Rother District Council	Section 2.4 'Movement & Transport' doesn't seem to have been carried forward into proposals in Strategic Masterplan (see comments above).	Noted.	No	The Strategic Masterplan is an ongoing piece of work for the Council, some of its concepts have fed into the HGNP, but the document is not an integral part of the HGNP.
98	Statutory Consultee	Design Codes Document	Rother District Council	Section 3 – Design Codes – good guidance, perhaps a caveat is needed to explain that grey blocks in explanatory diagrams are purely to illustrate the specific urban design point of each Design Code point, and are not intended to represent wider acceptable built plan form. For example, there are lots of diagrams featuring a 'permeable' cul-de-sac where the 'ticked' scheme shows public paths on blank sides of buildings, and where the buildings are rather segregated and fail to tightly define the space. It may cause problems if developers think this is the correct way to arrange a 'square' or embrace a green space for example.	Design Codes updated, and a caveat added on the appropriate pages.	Yes	As per Parish Council response.
99	Statutory Consultee	Design Codes Document	Rother District Council	The versions of this diagram on p.70 illustrate a valid point about car-parking and left-over space but have the unfortunate consequence of dismissing (with a 'cross') a built form layout that sometimes might more successfully define a central space (with a revised parking strategy) – be clear about the specific issue that's illustrated in each diagram, sometimes a couple of options may help.	Design Codes updated, and a caveat added on the appropriate pages.	Yes	As per Parish Council response.
100	Statutory Consultee	Design Codes Document	Rother District Council	The diagram on p.66 is confusing – what is it trying to show? It seems to be promoting a fairly isolated new development. This may need rethinking.	Design Codes updated, diagram on page 66 has been removed.	Yes	As per Parish Council response.
101	Statutory Consultee	Design Codes Document	Rother District Council	Diagram on p.67 (parking) – we do encourage a mix of parking strategies, including small parking courts (as does the High Weald AONB Design Guide). To avoid confusion, this diagram should be expanded to show an acceptable rear parking court, as well as the unacceptable large tarmacked parking area. The parking diagrams on p.71 are very good	Design Codes updated, and a caveat added on the appropriate pages, and the cross on page 67 has been replaced with a green tick.	Yes	As per Parish Council response.
102	Statutory Consultee	Design Codes Document	Rother District Council	3.2 – Case Studies – this is a very interesting range, we recommend an introductory caveat to explain that each of these display some though not necessarily all of the relevant design, placemaking principles and requirements.	Design Codes updated, and a caveat added on the appropriate pages.	Yes	As per Parish Council response.
103	Statutory Consultee	Design Codes Document	Rother District Council	Mapping: Development boundary – Please make sure that the boundary is a solid line throughout (including proposed extensions) and there are no visible gaps e.g. obscured by another line.	Design Codes updated.	Yes	As per Parish Council response.
104	Statutory Consultee	Design Codes Document	Rother District Council	Mapping: Employment sites – these are plotted on the policies map, however they are not mentioned in HG17 and therefore not protected by this policy. Please omit from the map or amend the policy to reflect the existing sites.	The Parish Council have added a clause within the policy HG17 to include these sites. This was not originally included as it was deemed a repetition of strategic policy.	Yes	As per Parish Council response.

105	Statutory Consultee	General Comments	East Sussex County Council	<p>"3.5 Neighbourhood Plan Objectives</p> <p>3) To create an environment that encourages residents to live active, social, meaningful lives that promote good health and well-being. This includes bringing forward action on facilities and public realm improvements, which are needed by the village of Hurst Green; and the hamlets of Silver Hill and Swiftsden.</p> <p>4) To improve the visual appearance and overall perception of Hurst Green as a place where people want to live, work and visit. This includes conserving and enhancing the built and historic environment and improving the general street scene and connectivity around the Parish.</p> <p>5) To enhance our existing, and create new, open green spaces and improve access to the countryside. This includes identifying ways to support and enhance our biodiversity and increase physical activity and mental wellbeing.</p> <p>Thank you for the opportunity to comment on the Hurst Green Neighbourhood Plan. The following are officer comments from East Sussex County Council (ESCC) which have been subdivided into the respective disciplines for ease of reference. Where appropriate the specific section, policy or document within the consultation documents has been referred to.</p> <p>If you have any queries on the County Council's comments, please contact: Infrastructure Planning & Place Team, Communities, Economy & Transport, East Sussex County Council</p>	Noted.	No	None.
106	Non-Statutory Consultee	General Comments	Bodiam Parish Council	At our meeting on Monday 26th September, Councillors felt that they had no objections or concerns to raise.	Thank you for this feedback.	No	None.
107	Non-Statutory Consultee	General Comments	Salehurst & Robertsbridge Parish Council	The Parish Council is supportive of the plan which is well written. We wholeheartedly support the emphasis on walk cycle connectivity, energy sustainability and dark skies. Green spaces are very important, especially The Stage Field.	The Parish Council is grateful for this feedback, comments and support.	No	None
108	Public Representation	General Comments	Angie Loveless	Please do not fill the playground with plastic. The previous "upgrade" involved the removal of blossoming trees - which provided both aesthetic and environmental benefits - and the installation of visually offensive brightly coloured plastic and metal toys. The "bus shelter" has been an eyesore and litter magnet. People use the space without regard for others - for example there is no enforcement of the dog ban; there is often broken glass and cigarette ends; sometimes people let off fireworks. It's a disgrace.	The re-development of the playground is outside the scope of the policies contained within the Neighbourhood Plan, therefore there is nothing within the plan that could be amended as these comments related to matters that are outside the scope of the neighbourhood plan. The Parish Council has communicated with residents previously that these trees	No	The approved design for the playground is made almost entirely from wood. During 2024 additional consultation with resposdee was undertaken in relation to the village hub policy.

					were removed as they were diseased and were considered by a specialist tree surgeon to be unsavable.		
109	Public Representation	General Comments	Victoria Harrison	Greater access to greenspace through more permissive footpaths.	The Parish Council is supportive of providing greater access, and this is demonstrated in the HGNP, recognising that the introduction of permissive footpaths is entirely at the discretion of landowners.	No	None.
110	Public Representation	General Comments	Victoria Harrison	Environmental protection and safety of residents must be a priority.	Noted.	No	None.
111	Public Representation	General Comments	Angie Loveless	How about getting some of the basics sorted first: litter; pavement parking; shocking state of the village hall car park; empty buildings (former Catholic Church); visible presence of parish councillors when there are infrastructure failures such as the recent absence of mains water.	The village hall car park is not owned and operated by Parish Council. These comments relate to matters outside the scope of the policies contained within the Neighbourhood Plan, therefore there is nothing within the plan that could be amended.	No	Comments discussed by the Parish Council.

112	Statutory Consultee	General Comments	National Grid	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid - National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below. www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p> <p>Further Advice Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included. If you require any further information in respect of this letter, then please contact us.</p>	Noted.	No	None.
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113	Statutory Consultee	General Comments	Rother District Council	The start date should relate to the latest figures made available when the Plan is submitted. The latest Housing Land Supply figures are from April 2021	The start date has been amended to 2021.	Yes	Amended start date to 2021.
114	Statutory Consultee	General Comments	Historic England	Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Hurst Green Neighbourhood Plan. We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ . For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local authority's planning and conservation advisers, and if appropriate the Historic Environment Record at your local County Council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.	Noted.	No	None.