

Submission Hurst Green Neighbourhood Plan Summary of Representations

Respondent Details			Agent Details		Part of Neighbourhood Plan		Summary of Comments	Participate in oral exam	Notify when NP made
Reference	Respondent Name	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Item	Support/ Object/ Comment			
Statutory									
HGNP/R16/2024/1		Environment Agency	Abbie Philpot	KSL Planning	Site allocations	Comment	We have no bespoke comments to make as the allocated sites are in locations with no constraints within our remit.		
HGNP/R16/2024/2	Edward Sheath	East Sussex County Council			Whole Plan	Comment	<p>Highways</p> <p>1. The plan meets with the basic conditions (paragraphs 1.2-1.5), conforming with ESCC strategic policies, specifically the East Sussex Local Transport Plan 2024 – 2050.</p> <p>2. Transport challenges identified in the plan are agreed and noted.</p> <p>3. Policy HG7: The use of wayfinding and signage is supported where appropriate, although where this could be introduced 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. the provision and the amount of car parking spaces should be carefully considered and balanced between improving walking, wheeling and cycling connectivity to any new green space.</p> <p>4. We welcome the addition of the reference to Etchingham Station and reference to funding and the East Sussex Local Cycle and Walking Infrastructure Plan.</p> <p>5. Careful consideration has been given in the Plan as to how to improve pedestrian and cycling access and connectivity within the village including forthcoming housing development, as well to key neighbouring communities (as identified in Policy HG18(B)), which is welcomed.</p> <p>6. There is no reference within the Neighbourhood Plan to East Sussex Local Transport Plan. Recommend making reference to reference to this document and its modal strategies including and the Local Cycle and Walking Infrastructure Plan, Bus Service Improvement Plan are made in the NP; and referecne to the Rail Strategy.</p> <p>4. Recommend that references to "walking and cycling" are amended to "walking, wheeling and cycling". Wheeling refers to using a wheelchair or mobility scooter to get around as opposed to walking or cycling.</p> <p>5. Recommended that bus travel is mentioned and the Flexibus service</p> <p>6. Safe crossing needed across the A21 close to the school.</p> <p>Education</p> <p>7. Our current forecasting models only contain detailed housing numbers and trajectories for Rother District to 2027/28, alsowe don't have the data from ONS to produce the sub-district demographic projections of future births to inform our longer-term forecasts. In consequence, we have been unable to produce detailed forecasts in response to the Hurst Green NP consultation. Forecasts are currently projecting a sufficiency of places in the Hurst Green area until at least 2026/27 for both early years and primary school places.</p> <p>Culture and Tourism</p> <p>8. HG14: Consideration could also be given to dance, drama and art provision.</p> <p>9. HG16: We welcome this policy and suggest some amended wording.</p> <p>Rights of Way</p> <p>10. Recommend that Chapter 10 and policy HG18 accord with para 104 of the NPPF in order to meet the Basic Conditions.</p>		
HGNP/R16/2024/3	Louise Dandy	Historic England			Whole Plan	Comment	The neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.		
HGNP/R16/2024/4	Stephanie Holt- Castle	Kent County Council			Whole Plan	Comment	<p>Housing Requirements</p> <p>1. Policy HG2: Housing Strategy. The County Council requests, as the neighbouring Local Highways Authority, that it is included in any pre-application enquiries and consultations on future planning applications for the A21 sites. It would also ask that a transport assessment be included, which considers the impact on the local highway network within Kent.</p> <p>Getting Around – Sustainable Movement</p> <p>1. Policy HG18: Encouraging active travel. The County Council welcomes the recognition within the Regulation 16 Submission Consultation and the aims to advance sustainable travel and leisure facilities for its residents – PRoW can positively contribute to these aspirations. TIt is noted that it is likely that residents do walk or cycle from parish to parish; two existing PRoW run contiguously across the parish and county boundary and may assist local interactions.</p> <p>2. The County Council welcomes proposals for the creation of new off-road and cycling routes, as suggested in the Neighbourhood Plan. The Plan could recognise the value of local PRoW for wellbeing and leisure, and to deliver benefits for community cohesiveness and sustainable/active travel and would ask that this be reflected in any further draft of the document.</p>		
HGNP/R16/2024/5	Elizabeth Cleaver	National Highways			Whole Plan	Comment	<p>1. We note that Rother District Council has an has an emerging allocation of 64 dwellings to be provided in the Hurst Green Neighbourhood Plan, and the Submission Hurst Green Neighbourhood Plan allocates housing sites providing a total of 57 dwellings.</p> <p>2. National Highways will be looking to the emerging Rother District Local Plan 2020-2040 to identify the cumulative overall traffic impacts and any necessary mitigations across Rother District including the Hurst Green Parish area.</p> <p>3. Each of the sites allocated in the Hurst Green Neighbourhood Plan will need to be supported by a Transport Statement/Assessment and Travel Plan at planning application stage. We are content that we can deal with any site specific matters as part of the planning application process. We encourage early engagement with all developers, and especially for the sites in close proximity to the A21.</p> <p>4. Policy HGSA4 relates to allocated site HG45, Land adjacent to Iridge Place, for 3 to 4 dwellings. We note the expectation that this site will be accessed via the A21 trunk road. Any new connections to the SRN require National Highways' permission and in addition all works to construct a new access will require the developer to enter into a Section 278 Agreement with us. We encourage early engagement with any proposal to develop this site.</p> <p>5. There is an error on page 86 in paragraph 11.16. The A21 is on the south western boundary of the HG45 site (not south eastern).</p> <p>6. We are aware that Hurst Green Parish Council are in discussion with our colleagues in our A21 Safety Package Team regarding potential A21 safety improvements within the Parish.</p>		
HGNP/R16/2024/6	Sally Wintle	Natural England			Whole plan	Comment	Natural England does not have any specific comments on this draft neighbourhood plan.		

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HGNP/R16/2024/7	Pedro Santos	South East Water			Whole plan	Comments	Our recently published WRMP considers the most recent housing trajectory figures from Rother District Council (inclusive of Hurst Green Parish Council figures), available at the time we developed our plan. We are confident that our plans accommodate a level of growth published within local plans at a Borough Council level (although final refinement may be required, based on local plan updates) to ensure that sufficient water is available within the local area to meet a supply- demand balance.		
HGNP/R16/2024/8	Catherine Adamson	Southern Water			Whole plan	Comments	We have reviewed the document, and the content of the Consultation Statement also provided, and we have no comments to make further to those provided on the Pre-Submission version of the Plan.		
HGNP/R16/2024/9	Adam Reguera	Tunbridge Wells Borough Council			Whole plan	Comment	1. TWBC has focussed on aspects of the Neighbourhood Plan that could raise strategic cross-boundary issues, including issues such as infrastructure and the protection of the natural and built environment. 2. TWBC has focussed on aspects of the Neighbourhood Plan that could raise strategic cross-boundary issues, including issues such as infrastructure and the protection of the natural and built environment. 3. TWBC query whether Hurst Green Parish Council have been involved in any discussions with RDC on the nature of future development along the A21 and would welcome further dialogue should any proposals be advanced in this area, which could have an impact on strategic infrastructure, depending on the proposals. Policy HG2: Housing Strategy - The housing strategy section justifying the approach to Policy HG2 seems muddled andcould benefit from some re-drafting to aid clarity for the reader, particularly in terms of the various policy documents and allocations/policies that are referred to. It is not clear if the permissions for sites HG 35, HG 6, HG 22/43 have been implemented and it is generally good practice to continue to allocate a site during plan preparation until it has been largely implemented, in the event of an alternative scheme coming forward on any of the sites, a site allocation would help set the framework for development on the site as well as helping to deliver community benefits through policy criteria. 4. Policy HG4: Character of Development - some of the pictures in the supporting text do not best illustrate good design principles, such as those for Vicarage Way and Coronation Gardens. It might be worth exploring and using other examples to demonstrate good design. 5. Policy HG10: Green Infrastructure - We have concerns with the wording of policy criterion Bii. It suggests significant harm can be worked with, which would be difficult to mitigate and adequate mitigation does not imply the significant harm would be completely mitigated. 6. Policy HG13: A Green Village Hub for Hurst Green - It is not an allocation within the NDP and there does not appear to be any mechanisms within the plan for collecting developer contributions to fund this. It is also not too clear where the village hub should go. Policy HG18: Encouraging Sustainable Movement - The reluctance to consider the use of shared surfaces under policy criterion C is questioned, Active Travel England's current guidance is that they 'may be appropriate in new residential developments'.		
HGNP/R16/2024/10	Veronique Matre	UK Power Network			Whole plan	Comment	UK Power Networks does not foresee any immediate challenges in suppling the 75 new homes forecast or the growth of domestic EV charging within the village. You may be interested in looking at our Distribution Future Energy Scenarios Distribution Future Energy Scenarios - UKPN DSO, a forecasting portal. The Hurst Green area is under "Rother 001C" and our forecasting system shows we currently have a forecast of 668 homes and 702 EVs over the next ten years.		
HGNP/R16/2024/11	Gill Colqhoun	Salehurst Parish Council			Whole plan	Comment	The Parish Council is in support of the plan. We are pleased that a plan has been produced and congratulate Hurst Green Parish Council.		
HGNP/R16/2024/12	Cllr Theresa Killeen	Rother District Council			Whole plan	Comment	HG1: Location of development B (ii): It is unclear how "Small-scale infill and redevelopment" is to be defined. B(iv)This should be re-worded, development should "conserve and seek to enhance" the High Weald National Landscape (HWNL), not "avoid significant harm." C: The words "when viewed from publicly accessible locations" should be deleted. D: We suggest the addition of the words "subject to other Development Plan policies". Policy HG2: Housing Strategy This site (Land Adjacent to Iridge Place) is not considered suitable for development and so it is suggested this allocation is deleted. Policy HG3: Meeting Local Needs Part B of Policy HG3 should also be deleted because it is unnecessary. Policy HG4: Character of Development A. We recommend the following deletion: "A. Development should conserve and enhance the Character Area in which it is located (as shown in Figure 6.1 and described in the Hurst Green Design Codes). The design of new development should demonstrate how it has taken account of the local context and has reflected the character and vernacular of the area, using architectural variety in form and materials, to avoid building design that is inappropriate to the Plan area. Innovation in design will be supported where this demonstrably enhances the quality of the built form in a character area." E. the policy should acknowledge that there may be situations where future development may occur beyond the development boundary e.g. if a 'deliverable' HELAA site is identified and the proposed transition of density will not be appropriate. Policy HG5: Design of Development We recommend referring to Homes England 'Streets for a Healthy Life' best practice regarding criterion x) Limited use of shared surfaces. Policy HG6: Energy Efficiency and Design We support this policy but recommend that it be strengthened, i.e. not only supporting development which incorporate the features but instead, requiring developments to demonstrate how they have incorporated the sustainable design features as appropriate. Policy HG7: Enhancing the public realm Regarding 'Development proposals to enhance Hurst Green, as set out in the Hurst Green Aims and Vision and supported by the Hurst Green Design Codes, and in accordance with the High Weald Housing Design Guide, will be supported'. HG9: Protecting the natural features of the parish B. Retain ancient trees should be amended to 'retains, protects and enhances ancient woodland' as per Rother Local Plan Core Strategy Policy EN5: Biodiversity and Green Space, criterion viii.		

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							<p>HG10: Green Infrastructure B. the reference to a 'biodiversity appraisal' should be amended to a Biodiversity Gain Plan, as the recognised government template for this work stage. Policy HG11: Local Green Space We support this policy. Policy HG12: Protection of Locally Significant Views We support this policy HG13: A Green Village Hub for Hurst Green We support this policy</p> <p>HG14: Sport and Leisure Facilities in Hurst Green We largely support this policy; however, we recommend rewording so that the policy does not suggest that the desired benefits will be considered when the planning application is determined. HG16: Promoting rural tourism We recommend that the concept of rural tourism in relation to green travel, is explained in the policy text to make the policy requirement clearer. HG17: Supporting local employment opportunities C. The meaning of "on flexible terms" in the first sentence is unclear and could be interpreted as referring to a flexible use (which could mean a change of use to residential, for example, which could be undesirable). Policy HGSA4: Site allocation: Land adjacent to Iridge Place (HG45) As noted above (point 8), this site is not considered suitable for development and the allocation should be deleted. Policy HG21 Highway capacity at key road junctions We recommend removing the NPPF paragraph number from the policy due to anticipated NPPF revisions.</p>		
							<p>Hurst Green Design Codes The clarity and effectiveness of the design code could be improved. To improve usability, it is essential to explain how the criteria should be applied and to clarify the interpretation of key terms, particularly the distinction between "should" and "must." Reference to High Weald Housing Design Guide It would be beneficial to map the Hurst Green Design Code against the 12 considerations of Building for a Healthy Life and the 10 sections of the High Weald Housing Design Guide. Setback from Busy Roads "New development should be appropriately set back from busy roads." Clarify that this applies specifically to the A21. Boundary Planting We recommend adding Sustainable Urban Drainage Systems (SuDS) as an alternative. Greenfield Development It would be beneficial to highlight Building for a Healthy Life's requirement to retain hedgerows within the public realm, safeguarding their future retention and management. Street Types and Dimensions The stated building to building distances dimensions significantly exceed the best practices outlined in "Streets for a Healthy Life," which is a companion document to "Building for a Healthy Life." Access and Footways The carriageway should be designed to accommodate two-way traffic. Amenity Space Front amenity spaces are typical for the High Weald and Hurst Green. Refer to the High Weald Design Guide DG4 Using Buildings to Define Streets & Spaces On-Street Parking It would also be beneficial to include SuDS, especially since street trees work well when situated in rain gardens. Parking Location It is important to highlight that cars should be parked well behind the building line. Density Profile The criterion (page 60) has potential for contradiction if it hinders creative, health-oriented density solutions. While it supports healthy living by maintaining a sense of place and community, a rigid interpretation could limit innovative approaches to higher density development that include green spaces and communal areas. New Planting Additionally, it would be beneficial to mention the incorporation of the four pillars of SuDS. Integration of Streets SuDS should also be included here. New Development Green Space The criterion is also potentially contradictory, as the High Weald Design Guide suggests three possibilities for positioning. Colour Palette For the colour palette, refer to the High Weald Area of Outstanding Natural Beauty guidance on the selection and use of colour in development. Guidance on Colour Usage Refer to the 'High Weald Colour Study.'</p>		
Non-statutory									
HGNP/R16/2024/13	Diedre Parrinder				HG2	Comment	I am pleased to see that Cooks Field with its far-reaching views is not to be included in the list of areas for housing development. It should be considered for an allotment, chemicals have never been used in this field, making it perfect for organic growing.	Y	Y
HGNP/R16/2024/14	Jenny Jones				HG2	Comment	I welcome the recent refusal for any development of Cooks Field on Burgh Hill. We some relief for the traffic chaos at the junction with the A21 and Station road. Any further development needs to address the long long overdue need for a bypass. Tourism and cycling in Burgh Woods cannot be allowed. No need for the expense of a community hub.	N	Y
HGNP/R16/2024/15	Ned Pakenham				Chapter 8, Design Codes	Objections	Policy HG13 a Village Hub is impractical, there are not the available land resources, a stage will be expensive and the proposal is vague. There are many issues with the design codes which should be addressed.	Y	Y
HGNP/R16/2024/16	Anthony Tiernan				HGSA4	Objection	I am strongly not in favour of any development on this land HGSA4 - it is heavily wooded, ecosystems present, no access and in the AONB.	Y	Y
HGNP/R16/2024/17	Corinne Stuart				HG2	Comment	1. HG11 refusal was correct. Green spaces are to be encouraged. Why hasn't HGPC designated Cooks Field as a Local Green Space? 2. Burgh Wood – Ancient Woodland. HGPC should not be encouraging tourists into Burgh Wood which is private woodland. 3. Community Green Hub -The proposal for the community green hub is unclear and uncoted. 4. Tourism to Hurst Green - There will be no significant uplia in tourism to Hurst Green without a bypass. 5. A21 Traffic - The HGNP is silent on the need for traffic lights on the juncCon of the A21 and the A265 Station Road. 6. The HGNP is opaque regarding what further housing numbers, locaCons etc may be requested (by RDC)/considered by the HGPC, the necessary resulCng infrastructure uplift, monitoring and enforcement of conditions etc. 7. Lack of Engagement by HGPC The HGPC appear reluctant to engage with local people. There is no clear communicaCon, few public meeCngs, no proper minutes of council meeCngs detailing discussions, actions and outcomes. 8. 9. HGPC and Public Finances HGPC finances are not transparent and decision making on the expenditure of public funds and council taxpayers money is opaque.	Y	Y

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HGNP/R16/2024/18	Robert Stone				Whole plan	Comment	It is important to recognise and register the recent rejection by Rother District Council of outline planning for Cooks Field. Policy HG11 Local Green Spaces: The Neighbourhood Plan rightly draws attention to the need for green spaces and Burgh Hill should be included. HG9 Protecting the Natural Features of the Parish. Burgh Wood, coupled with corridor zones such as Cooks Field and adjacent lands that lie between Burgh Hill and the A265, are critical sanctuary zones and corridors for many species moving between the woods and the Rother floodplain. The biological richness of this segment of the parish is unique and should be afforded far greater mention and protection measures in the Neighbourhood Plan. Policy HG10 Green Infrastructure: The Plan makes vague reference to the importance of trees and ancient woodland What is lacking is a conscious effort to inform people of the nature of such protection measures.	Y	Y
HGNP/R16/2024/19	Steve and Andrew Gasson				HG45	Support	We are very supportive of the Neighbourhood Plan process. We have set back the new building away from the A21 (HGSA4 11.21 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 11.20). New public footpath - we are committed to providing 'a new footpath link between the A21 London Road and Drewetts Field' Policy HGSA4 B ix. We propose that the new footpath will commence where the existing pavement terminates (at the driveway to 70, London Road) and continue through the site to Drewetts Field Sportsground. On-site Biodiversity - we are confident that the small scale of the development relative to the size of the site, together with the steps described above under Sustainable and Landscape-sensitive Housing, will make it possible for 10% BNG to be achieved. Informal Public Amenity Space - we identified the potential for an informal public amenity space in the south-west corner of the site, which today includes part of a seasonal pond, shared with the neighbouring property at 74 London Road. 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.		
HGNP/R16/2024/20	Vivien Stone				HG2, HG4, HG11, HG12, HG13, HG14, HG21	Comment	HG2 - The Hurst Green Neighbourhood Plan is opaque regarding what further (to the previous 75 target) housing numbers, locaAons etc may be requested. RDC has rightly decided Cooks Field, Burgh Hill, is unsuitable for any development. HG4 - Where is the mechanism to determine whether good design happens? HG11 - Where is the evidence that the sites listed are "demonstrably special to the local community"? Why isn't Cooks Field designated as a Local Green Space? Policy HG12 - Why isn't Cooks Field (Burgh Hill) included as a locally significant viewpoint? Policy HG13- This policy is unclear and uncoted. The village already has a village hall and parking very close to the playground. The proposed car park would be adjacent to the playground and a pedestrian crossing – creaAng a potenial hazard. Policy HG14 - The suggesAon to increase access to Burgh Woods with cycle paths is reckless – damaging to flora and fauna. Policy HG21 - Hurst Green is blighted by the A21. While improvements to this A road are the responsibility of NaAonal Highways, the Hurst Green Neighbourhood Plan does not evidence any requests Hurst Green Parish Council is undertaking on this matter especially the need for traffic lights on the juncAon of the A21 and the A265 StaAon Road and for a roundabout at Coopers Corner.	Y	Y