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Our Ref R520/SHS/KAC/CW

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Dear Sirs

REPRESENTATIONS IN CONNECTION WITH HURST GREEN NEIGHBOURHOOD PLAN

SITE: LAND AT BURGH HILL (HG11)

Hurst Green is producing a new Neighbourhood Plan under the Localism Act 2011 to cover the period up to 2030 and to guide development within the Neighbourhood Plan area. The Neighbourhood Plan will need to comply with the principles of the Development Plan and wider national policies identified within the National Planning Policy Framework (NPPF).

These representations are made in respect of Land at Burgh Hill, Hurst Green on behalf of the landowners. The Neighbourhood Plan Steering Group is preparing the draft Neighbourhood Plan for the Regulation 14 Pre-submission Consultation. Commentary is made here in the interim as a starting point for discussion about the possibility of future development of the land.

These representations are supported by the enclosed Stage 1 Feasibility Study produced by Hazle McCormack Young LLP (HMY) and have been produced in accordance with the Neighbourhood Plan design guidance for HG11 dated 16 August 2019 which outlines the Neighbourhood Plan's aspirations for the site.

The Site

The Land at Burgh Hill, also referred to as Cooks Field (HG11), comprises an area of predominantly flat permanent pasture. The immediate vicinity is characterised by suburban residential development, primarily comprising substantial detached dwellings with large front and rear gardens. The southernmost boundary of the site is bound by a mature tree line, beyond that is undulating pasture also within the ownership of the same family. A site plan and photographic schedule can be seen at sections 1.0 and 2.0.

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Planning Policy Background

The subject site lies within Rother District Council's jurisdiction area. The Development Plan for the site comprises the 2006 Local Plan which was adopted in July 2006 and sets out the development strategy for Rother District. It contains the policies for different types of development as well as town strategies for specific allocations. The Core Strategy which was adopted in September 2014 is the key planning policy document within the Rother Local Plan and sets out the overall vision for future land use and provides a framework for the scale and distribution of development up to 2028. Material considerations also include the National Planning Policy Framework (NPPF). The Core Strategy does not allocate specific sites for development, instead this will be done by a separate document known as the Development and Site Allocations (DaSA) Local Plan.

The DaSA, once adopted, will implement the development strategy and core policies set out in the Core Strategy. The DaSA is undergoing final modifications following submission to the Inspector for consideration and is anticipated to be adopted in December 2019, at which point it will form part of the adopted development plan.

The DaSA does not include housing allocations in designated Neighbourhood Plan Areas. The Land at Burgh Hill lies within Hurst Green's Neighbourhood Plan Area. Once 'made', the Hurst Green Neighbourhood Plan will form part of the statutory Development Plan and will be used for determining planning applications within the designated Neighbourhood Area.

Hurst Green Parish Council is currently preparing the draft Hurst Green Neighbourhood Plan for Regulation 14 Pre-submission Consultation. Informed by the feedback from resident surveys and public events held throughout 2018 and 2019, a series of aims has been established which will underpin the Hurst Green Neighbourhood Plan to achieve the overall vision.

Neighbourhood Plan Team

The landowners and Neighbourhood Plan Team have continued to discuss both the aspirations of the community and housing need in respect of the future of HG11. Having submitted various representations including Call for Sites Submission Forms, the Neighbourhood Plan Team have now invited the landowners to submit further representations.

Cllr Brown, Cllr Wright and Cllr Browne have inspected the site along with Mr F Rallings who is the delegated Neighbourhood Plan Planning Officer from Rother District Council and have subsequently provided indicative design guidance and features they would envisage as being appropriate in order to form part of a forthcoming Neighbourhood Plan policy for the subject site.

The key elements for consideration were set out in their letter addressed to the landowners dated 16 August 2019. Every effort has been made to ensure the design considerations of both the Neighbourhood Plan, and Rother District Council have been incorporated into the outline design concept forming part of these representations.

The key design features and how they have been considered are set out below:

- 1. The construction of at least 5/6 dwellings along the length of the plot, at a depth of no more than 1 dwelling deep.**

The indicative masterplan shown at section 6.0 comprises six detached dwellings each of a style and nature considered to be appropriate for the immediate surroundings.

- 2. Dwellings to be of a locally sensitive and inspired heritage housing design, and being no higher than neighbouring properties.**

A location character assessment has been undertaken which identifies both influential building styles and scales of the surrounding dwellings along with the design principles associated with the High Weald AONB. In addition to this the topography of the site and views from the existing residential dwellings nearby have been considered in detail. The resultant masterplan poses an indicative scheme that both assimilates with its immediate surroundings and displays characteristics of a quality one would expect to see in a sensitive semi-rural location such as this.

- 3. Consideration of allocation of plot(s) for self-builders.**

The emerging DaSA states that on sites of 20 or more dwellings, provision for 5-10% of the total number of dwellings to be provided should be made available as serviced plots for self and custom housebuilders. The provision of self-build plots will be considered although at this early stage and without the benefit of a feasibility study it cannot be confirmed.

- 4. To not unreasonably affect the owners of nearby or adjoining neighbours.**

The local character assessment undertaken underpins the design features of the outline masterplan with particular attention having been paid to the spatial relationship between the existing dwellings and those being proposed. The indicative masterplan is therefore considered to be both sensitive and appropriate to the neighbouring dwellings.

- 5. Save for access, the retention of all existing trees, and the reinstatement of any hedgerow / screening to be removed / relocated.**

The proposal seeks to retain all existing trees where possible and includes greening to boundaries and landscape buffer zones to both Burgh Hill itself and the tree root protection area to the registered TPO on the eastern border.

- 6. Adequate vehicle parking that is in excess of East Sussex parking allocation calculator.**

Each of the proposed dwellings has private driveway leading directly onto Burgh Hill with front driveway in keeping with the existing built form within the locality. Each dwelling exceeds the minimum parking requirements stipulated by the East Sussex parking calculator.

- 7. Provision of new green screening to the rear and sides of each plot and the site.**

Section 7.0 details the greening to each of the individual plot boundaries as well as the green buffer zone along Burgh Hill.

8. Provision for both front and rear private garden space for each dwelling.

Taking into consideration the possibility of a new pedestrian footpath along Burgh Hill itself, TPO tree root protection area and the retained agricultural access on the western boundary, the existing tree line on the southern most boundary of the developable area is indicated by area C within section 4.0.

9. The construction of a new public footpath near to the road that runs parallel to the site road along the entire length of the development.

A new footpath along Burgh Hill and repositioned hedge line is proposed as part of these indicative masterplans in order to improve the connectivity of the new dwellings whilst ensuring the character and appearance of the locality is retained.

10. Provision for a high-speed fibre broadband connection to each dwelling, as well as connection to electricity, mains sewerage and mains gas.

These service provisions are typical of what one would expect for new dwellings, particularly homes of this size. These service provisions will in part be dependent upon the nature and capacity of existing services locally. Although the nearest service points and capacities are yet to be tested it is very much intended these provisions would be incorporated in any forthcoming scheme.

11. Incorporation of heritage solar roof tiles and provision of rain/grey water recycling into the scheme.

The intent for the dwellings is for them to incorporate low energy design characteristics, with principles of sustainability being a key characteristic of their individual designs. This extends to the use of local materials such as oak and larch cladding where possible. It is anticipated the use of more specific green features can be explored as the design process evolves and the concept develops.

It is therefore considered that the design concepts featured as part of these representations accords directly with each aspect of guidance presented to the landowners by both the Neighbourhood Plan and Local District Council.

Planning Policy Considerations

Emerging DaSA policy DHG1(iv) requires developments within AONB locations such as this to provide 40% on-site affordable housing on schemes of 6 dwellings or more (or 0.2 hectare or more). On a scheme of 6 large detached units, as requested by the Neighbourhood Plan Team this would equate to 2.4 affordable dwellings on site.

The Neighbourhood Plan Team have expressed a desire for large detached market units in this specific location in order to be in keeping with the existing dwellings surrounding the site and in order to attract new families to the village through the provision of new, large, executive style family homes within close proximity to the mainline train station.

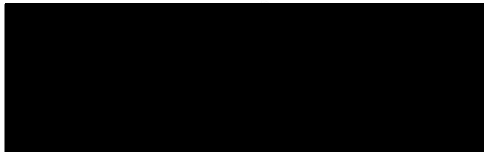
Firstly it is considered identifying a suitable registered provider to manage such a small number of affordable units is likely going to be extremely difficult. Batcheller Monkhouse are aware of numerous registered providers operating locally that will only consider opportunities of 20 plus affordable units on site.

Notwithstanding the practical difficulties associated with sourcing a registered affordable housing provider prepared to manage 2 dwellings in isolation in this semi-rural location, the provision of on-site affordable units on a site of this scale is likely to present significant viability concerns, which may prevent the site from being developed in a manner consistent with the design guidance submitted by the Neighbourhood Plan Team.

The affordable housing policy requirements are therefore considered to be both inappropriate for this site and contrary to the aspirations and design guidance provided by the Neighbourhood Plan.

We trust our comments will be given full consideration and we look forward to continuing to work with the Neighbourhood Plan Steering Group and Local Planning Authority in securing the delivery of quality new homes and the appropriate development of the site at Burgh Hill.

Yours faithfully

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Scott Smith

enc Hazle McCormack Young LLP feasibility study