

# Strategic Environmental Assessment for the Hurst Green Neighbourhood Plan

Scoping Report

Hurst Green Neighbourhood Plan Steering Group

September 2020

## Quality information

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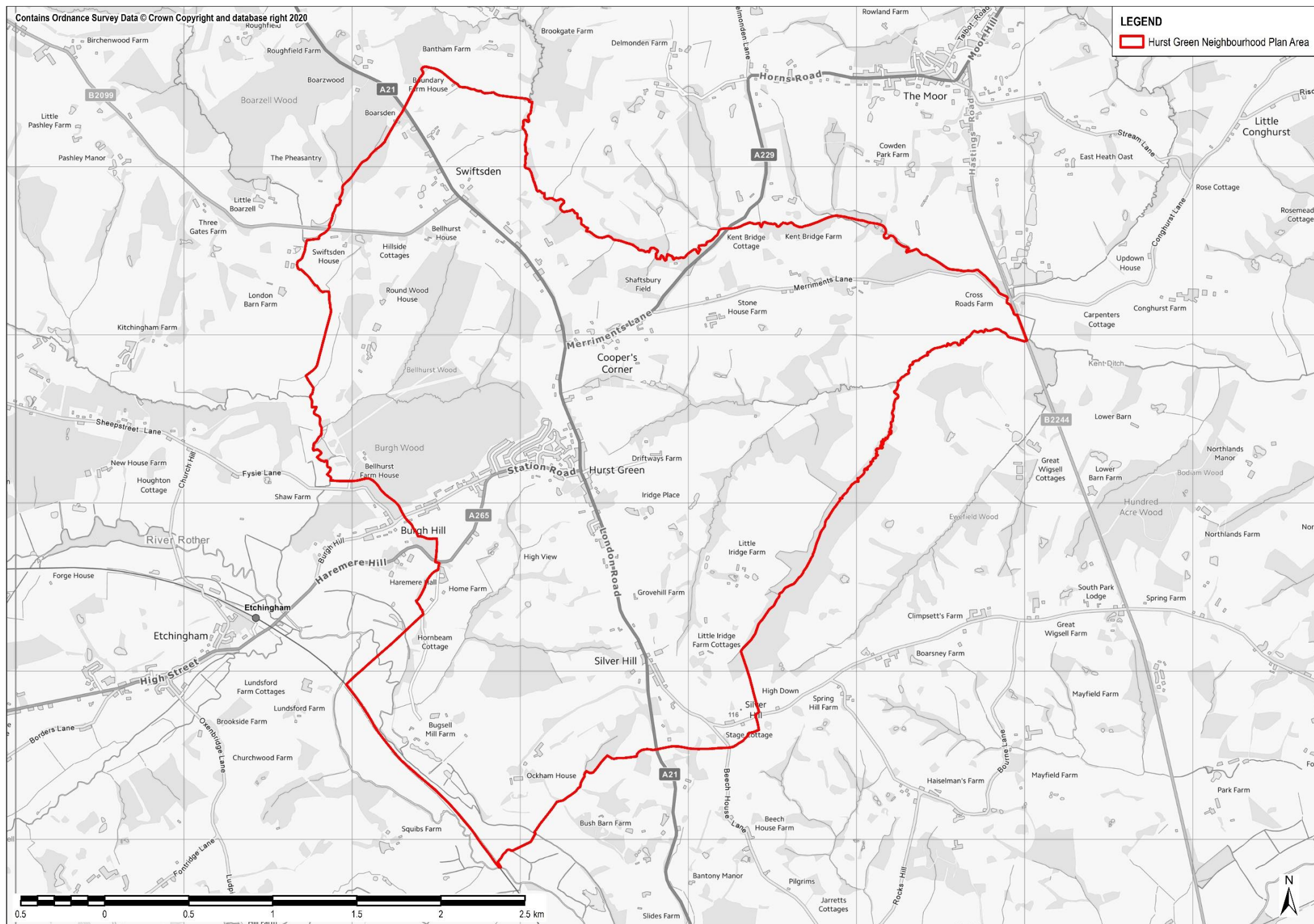
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Front cover image: Merriments Gardens (located in the north eastern section of the Neighbourhood Plan area)

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# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Hurst Green's emerging Neighbourhood Plan.
- 1.2 The Hurst Green Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Rother Core Strategy (adopted in September 2014) and the Development and Site Allocations (DaSA) Local Plan (adopted in December 2019).
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to Rother District Council in 2021 for subsequent independent examination. Key information relating to the Hurst Green Neighbourhood Plan is presented in **Table 1.1**.

**Table 1.1: Key facts relating to the Hurst Green Neighbourhood Plan**

Name of Responsible Authority	Hurst Green Parish Council
Title of Plan	Hurst Green Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Hurst Green Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Rother Core Strategy (adopted in September 2014) and the Development and Site Allocations (DaSA) Local Plan (adopted in December 2019).</p> <p>The Hurst Green Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2030
Area covered by the plan	The Hurst Green Neighbourhood Plan area covers the parish of Hurst Green, in Rother District.
Summary of content	The Hurst Green Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Janet Ellis, Parish Clerk Email address: <a href="mailto:clerk@hurstgreen-pc.org.uk">clerk@hurstgreen-pc.org.uk</a>

## Relationship of the Hurst Green Neighbourhood Plan to the Rother Local Plan

- 1.4 The Hurst Green Neighbourhood Plan is being prepared in the context of the Rother Local Plan, which includes the Rother Core Strategy<sup>1</sup> (adopted September 2014) and the Development and Site Allocations (“DaSA”) Local Plan<sup>2</sup> (adopted in December 2019). The Core Strategy sets the overall vision for future land use and provides the framework for the scale and distribution of development up to 2028. It also contains ‘core policies’ that address key issues facing the district, in relation to sustainable resource management, community development, housing, the economy, the environment and transport. The DaSA contains specific site allocations allocates and sets out more detailed policies for the effective management of development in relation to key issues.
- 1.5 In this respect, Hurst Green is defined as a ‘Local Service Village’ within the Rother Core Strategy. Policy RA1 ‘Villages’ encourages high quality and sustainable economic growth by identifying sites for local job opportunities within the district, with Hurst Green identified in Figure 10 as a village demonstrating a particular need for employment floorspace. In order to meet housing needs and ensure the continued vitality of villages, Policy RA1 confirms that the provision of 1,670 additional dwellings (comprising existing commitments, new allocations and windfalls) will be delivered in villages over the plan period. The residual housing requirement for Hurst Green identified within the DaSA to be delivered on larger sites (of 6+ dwellings) was 75 dwellings.<sup>3</sup>
- 1.6 Within the DaSA, Policy DIM2 ‘Development Boundaries’ states that new development shall be focused within defined settlement boundaries, with limited development permitted outside of these boundaries. Hurst Green is listed as a settlement which has a defined boundary (see Figure 14 within the DaSA).
- 1.7 No site allocations for Hurst Green are listed in the DaSA. In this regard, Policy OVE1 ‘Housing Supply and Delivery Pending Plans’ states that until neighbourhood plans are in place for the relevant settlements, planning applications will be favourably considered for development proposals where:
- They contribute to meeting the housing targets for that settlement and accord with the relevant spatial strategy; and
  - The site and development proposals are otherwise suitable, having regard to other relevant policies of the Rother Core Strategy.
- 1.8 Neighbourhood plans will form part of the development plan for Rother District, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Rother District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

## SEA for the Hurst Green Neighbourhood Plan

### SEA Screening for the Neighbourhood Plan

- 1.9 The Hurst Green Neighbourhood Plan has been screened in by Rother District Council as requiring a Strategic Environmental Assessment (SEA).
- 1.10 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Hurst Green Neighbourhood Plan has been screened in as requiring an SEA process for the following reasons:

<sup>1</sup> Rother District Council (2014): ‘Rother Core Strategy’, [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/corestrategy/>

<sup>2</sup> Rother District Council (2019): ‘Development and Site Allocations (DaSA) Local Plan’, [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/development-and-site-allocations-dasa-local-plan/>

<sup>3</sup> As at 1<sup>st</sup> April 2018

- The Neighbourhood Plan will allocate new development in the parish. This includes potentially in environmentally sensitive locations, such as:
  - locations within the setting of the High Weald (AONB);
  - locations with sensitivity for the historic environment; and
  - locations with sensitivity for biodiversity.

1.11 In light of this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

## SEA explained

1.12 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.

1.13 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the Hurst Green Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.

1.14 Two key procedural requirements of the SEA Regulations are that:

- i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
- ii. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Hurst Green Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

## This Scoping Report

1.15 This 'Scoping Report' is concerned with item 'i' above. It presents a suggested scope for the SEA so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.

## SEA 'Scoping' Explained

1.16 Developing the draft scope for the SEA as presented in this report has involved the following steps:

- i. Defining the broader context for the Hurst Green Neighbourhood Plan and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;
- ii. Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the Hurst Green Neighbourhood Plan, in order to help identify the plan's likely significant effects;
- iii. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SEA; and
- iv. Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

## Structure of this Report

### Key Sustainability Issues

1.17 The outcomes of the scoping elements introduced through steps i-iv above have been presented under a series of key environmental themes, as follows:

- Air Quality
- Biodiversity and Geodiversity
- Climatic Factors (including flood risk)
- Landscape
- Historic Environment
- Land, Soil and Water Resources
- Population and Community
- Health and Wellbeing
- Transportation

1.18 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive<sup>4</sup>. These were refined to reflect a broad understanding of the anticipated scope of plan effects. It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them. Once agreed (i.e. subsequent to consultation on this Scoping Report), the suggested scope presented under these nine themes will provide a methodological 'framework' for the environmental assessment of the draft plan and reasonable alternatives.

1.19 The discussion of the scoping information for each theme is presented in Sections 2 to 10.

### SEA Framework to assess policy proposals

1.20 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the emerging Hurst Green Neighbourhood Plan will be assessed consistently using the framework.

1.21 The SEA objectives and appraisal questions proposed for the Hurst Green Neighbourhood Plan SEA are presented under each of the themes in Sections 2 to 10.

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<sup>4</sup> The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' [our emphasis]

## 2. Air Quality

### Focus of Theme

- Air pollution sources
- Air quality hotspots
- Air quality management

### Policy Context

2.1 Key messages from the National Planning Policy Framework (NPPF)<sup>5</sup> include:

- *‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’*
- *‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.’*
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

2.2 The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

2.3 The government published the ‘UK plan for tackling roadside nitrogen dioxide concentrations’ in July 2017.<sup>6</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that “the link between improving air quality and reducing carbon emissions is particularly important” and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

2.4 Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>7</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25-year plan directly relate to the air quality SEA theme.

2.5 The government published the ‘UK plan for tackling roadside nitrogen dioxide concentrations’ in July 2017.<sup>8</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that “*the link between improving air quality and*

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<sup>5</sup> HM GOV (2018): ‘Revised National Planning Policy Framework’, [online] available to access via:

<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

<sup>6</sup> DEFRA (2017) ‘UK plan for tackling nitrogen dioxide concentrations’ [online], available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

<sup>7</sup> HM GOV (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>8</sup> DEFRA (2017) ‘UK plan for tackling nitrogen dioxide concentrations’ [online], available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-planoverview](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-planoverview)

*reducing carbon emissions is particularly important*" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

- 2.6 The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.
- 2.7 In February 2020, the UK government updated the Clean Air Zone<sup>9</sup> Framework (2017)<sup>10</sup>, which sets out the principles for the operation of Clean Air Zones England and provides the expected approach to be taken by local authorities when implementing and operating a Clean Air Zone. Clean Air Zones bring together local measures to deliver immediate action to improve air quality and health with support for cities to grow while delivering sustained reductions in pollution and a transition to a low emission economy. Where a Clean Air Zone is introduced it will be identified in the local plans and policies, and local transport plan at the earliest opportunity to ensure it is consistent with wider ambition.
- 2.8 Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary. Where an AQMA is designated, an Air Quality Action Plan (AQAP) must then be put in place.
- 2.9 In September 2019, Rother District Council declared a climate emergency and pledged to become carbon neutral by 2030. The Draft Environment Strategy for Rother<sup>11</sup> (2020 – 2030) sets out how the council will deliver on this commitment. The plan is currently during the drafting stages following public consultation in May 2020. Priority number 3 'Air Quality' outlines the following actions for the wider district:
  - We will explore the use of future planning policy to require electric vehicle charging points and cycle parking to all new homes and businesses.
  - We will work with East Sussex County Council to deliver an Electric Vehicle Plan for the county which will bring forward EV charging points.
  - We will reduce the need to own or use a car.
  - We will bring forward initiatives which encourage walking and cycling; this includes ensuring walking and cycling friendly development is encouraged through planning policy.
  - We will explore ways to incentivise taxi drivers to take up electric vehicle use.
  - We will explore options with partners and contractors to move away from diesel vehicles to electric fleet.
- 2.10 At the local level, Policy OSS3 'Location of Development' within the Rother Core Strategy and Policy DEN6 'Land Stability' within the DaSA directly relate to the Air Quality theme.

<sup>9</sup> Defined as: 'an area where targeted action is taken to improve air quality and resources are prioritised and coordinated in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth'.

<sup>10</sup> Department for Environment, Food and Rural Affairs (2020) Clean Air Zone Framework: Principles for setting up Clean Air Zones in England [online] available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863730/clean-air-zone-framework-feb2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf)

<sup>11</sup> Rother District Council (2020): 'Draft Environment Strategy 2020-2030', [online] available to access via: <https://www.rother.gov.uk/consultations/draft-environment-strategy/>

## Baseline Summary

### Summary of Current Baseline

2.11 The most recently completed Air Quality Annual Status Report (ASR)<sup>12</sup>, published in July 2019 concludes that annual mean NO<sub>2</sub> concentrations recorded at continuous monitors and diffusion tubes in Rother District do not exceed levels for AQMA designation. Therefore, there are no AQMAs within the Rother District. The ASR also states that there have been no increases in annual mean NO<sub>2</sub> concentrations in any previous years since 2013.

2.12 In this respect, air quality in the Neighbourhood Plan area is generally very good. However, the ASR notes the following:

*“Rother District is committed to taking action to improve air quality, in particular through involvement with the Sussex Air Quality Partnership. Priority measures and actions for the district include the roll-out and expansion of electric charging points via the Energise Network, collaboration between departments on health improvement, climate change, environment and transport, and maintaining and updating the website, airAlert scheme and monitoring network.”*

2.13 However, the A21 passes through the Neighbourhood Plan area and often experiences significant congestion. Several smaller roads diverge from the A21, including the A265 (south west), A229 (south east) and B2099 (north west). Residents note that there are noticeable noise, vibration and pollution issues experienced whilst walking through the village. Additionally, the NO<sub>2</sub> monitoring stations in Flimwell and in Robertsbridge (just outside the parish, but also on the A21) have or are close to exceeding the EU standards at various points.

### Summary of Future Baseline

2.14 New housing and employment provision taken forward within the parish and the wider area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>.

2.15 However, as baseline air quality levels across the parish and district are relatively good, any effects are unlikely to be significant over the short to medium term providing that suitable mitigation measures are included within new development areas.

## Key Sustainability Issues

- There are no AQMAs within the Rother District, and the ASR notes that air quality levels within the district are generally very good.
- NO<sub>2</sub> is the key pollutant of concern, particularly along the A21 and wider road network within the Neighbourhood Plan area.

## What are the SEA objectives and appraisal questions for the Air Quality SEA theme?

SA objective	Appraisal questions
Deliver improvements in air quality in the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce emissions of pollutants from transport?</li> <li>• Promote the use of low emission vehicles?</li> <li>• Promote enhancements in sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide and other pollutants?</li> </ul>

<sup>12</sup> Rother District Council (2019): 2019 Air Quality Annual Status Report (ASR) [online] available from: <https://www.rother.gov.uk/wp-content/uploads/2020/03/RDCAirQuality2019.pdf>

## 3. Biodiversity and Geodiversity

### Focus of Theme

- Nature conservation designations
- Geological sites
- Habitats
- Species

### Policy Context

3.1 At the European level, the EU Biodiversity Strategy<sup>13</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'*.

3.2 Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'*
- *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'*
- *'To protect and enhance biodiversity and geodiversity, plans should:*
  - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'*.

3.3 The Natural Environment White Paper (NEWP)<sup>14</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

<sup>13</sup> European Commission (2011): 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020', [online] available to access via: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\\_resolution\\_april2012.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf)

<sup>14</sup> Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020;
  - Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
  - Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
  - Address barriers to using green infrastructure to promote sustainable growth.
- 3.4 The UK Biodiversity Action Plan<sup>15</sup> (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.
- 3.5 Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*<sup>16</sup>.
- 3.6 The recently published 25 Year Environment Plan<sup>17</sup> sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:
- Using and managing land sustainably;
  - Recovering nature and enhancing the beauty of landscapes;
  - Connecting people with the environment to improve health and wellbeing;
  - Increasing resource efficiency, and reducing pollution and waste;
  - Securing clean, productive and biologically diverse seas and oceans; and
  - Protecting and improving the global environment.
- 3.7 In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity and Geodiversity SEA theme.
- 3.8 Priority 6 of The Draft Environment Strategy for Rother (2020 – 2030) outlines the following actions for Hurst Green:
- We will encourage residents and community groups to take part in the 'Big Climate Fightback' by planting a tree.
  - We will set up a 'meet the target' page on the Rother District Council website which includes all reported tree planting and shows progress to 'doubling tree cover' in Rother.
  - Where possible, we will increase tree coverage throughout the district on council owned land.
  - We will reduce verge cutting and mowing; encourage wildflowers.
  - We will develop a pollinator and pesticide policy which will detail how the council will maintain, protect and enhance key habitats over the long-term for the many species of insects that pollinate crops and wildflowers and commits the council to avoiding pesticides

<sup>15</sup> JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

<sup>16</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to access via: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> last accessed [18/03/20]

<sup>17</sup> HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) last accessed [18/03/20]

whenever possible on its sites including parks, recreation grounds, children's play areas, sports fields, downland, cemeteries and nature reserves.

- 3.9 Policy EN5 'Biodiversity and Green Space' within the Rother Core Strategy and Policy DEN4 'Biodiversity and Green Space' within the DaSA directly relate to the Biodiversity and Geodiversity theme.

## Baseline Summary

### Summary of Current Baseline

#### European and nationally designated sites

- 3.10 There are no European or nationally designated sites for biodiversity located within or within proximity to the Neighbourhood Plan area.
- 3.11 The nearest European designated sites are located approximately 20km to the south east of the Neighbourhood Plan area, around the coastline between Hastings, Winchelsea, Rye, Lydd, and New Romney. The nearest nationally designated sites are located approximately 5km to the north and to the south of the Neighbourhood Plan area, specifically: Combwell Wood SSSI (to the north), Robin's Wood SSSI (to the north), and Darwell Wood SSSI (to the south).
- 3.12 SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, the Neighbourhood Plan area is not within any SSSI IRZs for the types of development likely to come forward during the plan period, specifically: residential, rural residential, and rural non-residential.

#### Locally designated sites

- 3.13 Sites of Nature Conservation Interest (SNCI) represent some of the most significant areas of semi-natural habitat in Rother District<sup>18</sup>. In this respect, there are six SNCIs within or within proximity to the Neighbourhood Plan area, predominantly areas of ancient woodland (including Burgh Wood and Boarzell Wood) and areas of good quality semi-improved grassland.
- 3.14 There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, deciduous woodland (including ancient woodland), good quality semi-improved grassland, lowland meadows, and traditional orchard.
- 3.15 The Sussex Biodiversity Records Centre contains records of protected or notable species within Hurst Green<sup>19</sup>. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats and ecological designations within and surrounding the Neighbourhood Plan area are likely to support populations of protected species.
- 3.16 The figure overleaf shows the location of the designated ecological sites within and within proximity to the Neighbourhood Plan area.

### Summary of Future Baseline

- 3.17 Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may

<sup>18</sup> Rother District Council (2006): 'Local Plan Proposals Map & Hurst Green Inset Map 20', [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/2006-local-plan-supplementary-planning-documents-spd/inset-maps/>

<sup>19</sup> Sussex Biodiversity Records Centre (2020): 'Data Request Service' [online] available to access via: <https://sxbrc.org.uk/services/dataRequests.php>

be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

- 3.18 The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.

## Key Sustainability Issues

- The nearest nationally designated sites are located approximately 5km to the north and to the south of the Neighbourhood Plan area, specifically: Combwell Wood SSSI (to the north), Robin's Wood SSSI (to the north), and Darwell Wood SSSI (to the south). However SSSI IRZs relating to the type of development with the potential to come forward through the Neighbourhood Plan do not cover potential development areas.
- There are six SNCIs within or within proximity to the Neighbourhood Plan area, predominantly areas of ancient woodland (including Burgh Wood and Boarzell Wood) and areas of good quality semi-improved grassland.
- BAP Priority Habitats located within or within proximity to Hurst Green include areas of coastal and floodplain grazing marsh, deciduous woodland (including ancient woodland), good quality semi-improved grassland, lowland meadows, and traditional orchard.
- The Sussex Biodiversity Records Centre contains records of protected or notable species within Hurst Green. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles.

## What are the SEA objectives and appraisal questions for the Biodiversity and Geodiversity SEA theme?

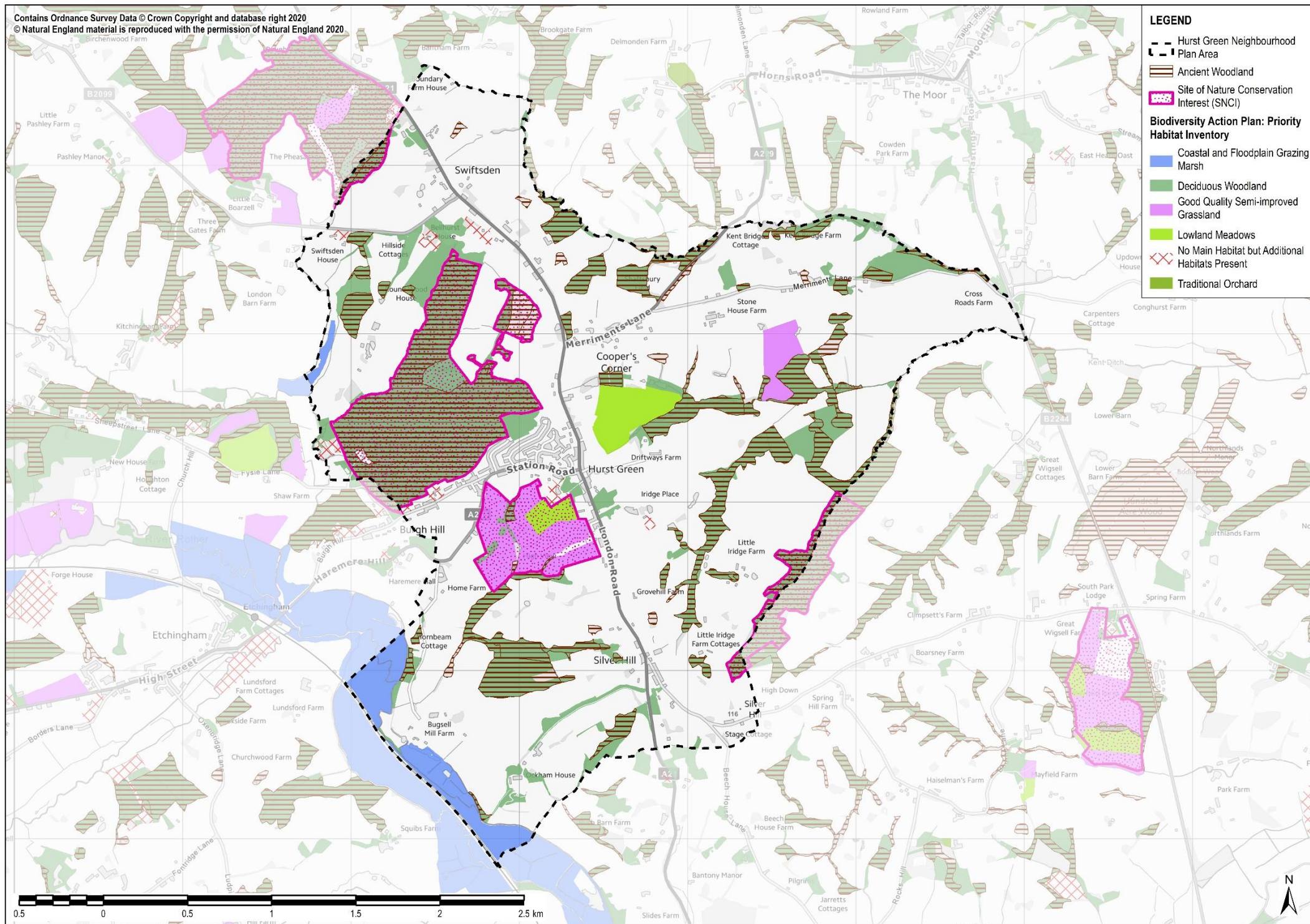
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### SEA objective    Assessment Questions

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Protect and enhance all biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the integrity of locally designated biodiversity sites located within proximity to the Neighbourhood Plan area?</li> <li>• Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
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## 4. Climate Change

### Focus of Theme

- Contribution to climate change
- Effects of climate change
- Climate change adaption
- Flood risk

### Policy Context

4.1 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below<sup>20</sup> :

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

4.2 The UK Climate Change Act<sup>21</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

<sup>20</sup> GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to access via: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

<sup>21</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <http://www.legislation.gov.uk/ukpga/2008/27/contents>

- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

4.3 Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.'* *'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- *'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*
- Direct development away from areas at highest risk of flooding (whether existing or future). *'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

4.4 The Clean Air Strategy released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

4.5 In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country.

4.6 In September 2019, Rother District Council declared a Climate Emergency<sup>22</sup>. As well as the declaration itself, the council has indicated the following priorities:

- Pledge to do what is within our powers to make Rother District carbon neutral by 2030, taking into account both production and consumption emissions.
- Call on the Government to provide the powers and resources necessary for Rother District to achieve the target of becoming carbon neutral by 2030, and to implement best practice methods to limit global warming to 1.5°C.
- Report to full Council within six months with an Action Plan, outlining how the Council will address this emergency. The Carbon Neutral 2030 Action Plan will detail the leadership role Rother District will take in promoting community, public, business and other Council

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<sup>22</sup> Rother District Council (2019): 'Climate Emergency', [online] available to access via: <https://www.climateemergency.uk/blog/rother/>

- partnerships to achieve this commitment throughout the district. The Action Plan will also outline adequate staff time and resources to undertake the actions to achieve the target.
- To investigate all possible sources of external funding and match funding to support this commitment.
  - Identify citizens across Rother who are climate champions for their communities and to use them to inform on ideas to implement locally.
- 4.7 Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to “*explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy.*”<sup>23</sup> Additionally, in response to the COVID-19 pandemic, the Green Alliance’s ‘Blueprint for a Resilient Economy’<sup>24</sup> (June 2019) report outlines the following five essential building blocks to support new long term employment opportunities, thriving businesses and a healthier, fairer society, whilst protecting against the potentially devastating future impacts of climate change and nature’s decline:
- Invest in net zero infrastructure;
  - Restore nature;
  - Stop wasting valuable resources;
  - Ensure clean air and healthy places; and
  - Make the recovery fair.
- 4.8 The Flood and Water Management Act<sup>25</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:
- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
  - Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
  - Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
  - Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
  - Creating sustainable drainage systems (SuDS).<sup>26</sup>
- 4.9 Further guidance is provided in the document ‘Planning for SuDS’.<sup>27</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’.
- 4.10 The Local Flood Risk Management Strategy (2016-2026)<sup>28</sup> for East Sussex provides the framework for the management of local flood risk in the county for the ten year period 2016 – 2026. This strategy is a high level, statutory document that sets out East Sussex County Council’s approach to limiting the impacts of local flooding across the county. It also provides a strategic framework for the risk management authorities to work within and goes on to establish

<sup>23</sup> Client Earth (2019) Lawyers put local authorities on notice over climate inaction [online] available at:

<https://www.clientearth.org/press/lawyers-put-local-authorities-on-notice-over-climate-inaction/>

<sup>24</sup> Green Alliance (2020): ‘Blueprint for a Resilient Economy’, [online] available to access via: [https://green-alliance.org.uk/blueprint\\_for\\_a\\_resilient\\_economy.php](https://green-alliance.org.uk/blueprint_for_a_resilient_economy.php)

<sup>25</sup> Flood and Water Management Act (2010) [online] available to access via:

<http://www.legislation.gov.uk/ukpga/2010/29/contents>

<sup>26</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

<sup>27</sup> CIRIA (2010): ‘Planning for SuDS – making it happen’, [online] available from:

[http://www.ciria.org/Resources/Free\\_publications/Planning\\_for\\_SuDS\\_ma.aspx](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx)

<sup>28</sup> East Sussex County Council (2016): East Sussex Local Flood Risk Management [online] available at: <https://www.eastsussex.gov.uk/media/6955/flood-risk-strategy-2016-26-final-edition-ebook1-1.pdf>

new standing advice on drainage issues in the county. The long-term aim of the strategy is to provide a co-ordinated approach to managing local forms of flood risk in East Sussex.

4.11 The following action plan priority chapters from the Draft Environment Strategy for Rother (2020-2030) directly relate to the Climate Change theme:

- Priority Chapter 5. Energy
- Priority Chapter 7. Construction and Existing Buildings
- Priority Chapter 8. Environmentally Friendly Council

4.12 At the local level, the following policies within the Rother Core Strategy directly relate to the Climate Change theme:

- Policy SRM1: Towards a Low Carbon Future
- Policy SRM2: Water Supply and Wastewater Management
- Policy EN6: Flood Risk Management
- Policy EN7: Flood Risk and Development

4.13 The following policies within the DaSA directly relate to the Climate Change theme:

- Policy DRM1: Water Efficiency
- Policy DRM2: Renewable Energy Developments
- Policy DRM3: Energy Requirements
- Policy DEN5: Sustainable Drainage

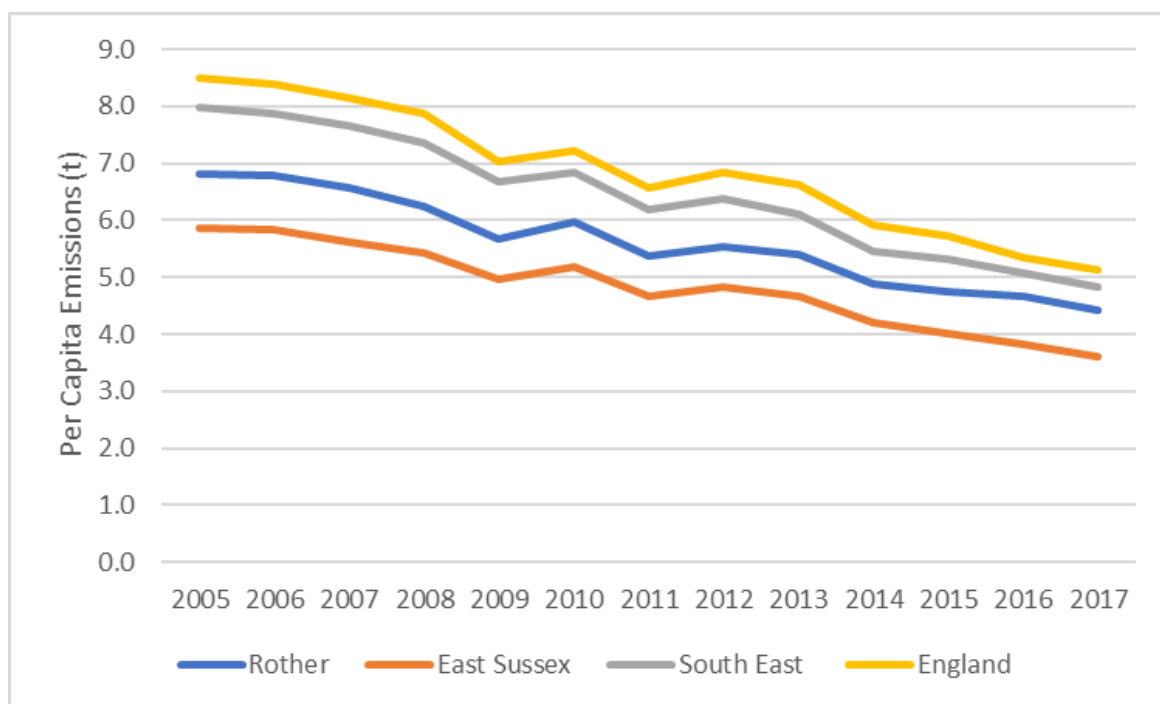
## Baseline Summary

### Summary of Current Baseline

#### Contribution to climate change

4.14 **Figure 4.1** (overleaf) shows carbon dioxide emissions (t CO<sub>2</sub>) for Rother, East Sussex, the South East and England as a whole. Emissions data for Rother demonstrates a similar declining trend as county-level, regional and national statistics. However, Rother continues to demonstrate higher levels of CO<sub>2</sub> when compared to East Sussex. As of 2017, CO<sub>2</sub> levels in Rother District were, on average, 0.8 tonnes greater than East Sussex levels (3.6 t CO<sub>2</sub>). Levels of CO<sub>2</sub> have declined by approximately 35% between the period of 2005- 2017 in Rother District.

4.15 With regards to sector-specific emissions, the largest contributing sector in Rother is the transport sector. Within the transport sector, road transport (minor roads) contributes the most to transport emissions (48.3% of total emissions).



**Figure 4.1: CO<sub>2</sub> emissions<sup>29</sup>**

### Effects of climate change

- 4.16 The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)<sup>30</sup> team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.
- 4.17 As highlighted by the research, the effects of climate change (under medium emissions scenarios 50<sup>th</sup> percentile) for South East England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows<sup>31</sup>:
- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
  - The central estimate of change in annual mean precipitation of +20 to +30% in winter and -10% to -20% in summer.
- 4.18 Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:
- Effects on water resources from climate change;
  - Reduction in availability of groundwater for extraction;
  - Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
  - Increased risk of flooding, including increased vulnerability to 1:100 year floods;
  - A need to increase the capacity of wastewater treatment plants and sewers;
  - A need to upgrade flood defences;

<sup>29</sup> UK Gov (2017): 'Local Authority CO2 emissions estimates 2005-2017 (kt CO2) - Full dataset' [online] available from: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics>

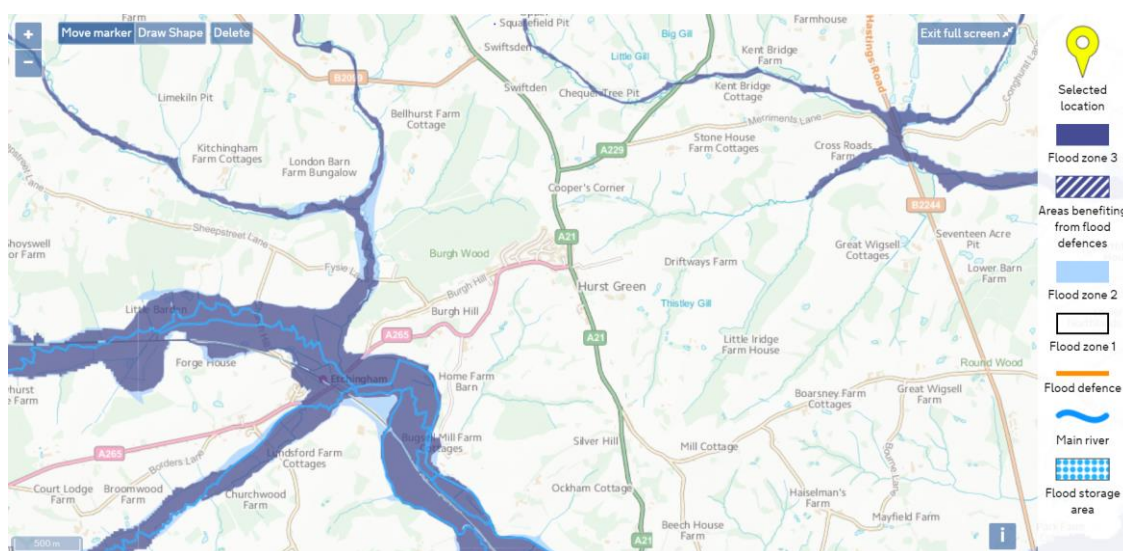
<sup>30</sup> Data released 26th November 2018 [online] available from: <https://www.metoffice.gov.uk/research/collaboration/ukcp>

<sup>31</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> last accessed [25/11/19]

- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

## Flood risk

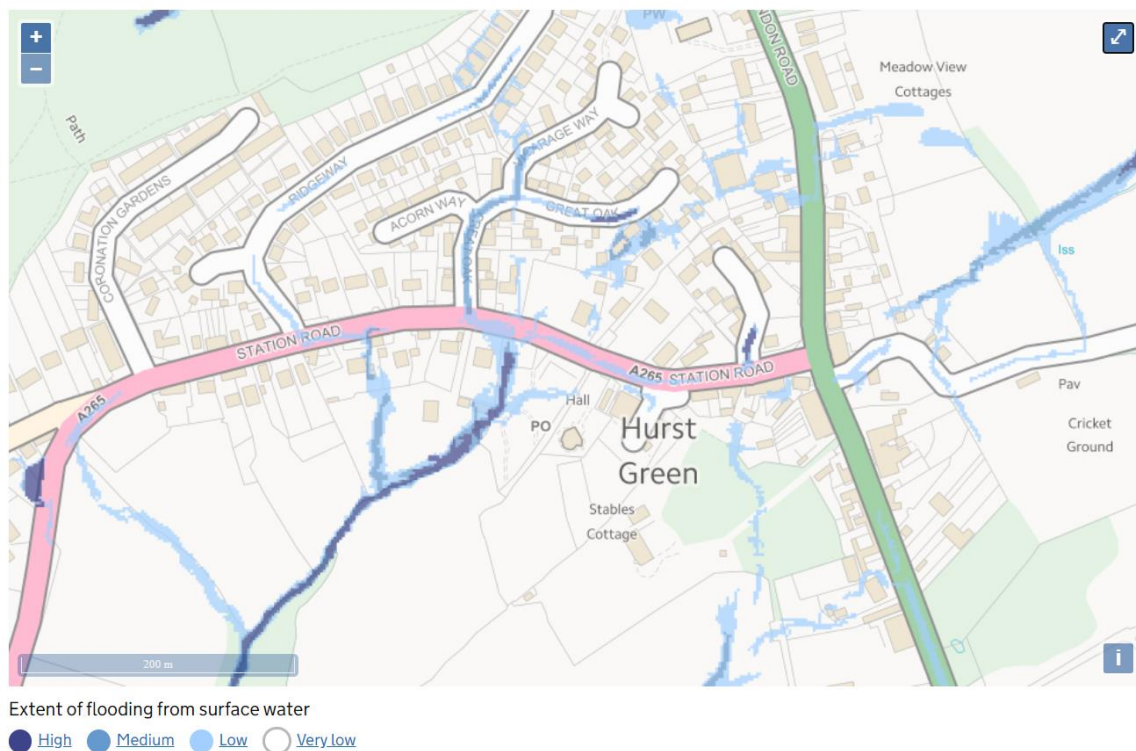
4.19 **Figure 4.2** (below) shows fluvial flood risk within and surrounding the Neighbourhood Plan area. Areas of land within Flood Zone 3 are broadly confined to areas of land surrounding the main watercourses, including the River Rother (which passes alongside the south western boundary) and the Kent Ditch (to the north and north east of the Neighbourhood Plan area). However, the settlement of Hurst Green is located within Flood Zone 1 and therefore has a low risk of fluvial flooding.



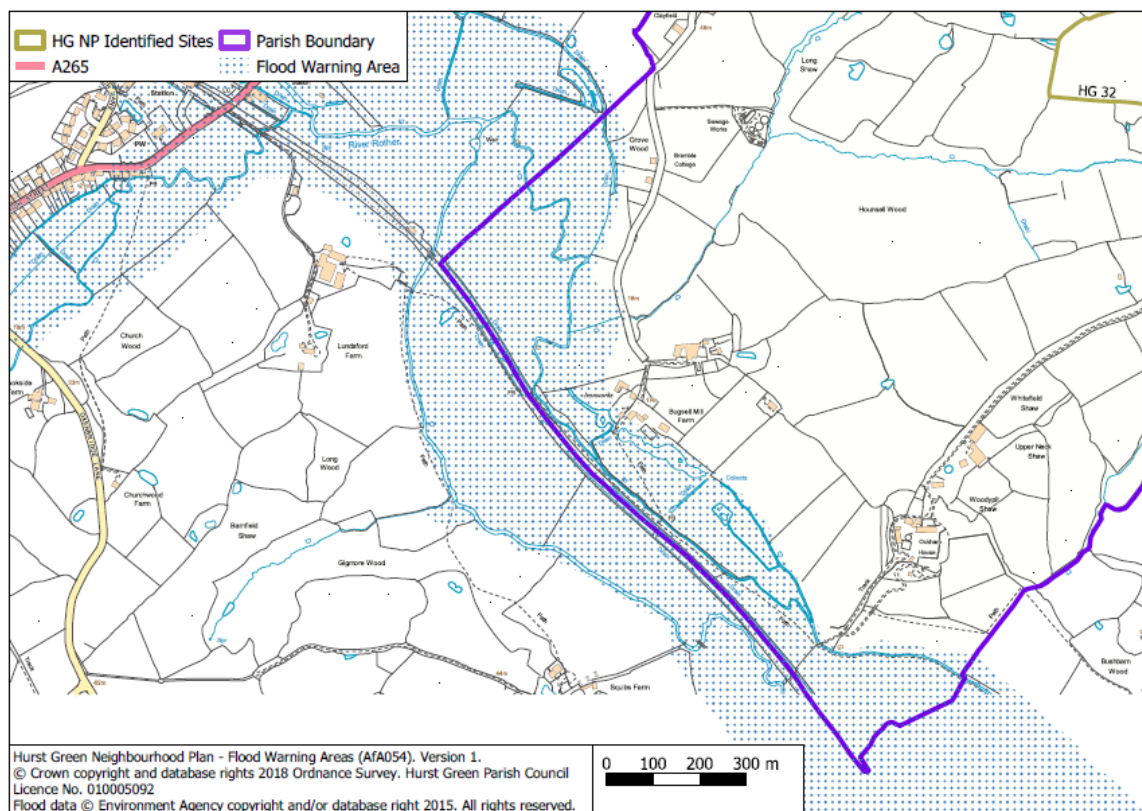
**Figure 4.2: Fluvial flood risk within and surrounding Hurst Green<sup>32</sup>**

- 4.20 **Figure 4.3** (overleaf) shows surface water flood risk within Hurst Green. Similar to the areas of fluvial flood risk, areas of highest surface water flood risk potential surround the broad corridors of the River Rother and Kent Ditch. Within the settlement of Hurst Green, areas at 'medium' to high' surface water flood risk are primarily located along the road network, including Vicarage Way, Great Oak, and Station Road.
- 4.21 Completed to contribute to the evidence base accompanying the emerging Hurst Green Neighbourhood Plan, a 'Flood Warning Area'<sup>33</sup> has been identified in the southern section of the parish. This includes areas of land surrounding the River Rother, and primarily covers agricultural land (adjoining Bugsell Mill Farm Cottages) and the neighbouring settlement of Etchingham (to the west). This is shown overleaf in **Figure 4.4**.

<sup>32</sup> GOV.UK (2020): 'Flood Map for Planning', [online] available to access via: <https://flood-map-for-planning.service.gov.uk/>  
<sup>33</sup>



**Figure 4.3: Surface water flood risk within Hurst Green<sup>34</sup>**



**Figure 4.4: Flood Warning Areas within and surrounding Hurst Green Parish<sup>35</sup>**

<sup>34</sup> GOV.UK (2020): 'Long term flood risk map', [online] available to access via: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/postcode>

<sup>35</sup> Hurst Green Parish Council (2020): 'Community Evidence 10A and 10B: Flood Warning Areas', [online] available to access via: <https://hurstgreen2030.uk/evidence-documents/>

## Summary of Future Baseline

- 4.22 Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.
- 4.23 Implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.
- 4.24 In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

## Key Sustainability Issues

- Rother continues to demonstrate comparatively higher levels of CO<sub>2</sub> when compared to East Sussex as a whole.
- The largest contributor towards CO<sub>2</sub> emissions in Rother is the transport sector, specifically, road transport (minor roads).
- Rother District Council declared a climate emergency in September 2019, and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- Areas of land within Flood Zone 3 are broadly confined to areas of land surrounding the main watercourses, including the River Rother and the Kent Ditch, and a 'Flood Warning Area' has been identified in the southern section of the parish.
- Within the village of Hurst Green, areas at 'medium' to high' surface water flood risk are primarily located along the road network, including Vicarage Way, Great Oak, and Station Road.
- The Neighbourhood Plan should seek to maximise opportunities to support actions in tackling climate change. This may include through encouraging sustainable transport technologies, such as the use of EVs.

## What are the SEA objectives and appraisal questions for the Climate Change SEA theme?

SEA objective	Assessment Questions
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the number of journeys made?</li> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

## 5. Landscape

### Focus of Theme

- Nationally protected landscapes
- Landscape and villagescape character and quality
- Designated and non-designated sites and areas
- Visual amenity

### Policy Context

- 5.1 The European Landscape Convention<sup>36</sup> of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.
- 5.2 Key messages from the National Planning Policy Framework (NPPF) include:
- *‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’*
  - *Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’*
  - *Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’*
  - *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*
    - *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
    - *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
    - *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*
- 5.3 The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Landscape SEA theme.
- 5.4 The High Weald AONB Management Plan (2019-2024)<sup>37</sup>, sets out the long-term objectives for conserving the designated landscape and the local authorities’ ambitions for how the High Weald will be looked after for the next 5 years. The document outlines the following objectives for the AONB:

<sup>36</sup> Council of Europe (2000): ‘European Landscape Convention’, [online] available to access via: <https://www.coe.int/en/web/landscape>

<sup>37</sup> High Weald AONB Partnership (2019): ‘Management Plan 2019-2024’, [online] available to access via: <http://www.highweald.org/high-weald-aonb-management-plan.html>

- Objective G1: To restore the natural function of rivers, water courses and water bodies.
- Objective G2: To protect and enhance soils, sandstone and outcrops, and other important landform and geological features.
- Objective G3: To help secure climatic conditions and rates of change which support continued conservation and enhancement of the High Weald's valued landscape and habitats.
- Objective S1: To reconnect settlements, residents and their supporting economic activity within the surrounding countryside.
- Objective S2: To protect the historic pattern and character of settlement.
- Objective S3: To enhance the architectural quality of the High Weald and ensure development reflects the character of the High Weald in its scale, layout and design.
- Objective R1: To maintain the historic pattern and features of routeways.
- Objective R2: To enhance the ecological function of routeways.
- Objective W1: To maintain the existing extent of woodland and particularly ancient woodland.
- Objective W2: To enhance the ecological quality and functioning of woodland at a landscape scale.
- Objective W3: To protect the archaeology and historic assets of AONB woodlands.
- Objective W4: To increase the output of sustainably produced high-quality timber and underwood for local markets.
- Objective FH1: To secure agriculturally productive use for the fields of the High Weald, especially for local markets, as part of sustainable land management.
- Objective FH2: To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.
- Objective FH3: To enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.
- Objective H4: To protect the archaeology and historic assets of the field and heath.
- Objective LBE1: To improve returns from, and thereby increase entry and retention in, farming, forestry, horticulture and other land management activities that conserve and enhance natural beauty,
- Objective LBE2: To improve amenities, infrastructure (including the provision of appropriate affordable housing), and skills development for rural communities and related sectors that contribute positively to conserving and enhancing natural beauty.
- Objective OQ1: To increase opportunities for learning about and celebrating the character of the High Weald.
- Objective OQ2: To increase the contribution of individuals and communities to the conservation and enhancement of the AONB.
- Objective OQ3: To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty.
- Objective OQ4: To protect and promote the perceptual qualities that people value.

5.5 At the local level, the following policies from the Rother Core Strategy directly relate to the Landscape theme:

- Policy OSS1 Overall Spatial Development Strategy
- Policy OSS3 Location of Development
- Policy RA3 Development in the Countryside

- Policy EN1 Landscape Stewardship

5.6 The following policies within the DaSA directly relate to the Landscape theme:

- Policy DEN1: Maintaining Landscape Character
- Policy DEN2: The High Weald Area of Outstanding Natural Beauty (AONB)

## Baseline Summary

### Summary of Current Baseline

#### Nationally protected landscapes

5.7 Designated in October 1983 and covering an area of approximately 1,500 km<sup>2</sup> (including the whole of the Neighbourhood Plan area), the High Weald AONB is one of the best-preserved medieval landscapes in North West Europe. The extensive survival of woodland and traditional mixed farming supports an exceptionally well-connected green and blue infrastructure with a high proportion of semi-natural habitat in a structurally diverse, permeable and complex mosaic supporting a rich diversity of wildlife. The High Weald AONB Management Plan notes the following key characteristics of the AONB:

- A principal ridge (Forest Ridge) running east-west from Horsham to Cranbrook with an attached ridge (Battle Ridge) extending to the sea at Fairlight.
- A pattern of faults and folds that distinguishes the Weald from the rest of the South and East of England, with a high concentration of springs associated with fault lines.
- Numerous small streams descending the main ridges in narrow steep-sided valleys (gills), historically often dammed to power industry with many 'pond bays' and 'hammer ponds' surviving.
- Distinctive outcrops of sandstone in the form of crags (popular with climbers and inland sea cliffs, gill stream bed and banks, old quarries, and along road edges associated with the survival of rare cryptogam communities (fems, lichens, liverworts and mosses).
- A high density of pits, quarries and ponds resulting from a long history of stone quarrying, surface mining and marl extraction.
- Locally-distinctive geological materials – sandstone, clay bricks and tiles, and Horsham stone – contributing to high quality vernacular architecture.
- Soils that are distinguished by their variability over short distances – mostly heavy and poorly drained with some coarse-grained, light and free draining.
- Heavily channelised and intensively managed river valleys in the eastern High Weald (Rother, Brede and Tillingham) originating from tidal and freshwater drowning in the Medieval period, with natural floodplain.
- A high density of ponds (five times higher than the national average) with a wide range of pond types supporting significant species such as great crested newts and emerald dragonflies.
- An oceanic climate featuring cool temperatures relative to the latitude, a narrow annual temperature range with few extremes, and rain throughout the year.

5.8 The Neighbourhood Plan area is not within or within proximity to a National Park or any Green Belt land.

#### National Character Areas

5.9 National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. In this respect, the Neighbourhood Plan area is within the High Weald NCA.

5.10 The Statements of Environmental Opportunity (SEOs) associated with the High Weald NCA are as follows<sup>38</sup>:

- SEO1: Maintain and enhance the existing woodland and pasture components of the landscape, including the historic field pattern bounded by shaws, hedgerows and farm woods, to improve ecological function at a landscape scale for the benefit of biodiversity, soils and water, sense of place and climate regulation, safeguard ancient woodlands and encourage sustainably produced timber to support local markets and contribute to biomass production.
- SEO 2: Maintain and restore the natural function of river catchments at a landscape scale, promoting benefits for water quality and water flow within all Wealden rivers, streams and flood plains by encouraging sustainable land management and best agricultural practices to maintain good soil quality, reduce soil erosion, increase biodiversity and enhance sense of place. Maintain and enhance the geodiversity and especially the exposed sandrock.
- SEO 3: Maintain and enhance the distinctive dispersed settlement pattern, parkland and historic pattern and features of the routeways of the High Weald, encouraging the use of locally characteristic materials and Wealden practices to ensure that any development recognises and retains the distinctiveness, biodiversity, geodiversity and heritage assets present, reaffirm sense of place and enhance the ecological function of routeways to improve the connectivity of habitats and provide wildlife corridors.
- SEO 4: Manage and enhance recreational opportunities, public understanding and enjoyment integrated with the conservation and enhancement of the natural and historic environment, a productive landscape and tranquillity, in accordance with the purpose of the High Weald AONB designation.
- Additional Opportunity 1: Protect and maintain the sandstone outcrops and other geological features of the High Weald to promote greater understanding of geodiversity and the contributions that they make to the cultural heritage of the area.

### Local landscape character

5.11 Landscape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of landscape, both in visual and amenity terms.

5.12 Completed in August 2009, the Rother Market Towns and Villages Landscape Assessment (2009)<sup>39</sup> aimed to define the relative capacity of the landscapes around existing settlements to accommodate new housing and business developments. In this respect, the Neighbourhood Plan area falls within the 'Upper Rother Valley' Landscape Character Area, described as follows:

*"The valley of the River Rother dominates the landscape and is overlooked by ridges and spurs with ghylls and shaws. These landscape features are dramatised by woodland cover, much of which is ancient woodland. Many of the larger villages straddle the boundaries of this character area as the settlement pattern is historically along the ridge tops which bound the character area. Landscape action priorities for this area, which should influence pressure for future development, are the need to control ribbon development and conserve the character of the historic settlements. The need to control traffic on rural lanes and protect the remote character of the area should also be considered."*

5.13 Regarding village character, the Landscape Assessment also provides an overview of Hurst Green, as follows:

*"(the village) is severed west from east by the busy A21. The area of greatest opportunity for further development in this village is to the east of the A21 in the more enclosed fields and*

<sup>38</sup> Natural England (2013): 'NCA Profile 122: High Weald (NE508)', [online] available to access via: <http://publications.naturalengland.org.uk/publication/4706903212949504?category=587130>

<sup>39</sup> Rother District Council (2009): 'Market Towns and Villages Landscape Assessment', [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/background-evidence/environment/>

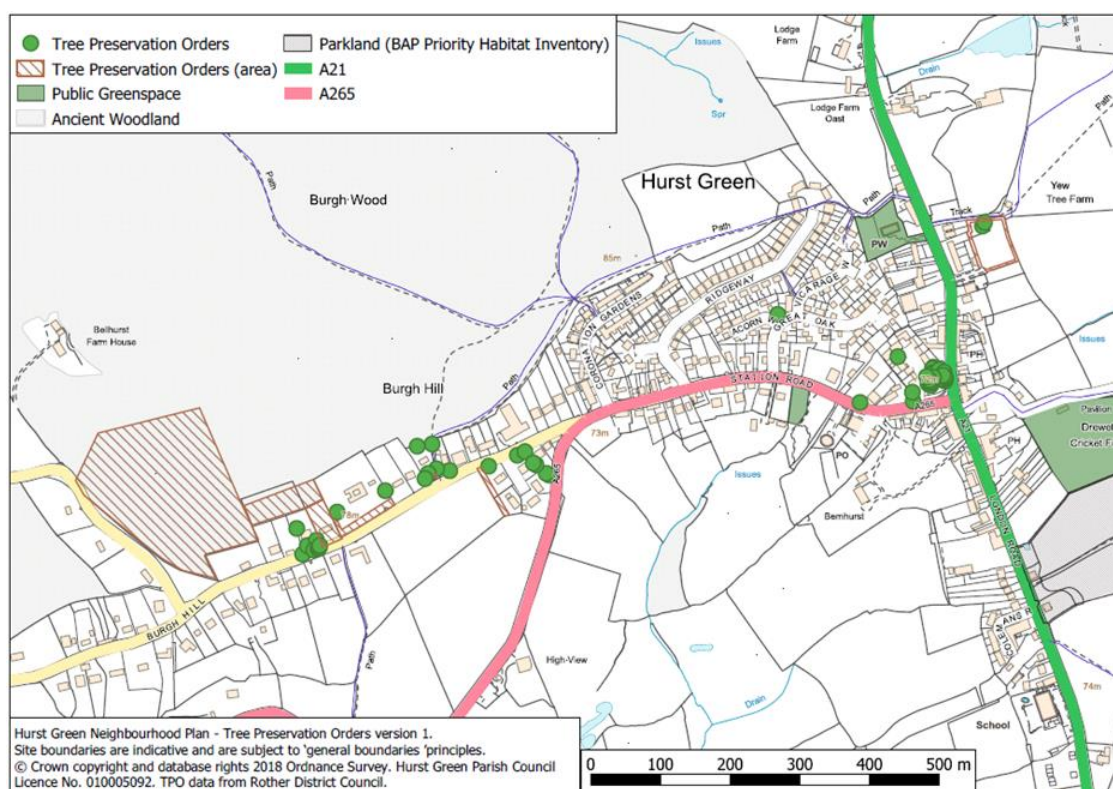
*close to the village boundaries. Areas to the south west are exposed to long views from the AONB countryside. Development has extended north of the village to the edge of the Ancient Woodland of Burgh Wood and there is little scope for more infill in this area."*

### Tree preservation orders

5.14 Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity; the local planning authority will likely take into consideration the following criteria<sup>40</sup>:

- Visibility: the extent to which the trees or woodlands can be seen by the public; and
- Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

5.15 In this context, Rother District Council have designated TPOs (individual and areas) in the interest of their amenity value, including several within and adjacent to the built up areas of the parish. These are available to view on Rother District Council's Planning and Building Online Mapping Tool<sup>41</sup>, and shown below in **Figure 5.1**, **Figure 5.2** and **Figure 5.3**.

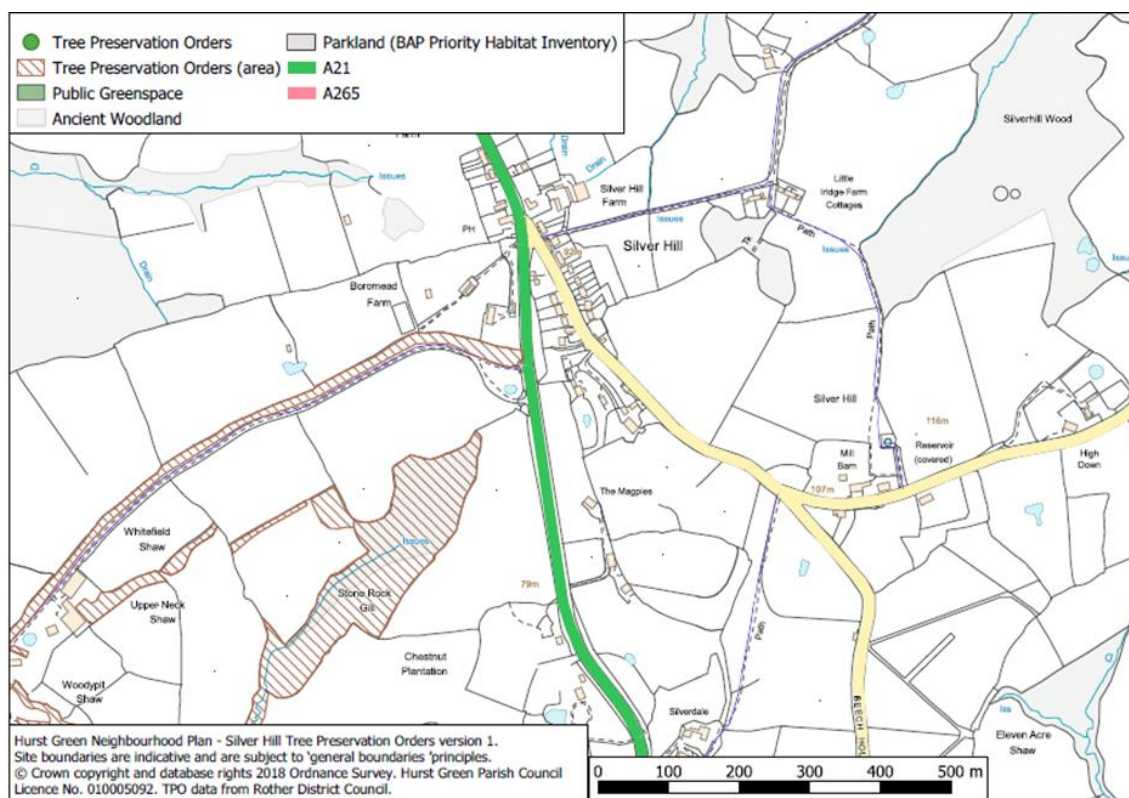


**Figure 5.1: TPOs within the settlement of Hurst Green<sup>42</sup>**

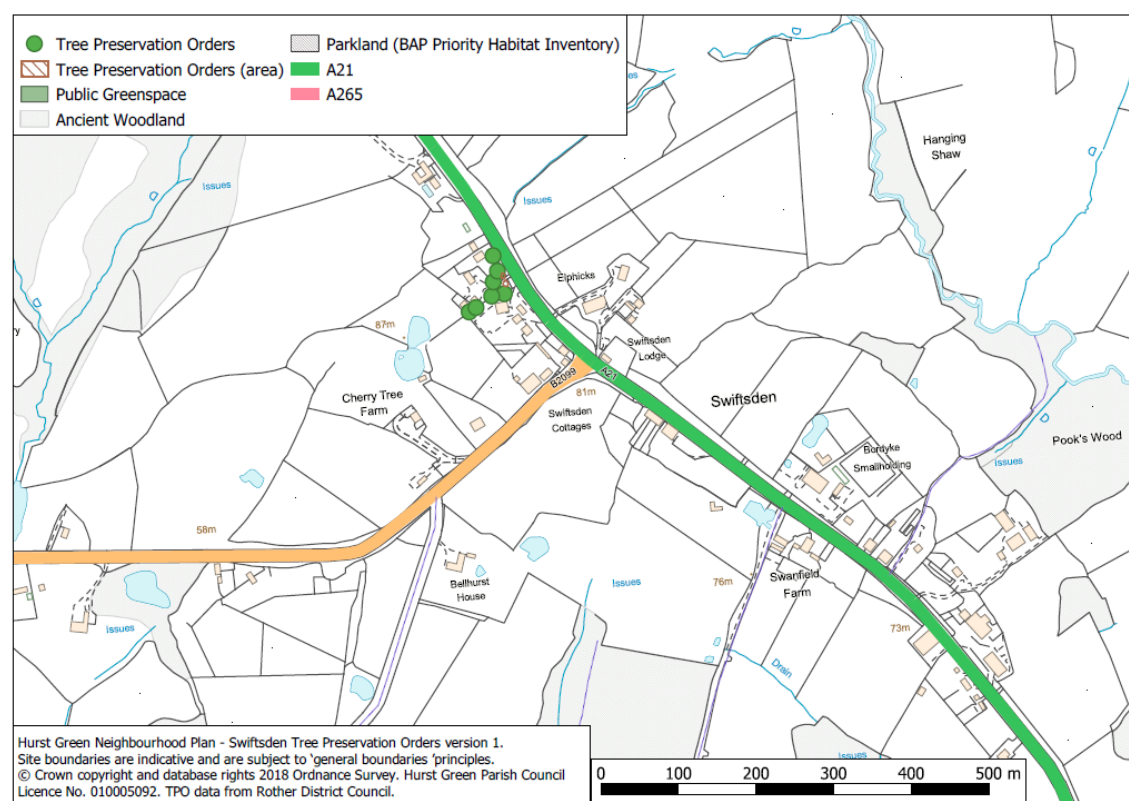
<sup>40</sup> GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>

<sup>41</sup> Rother District Council (2020): 'Planning and Building Online Mapping Tool', [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/online-mapping/>

<sup>42</sup> Hurst Green Parish Council (2020): 'Community Evidence: TPOs in Hurst Green (Evidence 24), Silver Hill (Evidence 25) and Swiftsden (Evidence 26)', [online] available to access via: <https://hurstgreen2030.uk/evidence-documents/>



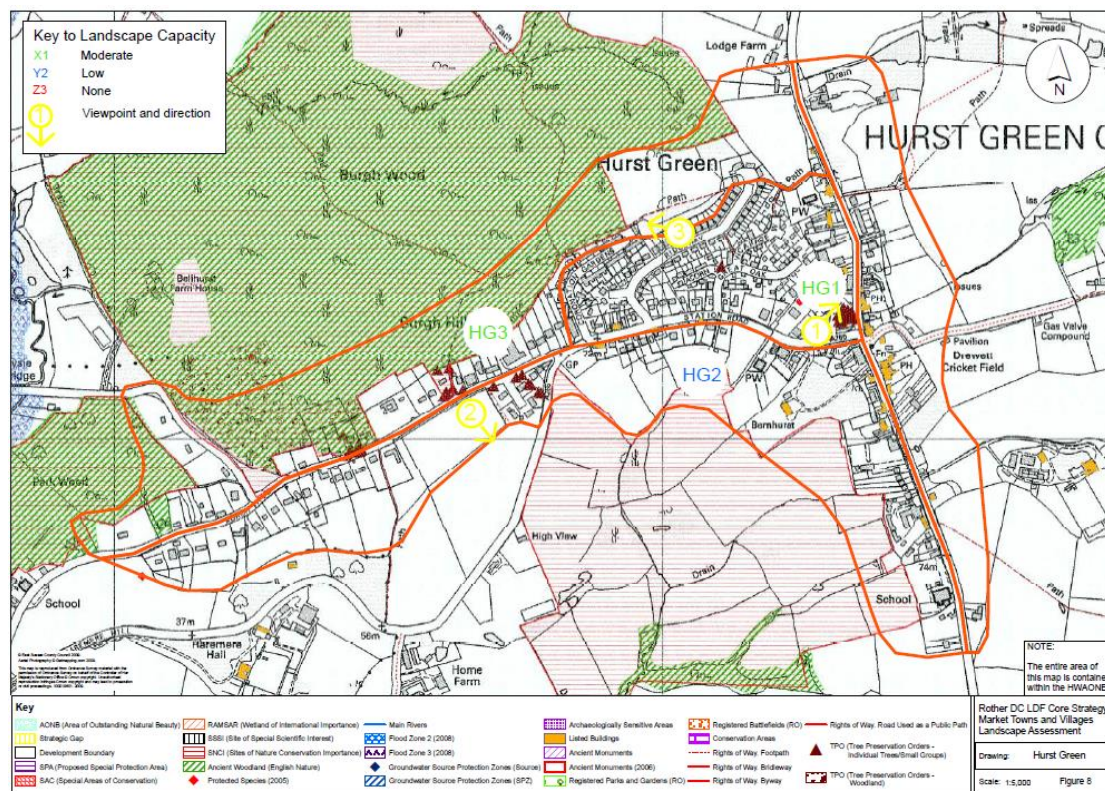
**Figure 5.2: TPOs within the settlement of Silver Hill (southern section of the Neighbourhood Plan area)**



**Figure 5.3: TPOs within the settlement of Swiftsden (northern section of the Neighbourhood Plan area)**

## Visual amenity

- 5.16 It is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.
- 5.17 In this respect, the Rother Market Towns and Villages Landscape Assessment notes three key viewpoints in the Neighbourhood Plan area (viewed from the settlement of Hurst Green and looking out into the surrounding landscape), depicted in **Figure 5.4** below.



**Figure 5.4: Key viewpoints (and directions) within the Neighbourhood Plan area**

## Summary of Future Baseline

- 5.18 New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.
- 5.19 In the absence of the Neighbourhood Plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the Neighbourhood Plan area.

## Key Sustainability Issues

- The High Weald AONB is one of the best preserved medieval landscapes in North West Europe, with the 2019-2024 Management Plan outlining several priority actions and objectives for the nationally protected landscape.
- The Neighbourhood Plan area is within the High Weald NCA, with the NCA profile for this landscape detailing five statements of environmental opportunity.
- The Rother Market Towns and Villages Landscape Assessment (2009) states that the area of greatest opportunity for further development in this village is to the east of the A21 in the more enclosed fields and close to the village boundaries. Areas to the south west are exposed to long views from the AONB countryside. Development has extended north of

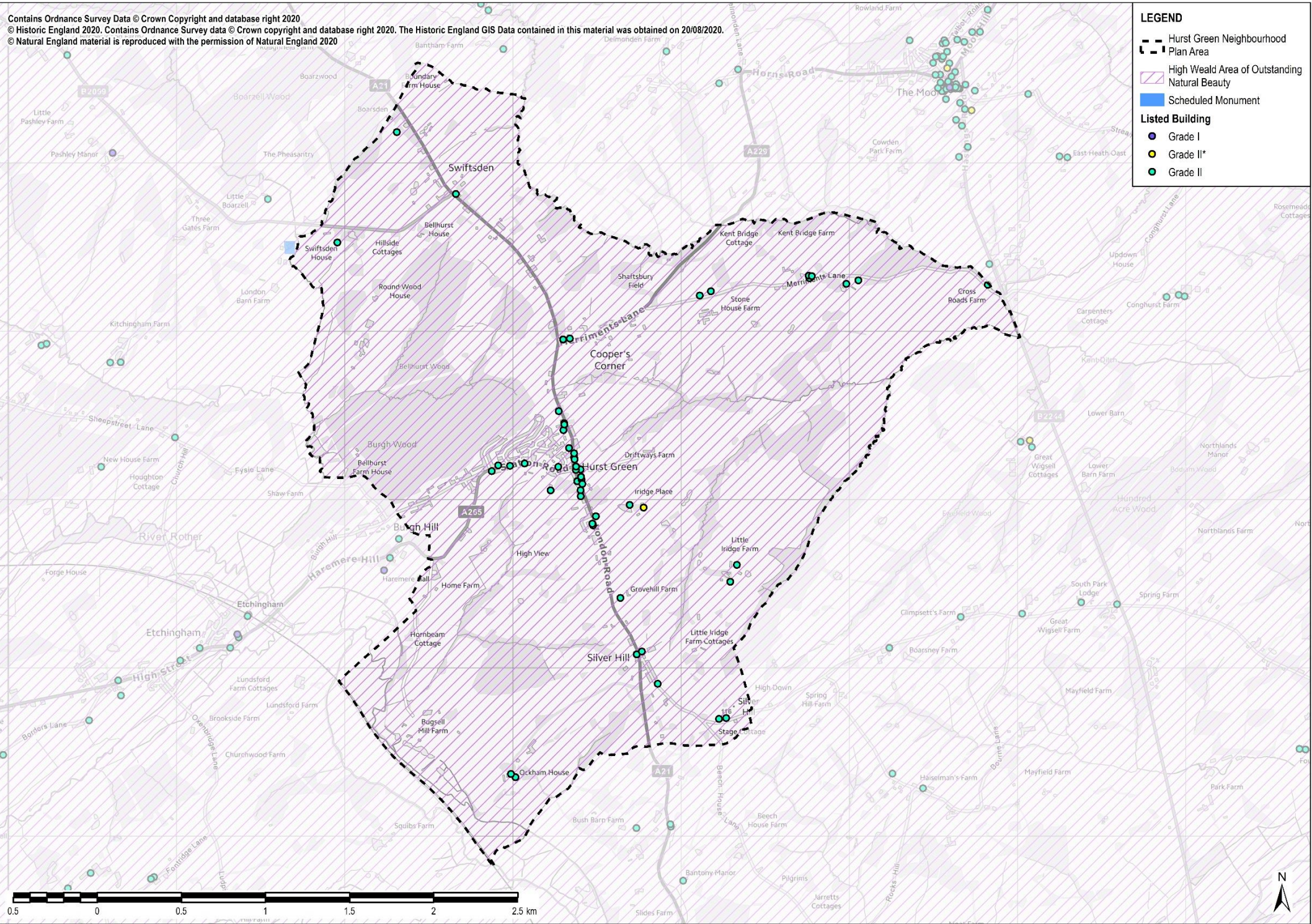
the village to the edge of the Ancient Woodland of Burgh Wood and there is little scope for more infill in this area.

- The Neighbourhood Plan area falls within the 'Upper Rother Valley' Landscape Character Area. Landscape action priorities include the need to control ribbon development, conserve the character of the historic settlements, the need to control traffic on rural lanes and protect the remote character.
- Rother District Council have designated TPOs (individual and areas) in the interest of their amenity value, including several within and adjacent to the built up areas of the parish.
- The Rother Market Towns and Villages Landscape Assessment notes three key viewpoints in the Neighbourhood Plan area (viewed from the settlement of Hurst Green and looking out into the surrounding landscape).

## What are the SEA objectives and appraisal questions for the Landscape SEA theme?

SEA objective	Assessment Questions
Protect and enhance the character and quality of landscapes and villagescapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the setting of the High Weald AONB and the Neighbourhood Plan area?</li> <li>• Conserve and enhance locally important landscape and villagescape features within the Neighbourhood Plan area?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?</li> </ul>

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## 6. Historic Environment

### Focus of Theme

- Designated and non-designated heritage assets
- Setting, special qualities and significance of heritage assets
- Locally important heritage features
- Historic character of the Neighbourhood Plan area

### Policy Context

6.1 Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an *'irreplaceable resource'* that should be conserved in a *'manner appropriate to their significance'*, taking account of *'the wider social, cultural, economic and environmental benefits'* of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a *'positive strategy'* for the *'conservation and enjoyment of the historic environment'*, including those heritage assets that are most at risk.
- *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

6.2 The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the historic environment SEA theme.

6.3 The Government's Statement on the Historic Environment for England<sup>43</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

6.4 Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

6.5 Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 – Second Edition (February 2019)<sup>44</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

<sup>43</sup> HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to access via: <[http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed [18/03/20]

<sup>44</sup> Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1 (second edition)', [online] available to access via: <<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>> last accessed [17/06/20]

- 6.6 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>45</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.
- 6.7 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>46</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:
- Step 1: Identify which heritage assets and their settings are affected;
  - Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
  - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
  - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
  - Step 5: Make and document the decision and monitor outcomes.
- 6.8 Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>47</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.
- 6.9 At the local level, the following policies from the Rother Core Strategy directly relate to the Historic Environment theme:
- Policy RA1: Villages
  - Policy RA3: Development in the Countryside
  - Policy RA4: Traditional Historic Farm Buildings

## Baseline Summary

### Summary of Current Baseline

#### Historic evolution of the parish

- 6.10 The following paragraphs have been taken from the Hurst Green Parish Council website<sup>48</sup>, the High Weald AONB Management Plan<sup>49</sup>, and the Hurst Green Parish Historic Settlement Factsheet<sup>50</sup>, and describe the historic evolution of the parish:

*"The Civil Parish of Hurst Green was created in 1952 out of lands taken from the centuries-old parishes of Salehurst, Etchingam, and to a lesser extent, Ticehurst. Hurst Green's own parish*

<sup>45</sup> Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to access via: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

<sup>46</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition', [online] available to access via: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

<sup>47</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

<sup>48</sup> Hurst Green Parish Council (n.d.): 'A history of Hurst Green' [online] available at: [http://www.hurstgreen-pc.org.uk/history\\_of\\_hurst\\_green.asp](http://www.hurstgreen-pc.org.uk/history_of_hurst_green.asp)

<sup>49</sup> High Weald Joint Advisory Committee (2019): 'High Weald AONB Management Plan' [online] available at: <http://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/2291-high-weald-management-plan-4th-edition-2019-2024/file.html>

<sup>50</sup> Hurst Green Parish Council (2017): 'High Weald AONB Hurst Green Parish Historic Settlement Factsheet' [online] available at: <http://www.hurstgreen-pc.org.uk/files/general/HGNP%20-%20Evidence%2019%20-%20HW%20AONB%20Hurst%20Green%20Parish%20Historic%20Settlement%20factsheet.pdf>

*church, Holy Trinity, was built in 1884. Much of the story of Hurst Green is entwined with the history of these other three parishes.*

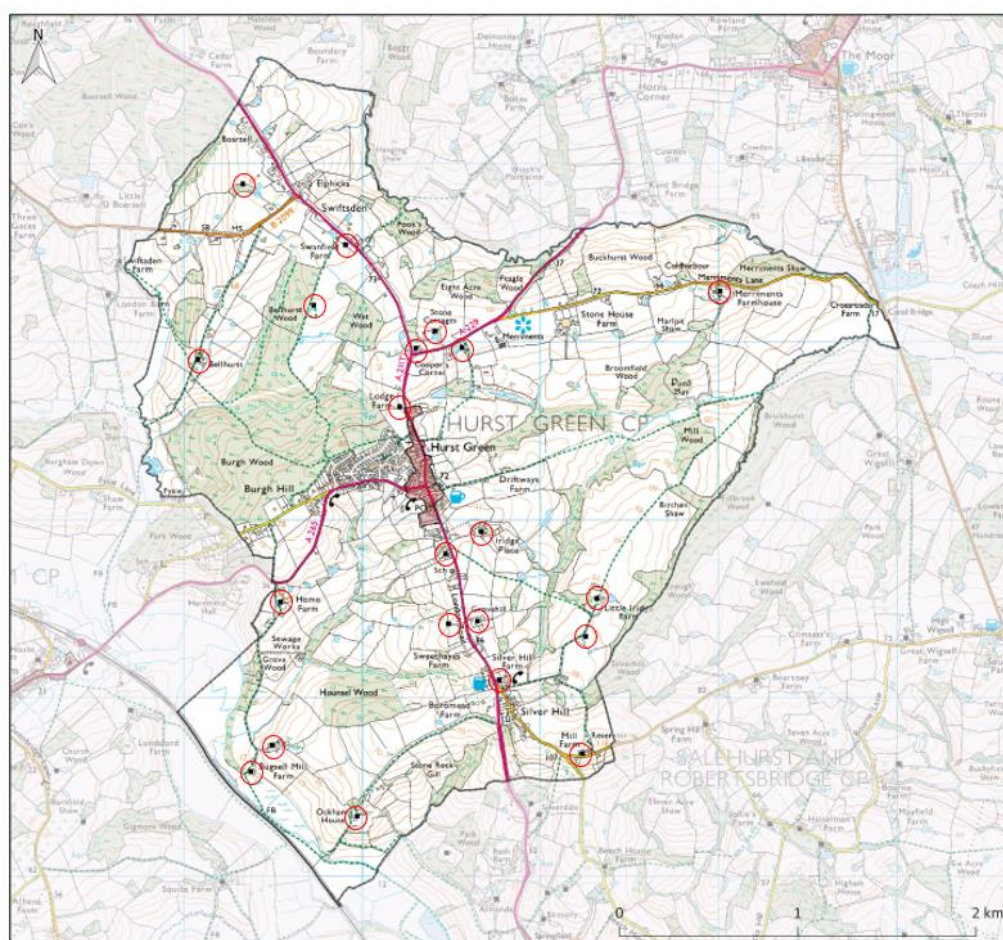
*"The earliest surviving document referring to "herst grene" is dated 1574. However, there are references to the great manors of Bernhurst in 1230, and Iridge in 1248, and records of some of the surrounding farms - Burghham, Eyelid, Boarzell, Bourne - date to the Domesday Book.*

*"For centuries, the village has been important on the London - Tonbridge - Lamberhurst - Robertsbridge - Battle route to the ancient Cinque port of Hastings, with all the business that such a highway implies. Boarzell's accounts of the 1570s show purchases from itinerant travellers of spices - ginger, aniseed, sugar, garlic, mace, cloves, pepper, mustard and cinnamon; exotic fruits - dates, olives, figs, pomegranates, Jordan almonds, prunes, raisins, rice, and oranges; and at least fifteen types of fish.*

*"The High Weald is crossed by one of the most famous routeways in English history, the one that took King Harold's army from victory at Stamford Bridge to defeat at Hasting in 1066. Today, its rich detail is still best explored through the myriad of interconnecting paths and tracks. Here you can walk in the footsteps of the Medieval and Anglo-Saxon ancestors who used this dense network of routeways to move between the wooded Weald and settlements on its fringes where farming was easier. These tracks remain a visible legacy of the value communities placed on the resources of the forest.*

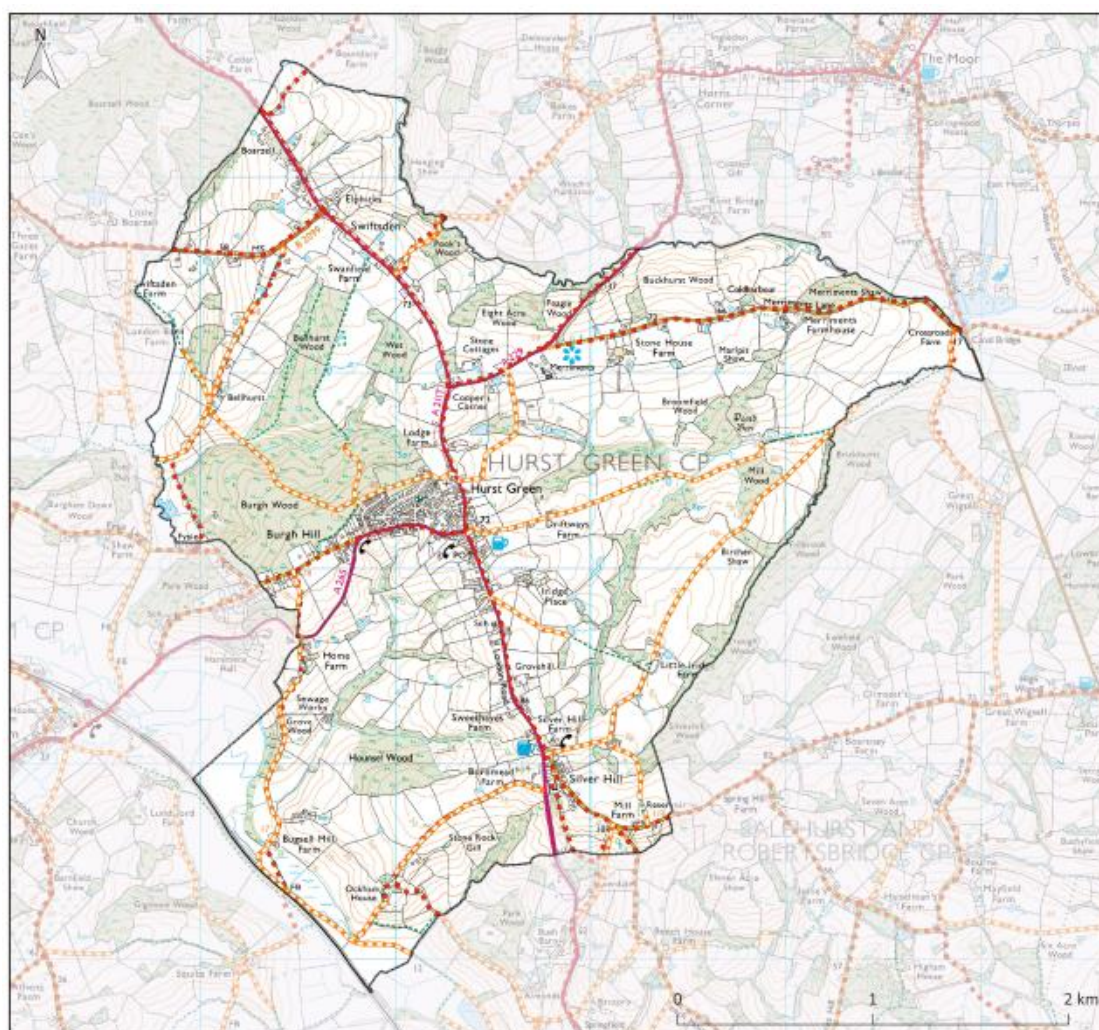
*"Woodland still covers nearly a third of the Weald in an intricate network of farm woods, shaws, pits and gills, and larger wooded estates. Most of the woodland is ancient, managed in the past as coppice and swept with carpets of bluebells and wood anemones in the spring."*

- 6.11 The High Weald AONB is also characterised by dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries. These farmsteads are presented in **Figure 6.1** (below).



**Figure 6.1: Historic farmsteads in Hurst Green (circled in red)**

- 6.12 The historic character of the High Weald is also characterised by ancient routeways (now roads, tracks and paths) in the form of ridge-top roads and a dense system of radiating droveways. Ancient routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks. These ancient routeways are depicted in **Figure 6.2** (below).



**Figure 6.2: Ancient routeways within the Neighbourhood Plan area (roads shown in red, public rights of way shown in orange)**

### Designated heritage assets and areas

- 6.13 The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.
- 6.14 An overview of the designated historic environment assets present in the Neighbourhood Plan area is provided below, with the map at the end of **Chapter 5** (above) highlighting the location of these assets.

### Listed buildings

- 6.15 Listed buildings are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.<sup>51</sup> The Neighbourhood Plan area contains 50

<sup>51</sup> Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>

Grade II listed buildings, no Grade I and one Grade II\* listed buildings<sup>52</sup>. The Grade II\* listed building is 'Iridge Place'.

### *Scheduled monuments*

- 6.16 The Ancient Monuments and Archaeological Areas Act (1979)<sup>53</sup> allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites which are protected under the Act. In this regard, there are no scheduled monuments within the Neighbourhood Plan area itself. However, the 'Old Boarzell moated site 100m north east of Swiftsden Farm, Little Swiftsden' Scheduled Monument is located directly adjacent to the north western boundary of the Neighbourhood Plan area.

### *Registered parks and gardens, and historic battlefields*

- 6.17 Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. There are no registered parks and gardens within the Neighbourhood Plan area.
- 6.18 Historic England's Register of Historic Battlefields identifies important English battlefields. Its purpose is to offer them protection through the planning system, and to promote a better understanding of their significance and public enjoyment. No historic battlefields are in the Neighbourhood Plan area.

### *Conservation areas*

- 6.19 Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>54</sup>. There are ten conservation areas within Rother District<sup>55</sup>, none of which are within or within proximity to the Neighbourhood Plan area.

### *Locally important heritage features*

- 6.20 Archaeological Notification Areas define presently known and recorded areas of heritage sensitivity which have the potential to contain further presently un-recorded features of archaeological and historic interest within Rother District. In this respect, there are several ANAs located within the Neighbourhood Plan area, shown overleaf in **Figure 6.3** (Hurst Green), **Figure 6.4** (Swiftsden), and **Figure 6.5** (Silver Hill)<sup>56</sup>.
- 6.21 It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.
- 6.22 The East Sussex Historic Environment Record (HER)<sup>57</sup> identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the Neighbourhood Plan area. Following a high-level review of the East Sussex HER, there are

<sup>52</sup> Historic England (2020): National Heritage List for England', [online] available to access via:

<https://historicengland.org.uk/listing/the-list/advanced-search>

<sup>53</sup> Ancient Monuments and Archaeological Act (1979) [online] available at: <https://www.legislation.gov.uk/ukpga/1979/46>

<sup>54</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via: <https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

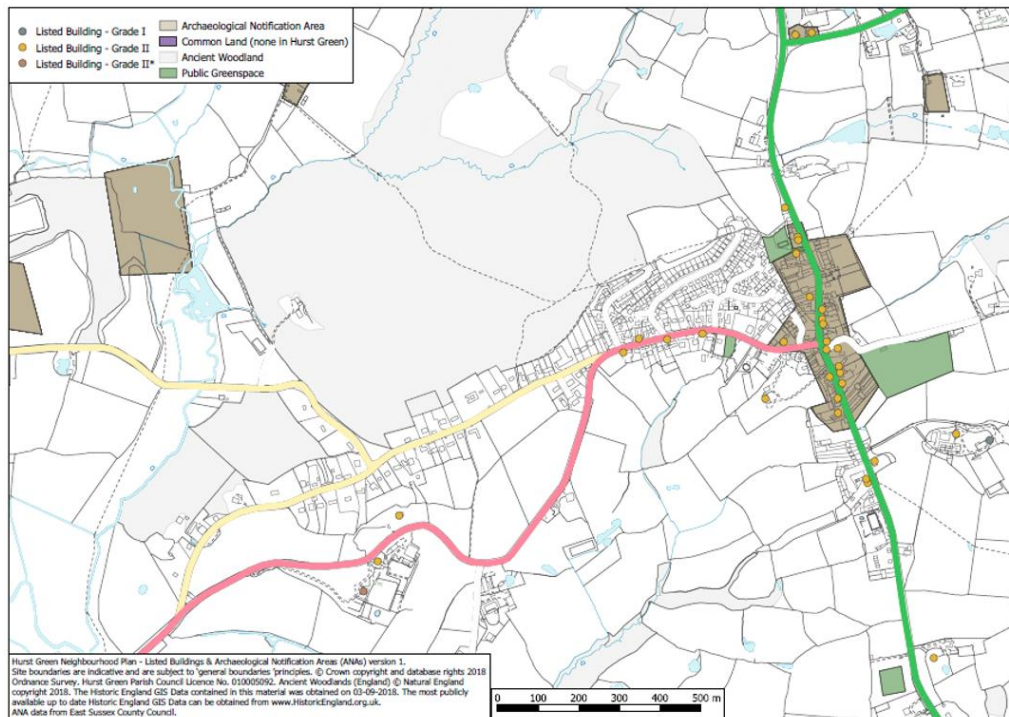
<sup>55</sup> Rother District Council (2020): 'Conservation Areas', [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/conservation-and-design/conservation-areas/>

<sup>56</sup> Rother District Council (2020): 'Community Evidence: Archaeological Notification Areas (evidence documents 11-13)', [online] available to access via: <https://hurstgreen2030.uk/evidence-documents/>

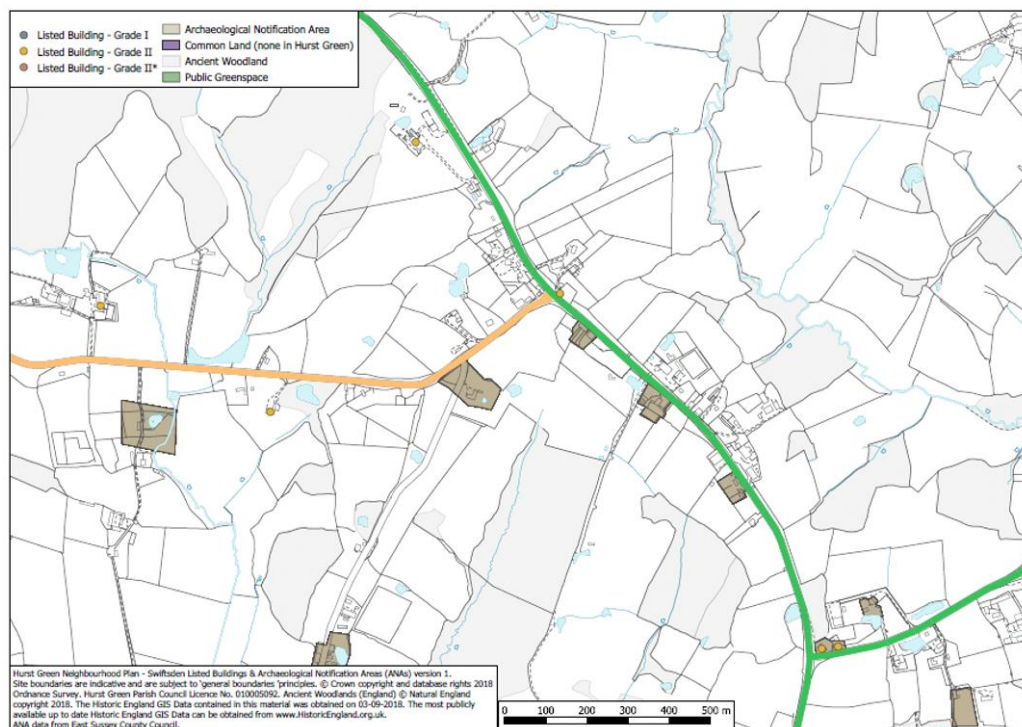
<sup>57</sup> Heritage Gateway (2020): 'Advanced Search – East Sussex HER', [online] available to access via: [https://www.heritagegateway.org.uk/gateway/advanced\\_search.aspx](https://www.heritagegateway.org.uk/gateway/advanced_search.aspx)

a total of 81 records within Hurst Green. This includes records of farmhouses and cottages, woodlands, and monuments.

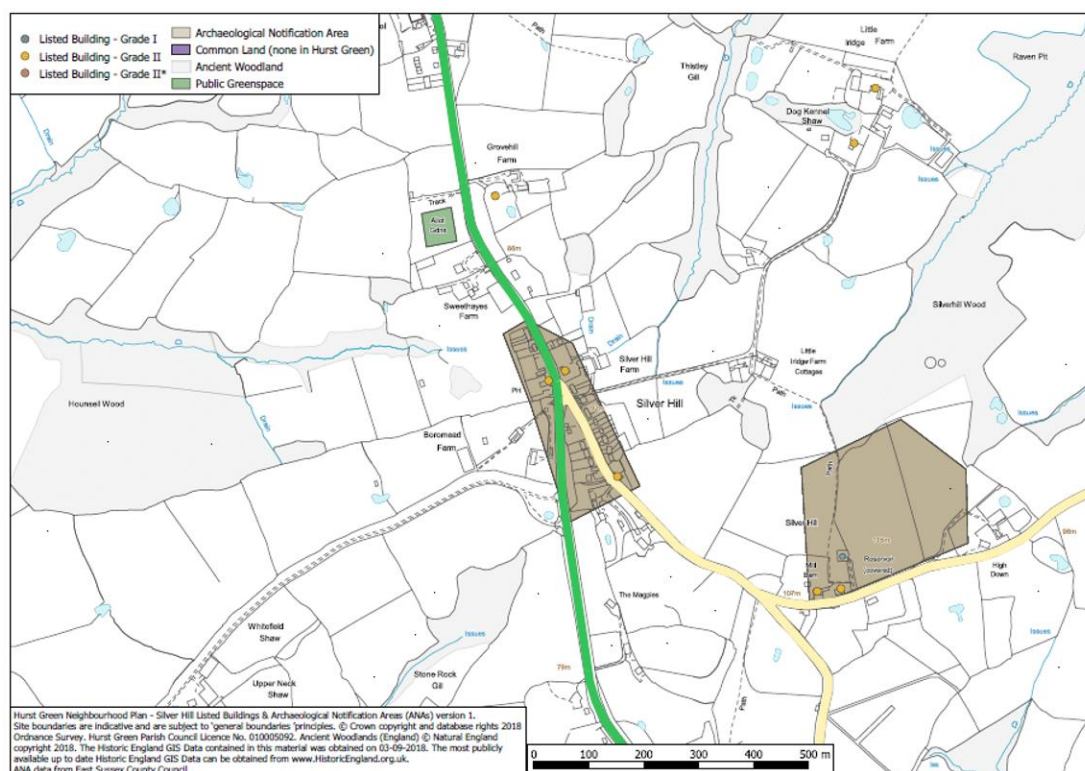
- 6.23 During the subsequent stages of the SEA process, the East Sussex HER will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred development strategy within the Neighbourhood Plan. These heritage considerations (alongside any suggested mitigation measures or recommendations) will be presented in the Environmental Report accompanying the Neighbourhood Plan at Regulation 14 consultation.



**Figure 6.3: ANAs within the settlement of Hurst Green**



**Figure 6.4: ANAs within the settlement of Swiftsden (northern section of the Neighbourhood Plan area)**



**Figure 6.5: ANAs within the settlement of Silver Hill (southern section of the Neighbourhood Plan area)**

### Heritage at risk

- 6.24 Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2019 Heritage at Risk Register for London and South East England<sup>58</sup>, none of the heritage assets within the Neighbourhood Plan area are at risk.
- 6.25 It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.

### Summary of Future Baseline

- 6.26 New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.
- 6.27 Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the parish's settlements, support historic landscape character and better reveal assets' heritage significance.

## Key Sustainability Issues

- The Neighbourhood Plan area contains dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries.

<sup>58</sup> Historic England (2019): 'Heritage at Risk Register for South East England', [online] available to access via: <https://historicengland.org.uk/images-books/publications/har-2019-registers/>

- Ancient routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks, with several located within the Neighbourhood Plan area.
- The Neighbourhood Plan area contains 50 Grade II listed buildings, no Grade I and one Grade II\* listed buildings. The Grade II\* listed building is 'Iridge Place'.
- It is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.
- The 'Old Boarzell moated site 100m north east of Swiftsden Farm, Little Swiftsden' Scheduled Monument is located directly adjacent to the north western boundary of the Neighbourhood Plan area.
- Archaeological Notification Areas define presently known and recorded areas of heritage sensitivity which have the potential to contain further presently un-recorded features of archaeological and historic interest within the Neighbourhood Plan area.
- Following a high-level review of the East Sussex HER, there are a total of 81 records within Hurst Green. This includes records of farmhouses and cottages, woodlands, and monuments.

## What are the SEA objectives and appraisal questions for the Historic Environment SEA theme?

SEA objective	Assessment Questions
Protect, conserve and enhance heritage assets within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts?</li> <li>• Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the East Sussex HER?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> </ul>

## 7. Land, Soil and Water Resources

### Focus of Theme

- Quality of agricultural land
- Water resources and water quality
- Mineral safeguarding areas

### Policy Context

- 7.1 The EU's Soil Thematic Strategy<sup>59</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.
- 7.2 Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:
- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
  - Promote the sustainable use of water;
  - Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
  - Ensure the progressive reduction of groundwater pollution; and
  - Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.
- 7.3 Key messages from the NPPF include:
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
    - i. *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
    - ii. *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
  - Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
  - *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*

<sup>59</sup> European Commission (2006): 'Soil Thematic Policy', [online] available to access via: [http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm)

- *‘Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.’*
  - Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
  - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
  - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
  - The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.
- 7.4 Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Land, Soil and Water Resources SEA theme.
- 7.5 Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>60</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>61</sup>, which sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.
- 7.6 In terms of waste management, the Government Review of Waste Policy in England<sup>62</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan<sup>63</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>64</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.
- 7.7 River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. Hurst Green falls within the South East River Basin District and the December 2015 Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment<sup>65</sup>.
- 7.8 The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. These documents are<sup>66</sup>:
- The Waste and Minerals Plan (adopted February 2013); and
  - The Waste and Minerals Sites Plan (adopted February 2017).

<sup>60</sup> Defra (2009): ‘Safeguarding our Soils: A strategy for England’, [online] available to access via:

<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

<sup>61</sup> Defra (2011): ‘Water for life (The Water White Paper)’, [online] available to access via: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

<sup>62</sup> Defra (2011): ‘Government Review of Waste Policy in England’, [online] available at:

<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>

<sup>63</sup> DEFRA (2013) Waste Management Plan for England [online] available to access via:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf)

<sup>64</sup> Directive 2008/98/EC

<sup>65</sup> Environment Agency (2015): ‘South East River Basin Management Plan’, [online] available to access via:

<https://www.gov.uk/government/collections/river-basin-management-plans-2015>

<sup>66</sup> East Sussex County Council (2020) ‘Waste and Minerals Local Plan for East Sussex’, [online] available to access via:

<https://www.eastsussex.gov.uk/environment/planning/mineralsandwaste/>

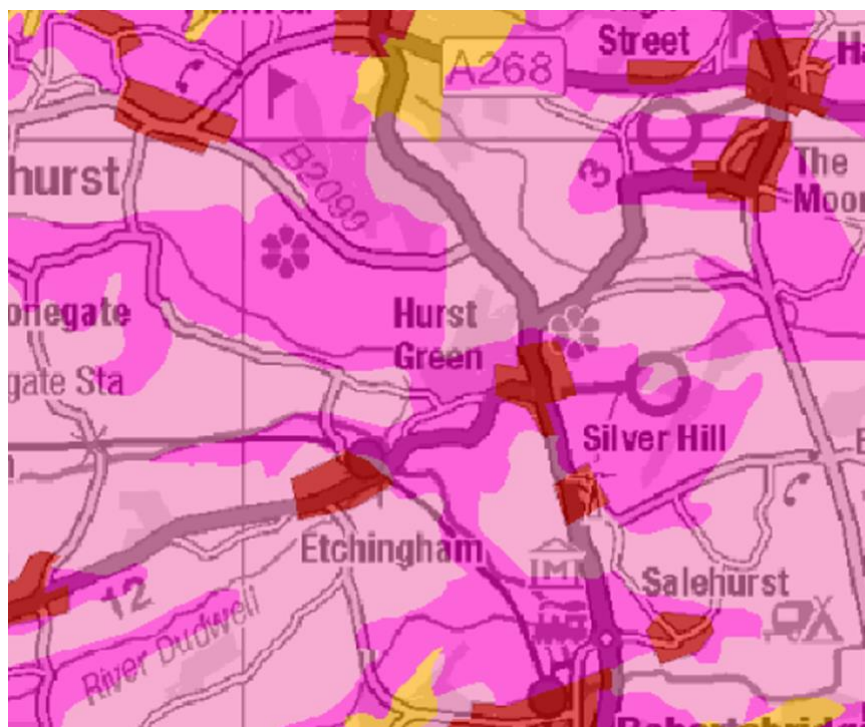
- 7.9 Policy SRM2 'Water Supply and Wastewater Management' from the Rother Core Strategy and Policy DMR1 'Water Efficiency' and Policy DEN5 'Sustainable Drainage' from the DaSA directly relate to the Land, Soil and Water Resources theme.

## Baseline Summary

### Summary of Current Baseline

#### Soil resources

- 7.10 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.
- 7.11 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for the areas of undeveloped land in Hurst Green. The provisional ALC dataset provided by Natural England indicates that the undeveloped areas of Hurst Green Parish are predominantly underlain by areas of Grade 3 agricultural land. The Neighbourhood Plan area therefore has the potential to contain some of the best and most versatile land for agricultural purposes.
- 7.12 However, in the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e. best and most versatile land) or Grade 3b land.
- 7.13 The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England<sup>67</sup> provided by Natural England indicates that most of the undeveloped areas of land in the Neighbourhood Plan area have a moderate (20 – 60%) or low (<= 20%) likelihood of containing BMV land. This is shown below in **Figure 6.1** (darker pink areas represent moderate likelihood, with the lighter pink areas representing low likelihood).



**Figure 6.1: Predictive BMV agricultural land quality for Hurst Green**

<sup>67</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic Scale Map for the South East Region (ALC018)', [online] available to access via: <http://publications.naturalengland.org.uk/publication/5624668800679936>

## Water resources and quality

- 7.14 The water resources located within and within proximity to the Neighbourhood Plan area include a network of small streams and brooks, along with the River Rother which passes alongside the south western boundary. There are also drainage ditches located adjacent to field margins, including the Kent Ditch which passes alongside the northern boundary of the Neighbourhood Plan area.
- 7.15 Hurst Green is within the South East River Basin District, specifically within the 'Rother Levels' Operational Catchment and the 'Rother Upper' Operational Catchment. As shown on the Environment Agency's Catchment Data Explorer, the following watercourses are located within the Neighbourhood Plan area:
- Kent Ditch (alongside the northern boundary);
  - Lower Rother from Etchingham to Scott's Float (southern and south eastern section); and
  - Limden (alongside the western boundary).
- 7.16 Based on the most recently completed water quality assessments by the Environment Agency in 2016, the 'Kent Ditch'<sup>68</sup> watercourse has a 'poor' ecological status and a 'good' chemical status. The reasons for not achieving 'good' status (RNAGs) for the watercourse are associated with the following activities: private sewage treatment, sewage discharge (continuous), and poor livestock management.
- 7.17 Based on the most recently completed water quality assessments by the Environment Agency in 2016, the 'Lower Rother from Etchingham to Scott's Float'<sup>69</sup> watercourse has a 'moderate' ecological status and a 'good' chemical status. The RNAGs for the watercourse are associated with the following activities: poor soil management, poor nutrient management, natural mineralisation, and sewage discharge (continuous).
- 7.18 Based on the most recently completed water quality assessments by the Environment Agency in 2016, the 'Limden'<sup>70</sup> watercourse has a 'poor' ecological status and a 'good' chemical status. The RNAGs for the watercourse are associated with the following activities: sewage discharge (continuous), poor nutrient management, poor livestock management, and poor soil management.
- 7.19 The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the Neighbourhood Plan area overlaps with three surface water NVZs, specifically:
- 'Kent Ditch' NVZ (north eastern and eastern sections);
  - 'Limden' NVZ (western and north western sections) and
  - 'Lower Rother from Robertsbridge to Iden' NVZ (central and southern sections).
- 7.20 It is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to significantly increase the risk of pollution to NVZs.

## Mineral resources

- 7.21 Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality

<sup>68</sup> Environment Agency (2016): 'Catchment Data Explorer: Kent Ditch', [online] accessible via: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB107040013600>

<sup>69</sup> Environment Agency (2016): 'Catchment Data Explorer: Lower Rother from Etchingham to Scott's Float', [online] accessible via: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB107040013640>

<sup>70</sup> Environment Agency (2016): 'Catchment Data Explorer: Limden', [online] accessible via: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB107040013610>

of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance<sup>71</sup>.

- 7.22 The East Sussex Minerals and Waste Plan outlines areas of mineral sensitivity within the county. In this regard, there are no Mineral Safeguarding Areas or Mineral Consultation Zones within or within proximity to the Neighbourhood Plan area.

## Summary of Future Baseline

- 7.23 Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.
- 7.24 Due to the potentially limited prevalence of BMV agricultural land within sections of the undeveloped areas of the parish, new developments which are located outside of the settlement are less likely lead to losses of higher quality (best and most versatile) agricultural land.

## Key Sustainability Issues

- The provisional ALC dataset provided by Natural England indicates that the undeveloped areas of Hurst Green Parish are predominantly underlain by areas of Grade 3 land. The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England indicates that most of the undeveloped areas of land in the Neighbourhood Plan area have a moderate (20 – 60%) or low ( $\leq 20\%$ ) likelihood of containing BMV land.
- The water resources located within and within proximity to the Neighbourhood Plan area include a network of small streams and brooks, along with the River Rother. There are also drainage ditches located adjacent to field margins, including the Kent Ditch.
- None of the watercourses in the Neighbourhood Plan area recorded a 'good' overall water quality status based on the most recently completed water quality assessments by the Environment Agency in 2016.
- RNAGs for the watercourses are primarily attributed to the following activities: poor soil and nutrient management, sewage discharge and treatment, and poor livestock management.
- The Neighbourhood Plan area overlaps with three surface water NVZs: 'Kent Ditch' NVZ 'Limden' NVZ and 'Lower Rother from Robertsbridge to Iden' NVZ.

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<sup>71</sup> GOV.UK (2014): 'Minerals Guidance', [online] available to access via: <https://www.gov.uk/guidance/minerals>

## What are the SEA objectives and appraisal questions for the Land, Soil and Water Resources SEA theme?

SEA objective	Assessment Questions
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 3a agricultural land?</li> <li>• Protect the integrity of mineral resources?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Protect surface water resources?</li> </ul>

## 8. Population and Community

### Focus of Theme

- Population size
- Population density
- Age structure
- Deprivation
- Housing mix and affordability
- Education and skills

### Policy Context

#### 8.1 Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a *'sufficient choice of school places'* and taking a *'proactive, positive and collaborative approach'* to bringing forward *'development that will widen choice in education'*.

- 8.2 The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>72</sup> warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.
- 8.3 At the local level, the following policies from the Rother Core Strategy directly relate to the Population and Community theme:
- Policy CO1: Community Facilities and Services
  - Policy CO2: Provision and Improvement of Healthcare Facilities
  - Policy CO3: Improving Sports and Recreation Provision
  - Policy CO4: Supporting Young People
  - Policy CO5: Supporting Older People
  - Policy CO6: Community Safety
  - Policy LHN1: Achieving Mixed and Balanced Communities
  - Policy LHN5: Sites for the Needs of Gypsies and Travellers
  - Policy LHN6: Gypsies, Travellers and Travelling Showpeople Criteria
  - Policy EC1: Fostering Economic Activity and Growth
  - Policy EC2: Business Land and Premises
  - Policy EC3: Existing Employment Sites
  - Policy EC4: Business Activities Elsewhere Within the District
  - Policy EC5: Support for Key Sectors
  - Policy EC6: Tourism Activities and Facilities
  - Policy EC7: Retail Development
- 8.4 The following policies from the DaSA directly relate to the Population and Community theme:
- Policy DCO1: Retention of Sites of Social or Economic Value
  - Policy DEC1: Shopfronts, Signage and Advertising
  - Policy DEC2: Holiday Sites
  - Policy DEC3: Existing Employment Sites and Premises
  - Policy OVE1: Housing Supply and Delivery Pending Plans

## Baseline Summary

### Summary of Current Baseline

#### Population

- 8.5 Based on the 2011 Census data as shown in **Table 8.1** (below), the population of Hurst Green increased by approximately 1.4% between 2001 and 2011, lower than the observed increases for Rother District (6.0%), South East England (7.9%) and England (7.9%). Approximately 1.6% of the population of Rother District live within Hurst Green.

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<sup>72</sup> Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available to access via: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [18/03/20]

- 8.6 The estimated population of Hurst Green in 2018 was 1,592 residents, an increase of approximately 7.5%<sup>73</sup>. This indicates that the rate of population growth in the Neighbourhood Plan area in the last decade was higher than the observed rate of growth between 2001-2011.

**Table 8.1 Population change (2001-2011)**

	Hurst Green	Rother	South East	England
<b>2001</b>	1,460	85,471	8,000,645	49,138,831
<b>2011</b>	1,481	90,588	8,634,750	53,012,456
<b>Population change (percentage)</b>	1.44%	5.99%	7.93%	7.88%

### Age Structure

- 8.7 Generally, there is a similar proportion of residents within the 60+ age category within the Neighbourhood Plan area (22.6%) in comparison to the totals for South East England (23.4%) and England (22.3%). However, this total is noticeably lower than the total for Rother District (37.2%). This is shown in **Table 8.2** (below).
- 8.8 In contrast, a higher proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (47.8%) in comparison to the totals for Rother District (38.6%), South East England (46.4%) and England (46.9%).
- 8.9 Additionally, 29.6% of residents within the district are within the younger age categories (0-15 and 16-24), lower than the totals for South East England (30.2%) and England (30.8%), but higher than the total for Rother District (24.2%).

**Table 8.2: Age structure, 2011**

	Hurst Green	Rother	South East	England
<b>0-15</b>	20.1%	15.7%	19.0%	18.9%
<b>16-24</b>	9.5%	8.5%	11.2%	11.9%
<b>25-44</b>	24.0%	18.1%	26.5%	27.5%
<b>45-59</b>	23.8%	20.5%	19.9%	19.4%
<b>60+</b>	22.6%	37.2%	23.4%	22.3%
<b>Total population</b>	1,481	90,588	8,634,750	53,012,456

### Household deprivation

- 8.10 Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:
- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
  - **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
  - **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.

<sup>73</sup> City Population (ca 2018): 'Hurst Green: Parish in South East England', [online] available to access via: [http://citypopulation.de/en/uk/southeastengland/admin/rother/E04003811\\_hurst\\_green/](http://citypopulation.de/en/uk/southeastengland/admin/rother/E04003811_hurst_green/)

- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.
- 8.11 Based on the Census information presented in **Table 8.3** (below), out of the 52.1% of households which are deprived in the district, the majority are deprived in one or two dimensions. This is similar to the regional and national averages. Overall, fewer households are deprived in the Neighbourhood Plan area in comparison to the totals for Rother District, South East England, and England.

**Table 8.3 Household deprivation**

	Hurst Green	Rother	South East	England
<b>Household not deprived in any dimension</b>	52.1%	40.3%	47.7%	42.5%
<b>Deprived in 1 dimension</b>	31.4%	35.8%	32.2%	32.7%
<b>Deprived in 2 dimensions</b>	13.4%	19.9%	16.0%	19.1%
<b>Deprived in 3 dimensions</b>	3.0%	3.8%	3.7%	5.1%
<b>Deprived in 4 dimensions</b>	0.2%	0.3%	0.4%	0.5%

### Housing Needs

- 8.12 The Hurst Green Neighbourhood Plan local housing demand survey was conducted across Hurst Green from March to May 2019 and was completed by approximately 40% of households in the Parish. The main findings of the survey are summarised below<sup>74</sup>:
- 78% of households live in accommodation suitable for their needs.
  - 22% of households are living in accommodation that is not suitable for their needs.
  - 72% of households say that the Hurst Green area is their preferred place to live.
  - 28% of households say that the Hurst Green area is not their preferred place to live. Top reasons being a) limited facilities, b) road noise / traffic and c) it being difficult to meet people and make friends.
  - 30 local households are looking for homes in the parish, including:
    - 23 local households looking for homes in Hurst Green village.
    - 3 local households looking for homes in the Silver Hill area.
    - No local households were looking for homes in the Swiftsden area.
    - 4 local households looking for homes elsewhere within the Hurst Green parish boundaries (rural Hurst Green).

### Index of Multiple Deprivation

- 8.13 The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:
- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).

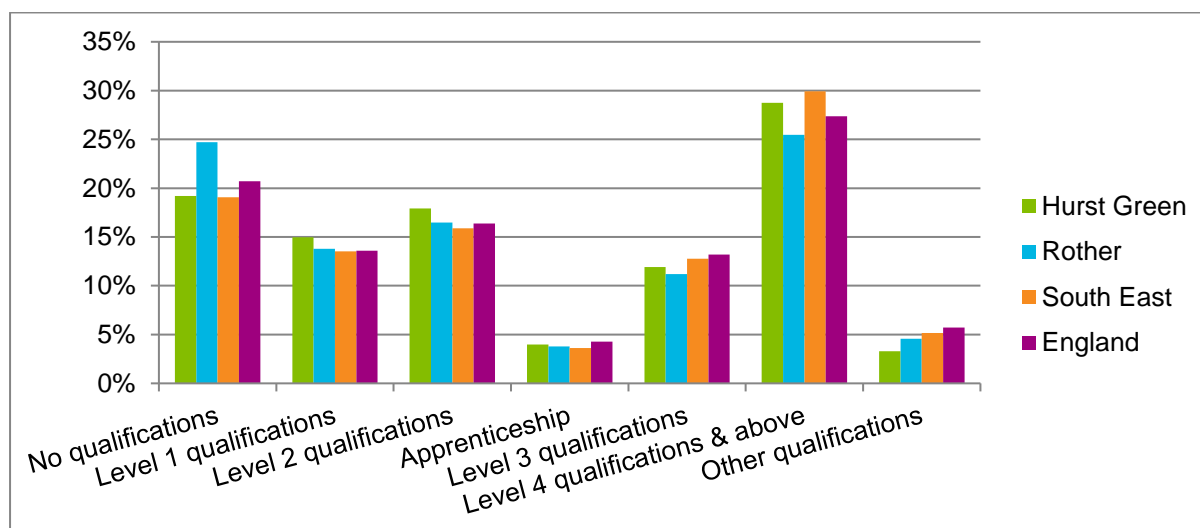
<sup>74</sup> Hurst Green Parish Council (2020): 'Community Evidence 35 – Hurst Green Neighbourhood Plan Local Housing Demand Survey', [online] available to access via: <https://hurstgreen2030.uk/evidence-documents/>

- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
  - **Education, Skills and Training:** The lack of attainment and skills in the local population.
  - **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
  - **Crime:** The risk of personal and material victimisation at local level.
  - **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
    - 'Geographical Barriers': relating to the physical proximity of local services
    - 'Wider Barriers': relating to access to housing, such as affordability.
  - **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
    - 'Indoors Living Environment' measures the quality of housing.
    - 'Outdoors Living Environment' measures air quality and road traffic accidents.
  - Two supplementary indices (subsets of the Income deprivation domains), are also included:
    - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
    - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.
- 8.14 Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.
- 8.15 In this respect, the Neighbourhood Plan area falls within the Rother 001C LSOA, which is ranked amongst the 30% least deprived neighbourhoods in England<sup>75</sup>.

## Education

- 8.16 Skills and education are a key factor in driving economic growth. The 2011 Census data indicates that the Neighbourhood Plan area has a lower proportion of residents with no qualifications (19.2%) when compared to Rother District (24.7%). However, this total aligns with the regional and national averages.
- 8.17 The Neighbourhood Plan area has a higher proportion of residents who have a level 4 qualification or above (28.7%) when compared to Rother District (25.5%). However, this total also aligns with the regional and national averages. This is shown in **Figure 8.1** below.

<sup>75</sup> DCLG (2020): 'IMD 2019 Mapping Tool', [online] available to access via:  
[http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)



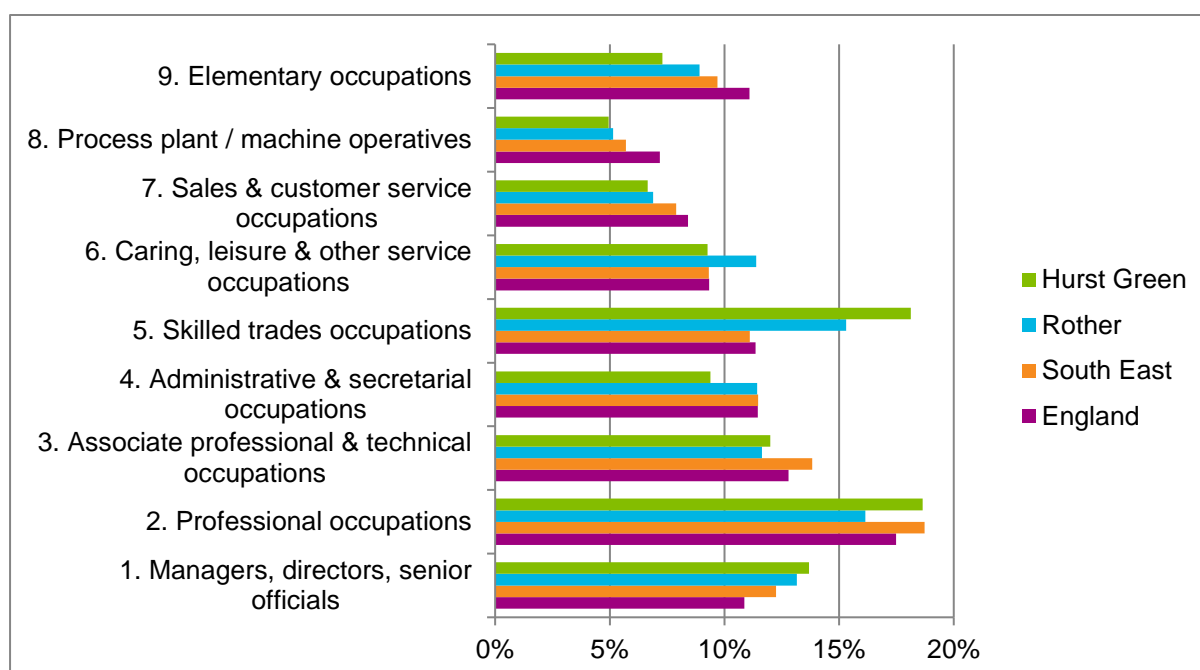
**Figure 8.1: Highest Level of Qualification**

### Employment

8.18 Based on the 2011 Census data shown in **Figure 8.2** (below), the following three occupation categories account for the greatest proportion of residents in the Neighbourhood Plan area:

- Professional occupations;
- Skilled trades occupations; and
- Managers, directors, and senior officials.

8.19 Approximately 50.5% of working residents within the Neighbourhood Plan area hold jobs in these three occupation categories, higher than the totals for Rother District (44.6%), South East England (42.1%) and England (39.7%).



**Figure 8.2: Occupation of residents aged 16 to 74**

### Community assets and infrastructure

8.20 Key services and facilities within the Neighbourhood Plan area include the Holy Trinity Church, a Hurst Green Local Convenience Store and Post Office, Hurst Green Village Hall, Hurst Green Church of England Primary School, and Drewett Cricket Field.

- 8.21 Additionally, there are a handful of clubs and societies listed on the Hurst Green Parish website<sup>76</sup>, which include Hurst Green Historical Society, District Community First Responders, and the Hurst Green Allotments Association.

## Summary of Future Baseline

- 8.22 As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community in the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities.
- 8.23 The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.
- 8.24 As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices. This is echoed within the place making principles outlined in the UK Government's recent Planning White Paper<sup>77</sup> which was released in August 2020.
- 8.25 Additionally, the facilitation of high-quality and superfast broadband in rural areas will be required to ensure that everyone has equal opportunities and access to the digital economy. Furthermore, the regeneration of redundant or underutilised brownfield land across the district (including the densification of existing areas) will help to support local employment opportunities and reduce the need to commute to surrounding areas.

## Key Sustainability Issues

- The rate of population growth in the Neighbourhood Plan area in the last decade was higher than the observed rate of growth between 2001-2011.
- A higher proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (47.8%) in comparison to the totals for Rother District (38.6%), South East England (46.4%) and England (46.9%).
- Based on 2011 Census data, approximately 22.6% of residents within the Neighbourhood Plan area are within the 60+ age category. This is likely to have increased in the last decade.
- The findings of the Hurst Green Neighbourhood Plan local housing demand survey indicate that 22% of households are living in accommodation that is not suitable for their needs, with 30 households looking to move into a new home in the parish.
- The services and facilities within the Neighbourhood Plan area supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the Neighbourhood Plan area.
- As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.

<sup>76</sup> Hurst Green Parish Council (n.d.): 'Local Groups and Clubs' [online] available at: [http://www.hurstgreen-pc.org.uk/local\\_groups\\_and\\_clubs.asp](http://www.hurstgreen-pc.org.uk/local_groups_and_clubs.asp)

<sup>77</sup> MHCLG (2020): 'Planning for the Future – White Paper', [online] available to access via: <https://www.gov.uk/government/consultations/planning-for-the-future/planning-for-the-future> last accessed [11/08/20]

## What are the SEA objectives and appraisal questions for the Population and Community SEA theme?

SEA objective	Assessment Questions
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>

## 9. Health and Wellbeing

### Focus of Theme

- Health indicators and deprivation
- Influences on health and wellbeing

### Policy Context

#### 9.1 Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’*
- *‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

9.2 In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>78</sup> (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

9.3 Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).<sup>79</sup>

The report highlights that:

- people can expect to spend more of their lives in poor health;
- improvements to life expectancy have stalled, and declined for the poorest 10% of women;
- the health gap has grown between wealthy and deprived areas; and
- place matters – for example living in a deprived area of the North East is worse for your health than living in a similarly deprived area in London, to the extent that life expectancy is nearly five years less.

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<sup>78</sup> The Marmot Review (2011): ‘The Marmot Review: Implications for Spatial Planning’, [online] available to access via: <https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf>

<sup>79</sup> Health Equity in England: The Marmot Review 10 Years on (2020) [online] available to access via <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

- 9.4 The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.
- 9.5 Policy CO2 'Provision and Improvement of Healthcare Facilities' within the Rother Core Strategy and Policy DHG5 'Specialist Housing for Older People' within the DaSA directly relate to the Health and Wellbeing theme.

## Baseline Summary

### Summary of Current Baseline

#### Green Infrastructure Networks

- 9.6 Health is a cross-cutting topic and there are natural synergies with other SEA themes including climate change, population and community, and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.
- 9.7 The Green Infrastructure Study (2011-2028)<sup>80</sup> completed by Rother District Council presents specific recommendations for Hurst Green to improve access to green open spaces, based on current deficits, with the findings indicating a need for more allotment spaces.
- 9.8 Additionally, Stage Field is an underused historic public open space gifted to the area in 1949 by Colonel T B. Hornblower. The Parish Council took on a 999 year lease of the field in 2010. Situated on one of the highest points in the county, the field has commanding views over the surrounding area. The Parish Council recently obtained planning permission for a new access point with improved visibility and a small parking area. This has now been completed and has opened the field for greater access<sup>81</sup>.

#### Public Health Profile

- 9.9 Public Health Profiles for England provide a 'snapshot' of the overall health of a local authority. The Public Health Profile for the Rother District provides the following summary:
- The health of people in Rother is varied compared with the England average. About 17% (2,210) children live in low income families.
  - Life expectancy for men is higher than the England average.
  - Life expectancy is 7.4 years lower for men and 5.5 years lower for women in the most deprived areas of Rother than in the least deprived areas.
  - In Year 6, 16.6% (134) of children are classified as obese, better than the average for England.
  - Levels of smoking in pregnancy are worse than the England average.
  - Estimated levels of excess weight in adults (aged 18+) are better than the England average.
  - The rates of new sexually transmitted infections and new cases of tuberculosis are better than the England average.
  - The rate of killed and seriously injured on roads is worse than the England average.
  - The rates of under 75 mortality rate from cardiovascular diseases and under 75 mortality rate from cancer are better than the England average.

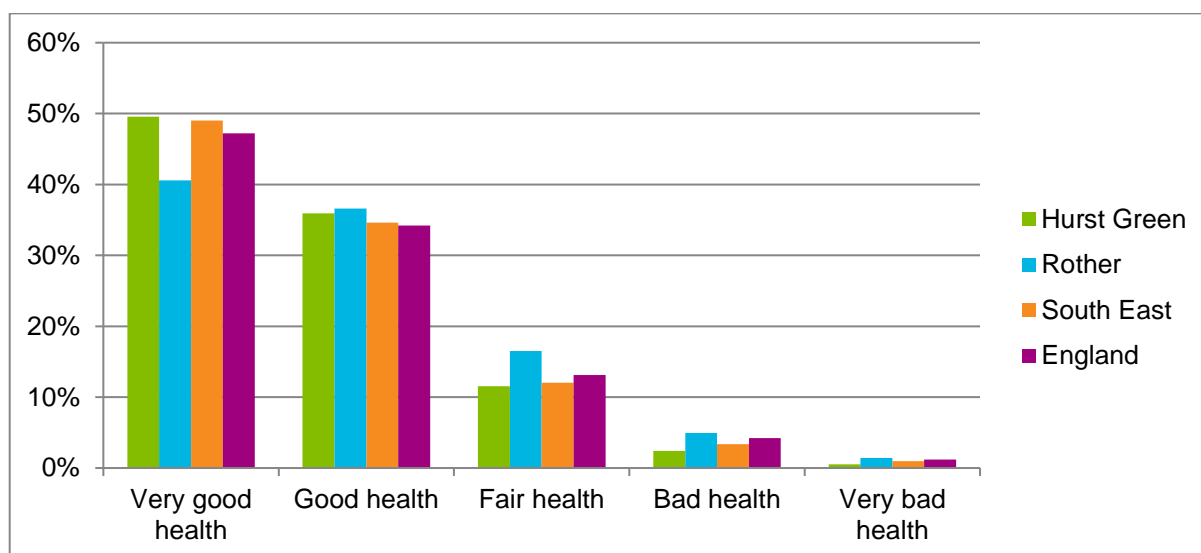
<sup>80</sup> Rother District Council (2016): 'Green Infrastructure Study', [online] available to access via:

<https://www.rother.gov.uk/planning-and-building-control/planning-policy/background-evidence/environment/>

<sup>81</sup> Hurst Green Parish Council (no date): 'New Entrance and Parking at the Stage Field off the Bodiam Road in Silver Hill', [online news article] accessible via: <http://www.hurstgreen-pc.org.uk/news/New-entrance-and-parking-at-the-Stage-Field-off-the-Bodiam-Road-in-Silverhill.asp>

## Indicators of health and wellbeing

- 9.10 Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality and the living environment previously discussed in detail in **Chapter 8**.
- 9.11 Based on the 2011 Census data as shown in **Figure 9.1** (below), 85.5% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', higher than the totals for Rother District (77.2%), South East England (83.7%) and England (81.4%). Additionally, 3.0% of residents in the Neighbourhood Plan area consider themselves to have 'bad health' or 'very bad health', lower than the regional and national trends.



**Figure 9.1: General health of residents**

- 9.12 As shown in **Table 9.1** (below), the total percentage of residents within the Neighbourhood Plan area who report that their activities are limited either 'a little' or 'a lot' (13.6%) is lower than the total for Rother District (23.4%), South East England (15.7%), and England (17.6%).

**Table 9.1: Long term health category**

	Hurst Green	Rother	South East	England
Day-to-day activities limited a lot	5.1%	10.7%	6.9%	8.3%
Day-to-day activities limited a little	8.6%	12.8%	8.8%	9.3%
Day-to-day activities not limited	86.4%	76.6%	84.3%	82.4%

## Summary of Future Baseline

- 9.13 Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.
- 9.14 However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population).
- 9.15 Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

- 9.16 Poor mental health is associated with low long term life quality, a larger number of hospitalisations and deaths. Experts indicate that problems surrounding the worsening of mental health, including secondary dependencies such as alcoholism are likely to worsen over time without suitable changes within communities.

## Key Sustainability Issues

- The Green Infrastructure Study (2011-2028) completed by Rother District Council presents specific requirements for Hurst Green council to improve access to green open spaces, based on current deficits, with the findings indicating a need for more allotment spaces.
- Stage Field is an underused historic public open space within the Neighbourhood Plan area. Situated on one of the highest points in the county, the field has commanding views over landscape and is an important local open space.
- The Public Health Profile for Rother District indicates that the rate of killed and seriously injured on roads is worse than the England average.
- Based on 2011 Census data, 13.6% residents within the Neighbourhood Plan area report that their activities are limited either 'a little' or 'a lot'.
- Based on 2011 Census data, 14.5% of residents in the Neighbourhood Plan area do not consider themselves as having 'very good health' or 'good health'.

## What are the SEA objectives and appraisal questions for the Health and Wellbeing SEA theme?

SEA objective	Assessment Questions
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards?</li> <li>• Protect and enhance access to nature via greenspace and footpaths?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>

# 10. Transportation

## Focus of Theme

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility
- Car ownership
- Travel to work

## Policy Context

10.1 European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

10.2 Key messages from the NPPF include:

- *‘Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- *The potential impacts of development on transport networks can be addressed;*
- *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;*
- *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
- *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and*
- *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.’*
- *‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’*

10.3 Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the East Sussex Local Transport Plan (2011)<sup>82</sup> sets out the future direction for planning and providing the transport infrastructure and services needed to deliver sustainable economic growth and support additional housing in the county up to 2026.

10.4 At the local level, the following policies within the Rother Core Strategy directly relate to the Transportation theme:

- Policy TR1: Management and Investment in Strategic Accessibility
- Policy TR2: Integrated Transport
- Policy TR3: Access and New Development
- Policy TR4: Car Parking

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<sup>82</sup> East Sussex County Council (2011): ‘Local Transport Plan 2011-2026 [online] available at: [https://www.eastsussex.gov.uk/media/2336/ltp3\\_main\\_doc\\_2011-2026.pdf](https://www.eastsussex.gov.uk/media/2336/ltp3_main_doc_2011-2026.pdf)

## Baseline Summary

### Summary of Current Baseline

#### Rail network

- 10.5 There are no rail stations within the parish, with the nearest station accessible in the neighbouring settlement of Etchingham (approximately 2km to the south west). The station provides direct services to London Charing Cross (approximately an hourly service), Tunbridge Wells, Sevenoaks, Battle and Hastings (approximately a half hourly to hourly service), operated by Southeastern trains<sup>83</sup>. Journey times are approximately 76 minutes to London Charing Cross and 30 minutes to Hastings.

#### Bus network

- 10.6 The Neighbourhood Plan area is served by the following bus routes:

- Route 254: Hurst Green -Tunbridge Wells
- Route 360: Etchingham - Bexhill College
- Route 304: Hastings - Hawkhurst
- Route 305: Hastings - Hawkhurst
- Route U1: Johns Cross - Uplands College
- Route U3: Burwash - Uplands College
- Route 331: Heathfield - Uckfield Community Centre

- 10.7 Bus stops are located within Hurst Green village centre, along London Road and Station Road.

#### Road network and congestion

- 10.8 The primary route passing through the Neighbourhood Plan area is the A21 (London Road), an important strategic route which connects Hurst Green to London, Hastings and parts of Kent. It also links to the motorway network via the M25. The route often experiences significant congestion. Several smaller roads diverge from the A21, including the A265 (south west), A229 (south east) and B2099 (north west).

- 10.9 Following the Neighbourhood Plan Local Housing Demand Survey, the Neighbourhood Plan conducted a survey of local residents around their attitudes to car parking<sup>84</sup>. Results of the survey are summarised below:

- Nearly 70% of residents said they were unhappy with the parking situation in their road, rising to over 80% of residents who lived on Station Road and London Road.
- 100% of residents who lived in Coronation Gardens, Foundry Close, Great Oak and Dairy Close were unhappy with the parking situation in their road.
- 90% agreed that Hurst Green does not have enough available and safe car parking for residents.
- Nearly a quarter of residents reported that their car or vehicle had been damaged whilst parked on the road or pavement around Hurst Green. While less than 3% of residents thought it was safe to park or leave their vehicle parked on the A21.
- 91% of respondents were concerned about people parking on the pavements and grass verges around Hurst Green.
- 85% of respondents were concerned about parking on Station Road (the road the Village Hall is on) near to the junction of the A21.

<sup>83</sup> National Rail (2020): 'Etchingham Station Details' [online] available to access via: <https://www.nationalrail.co.uk/stations/etc/details.html>

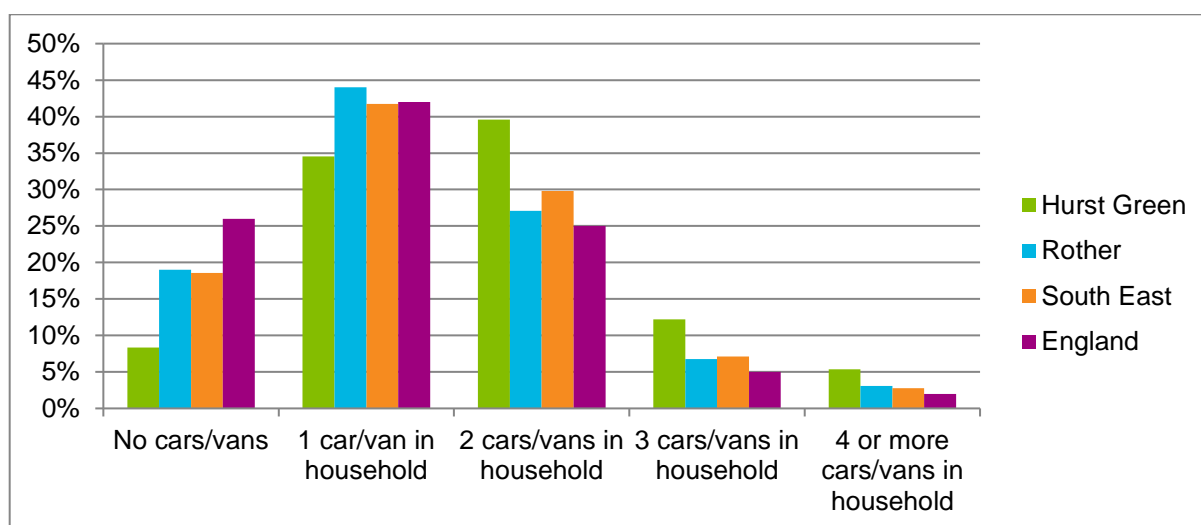
<sup>84</sup> Hurst Green Parish Council (n.d.): 'Local parking survey proves that Hurst Green does not have enough safe parking for residents' [online] available at: <https://hurstgreen2030.uk/uncategorized/local-parking-survey-proves-that-hurst-green-does-not-have-enough-safe-parking-for-residents%E2%80%8B/>

- 71% of respondents would be supportive of the Parish Council providing nearby allocated car parking spaces to rent at low cost.
- 82% of respondents were supportive of double yellow lines near to road junctions in and around Hurst Green.

### Access to cars and vans

10.10 Based on the 2011 census data presented in **Figure 10.1** (below), 91.7% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals Rother District (81.0%), South East England (81.4%) and England (74.0%).

10.11 The total number of households in the Neighbourhood Plan area with access to at least two cars or vans (57.1%) is noticeably higher than the totals for Rother District (37.0%), South East England (39.7%) and England (32.0%).

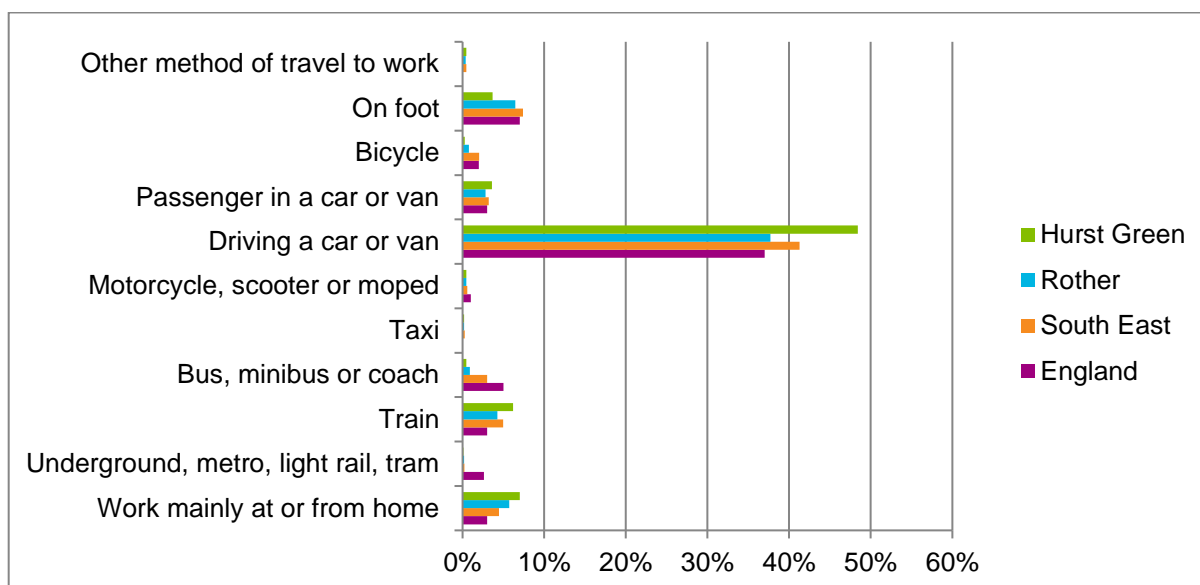


**Figure 10.1: Car ownership**

### Method of travel to work

10.12 As shown in **Figure 10.2** (below), the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (48.4%), higher than the totals for Rother District (37.7%), South East England (41.3%) and England (37.0%).

10.13 The percentage of residents in the Neighbourhood Plan area that catch a train, bus, minibus, coach or walk or cycle to work (10.6%), is lower than the totals for Rother District (12.4%), South East England (17.4%) and England (17.0%).



**Figure 10.2: Method of travel to work**

## Summary of Future Baseline

- 10.14 New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours). This is significant in the local context, due to the pressures from the local road network.
- 10.15 However, development within the Neighbourhood Plan area has the potential to lead to enhancements to the transport network in order to promote more sustainable modes of travel, such as pedestrian and cycle networks.
- 10.16 Additionally, there are opportunities to improve public transport networks within the Neighbourhood Plan area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims.
- 10.17 Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.
- 10.18 The recovery from the Covid-19 epidemic has the potential to change travel patterns in the village in the short, medium and (potentially) longer term.

## Key Sustainability Issues

- There are no rail stations within the parish, with the nearest station accessible in the neighbouring settlement of Etchingham (approximately 2km to the south west).
- The Neighbourhood Plan area is served by seven bus services, with stops located along Station Road and London Road within the village centre.
- The primary route passing through the Neighbourhood Plan area is the A21 (London Road), an important strategic route which connects Hurst Green to London, Hastings, and parts of Kent. The route often experiences significant congestion.
- Residents within the Neighbourhood Plan area are concerned about parking, with nearly 70% of respondents to a local survey noting that they are unhappy with the parking situation for their road.
- The proportion of households in the Neighbourhood Plan area with access to at least two cars or vans (57.1%) is noticeably higher than the totals for Rother District (37.0%), South East England (39.7%) and England (32.0%).

- The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (48.4%), higher than the totals for Rother District (37.7%), South East England (41.3%) and England (37.0%).
- The percentage of residents in the Neighbourhood Plan area that catch a train, bus, minibus, coach or walk or cycle to work (10.6%), is lower than the totals for Rother District (12.4%), South East England (17.4%) and England (17.0%).

## What are the SEA objectives and appraisal questions for the Transportation SEA theme?

SEA objective	Assessment Questions
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> </ul>

# 11. Next Steps

## Subsequent stages for the SEA process

- 11.1 The five stages of the SEA process<sup>85</sup> are identified below. Scoping (the current stage) is the second stage of the SEA process.
- i. Screening;
  - ii. Scoping;
  - iii. Assess reasonable alternatives, with a view to informing preparation of the draft plan;
  - iv. Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation;
  - v. Publish a 'statement' at the time of plan adoption in order to 'tell the story' of plan-making / SEA (and present 'measures concerning monitoring').
- 11.2 The next stage will involve appraising reasonable alternatives for the Hurst Green Neighbourhood Plan. This will consider alternative policy approaches for the plan, including, if appropriate, alternative spatial strategies. The findings of the appraisal of these alternatives will be fed back to the Hurst Green Neighbourhood Plan Steering Group (the Neighbourhood Plan group) so that they might be taken into account when preparing the draft plan.
- 11.3 Once the draft 'pre-submission' plan has been prepared by the Neighbourhood Plan group, it will be subjected to SEA and the Environmental Report prepared for Regulation 14 consultation alongside it.
- 11.4 Following submission to Rother District Council, and consultation, the Neighbourhood Plan will be put forward for Independent Examination.

## Consultation on the Scoping Report

- 11.5 At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies. The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report has been released to these three statutory consultees, as well as Rother District Council.
- 11.6 Consultees are invited to comment on the content of this Scoping Report; in particular, the evidence base for the SEA, the identified key issues and the proposed SEA Framework.
- 11.7 The consultation period runs from 24<sup>th</sup> September 2020 to 29<sup>th</sup> October 2020. Comments on the Scoping Report should be sent to:
- Ryan Putt, Environmental Consultant, AECOM
- Email address: [ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)
- 11.8 All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

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<sup>85</sup> In accordance with the stages set out in the National Planning Practice Guidance

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