

Strategic Environmental Assessment for the Hurst Green Neighbourhood Plan

Options Appraisal

Hurst Green Neighbourhood Plan Steering Group

May 2021

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
V4.0	18 th May 2021	Updated version incorporating additional options	18 th May 2021	Nick Chisholm- Batten	Associate Director

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Front cover image of 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 (SEA) in support of Hurst Green's emerging Neighbourhood Plan (HGNP). The HGNP area covers the parish of Hurst Green, in Rother District (as shown in the figure overleaf).
- 1.2 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. 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 HGNP seeks to support the emerging plan's contribution to sustainable development.

Purpose of this Options Appraisal

- 1.3 This Options Appraisal is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2020), which included information about the HGNP area's environment and community¹, and set out the proposed approach to the SEA process. The Scoping Report was released for consultation with the statutory consultees for SEA (the Environment Agency, Historic England and Natural England) in late 2020.
- 1.4 The purpose of this Options Appraisal is to:
 - Provide an outline of the spatial strategy options that have been developed as 'reasonable alternatives' for the purposes of the SEA;
 - Appraise the potential effects and relative sustainability merits of these spatial strategy options;
 - Provide a sustainability context for different spatial approaches that can be taken for the Neighbourhood Plan; and
 - Inform the development of the preferred spatial strategy for the emerging HGNP.
- 1.5 An earlier version of this Options Appraisal was provided to the Neighbourhood Plan Steering Group in March 2021. The report has since been updated to incorporate an assessment of a number of revisited development strategy options.

Local Plan context for the Hurst Green Neighbourhood Plan

- 1.6 The Hurst Green Neighbourhood Plan is being prepared in the context of the Rother Local Plan, which includes the Rother Core Strategy² (adopted September 2014) and the Development and Site Allocations ("DaSA") Local Plan³ (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.
- 1.7 Within the DaSA, Policy DIM2 'Development Boundaries' states that new development shall be focused within defined settlement boundaries, with limited development permitted outside of

¹ The SEA 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.

² Rother District Council (2014): 'Rother Core Strategy', [online] available to access via: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/corestrategy/>

³ 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/>

these boundaries. Hurst Green is listed as a settlement which has a defined boundary (see Figure 14 within the DaSA).

- 1.8 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.
- 1.9 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.

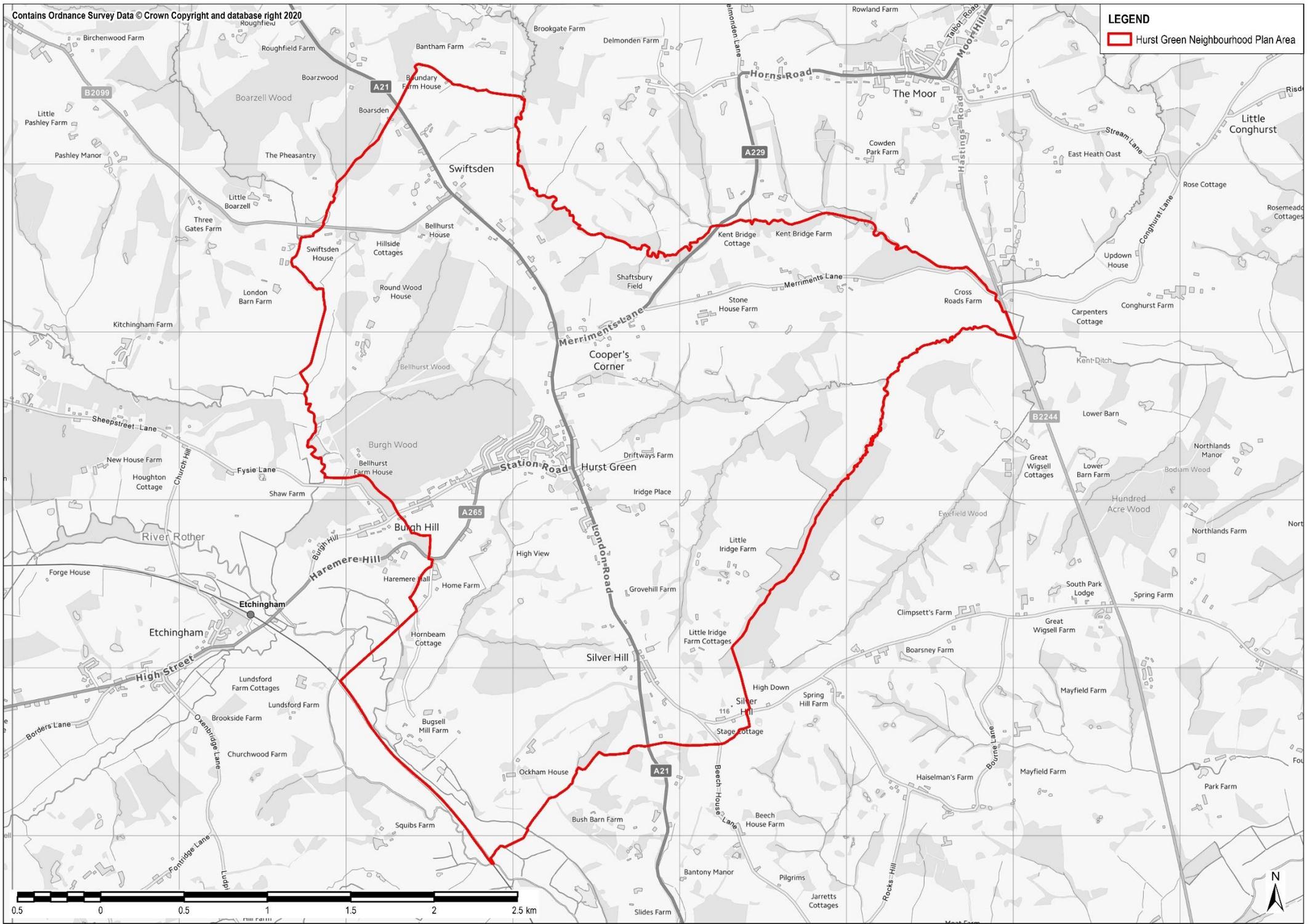
Housing numbers to deliver through the Neighbourhood Plan

- 1.10 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.
- 1.11 The residual housing requirement for Hurst Green identified within the DaSA to be delivered on larger sites (of 6+ dwellings) was 75 dwellings.⁴ However, planning application 'RR/2019/2194/P' for the development of 20 residential dwellings (with associated landscaping and parking) has since been approved with conditions (in October 2020) on Land to the East of Foundry Close in Hurst Green village⁵. This leaves a residual requirement to deliver in the region of 55 dwellings.

⁴ As at 1st April 2018

⁵ Rother District Council (2020): 'Planning Application Details: RR/2019/2194/P', <https://planweb01.rother.gov.uk/OcellaWeb/planningDetails?reference=RR/2019/2194/P&from=planningSearch>

LEGEND
[Red outline box] Hurst Green Neighbourhood Plan Area



2. Spatial strategy options considered through the SEA

Initial shortlisting of sites

- 2.1 During the earlier stages of the HGNP's development, there was a recognition that the Neighbourhood Plan would potentially need to allocate sites for development.
- 2.2 In light of this, Hurst Green Parish Council has undertaken an ongoing call for sites process since late 2018, with a view to identifying sites which could be considered as potential allocations for the Neighbourhood Plan.
- 2.3 The Neighbourhood Plan Steering Group (with support from an independent planning consultancy) has subsequently undertaken assessments of the various sites in the parish identified through the call for sites process⁶ in terms of their suitability, availability and achievability for the purposes of a potential Neighbourhood Plan allocation.
- 2.4 Following this process, a total of six sites have been identified as appropriate locations to consider as possible allocations for the HGNP. The sites, which are listed below in **Table 2.1** and shown in the figure overleaf, are located on land which is situated within or adjacent to the settlements of Hurst Green and Silver Hill. Sites with a capacity of fewer than 6 homes have not been considered through this options appraisal. This is given that these types of sites are best placed to come forward as windfall sites during the plan period.⁷

Table 2.1: Sites taken forward for further consideration through the SEA process

Site ID	Name of site, address	Size (Ha) ⁸
HG06	London Road	1.71
HG11	Cooks Field, Burgh Hill	1.54
HG22 / HG43	Land Opposite Hurst Green School	2.05
HG30	Land Adjacent to Mill Barn	1.28
HG40	Land Behind Foundry Close (TN19 7QW)	0.62
HG42	Land Behind Foundry Close (TN19 7PN)	0.67

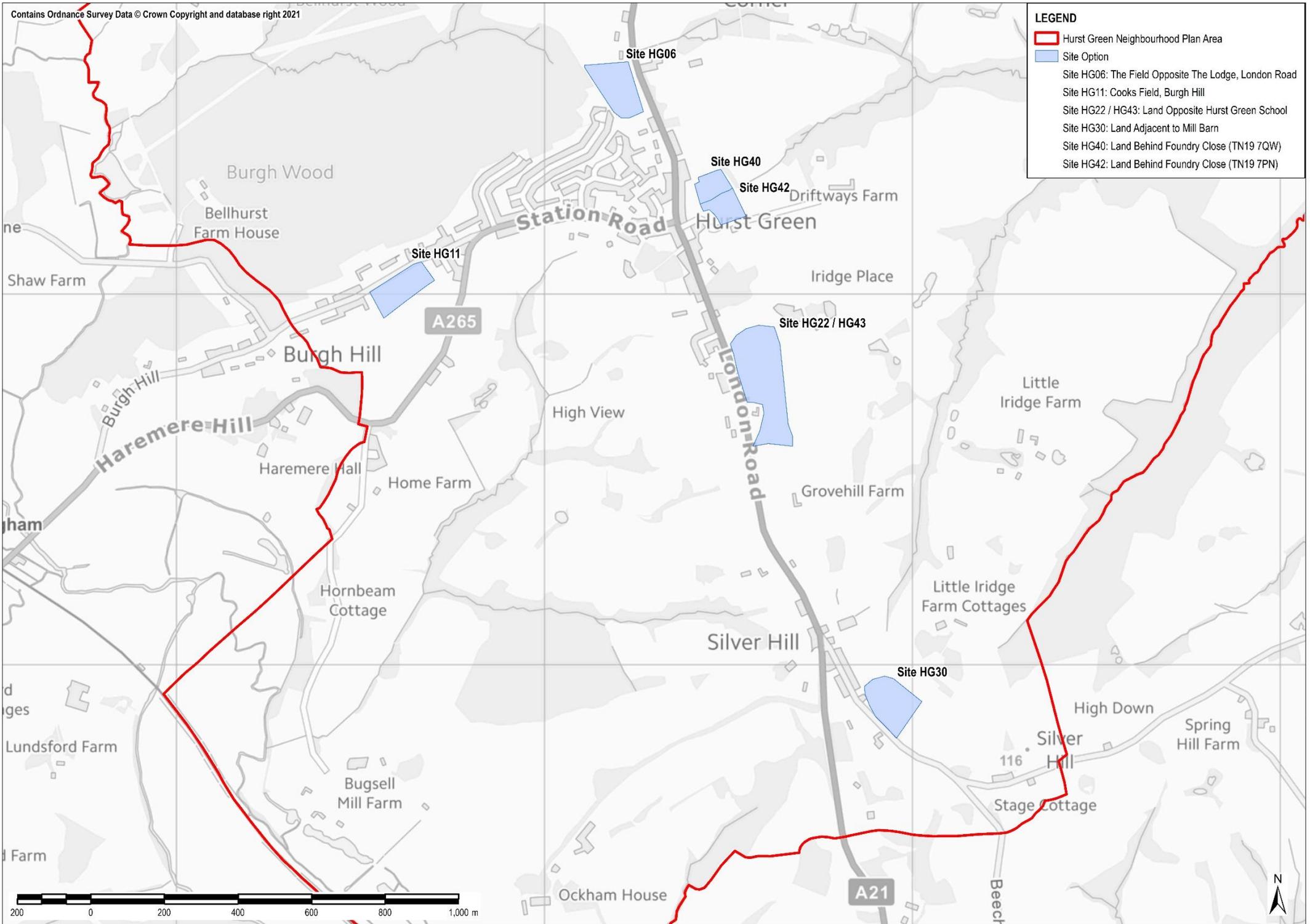
⁶ The initial site assessment report contributes to the evidence base for the emerging HGNP and will accompany the HGNP at Regulation 14 consultation.

⁷ The Rother Core Strategy states: "Developments of less than 6 dwellings, on currently unidentified sites, will count towards the overall rural housing numbers total as 'small-site windfalls'."

⁸ Represents total site size and not necessarily total developable area and is taken from the High-Level Landscape Assessment Report completed on behalf of the HGNP Steering Group (later discussed within Chapter 2).

LEGEND

-  Hurst Green Neighbourhood Plan Area
-  Site Option
- Site HG06: The Field Opposite The Lodge, London Road
- Site HG11: Cooks Field, Burgh Hill
- Site HG22 / HG43: Land Opposite Hurst Green School
- Site HG30: Land Adjacent to Mill Barn
- Site HG40: Land Behind Foundry Close (TN19 7QW)
- Site HG42: Land Behind Foundry Close (TN19 7PN)



Spatial strategy options considered through the SEA process

2.6 To support the choice of a development strategy for the Neighbourhood Plan, the SEA process has assessed a number of spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified above, which are summarised below.

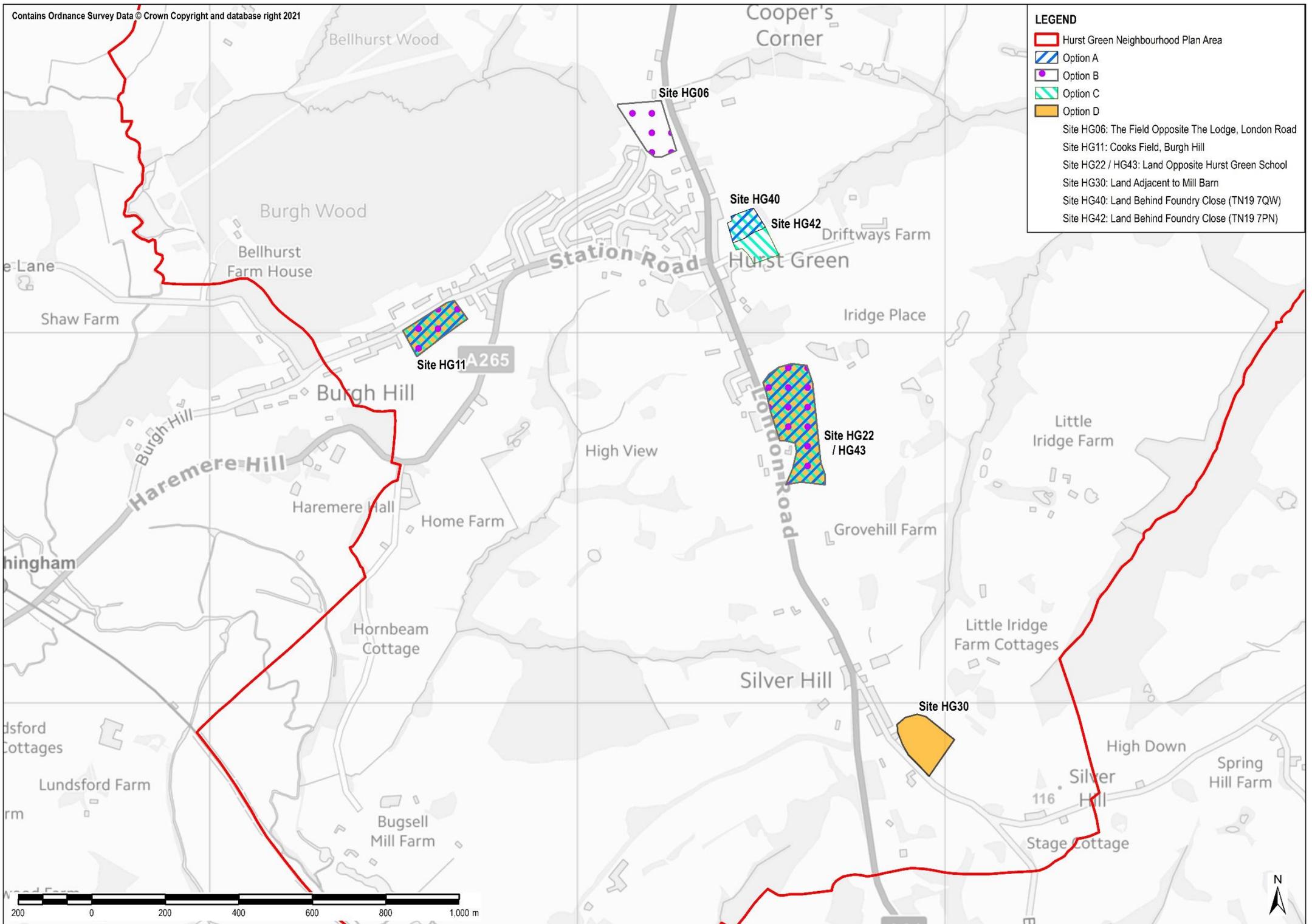
- **Option A:** Delivery of the housing target through allocations at Site HG11, Site HG22/43 and Site HG40. The total homes delivered through this option would be in the region of 58 dwellings.
- **Option B:** Delivery of the housing target through allocations at Site HG06, Site HG11 and Site HG22/43. The total homes delivered through this option would be in the region of 77 dwellings.
- **Option C:** Delivery of the housing target through allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42. The total homes delivered through this option would be in the region of 72 dwellings.⁹
- **Option D:** Delivery of the housing target through allocations at Site HG11, Site HG22/43 and Site HG30. The total homes delivered through this option would be in the region of 65 dwellings. In addition to sites in Hurst Green village, this would also deliver a Site HG30, which is located in Silver Hill.¹⁰ Whilst outside the development boundary, there is merit in exploring the capability of HG30 from an SEA perspective as it could in theory contribute to the vitality of this smaller hamlet.

2.7 In the context of the above, all three options include the three sites identified through the site assessments undertaken for the Neighbourhood Plan to date as best suited for potential allocations. These sites are HG11 and HG22 / HG43.

2.8 The map overleaf visually represents these four options.

⁹ It is anticipated that Rother District Council's minimum housing requirement of c.55 homes could be met by taking forward just one of these additional two sites (i.e. HG40 or HG42).

¹⁰ Sites which are not located within or immediately adjacent to a settlement with a defined boundary (as outlined within the Rother Local Plan: Core Strategy) would classify as development within the countryside. As the proposed site allocations in Silver Hill (i.e. HG30 and HG38) are located outside of Hurst Green village, they would not contribute to Rother District Council's minimum housing requirement of c. 55 homes.



LEGEND

- Hurst Green Neighbourhood Plan Area
- Option A
- Option B
- Option C
- Option D

Site HG06: The Field Opposite The Lodge, London Road
Site HG11: Cooks Field, Burgh Hill
Site HG22 / HG43: Land Opposite Hurst Green School
Site HG30: Land Adjacent to Mill Barn
Site HG40: Land Behind Foundry Close (TN19 7QW)
Site HG42: Land Behind Foundry Close (TN19 7PN)

3. Appraisal findings

Approach to the appraisal

- 3.1 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through nine SEA 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
- 3.2 The appraisal considers the relative sustainability merits of each of the three spatial strategy options. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the three options in relation to each theme considered.
- 3.3 Sources of information to support the appraisal has included (amongst others): Ordnance Survey maps, MAGIC Interactive Map¹¹, the Environment Agency's Flood Risk Maps for England¹², Natural England's Agricultural Land Classification maps^{13,14}, Google Earth¹⁵, reports and interactive mapping layers available on Rother District Council's webpages, the East Sussex Historic Environment Record, and baseline studies provided by the HGNP Steering Group (including a High-Level Landscape Assessment Report¹⁶ for the sites).
- 3.4 **Table 3.1** to **Table 3.9** below present the findings of the appraisal of the three spatial strategy options for each of the SEA themes.

¹¹ MAGIC (2021): 'Interactive Map', [online] available to access via: <https://magic.defra.gov.uk/>

¹² Environment Agency (2021): 'Flood Map for Planning', [online] available to access via: <https://flood-map-for-planning.service.gov.uk/>

¹³ Natural England (2021): 'Regional Agricultural Land Classification Maps and Likelihood of Best and Most Versatile Land', [online] available to access via: <http://publications.naturalengland.org.uk/category/5954148537204736>

¹⁴ 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>

¹⁵ Google (2021): 'Google Earth', [online] available to access via: <https://earth.google.com/web/>

¹⁶ Harper Landscape Architecture (November 2020): 'High-Level Landscape Assessment Report'

Table 3.1: Appraisal findings: Air Quality

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>There are no Air Quality Management Areas (AQMAs) located in the vicinity of the Neighbourhood Plan area, or within the wider Rother District. In this respect, none of the options have the potential to exacerbate air quality issues within an AQMA. The most recently completed Air Quality Annual Status Report¹⁷ concludes that annual mean NO₂ concentrations recorded at continuous monitors and diffusion tubes in Rother District do not exceed levels for AQMA designation. As air quality levels across the area are relatively good, air quality impacts associated with all three options are unlikely to be significant over the short to medium term providing that suitable mitigation measures are included within new development areas. Such measures could include incorporating green infrastructure in the design of proposals to maximise the dispersal of pollutants, particularly in the most sensitive locations (i.e. adjacent to the existing road network and any new roads which would provide access to the sites).</p> <p>The A21 passes through the HGNP area and often experiences significant congestion. Residents note that there are noticeable noise, vibration and pollution issues experienced whilst walking through the village. Additionally, the NO₂ monitoring stations in Flimwell and in Robertsbridge (just outside of the HGNP area, but also on the A21) have exceeded or are close to exceeding the EU standards at various points. In this respect, Option D would deliver new development areas within Silver Hill, which is less connected to the services and facilities within Hurst Green village (which includes a church, village hall, primary school, and a sports field). Therefore, Option D is perhaps less likely to reduce the reliance on private vehicles for undertaking some day to day activities within the HGNP area in comparison to Options A-C, through increasing traffic flows and associated levels of pollutants such as NO₂. However, the Silver Hill site (HG30) is accessible via the public transport network, as the hamlet is located along local bus routes 304 and 305 which provide connections between Hastings and Hawkhurst (via Hurst Green). There is also a narrow footpath located alongside the busy A21 which provides pedestrian connectivity to Hurst Green village (albeit on the opposite side of the road in relation to the proposed sites in Silver Hill). These elements are further discussed within the 'Population and Community' and 'Transportation' appraisal sections below.</p>	1	3	2	4

¹⁷ 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>

Table 3.2: Appraisal findings: Biodiversity and Geodiversity

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>There are no European or nationally designated sites for biodiversity and/or geodiversity located within or within proximity to the HGNP area. The nearest European designated sites are located approximately 20km to the south east of the HGNP 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 HGNP area, specifically: Combwell Wood Site of Special Scientific Interest (SSSI) to the north, Robin's Wood SSSI (to the north) and Darwell Wood SSSI (to the south). Crucially, the HGNP area is not within any SSSI Impact Risk Zones for the types of development likely to come forward through the Neighbourhood Plan during the plan period, specifically relating to residential, rural residential, and rural non-residential development types. In the context of the above, none of the proposed site allocations through Options A-D are likely to adversely impact the integrity of any European or nationally designated sites.</p> <p>As key components of local ecological networks, Sites of Nature Conservation Interest (SNCI) represent some of the most significant areas of semi-natural habitat in Rother District¹⁸. There are six SNCIs within or within proximity to the HGNP area, predominantly areas of ancient woodland (including Burgh Wood and Boarzell Wood) and areas of good quality semi-improved grassland. Many of the SNCIs also contain areas of Biodiversity Action Plan (BAP) priority habitats, including areas of coastal and floodplain grazing marsh, deciduous woodland (including ancient woodland), good quality semi-improved grassland, lowland meadows, and traditional orchard. In this respect, none of the proposed site allocations are located within a SNCI, with the nearest SNCI (Burgh Wood) located approximately 50m to the north of Site HG11. However, the following sites either contain or are directly adjacent to areas of BAP priority habitat:</p> <ul style="list-style-type: none"> • Site HG06: area of deciduous woodland BAP priority habitat (also comprising ancient woodland) located adjacent to the north western corner of the site at Burgh Wood. • Site HG22 / HG43: areas of deciduous woodland BAP priority habitat and wood-pasture and parkland BAP priority habitat located to the north and north east of the site. • Site HG40: area of lowland meadows BAP priority habitat adjacent to the eastern site boundary. • Site HG42: area of lowland meadows BAP priority habitat located directly to the north east of the site. <p>Whilst all options have the potential to directly and indirectly impact areas of BAP priority habitats, Option A (through delivering lower levels of growth in comparison to Options B to D) will help limit potential effects from new development on local features and areas of biodiversity interest and support the resilience of ecological networks. However, all options have the potential to provide enhancements ecological networks providing development proposals are designed to deliver measurable, proportionate and appropriate biodiversity net gains, in line with national and local policy. This could include retaining and enhancing habitats, improving ecological connectivity to create biodiversity networks with the surrounding landscape, and including measures to attract wildlife to new development areas such as: planting wildflower meadows and native hedgerows; bridges / tunnels for small mammals; the use of boxes /bricks for birds, bees and invertebrates; ponds and drainage ditches.</p>	1	4	3	2

¹⁸ 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/>

Table 3.3: Appraisal findings: Climate Change

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>In response to the UK Government’s commitment to tackling the climate crisis, Rother District Council declared a climate emergency¹⁹ in September 2019 and pledged a target to become carbon neutral by 2030. In the context of this, it will be important for the HGNP to encourage proposals which seek to incorporate sustainable construction methods through design, and which seek to deliver low-carbon development. This could include via the use of thermally efficient insulation materials and double glazing, the use of sustainable water sources (rainwater harvesting and management), and via the application of renewable energy sources (where appropriate).</p> <p>In terms of climate change mitigation, road transport is a significant contribution to emissions at the district level, representing approximately 48.3% of total emissions²⁰. In this respect, the proposed site allocations through Options A, B and C are located adjacent to the existing village of Hurst Green. Therefore, development through these options will, to an extent help limit greenhouse gas emissions from transport through encouraging new development in locations with proximity to the key amenities of Hurst Green village and public transport networks. With reference to Option D, Site HG30 is adjacent to the hamlet of Silver Hill, which has a very limited amenity offer. In this respect, given Hurst Green village benefits from the greatest range of services and amenities within the HGNP area, Options A-C are more favourable in comparison to Option D in terms of limiting emissions from transport.</p> <p>In relation to adapting to the effects of climate change, the settlements of Hurst Green and Silver Hill are wholly located within Flood Zone 1 which represents areas of England which have a low fluvial flood risk potential. Areas of land within Flood Zone 3 within the HGNP area are broadly confined to areas of land surrounding the main watercourses, including the River Rother (which passes alongside the south western boundary of the parish) and the Kent Ditch (to the north and north east). Given that all potential site allocations are within Flood Zone 1, fluvial flood risk is unlikely to comprise a significant constraint to development through all options. It is also considered that the provisions of the NPPF and national policy (including relating to the sequential / exception test) will help guide development away from potential flood risk areas and ensure that appropriate mitigation measures are implemented. Such measures could include the use of permeable materials and natural features within the design of new development areas to appropriately respond to the potential impacts from more frequent extreme weather events.</p> <p>Regarding surface water flood risk issues, areas at ‘medium’ to ‘high’ risk within Hurst Green village are primarily located along the road network, including Vicarage Way, Great Oak, and Station Road. A similar trend is observed within Silver Hill, with areas of ‘medium’ to ‘high’ risk along Bodiam Road (directly to the north west of Site HG30) and sections of the A21. Although most of the proposed site allocations have a ‘very low’ or ‘low’ risk, there are some isolated areas of ‘medium’ risk along the boundary between Site HG40 and Site HG42 (associated with a stream which extends to the east of the sites). Reflecting this, Option C performs least favourably in terms of surface water flood risk issues. However, it is anticipated that surface water flood risk issues could largely be contained to all sites via the use of appropriate drainage systems which would minimise the risk of surface water run-off to surrounding areas.</p>	1	1	3=	3=

¹⁹ Rother District Council (2019): ‘Climate Emergency’, [online] available to access via: <https://www.climateemergency.uk/blog/rother/>

²⁰ 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>

Table 3.4: Appraisal findings: Landscape

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>Designated in October 1983 and covering an area of approximately 1,500 km² (including the whole of the HGNP area), the High Weald Area of Outstanding Natural Beauty (AONB)²¹ is one of the best-preserved medieval landscapes in North West Europe. As noted within the High-Level Landscape Assessment Report completed on behalf of the HGNP Steering Group, the parish scale of landscape character is a distinct and recognisable High Weald AONB landscape. Although there are detracting influences (predominantly relating to the settlements and roads) which somewhat lessen the landscape value and quality, the sensitivity of the parish scale landscape character is judged to be medium to high. In this respect, the proposed site allocations through all three options have the potential to adversely impact the special character and qualities of this nationally protected landscape in the absence of sensitive design.</p> <p>Reflecting these sensitivities, development proposals should be accompanied by an appropriate Landscape and Visual Impact Assessment in line with the current Landscape Institute Guidelines which demonstrate how any impacts would be appropriately mitigated through the application of sensitive design measures. This could include measures which seek to conserve and enhance the special qualities of the High Weald AONB (in line with the most up-to-date management plan), retain and enhance locally important viewpoints, incorporate local materials into the design to respond to local architectural styles, and incorporate visual screening from the surrounding landscape (including from nearby residential areas).</p> <p>At the local level, landscape and villagescape 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 and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. In this regard, the High-Level Landscape Assessment Report contains a detailed review of the constraints and opportunities associated with potential site allocations. A brief summary of the local landscape sensitivity assessments and recommendations for each site is provided below:</p> <ul style="list-style-type: none"> • Site HG06: Site HG06: MEDIUM to HIGH sensitivity but is well located in relation to the village and would be a natural extension to the existing pattern of development. Potential for new development areas to offer effective visual mitigation and landscape opportunities for the settlement edge and setting of the village, the local green and blue infrastructure, and the High Weald historic Medieval field boundary pattern. • Site HG11: MEDIUM to HIGH sensitivity, but a natural fit for a continuation of the ribbon settlement pattern as there are existing dwellings to the north, east and west. • Site HG22 / HG43: MEDIUM to HIGH sensitivity, but less influenced by the settlement character given its screening from the exiting village. The parkland and countryside High Weald character is more influential, and the development design must be sensitive to reflect this context. • Site HG30: MEDIUM to HIGH sensitivity, with any development on site resulting in the loss of an area of Medieval field system which significantly contributes to the local landscape character and some of the high sensitivity viewpoints. In this respect, the site is not considered to be capable of accommodating landscape change without significant impacts on the surrounding landscape character and visual receptor sites. • Site HG40 and Site HG42: MEDIUM sensitivity, with the sites located in a buffer zone between the existing village and the surrounding countryside. Both sites 	1	3	4	2

²¹ High Weald AONB Partnership (2019): 'Management Plan 2019-2024', [online] available to access via: <http://www.highweald.org/high-weald-aonb-management-plan.html>

<p>are considered to be relatively discrete, despite new development areas resulting in the loss of fields within the High Weald and having an incremental impact on the historic built edge of the existing village. The sites could also offer a number of landscape opportunities for the village's local green and blue infrastructure networks which has the potential to offset the adverse impacts of any potential residential development.</p> <p>Regarding locally important landscape and villagescape features of interest, Rother District Council have designated Tree Preservation Orders (TPOs) in the interest of their amenity value²². This includes a TPO area alongside the eastern boundary of Site HG11 and individual TPOs located directly to the north of Site HG11 along Burgh Hill. However, it is anticipated that these features can be retained through new development areas. Additionally, delivering net gains in biodiversity and green infrastructure enhancements have the potential to help conserve and enhance landscape and villagescape character, including its special qualities and sense of place. For example, enhanced habitats (trees, hedgerows, grass, shrub, etc.) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. They can also play a role in contributing towards local distinctiveness and a sense of place.</p> <p>Higher levels of growth as proposed through Option B and Option C will extend the settlement boundaries of Hurst Green. Cumulatively, potential impacts associated with the allocation on Site HG40 and Site HG42 through Option C could be exacerbated in combination with the delivery of 20 dwellings on 'Land to the East of Foundry Close' which was approved with conditions in October 2020 (ref: RR/2019/2194/P). Nevertheless, it should be acknowledged that the High-Level Landscape Assessment Report identify the potential for these sites to deliver a number of landscape opportunities for enhancing local green and blue infrastructure networks.</p> <p>In summary, Option A is likely to perform most favourably in relation to the Landscape SEA theme given that the scale of proposals which would be taken forward at these locations can potentially limit the impacts on landscape and villagescape character. This is providing that proposals incorporate sensitive designs which contribute to local distinctiveness and sense of place, with due regard given to the landscape strategies, mitigation measures and recommendations for each site (as outlined in the High-Level Landscape Assessment Report).</p>				
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²² 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/>

Table 3.5: Appraisal findings: Historic Environment

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>In relation to historic environment constraints, the settlement of Hurst Green has the largest concentration of features and areas of historic interest in the HGNP area, including 50 Grade II listed buildings, the Grade II* listed 'Iridge Place'²³, and archaeological notification areas (ANAs)²⁴. In this respect, potential impacts to the historic environment are possible through all options, given they comprise sites which are within proximity to the existing village boundary. Whilst none of the sites contain any listed buildings, some of the sites are within the setting of listed buildings. For example:</p> <ul style="list-style-type: none"> • Site HG06 is located directly to the west of the Grade II listed Hawthorne Cottage, with views into the site from the building. The Grade II listed Woolpack Inn and Yew Tree House are also located approximate 50m to the south east of the site, although there is a lack of intervisibility with regards to the site. • Site HG22 / HG43 is located to the south west of the Grade II* listed 'Iridge Place'. Although there is an element of visual screening provided by the vegetation along the north eastern site boundary, views of the listed building are likely to be possible from some locations given the relatively open character of the site itself. There are also three Grade II listed buildings located adjacent to the north western corner of the site along the A21 (London Road) which also have views into the site. Site HG22 / HG43 is also located to the south west of the Grade II listed 'The Stables of Iridge Place to the North West of the House'. However, this listed building is likely screened from view by existing vegetation and from the surrounding buildings at this location. • The Grade II listed 'Stangate' is located directly to the north west of Site HG30. Additionally, Site HG40 and Site HG42 are located directly to the west of the A21 (London Road), within proximity to approximately five Grade II listed buildings. Whilst views are likely to be restricted in places from existing vegetation or buildings located along the site boundaries, the heritage assets are likely to be visible from some locations. <p>Reflecting these sensitivities, consultation with Historic England is encouraged in order to ensure that development proposals seek to implement sensitive design techniques which respect and enhance the setting of heritage assets. Such measures could include:</p> <ul style="list-style-type: none"> • high quality and (where possible) locally sourced materials and detailing that contribute positively to the setting of nearby heritage assets and reflect local building traditions. • retention of traditional heritage features through the design of new development areas. • proposals could reflect the distinctive and historical architectural style and design traditions established in the HGNP area, integrating with the historic topography, settlement form, historic street patterns and street lines. <p>There are several ANAs located within the HGNP area, including adjacent to Site HG40 and Site HG42, and partly overlapping with the northern boundaries of Site HG30. Therefore, Option C and Option D would facilitate a higher proportion of new development areas in locations which have the greatest potential to contain presently un-recorded features of archaeological and historic interest. Development proposals at these locations should be encouraged to undertake archaeological</p>	1	1	3=	3=

²³ Historic England (2020): National Heritage List for England', [online] available to access via: <https://historicengland.org.uk/listing/the-list/advanced-search>

²⁴ The purpose of the ANAs is to identify where there is a likelihood of archaeological work being necessary, when land development of any kind is planned (for example, a new house, office building or pipeline/cable being laid). They are a form of early warning system so that appropriate steps can be taken to record and protect heritage assets in advance of development, and 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.

<p>evaluations with any findings appropriately reported and documented on the local historic environment record in line with best practice guidance.</p> <p>With reference to non-designated heritage assets and features, the Historic Environment Record for East Sussex contains a total of 81 locally important heritage features which contribute to the character and setting of the HGNP area. This includes records of farmhouses and cottages, woodlands, and monuments of local significance. However, in the absence of a detailed mapping system showing the location of these features, it is uncertain whether any of the options are likely to impact upon any locally important heritage features. Nonetheless, the historic character of the HGNP area is also influenced 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. In this regard, there is a historic routeway (path) passing through the northern field of Site HG22 / HG43, the historic interest of which should be reinforced (wherever possible) through new development areas. Additionally, there are historic routeways (paths) located along the southern boundary of Site HG42 and adjacent to the western boundary of Site HG11. Most of the road network within and between the settlement of Hurst Green and Silver Hill are also historic routeways.</p>				
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Table 3.6: Appraisal findings: Land, Soil and Water Resources

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>Regarding the location of the best and most versatile (BMV) land for agricultural purposes, a detailed agricultural land classification (ALC) assessment has not been undertaken for the HGNP area. The provisional ALC assessment and the likelihood of BMV agricultural land assessment datasets from Natural England suggest that the undeveloped areas of the potential site allocations have a moderate likelihood (20-60%) of containing areas of BMV land. In this respect, all options have the potential to result in the permanent loss of BMV land which cannot be mitigated. Regarding the water environment, there are no watercourses passing within or adjacent to the proposed allocations. The potential site allocations taken forward through Options A to C are within the 'Lower Rother from Robertsbridge to Iden' Surface Water Nitrate Vulnerable Zone (NVZ). The additional sites within Option D (i.e. HG30) are within the 'Kent Ditch' Surface Water NVZ. It is useful to note that as the HGNP 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. However, development proposals should be encouraged to deliver nitrate neutrality to minimise the risks to nearby watercourses (and their catchments).</p> <p>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 potential sites for allocation or the wider HGNP area.</p> <p>Overall, higher levels of growth proposed through Options B and C would facilitate increased development on greenfield land. This has the potential to result in, without mitigation measures, a greater loss of soils resources and of natural features which help to regulate soil and water quality.</p>	1	4	3	2

Table 3.7: Appraisal findings: Population and Community

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>Accessibility to amenities is a key determinant of residents' quality of life. In this respect, Hurst Green village contains the largest range of services and facilities within the HGNP area, including a church, village hall, primary school, and a sports field. The settlements of Silver Hill and Swiftsden are less well served in this regard. In terms of the relative distance of the sites from local services and facilities, the potential site allocations to be taken forward through Options A, B and C are located adjacent to the existing built-up area of Hurst Green village. This provides good accessibility to the services and facilities available locally.</p> <p>Regarding Option D, Site HG30 is located in Silver Hill. These sites are at relative distance from the services and facilities located in Hurst Green village (which are located approximately 750m to the north). Whilst a narrow footpath is located alongside the A21 which provides pedestrian connectivity to Hurst Green village, and Silver Hill is also located along local bus route 304 and 305, the option is less likely than Options A to C to support social inclusion and community cohesion. This is given the relative disjoint of Silver Hill from the main population centre of the parish, the narrow nature of the footpath along the A21 (coupled with high traffic flows along the road), the location of the footpath (which is on the opposite side of the road in relation to the proposed sites in Silver Hill) and the infrequency of bus services, coupled with the lack of services and facilities in Silver Hill.</p> <p>Overall therefore, Options A-C will do more than Option D to support the quality of life of residents, social inclusion and community cohesion.</p> <p>In terms of the delivery of housing, given the higher growth facilitated through these options, Options B and C have most potential to deliver a wider range of homes to meet local needs. The options also provide further potential to deliver additional community provision through developer contributions.</p>	3	1	2	4

Table 3.8: Appraisal findings: Health and Wellbeing

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>The benefits to wellbeing and mental health resulting from close contact with the natural environment are well-documented. In this respect, the Green Infrastructure Study (2011-2028)²⁵ 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 particular need for more allotment spaces. In the context of the above, the performance of the options depends on the delivery of green infrastructure provision alongside new development. In this respect proposals should proactively seek to enhance green and blue infrastructure networks within the HGNP area. This could include via the incorporation of amenity greenspace, natural and semi-natural greenspaces, green corridors, and other outdoor areas (e.g. allotments, play spaces and community gardens).</p> <p>Whilst all options are likely to encourage active lifestyles by facilitating development within proximity to the existing settlements of Hurst Green and Silver Hill, Options A, B and C are likely to perform more favourably. This is given the relative proximity of the sites taken forward through these options to local public green spaces such as Derwent Cricket Field and the play park and sports field along Station Road, and the disjoint of Silver Hill from these amenities.</p> <p>Access to services and facilities is also an important contributor to health and wellbeing. However, the nearest GP surgeries are located outside of the HGNP area in the settlements of Hawkhurst (to the north east), Robertsbridge (to the south) and Etchingam (to the south west). Nevertheless, Hurst Green village contains a range of services and facilities including a church, village hall, and primary school. As such, all options are likely to facilitate development in locations with good accessibility to local amenities. However, given the relative disjoint of Silver Hill from the services and facilities within Hurst Green village, Options A to C perform more favourably in comparison to Option D.</p>	1	1	1	4

²⁵ 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/>

Table 3.9: Appraisal findings: Transportation

Option A: Allocations at Site HG11, Site HG22/43 and Site HG40.

Option B: Allocations at Site HG06, Site HG11 and Site HG22/43.

Option C: Allocations at Site HG11, Site HG22/43, Site HG40 and Site HG42.

Option D: Allocations at Site HG11, Site HG22/43 and Site HG30.

Discussion of potential effects and relative merits of options	Rank of preference			
	A	B	C	D
<p>With reference to local public transport networks, the HGNP area is not connected to the rail network, with the nearest railway station accessible in the neighbouring settlement of Etchingham (located approximately 2km to the south west of Hurst Green village). Although there are bus routes which pass through Hurst Green and Silver Hill and connect to neighbouring towns of Hawkhurst and Hastings, services are relatively infrequent (roughly one service every two hours during Monday-Friday, with no weekend services). In the context of the above, there is a high dependency on private vehicles, with over 90% of households in the HGNP area having access to at least one car or van (based on Census data).</p> <p>Nevertheless, options which do more to reduce the dependence on private vehicles for undertaking some day-to-day activities within the HGNP area are better performing in relation to this SEA theme. In this respect Option D would deliver new development areas within Silver Hill, which is less connected to the services and facilities within Hurst Green village (including a church, village hall, primary school, and a sports field). Whilst the settlement is linked to Hurst Green village by a footpath along the A21, the path is narrow, and its usability is limited by the busy nature of this strategic road corridor (and its location on the opposite side of the road in relation to the proposed sites in Silver Hill). Therefore, Option D is less likely to limit the reliance on private vehicles in comparison to Options A to C, which direct development to Hurst Green.</p> <p>The impact of the COVID-19 pandemic means that the future baseline of travel demand is likely to be different for all residents within the HGNP area. In the longer term it is hard to predict how behaviours will evolve and whether some of the travel responses observed in lockdown will be maintained in some form. However, reflecting the results of the National Travel Attitudes Study²⁶, 94% of respondents thought it likely that they would continue to rely on active travel methods (walking and cycling) once travel restrictions were removed. In this respect, new development areas should seek to provide connectivity and accessibility to local public transport networks and maximise opportunities for safe walking and cycling to local services and facilities.</p> <p>The primary route passing through the HGNP area is the A21 (London Road), an important strategic route which connects to London, Hastings and parts of Kent. It also links to the motorway network via the M25. Regarding congestion issues along the route, given existing traffic flows along the A21, the delivery of c.58-77 new dwellings within the HGNP area is unlikely to significantly affect congestion. However, in terms of impacts on other routes in the village, the higher levels of growth proposed through Option B and Option C have increased potential for adverse effects. Wherever practicable, development proposals should seek to include traffic calming measures through design (i.e. 20mph limits through new development areas; speed humps to slow cars etc.) to minimise congestion at the most sensitive locations and incorporate active travel linkages. Proposals should also take a proportionate approach to parking which effectively balances the need to support the use of alternative modes of transport to the private car with limiting potential adverse impacts on the built environment from on-street parking and other uses.</p>	1	1	1	4

²⁶ Department for Transport (2020): 'National Travel Attitudes Study: Wave 4 (Provisional)': [online] available to access via: <https://www.gov.uk/government/statistics/national-travel-attitudes-study-wave-4-provisional>

4. Conclusions at this current stage

Summary of appraisal findings

- 4.1 The table below summarises the rankings of the options with regards to their relative performance in relation to each SEA theme.

Table 4.1: Development strategy options: summary of rankings by SEA theme

SEA theme	Option A	Option B	Option C	Option D
Air Quality	1	3	2	4
Biodiversity and Geodiversity	1	4	3	2
Climatic Factors (including flood risk)	1	1	3=	3=
Landscape	1	3	4	2
Historic Environment	1	1	3=	3=
Land, Soil and Water Resources	1	4	3	2
Population and Community	3	1	2	4
Health and Wellbeing	1	1	1	4
Transportation	1	1	1	4

- 4.2 This appraisal has highlighted that all four options have the potential to have positive impacts in relation to the 'Population and Community', 'Health and Wellbeing' and 'Transportation' themes, particularly in terms of delivering new housing in areas with good access to the services and facilities available locally and encouraging more sustainable and active methods of travel for undertaking some day to day activities within the HGNP area. However, as Hurst Green village benefits from the widest range of services and amenities within the HGNP area, and Silver Hill is disjointed from most of the facilities in Hurst Green, Options A, B and C perform more favourably in comparison to Option D with regards to these SEA themes. In addition, Option B and Option C have the most potential to deliver a wider range of housing which meets local needs, and through delivering additional growth, increased potential to deliver additional community provision through developer contributions.
- 4.3 From a landscape perspective, the whole of the HGNP area is within the High Weald AONB. In this respect, the potential site allocations considered through all three options have the potential to adversely impact on the special character and qualities of this nationally protected landscape in the absence of sensitive design. In terms of landscape and villagescape character, Option A is likely to perform most favourably given that the scale of proposals which would be taken forward at these locations can potentially limit potential impacts. This is subject to proposals incorporating sensitive designs which contribute to local distinctiveness and sense of place, with due regard given to the landscape strategies, mitigation measures and recommendations for each site (as outlined in the High-Level Landscape Assessment Report).
- 4.4 Higher levels of growth as proposed through Option B and Option C will extend the settlement boundaries of Hurst Green. Cumulatively, potential impacts associated with allocations on Site HG40 and Site HG42 through Option C could be exacerbated in combination with the delivery of 20 dwellings on 'Land to the East of Foundry Close' which was approved with conditions in October 2020 (ref: RR/2019/2194/P). Nevertheless, it is useful to acknowledge that the High-Level Landscape Assessment Report identifies the potential for these sites to deliver a number of landscape opportunities for enhancing local green and blue infrastructure networks.

- 4.5 Regarding the historic environment, potential adverse impacts are possible through all of the options given they comprise sites which are within or within proximity to locations within the HGNP area with concentrations of heritage features (including listed buildings, archaeological notification areas and ancient routeways).
- 4.6 Ecologically, none of the options are likely to have impacts on the integrity of any European or nationally designated sites. All options however have the potential to impact on key habitats in the parish. Whilst all options have the potential to directly and indirectly impact areas of BAP priority habitats, Option A (through delivering lower levels of growth in comparison to the other options) will help limit potential effects from new development on local features and areas of biodiversity interest and support the resilience of ecological networks. It should also be noted that all options have the potential to positively enhance ecological networks providing development proposals are designed to deliver measurable, proportionate and appropriate biodiversity net gains, in line with national and local policy.
- 4.7 It is important to recognise that, whilst recent detailed agricultural land classification has not been undertaken at the locations for development proposed through the options, the proposed site allocations through all options will focus development on areas of greenfield land which have a 20-60% likelihood of containing best and most versatile land for agricultural purposes. The loss of best and most versatile land cannot be mitigated. Higher levels of growth proposed through Options B and C therefore have the potential to result in an increased loss of soils resources and natural features which help to regulate soil and water quality, with Option A the most favourable option in relation to the 'Land, Soil and Water Resources' theme.
- 4.8 In relation to adapting to the effects of climate change, the proposed site allocations through all options are located within Flood Zone 1 and therefore have a low fluvial flood risk. Whilst most of the sites have a low to very low surface water flood risk, Option C performs least favourably in terms of surface water flood risk issues. However, it is anticipated that surface water flood risk issues could largely be contained to all sites via the use of appropriate drainage systems which would minimise the risk of surface water run-off to surrounding areas. Furthermore, in recognition of Rother District Council's declaration of a climate emergency, it is important for the HGNP to encourage proposals which mitigate and adapt to the climate crisis.

