

Hurst Green Neighbourhood Development Plan

Site Options and Assessment

Hurst Green Parish Council

April 2019

Quality information

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Table of Contents

| | | |
|----|---|----|
| 1. | Introduction..... | 7 |
| 2. | Policy Context | 9 |
| | Planning Policy and Evidence Base | 9 |
| | Development Plan | 9 |
| | Rother District Core Strategy (2014)..... | 9 |
| | Saved Policies of the Local Plan (2006) | 10 |
| | Evidence Base | 10 |
| | Rother District Council Strategic Housing Land Availability Assessment (2013) | 10 |
| | Emerging Development Plan | 10 |
| | Proposed Submission Development and Site Allocations Local Plan (2019)..... | 10 |
| 3. | Methodology | 12 |
| | Task 1: Identify Sites to be included in the Assessment | 12 |
| | Task 2: Pro-Forma..... | 12 |
| | Task 3: Consolidation of Results | 13 |
| | Indicative Housing Capacity | 14 |
| 4. | Site Assessment..... | 15 |
| | Known sites | 15 |
| | Summary of the Site Assessment | 19 |
| 5. | Conclusions | 26 |
| | Hurst Green Housing Requirement Figure | 26 |
| | Site Assessment Conclusions | 26 |
| | Silver Hill and Swiftsden..... | 27 |
| | 'Major Development' within the AONB | 28 |
| | Next Steps..... | 28 |
| | Viability | 29 |

Figures

| | | |
|-----------|--|----|
| Figure 1. | Hurst Green Neighbourhood Development Plan Area..... | 8 |
| Figure 2. | Known Sites | 17 |
| Figure 3. | Sites to be considered through this Site Appraisal | 18 |
| Figure 4. | Summary of Site Appraisal | 25 |

Tables

| | | |
|----------|------------------------------------|----|
| Table 1. | AECOM Net Housing Assessment | 14 |
| Table 2. | Known sites | 15 |
| Table 3. | Site assessment summary | 20 |

Executive Summary

AECOM has been commissioned to undertake an independent site appraisal for the Hurst Green Neighbourhood Development Plan on behalf of Hurst Green Parish Council. The work was agreed with the Parish Council and the Ministry of Housing, Communities and Local Government in November 2018.

The Neighbourhood Development Plan is being prepared in the context of the adopted Rother Local Plan Core Strategy (2014) and saved policies from the Local Plan (2006).

The Rother Local Plan Core Strategy sets a target for the delivery of 5,700 dwellings in the District over the Plan period to 2028 and suggests that within Hurst Green there are sites with the potential to deliver 75 homes¹.

The sites to be considered through this site appraisal have been identified through two Call for Sites exercises undertaken by Hurst Green Parish Council; a review of Rother District Council's Strategic Housing Land Availability Assessment; and other sites known to Rother District Council. From these sources 26 sites were identified ('known sites'). 10 sites were discounted where confirmation that a site was not available has been received and where there is overlap between sites (to avoid duplication).

17 sites have been considered for their potential suitability for allocation for housing within the Hurst Green Neighbourhood Development Plan.

This report has concluded that there are no sites within the Neighbourhood Area which are totally constraint-free; three sites are potentially suitable for allocation within the Hurst Green Neighbourhood Development Plan, subject to the mitigation of constraints (HG17, HG23 and HG35). These sites have a combined capacity of 9-33 dwellings (based on 8-30 dwellings per hectare); one site would not meet the threshold to be counted towards the figure of 75 dwellings for Hurst Green. Of the sites that would meet the threshold of six or more dwellings, the potentially suitable sites have an indicative capacity of 8-30 dwellings (based on 8-30 dwellings per hectare). The capacities of individual sites may increase or decrease pursuant to detailed design work and engagement with stakeholders. If the availability of HG6 is confirmed, it could provide 11-41 dwellings (based on 8-30 dwellings per hectare).

Based on the currently available evidence this report concludes that there are insufficient suitable sites, with capacities of 6 or more dwellings, to deliver 75 homes for Hurst Green. This reflects the environmental constraints that impact the area such as landscape and highways constraints. The Rother Local Plan Core Strategy sets out that the capacity of 75 homes will be refined through the Development and Site Allocations Development Plan Document and the neighbourhood development

¹ See Policy RA1 and Figure 12 of the adopted Core Strategy (2014), available at: <http://www.rother.gov.uk/CHttpHandler.ashx?id=22426&p=0>. The figure of 75 homes is also carried forwards in the Proposed Submission Development and Site Allocations Local Plan (October 2018) see draft Policy OVE1 and Figure 17, available at: <http://www.rother.gov.uk/CHttpHandler.ashx?id=30793&p=0>

plan-making process. If there is evidence of housing need in Hurst Green amounting to 75 dwellings, then the Group are advised to obtain specific evidence about the landscape capacity of the sites currently identified as 'potentially suitable' as well as sites HG11, HG22 and HG36 (currently identified as 'not suitable'). With respect to these sites, evidence of the ability to provide a suitable vehicle access must also be sought in order to re-categorise the sites as 'potentially suitable'.

Once the housing requirement for Hurst Green, and the shortlist of potentially suitable sites, are finalised (either based on the conclusions of this report or amended in line with the conclusions of this report and other evidence available to Hurst Green Parish Council), Hurst Green Parish Council should engage with Rother District Council and the community to select a site or sites to be included as allocations in the draft Neighbourhood Development Plan which best meets the objectives of the Neighbourhood Development Plan.

Abbreviations used in the report

Abbreviation

| | |
|------------|---|
| DEFRA | Department of the Environment, Food and Rural Affairs |
| LOCAL PLAN | Development Plan Document |
| Ha | Hectare |
| HGPC | Hurst Green Parish Council |
| MHCLG | Ministry of Housing, Communities and Local Government |
| NDP | Neighbourhood Development Plan |
| NPPF | National Planning Policy Framework |
| PDL | Previously Developed Land |
| PPG | Planning Policy Guidance (MHCLG) |
| RDC | Rother District Council |
| SHLAA | Strategic Housing Land Availability Assessment |

1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent site appraisal for the Hurst Green Neighbourhood Development Plan (NDP) on behalf of Hurst Green Parish Council (HGPC). The work was agreed with the Parish Council and the Ministry of Housing, Communities and Local Government (MHCLG) in November 2018.
- 1.2 The NDP is being prepared in the context of the adopted Rother Local Plan Core Strategy² (September 2014) and saved policies from the Local Plan 2006³. The Rother Local Plan Core Strategy sets out the overall spatial vision and development strategy for the district including key policies.
- 1.3 The Rother Local Plan Core Strategy sets a target for the delivery of 5,700 dwellings in the District over the Plan period to 2028. Development will be directed to Bexhill, Hastings, Battle and Rye with limited growth in all other villages (the scale of which will reflect the range of services available). Policy RA1 sets out a housing requirement figure for the villages in the District of 1,670 homes (gross) (although when the Plan was adopted it was recognised that there was an outstanding (net) target of 800 dwellings). Policy RA1 refers to Figure 12 which suggests that there are suitable and developable (green and amber) SHLAA sites with capacity to provide 75 dwellings in Hurst Green. Hurst Green is identified within the Local Plan Core Strategy as a 'local service village'.
- 1.4 RDC are currently in the process of producing a Development and Site Allocations (DaSA) Local Plan⁴; the Proposed Submission DaSA Local Plan was submitted to the Secretary of State for Examination-in-Public in January 2019, adoption is anticipated in August 2019. The DaSA Local Plan will implement the development strategy and core policies set out in the Local Plan Core Strategy. It will also review existing development boundaries and the Policies Map will be updated.
- 1.5 The DaSA Local Plan will not allocate sites in designated NDP Areas such as Hurst Green, instead deferring site allocation to the Neighbourhood Plan-making process. The DaSA Local Plan will be read in conjunction with NDPs that are in force in the district and which form part of the development plan for their area. Taken together, the DaSA Local Plan and NDPs should allocate the sites necessary to meet the Local Plan Core Strategy's settlement housing targets.
- 1.6 Figure 1 is a map of the Hurst Green NDP Area; which was designated as an NDP Area by Rother District Council in June 2017. The whole parish of Hurst Green is within the High Weald Area of Outstanding Natural Beauty (AONB). HGPC are looking to allocate sites within their NDP and want to ensure that key aspects of their proposals will be robust and defensible.
- 1.7 In this context, the HGPC asked AECOM to undertake an independent and objective assessment of the sites that have been identified.

² Available at: <http://www.rother.gov.uk/CoreStrategy>

³ Available at: <http://www.rother.gov.uk/rotherdistrictlocalplan2006>

⁴ Available at: <https://www.rother.gov.uk/dasa>

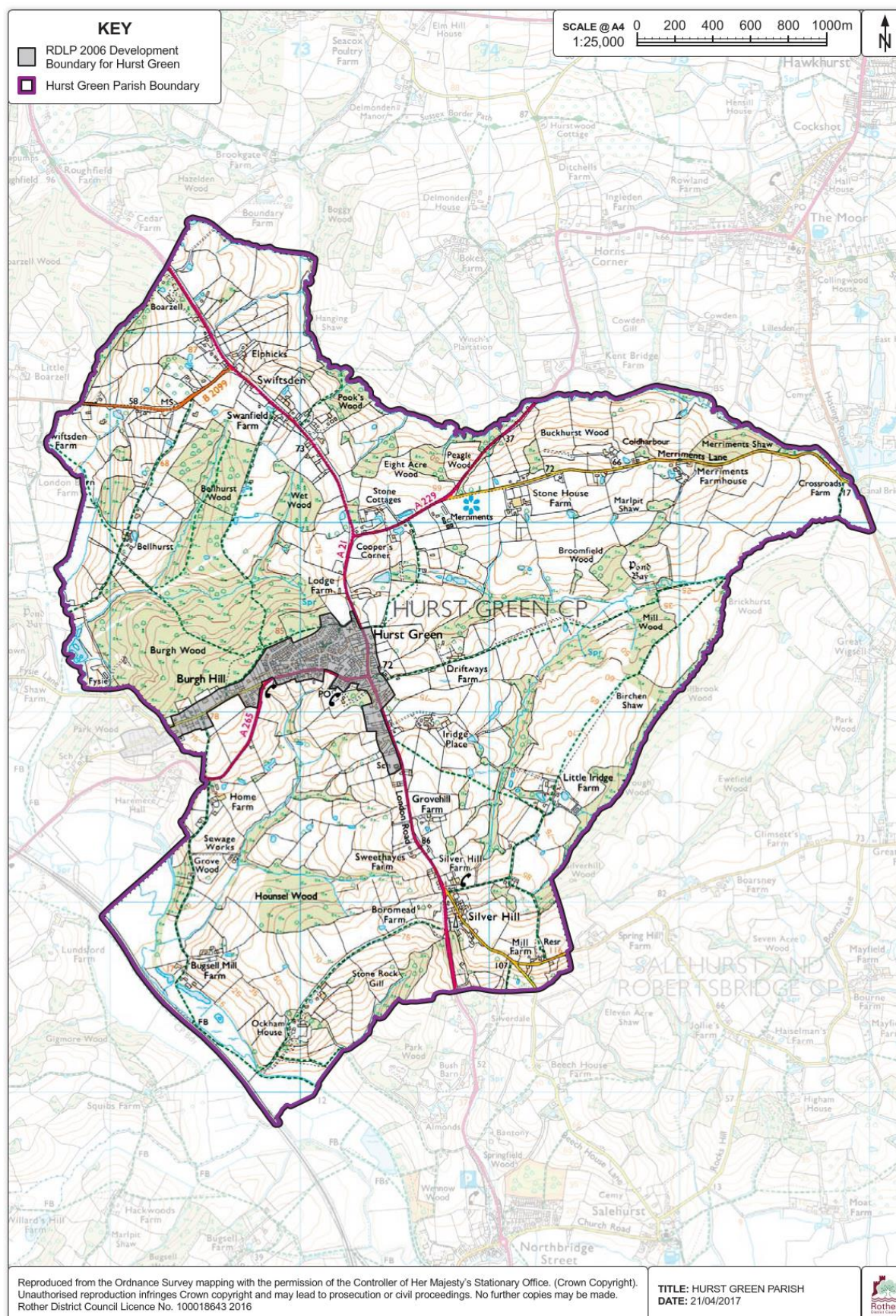


Figure 1. Hurst Green Neighbourhood Development Plan Area

2. Policy Context

Planning Policy and Evidence Base

- 2.1 The NDP policies must be in general conformity with the strategic policies of the development plan.
- 2.2 The key documents making up the development plan for Hurst Green are the:
 - Adopted Rother Local Plan Core Strategy (September 2014)⁵; and
 - Saved Policies from the Rother Local Plan 2006 (as of September 2014)⁶.
- 2.3 The Local Plan is supported by evidence base documents. Of relevance to this report is the Rother District Council Strategic Housing Land Availability Assessment (June 2013)⁷.
- 2.4 RDC are also in the process of preparing the DaSA Local Plan (Pre-Submission version, January 2019)⁸ which will, once adopted form part of the development plan.
- 2.5 The relevant policies are highlighted below.

Development Plan

Rother District Core Strategy (2014)

- 2.6 The policies of relevance to development in Hurst Green include:
- 2.7 *Policy OSS1: Overall Spatial Development Strategy* – to plan for at least 5,700 dwellings (net) in the district in the period 2011-2028. Development will be directed to the larger settlements with development in villages reflecting the existing offer of services and facilities. Particular attention will be given to the ecological, agricultural, public enjoyment and intrinsic value of the countryside.
- 2.8 *Policy OSS3: Location of development* - development proposals should accord with the relevant policies of the Core Strategy.
- 2.9 *Policy OSS4: General Development Considerations* - development should meet the needs of future occupiers and not detract from existing amenity, character or appearance of the surrounding environment.
- 2.10 *Policy RA1: Villages* - The needs of the rural villages will be addressed by protecting locally distinctive character, historic buildings and settings. New development will be sited in close proximity to key facilities and in locations accessible via a range of transport options. 1,670 additional dwellings will be provided in the villages over the Plan period; they will be located in accordance with Figure 12 which is subject to refinement through the DaSA Local Plan and/or NDPs. Figure 12 sets out that there is capacity for 75 dwellings in Hurst Green on 'Potential New Sites'.
- 2.11 'Potential new sites' in Figure 12 refers to sites expected to be formally allocated via the DaSA Local Plan or NDPs. These will normally comprise development sites accommodating 6 or more dwellings. The capacity of the 'potential new sites' set out in Table 12 is estimated from suitable and developable (green and amber) SHLAA sites. There is an expectation that new allocations are within or immediately abutting a village development boundary. The figure of 75

⁵ Available at: <http://www.rother.gov.uk/CHttpHandler.ashx?id=22426&p=0>

⁶ Available at: http://www.rother.gov.uk/media/pdf/c/s/local-plan_1.pdf

⁷ Available at:

http://www.rother.gov.uk/media/pdf/6/7/Strategic_Housing_Land_Availability_Assessment_June_2013_Main_Report.pdf

⁸ Available at: <http://www.rother.gov.uk/CHttpHandler.ashx?id=30773&p=0>

dwellings in Hurst Green is therefore an indication of capacity, not an indication of housing need/requirement.

- 2.12 *Policy EN1: Landscape Stewardship* - Management of the high quality historic, built and natural landscape character is to be achieved by ensuring the protection, and wherever possible enhancement, of the district's nationally designated and locally distinctive landscape features.

Saved Policies of the Local Plan (2006)

- 2.13 All Rother District Local Plan 2006 policies were 'saved' under a Direction by the Secretary of State in 2009. Subsequently a number of policies have been superseded by the adoption of the Core Strategy.
- 2.14 The "saved" policy relevant to Hurst Green is DS3 - proposals within development boundaries directs development to within defined development boundaries.
- 2.15 This policy carries 'due weight', having regard to their degree of compliance with the NPPF.

Evidence Base

Rother District Council Strategic Housing Land Availability Assessment (2013)

- 2.16 The Strategic Housing Land Availability Assessment (SHLAA)⁹ identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the Plan period.
- 2.17 Nine sites were included within RDC's SHLAA within the Hurst Green NDP Area.

Emerging Development Plan

Proposed Submission Development and Site Allocations Local Plan (2019)

- 2.18 RDC are currently in the process of producing a DaSA Local Plan¹⁰; the Proposed Submission DaSA Local Plan was submitted to the Secretary of State for Examination in Public in January 2019, adoption is anticipated in August 2019. The DaSA Local Plan will implement the development strategy and core policies set out in the Local Plan Core Strategy. It will also review existing development boundaries as per the Local Plan 2006 saved policies and the Policies Map will be updated.
- 2.19 The DaSA Local Plan will not allocate sites in designated NDP Areas such as Hurst Green, instead deferring site allocation to the Neighbourhood Plan-making process. The DaSA Local Plan will be read in conjunction with NDPs that are in force in the district and which form part of the 'development plan' for their area. Taken together, the DaSA Local Plan and NDPs should allocate the sites necessary to meet the Local Plan Core Strategy's settlement housing targets.
- 2.20 Policy OVE1: Housing supply and delivery pending plans. Housing sites sufficient to meet the Core Strategy requirement of at least 5,700 net additional homes over the period to 2028 will be met by allocations and other provisions in this Plan and NDPs. Table 17 states that the residual requirement at 1st April 2018 for Hurst Green is 75 dwellings; this language is different to the language of the Core Strategy which suggests that there is capacity for 75 homes as opposed to a requirement to provide 75 homes.
- 2.21 Paragraph 8.5 of the supporting text clarifies that the 75 homes in Hurst Green should be provided as housing allocations on sites of 6 or more dwellings. There is an additional allowance for smaller sites for the whole of the Rural Area.
- 2.22 The majority of Rother falls within the High Weald Area of Outstanding Natural Beauty (AONB) which is of national, as well as local landscape value. The AONB is also recognised as a

⁹ Available at:

http://www.rother.gov.uk/media/pdf/6/7/Strategic_Housing_Land_Availability_Assessment_June_2013_Main_Report.pdf

¹⁰ Available at: <https://www.rother.gov.uk/dasa>

National Character Area in its own right. The emerging DaSA Local Plan sets out the following policies in relation to the High Weald AONB:

- 2.23 *Policy DEN1: Maintaining Landscape Character* - The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it is to be located, based on a clear understanding of the distinctive local landscape characteristics, in accordance with *Core Strategy Policy EN1*. Particular care will be taken to maintain the sense of tranquillity of more remote areas, including through maintaining 'dark skies' in accordance with *Policy DEN7*.
- 2.24 *Policy DEN2: The High Weald Area of Outstanding Natural Beauty (AONB)* – All development within or affecting the setting of the High Weald AONB shall conserve and seek to enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan. Development within the High Weald AONB should be small-scale, in keeping with the landscape and settlement pattern; major development will be inappropriate except in exceptional circumstances. 'Major development' will be defined taking account of the nature, scale and setting of a proposal and whether it could have a significant adverse impact on the purposes for which the AONB was designated.
- 2.25 Policy DEN2 does not distinguish between plan-making and decision-making when it comes to major development in the AONB, just stating that 'major development will be inappropriate'. The NPPF explicitly refers to 'planning permission' when it refers to exceptional circumstances.
- 2.26 Paragraph 172 of the NPPF (2019) says "Planning permission should be refused for major development⁵⁵ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 2.27 Footnote 55 of the NPPF (2019) says "For the purposes of paragraphs 172 and 173, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined."

3. Methodology

- 3.1 The approach undertaken in the site appraisal is based primarily on the Government's Planning Practice Guidance (Assessment of Land Availability) published in 2019 with ongoing updates, which contains guidance on the assessment of land availability and the production of a Strategic Housing Land Availability Assessment (SHLAA) as part of a local authority's evidence base for a Local Plan.
- 3.2 Although an NDP is at a smaller scale than a Local Plan, the criteria for assessing the suitability of sites for housing are still appropriate. This includes an assessment of whether a site is suitable, available and achievable.
- 3.3 In this context, the methodology for carrying out the site appraisal is presented below.

Task 1: Identify Sites to be included in the Assessment

- 3.4 The first task is to identify which sites should be considered as part of the assessment.
- 3.5 HGPC undertook two 'Call for Sites' exercises which included writing to local landowners and asking residents to identify sites. The first ran from 18th June to 10th August 2018 and the second concluded on the 10th August 2018. Several sites also became known to the Parish Council during the winter of 2018. In total 27 sites are known (10 of which were submitted to the RDC SHLAA).

Task 2: Pro-Forma

- 3.6 A site appraisal pro-forma has been developed by AECOM to assess potential sites for allocation in the NDP. It has been developed based on the Government's Planning Practice Guidance, the Site Assessment for Neighbourhood Plans: A Toolkit for Neighbourhood Planners (Locality, 2015¹¹) and the knowledge and experience gained through previous neighbourhood planning site assessments. The purpose of the pro-forma is to enable a consistent evaluation of each site against an objective set of criteria.
- 3.7 The pro-forma utilised for the assessment enabled a range of information to be recorded, including the following:
- General information:
 - Site location and use; and
 - Site context and planning history.
 - Context:
 - Type of site (greenfield, brownfield etc.); and
 - Planning history.
 - Suitability:
 - Site characteristics;
 - Environmental considerations;
 - Heritage considerations;
 - Community facilities and services; and
 - Other key considerations (e.g. flood risk, agricultural land, tree preservation orders).
 - Availability
- 3.8 One pro-forma was completed for each site considered through this site assessment and is included in Appendix A.

¹¹ Available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/>

- 3.9 The pro-formas were completed following a desk top assessment which draws upon a range of sources of information including Google Maps¹² and Google Earth¹³, the MAGIC map¹⁴, Historic England mapping¹⁵ and the EA's Flood Map for Planning¹⁶ and information provided by HGPC.
- 3.10 Judgements have been made on the landscape sensitivity of each site by considering the landscape value of the site and the susceptibility of features within or of the site.
- 3.11 These judgements have been informed by best practice guidance contained within Guidelines for Landscape and Visual Impact Assessment 3rd Edition¹⁷ (GLVIA3); specifically, the range of factors in Box 5.1 of GLVIA3 to identify landscape value have been used to make judgements on the value of individual sites.
- 3.12 Consideration has been given to the RDC Core Strategy: Market Towns and Villages Landscape Assessment¹⁸ when assessing the landscape capacity of each site.

Task 3: Consolidation of Results

- 3.13 The desktop assessment was corroborated and verified following a site visit which allowed the team to consider aspects of the site assessment that could only be done visually. It was also an opportunity to gain a better understanding of the context and nature of the NDP Area.
- 3.14 Following this exercise conclusions have been drawn about the potential suitability of sites to be included as allocations for housing in the HG NDP.
- 3.15 A 'traffic light' rating of all sites has been given based on whether the site is an appropriate candidate to be considered for allocation in the NDP. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially appropriate if issues can be resolved and 'red' for sites which are not currently suitable, available and/or achievable. The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the site is suitable, available and achievable.

¹² Available at: <https://www.google.co.uk/maps>

¹³ Available at: <https://earth.google.com/web/>

¹⁴ Available at: <http://magic.defra.gov.uk/magicmap.aspx>

¹⁵ Available at: <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

¹⁶ Available at: <https://flood-map-for-planning.service.gov.uk/>

¹⁷ Landscape Institute and Institute for Environmental Management and Assessment. (2013). Guidelines for Landscape and Visual Impact Assessment 3rd Edition. Routledge: Abingdon.

¹⁸ Available at: <http://www.rother.gov.uk/CHttpHandler.ashx?id=11822&p=0>

Indicative Housing Capacity

- 3.16 This report includes a capacity analysis of each site. The capacity analysis is based on net housing densities and developable site area; the assumptions are detailed in Table 1 below.
- 3.17 The density of Hurst Green has been calculated as 8 dwellings per hectare and indicative capacities have been modelled on this basis. However, 8 dwellings per hectare is very low (and is uncharacteristic of parts of Hurst Green) and could impact site viability; therefore, a higher density of 30 dwellings per hectare, consistent with the RDC SHLAA, has also been calculated.
- 3.18 The indicative housing capacities have been calculated so that the sites can be compared and because it is useful to have an idea of capacity when evaluating a potential site. The result of this is that a range is provided for each site.

Table 1. AECOM Net Housing Assessment

| Area | Gross to net ratio standards | Net Housing Density | Net Housing Density |
|----------------|------------------------------|---------------------|---------------------|
| Up to 0.4 ha | 90% | 8 | 30 |
| 0.4 ha to 2 ha | 80% | 8 | 30 |
| 2 ha to 10 ha | 75% | 8 | 30 |
| Over 10 ha | 50% | 8 | 30 |

- 3.19 Different densities than suggested in this report may be appropriate to apply to the sites in the NDP (resulting in different capacities) due to the rural nature of the NDP area. It is recommended that number of houses allocated per site responds appropriately to the existing density of the village's built up area and the context and setting of the site, taking into account the site-specific characteristic and constraints.
- 3.20 The site capacities, which are based on the gross to net ratios above, stated are for illustrative purposes only.

4. Site Assessment

Known sites

4.1 The sites to be considered through this site appraisal have been identified through:

- Two call for sites exercise undertaken by HGPC;
- A review of RDC's SHLAA; and
- Other sites known to RDC.

4.2 The known sites are set out in Table 2 and Figure 2 below.

Table 2. Known sites

| Site Reference | Site Name/Address | Source of identification | Gross site area |
|----------------|---|--------------------------|-----------------|
| HG 2 | Land to the Rear of Ridgeway | RDC Identified (SHLAA) | - |
| HG 3 | Iridge Place, London Road, Hurst Green | RDC Identified (SHLAA) | - |
| | Site has changed ownership and is no longer available. Therefore, site is not taken forwards in this site assessment. | | |
| HG 4 | Land south of community shop / park | RDC Identified (SHLAA) | - |
| | Landowner has confirmed site is not available. Therefore, site is not taken forwards in this site assessment. | | |
| HG 5 | Land south of Village Hall | RDC Identified (SHLAA) | - |
| | Landowner has confirmed site is not available. Therefore, site is not taken forwards in this site assessment. | | |
| HG 6 | Land south of Lodge Farm | RDC Identified (SHLAA) | - |
| | Landowner has not confirmed availability. Site has been assessed for its suitability. | | |
| HG 7 | Land East of the Old Bakery | RDC Identified (SHLAA) | - |
| | HG 7 is superseded by HG 35 due to 100% overlap | | |
| HG 9 | Land at Yew Tree Farm | RDC Identified (SHLAA) | - |
| HG 10 | Land r/o Meadow View Cottages, Foundry Close, Hurst Green | RDC Identified (SHLAA) | - |
| | HG 10 is superseded by HG 35 due to 100% overlap | | |
| HG 11 | Cooks Field, Burgh Hill | RDC Identified (SHLAA) | - |
| HG 17 | Caravan Tech site | RDC Identified | - |
| | Land off Foundry Close | RDC Identified | - |
| HG 18 | HG 18 is superseded by HG 35 due to partial overlap and confirmation that the non-overlapping section is not available. Therefore, site is not taken forwards in this site assessment. | | |
| HG 20 | Ernst Doe site | NP Identified | 0.17 |
| | Landowner has confirmed site is not available. Therefore, site is not taken forwards in this site assessment. | | |

| Site Reference | Site Name/Address | Source of identification | Gross site area |
|----------------|---|--------------------------|-----------------|
| HG 21 | Land at Burgh Hill | NP Identified | 0.20 |
| | <i>Landowner has confirmed site is not available. Therefore, site is not taken forwards in this site assessment.</i> | | |
| HG 22 | Land off London Road | NP Identified | 2.05 |
| HG 23 | Land north of Pentwood Place, London Road | NP Identified | 0.09 |
| HG 24 | Land west of Coopers Corner | NP Identified | 3.17 |
| HG 25 | Land south of Coopers Corner | NP Identified | 1.43 |
| HG 26 | Land adjacent to HG Allotments | NP Identified | 0.75 |
| | <i>Landowner has confirmed site is not available. Therefore, site is not taken forwards in this site assessment.</i> | | |
| HG 30 | Land at Silver Hill | NP Identified | 3.15 |
| HG 32 | Slaughter House Field | NP Identified | 3.69 |
| HG 33 | Swiftsden | NP Identified | 0.54 |
| HG 34 | Land west of Bordyke Smallholding, Swiftsden | NP Identified | 0.15 |
| HG 35 | Land off Foundry Close | NP Identified | 0.81 |
| | <i>Site supersedes HG 7, HG 10 and HG 18.</i> | | |
| HG 36 | Land south of Cooks Field, Burgh Hill | NP Identified | 2.86 |
| HG 37 | Swiftsden Lodge | NP Identified | 0.31 |
| HG 38 | Windmill Farm, Silver Hill | NP Identified | 0.81 |

4.3 Based on the above this site assessment will consider 17 sites for their potential suitability for allocation for housing within the Hurst Green NDP, see Figure 3.

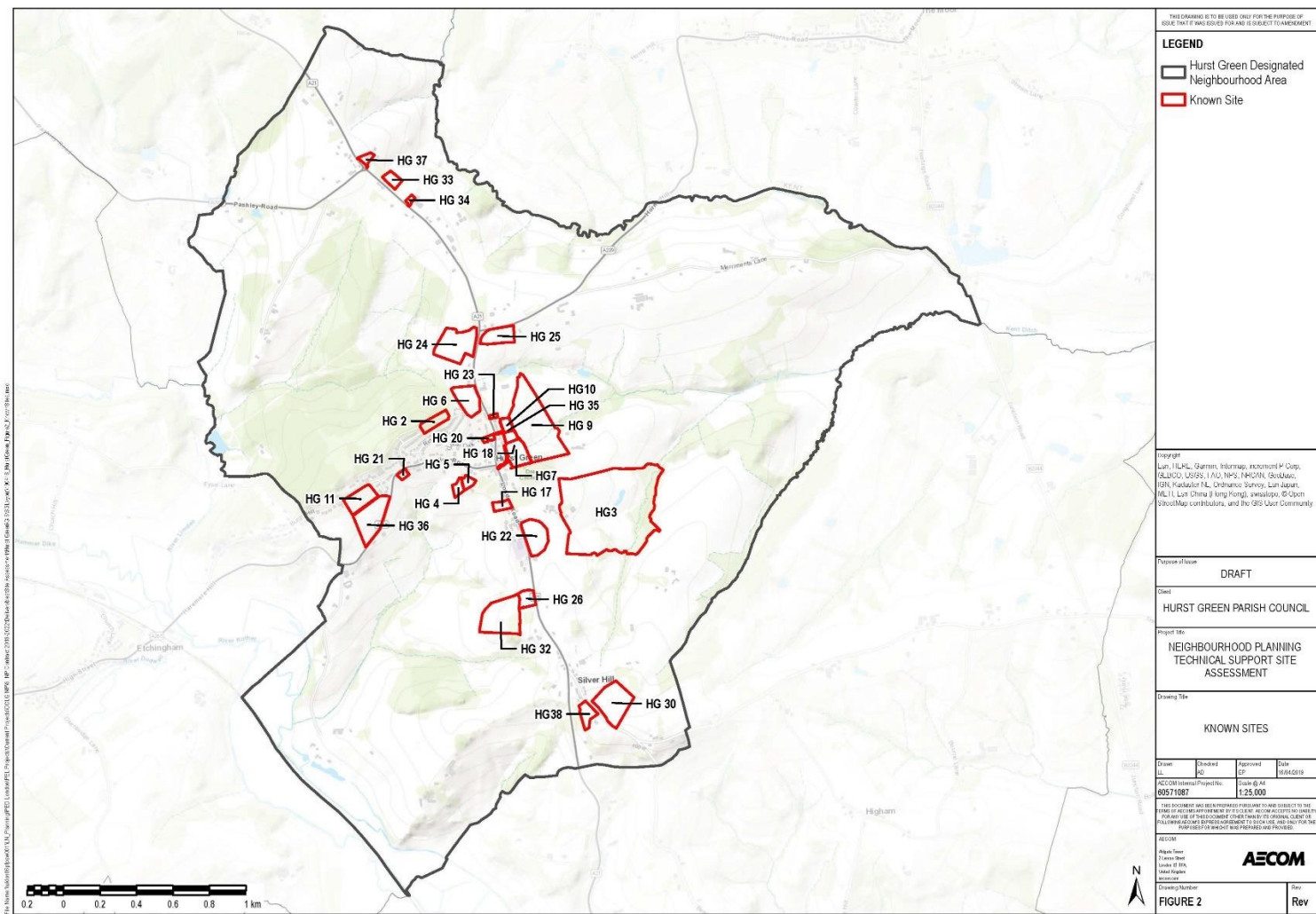


Figure 2. Known Sites

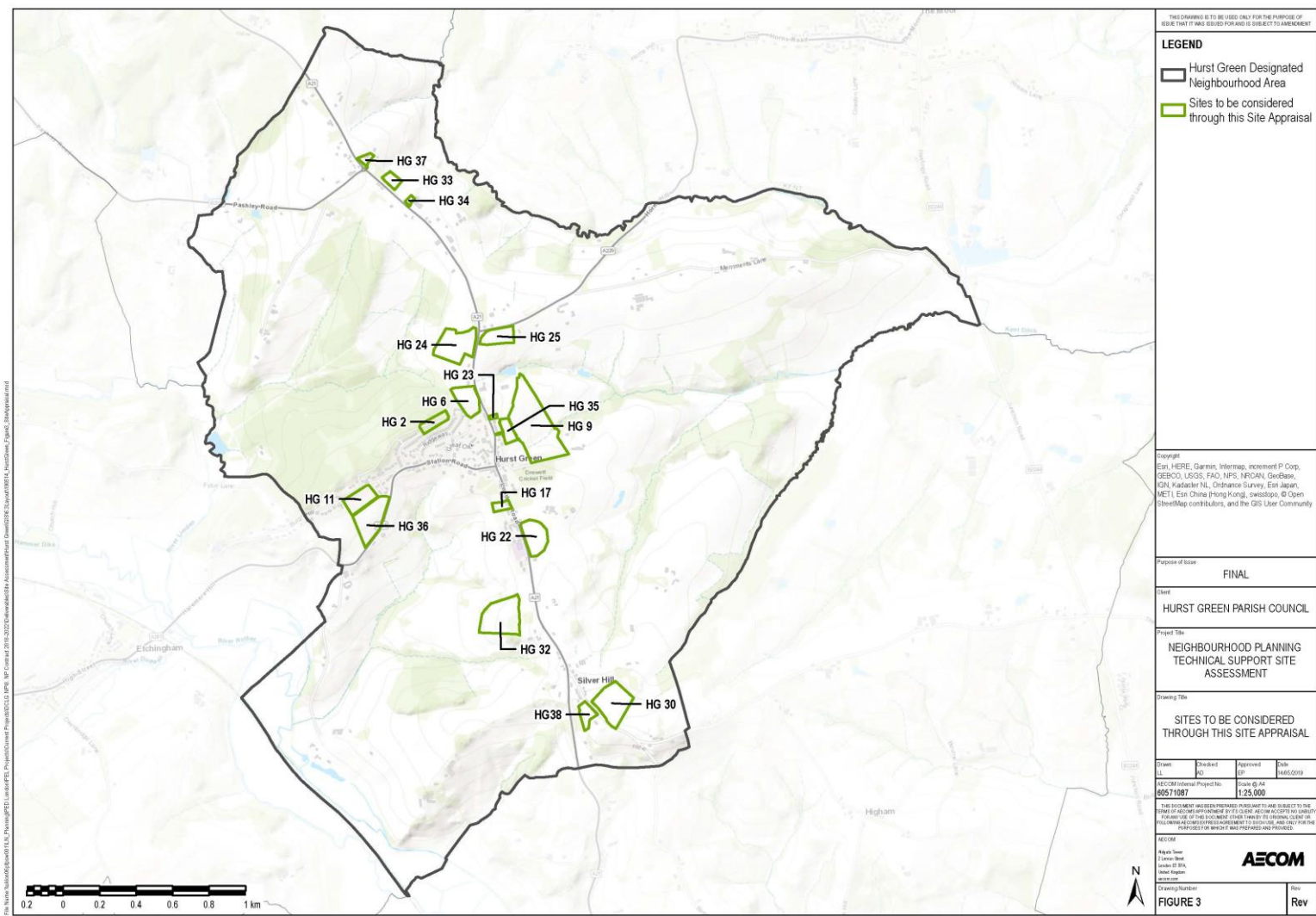


Figure 3. Sites to be considered through this Site Appraisal

Summary of the Site Assessment

- 4.4 17 sites have been assessed to consider their potential suitability for allocation for housing within the Hurst Green NDP.
- 4.5 Table 3 presents a summary of the potential site considered for development. The final column is a 'traffic light' rating for each site, indicating whether or not the site is appropriate for allocation. Red indicates the site is not appropriate for allocation within the NDP. Amber indicates that the site is potentially suitable for allocation within the NDP subject to the mitigation of constraints. Green indicates the site is appropriate for allocation within the NDP without constraint.
- 4.6 The 18 sites are considered to be available for development, as there is no indication from the landowner that this is not the case.
- 4.7 Table 3 should be read alongside the completed pro-formas presented in Appendix A.

Table 3. Site assessment summary

| Site Ref. | Gross Site Area | Indicative Capacity (based on net site area) (8 DPH / 30 DPH) | Site Type | Suitable? | Conclusions | Traffic Light Rating |
|-----------|-----------------|---|------------|-------------------------|---|----------------------|
| HG 2 | 0.86 | 6 – 21 | Greenfield | No | <ul style="list-style-type: none"> There is no existing access to the site and it is unclear whether acceptable access arrangements could be provided; this is because the site does not immediately adjoin a highway and any access to the site would require third party land The site is judged to be of high landscape sensitivity to change because of its total coverage by woodland (which itself is not Ancient Woodland but is adjacent to an area of Ancient Woodland) and designation within the AONB The site has the potential to support protected species due to proximity to Ancient Woodland The results of the assessment come to the same conclusion as the SHLAA conclusion | |
| HG 6 | 1.71 | 11 – 41 | Greenfield | Yes – major constraints | <p>The site was considered available in the SHLAA. However, HGPC have not been able to confirm availability through their efforts to contact the landowner. Until evidence of availability is obtained the site cannot be considered appropriate for allocation.</p> <p>Should the site's availability be confirmed, the following conclusions have been reached in terms of suitability:</p> <ul style="list-style-type: none"> Site is a greenfield site which is adjacent to the settlement boundary There is existing access to the site from the A21 which would need upgrading - access arrangements would need to be to the satisfaction of Highways England (i.e. satisfying the design requirements and be safe and fit for purpose without causing unacceptable delay to traffic on the A21) The development of this site could result in an impact on Ancient Woodland (Burgh Wood to the west of the site) and the setting of a designated heritage asset (Grade II listed Hawthorne Cottage to the southeast of the site), mitigation is possible but may reduce the developable area (given a requirement for a buffer to the adjacent Ancient Woodland and a potential buffer to the heritage asset) and, therefore, site capacity The site is judged to be of medium landscape sensitivity to change as a balance between its designation within the AONB, and its location adjacent to the existing settlement pattern The results of the assessment come to different conclusions from the SHLAA conclusion (i.e. potentially suitable, subject to the mitigation of major constraints rather than unsuitable) | |
| HG 9 | 7.77 | 47 – 175 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site which is not adjacent to the settlement boundary The site is unlikely to be able to provide adequate access | |

| Site Ref. | Gross Site Area | Indicative Capacity (based on net site area) (8 DPH / 30 DPH) | Site Type | Suitable? | Conclusions | Traffic Light Rating |
|-----------|-----------------|---|------------|-------------------------|---|----------------------|
| | | | | | <ul style="list-style-type: none"> The site is judged to be of high landscape sensitivity because of its designation within the AONB, location in relation to the settlement pattern, and landform The results of the assessment come to the same conclusion as the SHLAA conclusion | |
| HG 11 | 1.54 | 10 – 37 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site adjacent to the settlement boundary, reasonably well located in respect of local services and facilities but with poor accessibility for pedestrians There is no existing access, but acceptable access arrangements appear achievable The site is judged to be of high landscape sensitivity to change because of its location on the edge of the valley to the east, its enclosure by trees, and its views to the east which reflect the special qualities of the AONB identified in the AONB Management Plan. It is also within Viewpoint 2 of the “Core Strategy: Market Towns and Villages Landscape Assessment” where it concludes there a low ability to accommodate change The results of the assessment come to the same conclusion as the SHLAA conclusion | |
| HG 17 | 0.45 | 3 – 11 | Brownfield | Yes – minor constraints | <ul style="list-style-type: none"> Site is a brownfield site within the settlement boundary, well located in respect of local services and facilities There is existing access to the A21 if the access arrangements need upgrading they would need to be to the satisfaction of Highways England (i.e. satisfying the design requirements and be safe and fit for purpose without causing unacceptable delay to traffic on the A21) The site is judged to be of low landscape sensitivity to change as, despite its designation within the AONB, it is a brownfield site already characterised by commercial development, and within the existing settlement boundary. Redevelopment of the site would result in a loss of employment floor space within Hurst Green | |
| HG 22 | 2.05 | 12 – 46 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site adjacent to the settlement boundary, reasonably well located in respect of local services and facilities There is existing access to the site from the A21 which would need upgrading - access arrangements would need to be to the satisfaction of Highways England (i.e. satisfying the design requirements and be safe and fit for purpose without causing unacceptable delay to traffic on the A21). It is worth noting that there could be a potential conflict with the existing school opposite the site; this would need full consideration through detailed design development and transport input The site is judged to be of high landscape sensitivity to change because of its designation within the AONB, the presence of mature trees within the site and the lack of screening vegetation at its north, east and south boundaries. There is also a Public Right of Way to the south of the site which indicates that it is more readily perceived as part of the countryside of the AONB | |

| Site Ref. | Gross Site Area | Indicative Capacity (based on net site area) (8 DPH / 30 DPH) | Site Type | Suitable? | Conclusions | Traffic Light Rating |
|-----------|-----------------|---|------------|-------------------------|--|----------------------|
| | | | | | <ul style="list-style-type: none"> In addition, whilst the site is of a scale that is unlikely to change the size and character of the settlement, the boundary relates poorly to the existing settlement and prevailing pattern of development. The “Core Strategy: Market Towns and Villages Landscape Assessment” states that there is a moderate ability to accommodate change but not encroaching into the open countryside to the south or east | |
| HG 23 | 0.09 | 1 – 3 | Greenfield | Yes – minor constraints | <ul style="list-style-type: none"> Site is a greenfield site adjacent to the settlement boundary, well located in respect of local services and facilities There is existing access to the A21 which would need to be upgraded - access arrangements would need to be to the satisfaction of Highways England (i.e. satisfying the design requirements and be safe and fit for purpose without causing unacceptable delay to traffic on the A21) The site is judged to be of medium landscape sensitivity because of the vegetation at the boundaries, and its location within the AONB The development of this site could have an impact on the setting of designated heritage assets (Grade II listed Yew Tree House and Grade II listed The Woolpack Inn to the west of the site), mitigation is possible | |
| HG 24 | 3.17 | 19 – 71 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities There is existing access to the A21 which would need to be upgraded and this is likely to be achievable (although there is potential for conflict with the existing junction of the A21 and A229) The site of high landscape sensitivity to change as a result of its location in open countryside away from the main area of settlement, its landform, and its designation in the AONB | |
| HG 25 | 1.43 | 9 – 34 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities There is existing access to the A21 which would need to be upgraded and this is likely to be achievable (although there is potential for conflict with the existing junction of the A21 and A229) The site is of high landscape sensitivity to change as a result of its location in open countryside away from the main area of settlement, its location across elevated landform, and its designation in the AONB | |
| HG 30 | 3.15 | 19 – 71 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities If the whole site was developed it would significantly change the size and character of Silver Hill | |

| Site Ref. | Gross Site Area | Indicative Capacity (based on net site area) (8 DPH / 30 DPH) | Site Type | Suitable? | Conclusions | Traffic Light Rating |
|-----------|-----------------|---|------------|-------------------------|--|----------------------|
| | | | | | <ul style="list-style-type: none"> - A new access would be required, and it is unclear whether the adjoining road would have the ability to accommodate the traffic - The site is of high landscape sensitivity as a result of its designation within the AONB, its elevated landform, location in relation to existing settlement patterns, and extent of visibility | |
| HG 32 | 3.69 | 22 – 83 | Greenfield | No | <ul style="list-style-type: none"> - Site is a greenfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities - The site does not adjoin the highway; access is currently taken via a track to the north of the allotments across what is assumed to be third party land. There is potential for access to be taken via site HG 26, should that site be allocated, but again this would require agreement and cooperation of a third party (assumed) - The site is of high landscape sensitivity to change as a result of its designation within the AONB, its steeply sloping landform, and its location away from existing settlement patterns | |
| HG 33 | 0.54 | 3 – 13 | Greenfield | No | <ul style="list-style-type: none"> - Site is a greenfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities - If the whole site was developed it would significantly change the size and character of Swiftsden - Site does not adjoin a highway and it is assumed that access to the site requires third party land - The site of medium landscape sensitivity due to its relationship with the existing settlement pattern, and its designation within the AONB, vegetation around its boundary, and mature trees within the site | |
| HG 34 | 0.15 | 1 – 4 | Brownfield | No | <ul style="list-style-type: none"> - Site is a brownfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities - Existing access may need upgrading, likely to be achievable - The site is judged to be of low landscape sensitivity - Planning permission (RR/2018/2364/P) has been refused on the site for four dwellings. The reasons for refusal relate to the site being outside of the defined development boundary for Hurst Green and its inaccessibility to essential services and facilities which demonstrate that the site is not in a sustainable location; failure to conserve or enhance the landscape and scenic beauty of the AONB; and the impact on the existing commercial premises. | |
| HG 35 | 0.81 | 5 – 19 | Greenfield | Yes – minor constraints | <ul style="list-style-type: none"> - Site is a greenfield site adjacent to the settlement boundary, well located in respect of local services and facilities - Access would need to be provided from Foundry Close, this is considered achievable | |

| Site Ref. | Gross Site Area | Indicative Capacity (based on net site area) (8 DPH / 30 DPH) | Site Type | Suitable? | Conclusions | Traffic Light Rating |
|-----------|-----------------|---|------------|-----------|---|----------------------|
| | | | | | <ul style="list-style-type: none"> The site is of medium landscape sensitivity because of the balance between its designation within the AONB and greenfield use, and its location in respect of the settlement pattern The reasons for refusal for the recently refused planning application would need to be overcome by any future development; there is potential for design requirements through a specific site allocation policy in the NDP to assist with this | |
| HG 36 | 2.86 | 17 – 64 | Greenfield | No | <ul style="list-style-type: none"> Site is a greenfield site adjacent to the settlement boundary, reasonably well located in respect of local services and facilities There is no access to the site from the A265 at the southern boundary of the site. A new access would be required if the site were developed. It is possible that a new access could be created to the A265 although it may require the removal of vegetation at the southern boundary to achieve the required visibility splays, this is potentially undesirable. It is also not clear whether a bend in the road would prevent suitable visibility splays being achieved The site is judged to be of high landscape sensitivity to change because of its designation within the AONB and its steep landform which is visible from various vantage points surrounding the site. It is also within Viewpoint 2 of the “Core Strategy: Market Towns and Villages Landscape Assessment” where it concludes there a low ability to accommodate change, particularly if it encroaches into open countryside to the south | |
| HG 37 | 0.31 | 2 – 8 | Mixture | No | <ul style="list-style-type: none"> Site is a brownfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities There is an existing access to the site which is likely to be suitable for the intended use The site is of medium landscape sensitivity because of the balance between its designation within the AONB, and its relationship with the settlement pattern and current brownfield use | |
| HG 38 | 0.81 | 5 – 19 | Brownfield | No | <ul style="list-style-type: none"> Site is a brownfield site, outside and remote from the settlement boundary and poorly located in respect of local services and facilities The existing accesses would need to be upgraded to facilitate the proposed development and this is achievable; although it is unclear whether the adjoining road would have the ability to accommodate the traffic. The site is of medium landscape sensitivity because of the balance between its designation within the AONB, and its relationship with the settlement pattern and current brownfield use | |

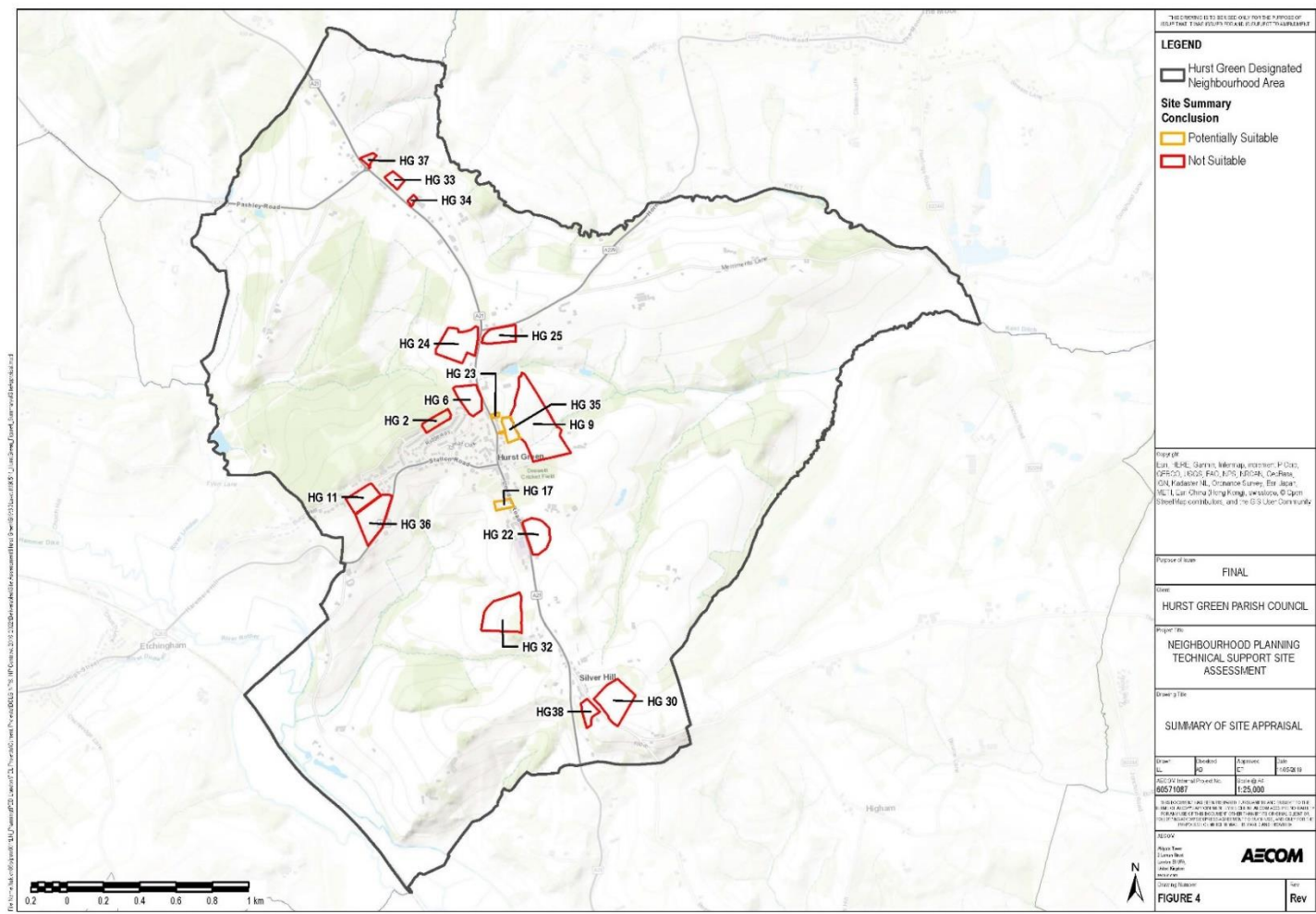


Figure 4. Summary of Site Appraisal

5. Conclusions

Hurst Green Housing Requirement Figure

- 5.1 The Rother Local Plan Core Strategy (adopted in 2014) sets out the overall spatial vision and development strategy for the district including key policies. It also identifies the potential capacity for development within Hurst Green (75 dwellings) based on “Potential New Sites” arising from the estimated suitable and developable (green and amber) SHLAA sites (HG7 and HG10: 70-80 houses). The Rother Local Plan Core Strategy recognises that refinement of the capacities will take place through the DaSA Local Plan and NDP plan-making process.
- 5.2 Policy OVE1 of the Draft DaSA Local Plan carries the figure of 75 as detailed within the Rother Local Plan Core Strategy forwards. However, Table 17 states that the residual requirement for Hurst Green, at 1st April 2018, is 75 dwellings; this language is different to the language of the Core Strategy which suggests that there is capacity for 75 homes as opposed to a requirement to provide 75 homes.
- 5.3 A planning application was submitted in connection with sites HG7 and HG10 (planning reference: RR/2016/1577/P), these sites have since been superseded by site HG35. The planning application was refused and subsequently a planning appeal has been dismissed. Given the reasons that the planning application was refused, and the appeal dismissed, it is queried, therefore, whether the site has capacity for 70-80 dwellings as identified in the SHLAA. AECOM’s indicative assessment suggests a capacity of up to 19 houses and it is anticipated that a planning application is due to be submitted for approximately 22 homes imminently.
- 5.4 As it is understood, the SHLAA informed Figure 12 of the Rother Local Plan Core Strategy, but more recent evidence challenges the capacity of the sites estimated as suitable and developable (green and amber).
- 5.5 HGPC are advised, therefore, to liaise with RDC to understand the change in language between the Rother Local Plan Core Strategy and the DaSA Local Plan, the evidence that supports this, to establish whether there is a requirement to plan for 75 dwellings or not.

Site Assessment Conclusions

- 5.6 This report has concluded that there are no sites within the NDP Area which are totally constraint-free. Three sites have been identified as potentially suitable for allocation within the Hurst Green NDP, subject to the mitigation of constraints. A summary of these sites is provided below.
- 5.7 HG17 has a potential capacity of 3 – 11 dwellings (8-30 dwellings per hectare). It is considered to be the least constrained site. However, the site currently provides employment (although it is not a designated employment site) and the Group should consider whether the loss of an employment site would be positive for the village, and in accordance with the aims and objectives of the NDP.
- 5.8 HG23 has a potential capacity of 1-3 dwellings (8-30 dwellings per hectare). It is affected by minor constraints which should be addressed prior to the site being included as a draft site allocation (or through the wording of the draft site allocation policy) such as the provision of suitable access arrangements and impact on the setting of nearby listed buildings. According to the wording of the draft DASA Local Plan, if this site were allocated in the Hurst Green NDP for 1-3 dwellings it would not contribute towards the allocation of 75 homes but instead would contribute to the additional allowance for smaller sites for the whole of the Rural Area. The Group should confirm this position with RDC and that RDC would be supportive of the Group allocating sites for five or fewer dwellings.

- 5.9 HG35 has a potential capacity of 5-19 dwellings (8-30 dwellings per hectare). The Group are advised to consider and seek further advice from RDC as well as the Local Highways Authority with respect to landscape, access, biodiversity and ecology. In addition, any development in this location would need to carefully consider and respond to the reasons for refusal detailed on the decision notice, and subsequent appeal decision, for RR/2016/1577/P.
- 5.10 In addition, HG6 was considered available in the SHLAA. However, HGPC have not been able to confirm availability through their efforts to contact the landowner. Until evidence of availability is obtained the site cannot be considered appropriate for allocation. Should the site's availability be confirmed the site should be recategorised as potentially suitable for development. The table above sets out the indicative housing capacity and key constraints which would need consideration prior to allocation.
- 5.11 The two sites, currently identified as potentially suitable with capacities of 6 or more dwellings, have a combined indicative capacity of 8-30 dwellings (8-30 dwellings per hectare). If the availability of HG6 is confirmed, it could provide 11-41 dwellings (8-30 dwellings per hectare). HG23, currently identified as potentially suitable but with a capacity of less than 6, has an indicative capacity of 1-3 dwellings. The indicative capacities of individual sites may increase or decrease pursuant to detailed design work and stakeholder engagement.
- 5.12 Based on the currently available evidence, this report concludes that there are insufficient suitable sites, with capacities of 6 or more dwellings, to deliver 75 homes in Hurst Green. This reflects the environmental constraints that impact the area including landscape and highways constraints.
- 5.13 If there is evidence of housing need in Hurst Green amounting to 75 dwellings, then the Group are advised to obtain specific evidence about the landscape capacity of the sites currently identified as 'potentially suitable' as well as sites HG11, HG22 and HG36 (currently identified as 'not suitable'). With respect to these sites, evidence of the ability to provide a suitable vehicle access must also be sought to re-categorise the sites as 'potentially suitable'.
- 5.14 Once the housing requirement for Hurst Green, and the shortlist of potentially suitable sites, are finalised (either based on the conclusions of this report or amended in line with the conclusions of this report and other evidence available to HGPC), HGPC should engage with RDC and the community to select a site or sites to be included as allocations in the draft NDP which best meets the objectives of the Hurst Green NDP.
- 5.15 There is scope for the Group to include site-specific site allocation policies for any/all of the sites which are decided to be allocated with specific design/development requirements which could assist with the mitigation of identified constraints – any further work should be undertaken with the promoter and RDC.

Silver Hill and Swiftsden

- 5.16 The sites within the hamlets of Silver Hill and Swiftsden have been categorised as unsuitable of allocation for housing. This largely relates to the fact that the NPPF and the Local Plan directs development to sustainable locations and seeks to protect the countryside for its intrinsic characteristics and beauty.
- 5.17 In Silver Hill HG38 is a brownfield site with an indicative capacity of 5 to 19 dwellings. Given the distance of the site to community services and facilities, and its relative inaccessibility (no provision for pedestrians), the site is not considered to be suitable for allocation for housing. However, if the Housing Needs Assessment identifies a local need for housing in Silver Hill, then it is advised that the conclusions of the site assessment could be revisited, and the site could potentially be re-categorised as potentially suitable subject to the mitigation of (major) constraints. The potential of this site should be discussed with RDC and the Local Highways Authority.

- 5.18 In Swiftsden HG34 is a brownfield site with an indicative capacity of 1 to 4 dwellings. Given the isolation of Swiftsden, the site is not considered to be suitable for allocation for housing. However, if the Housing Needs Assessment identifies a local need for housing in Swiftsden, then it is advised that the conclusions of the site assessment could be revisited, and the site could potentially be categorised as potentially suitable subject to the mitigation of (major) constraints. The potential of this site should be discussed with RDC and the Local Highways Authority.

‘Major Development’ within the AONB

- 5.19 As another consideration, Paragraph 172 of the NPPF (2019) sets out that “great weight should be given to conserving and enhancing landscape and scenic beauty in... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues”. The same paragraph also states “the scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.” Footnote 55 sets out that “for the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, considering its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”
- 5.20 Thus, whether a proposal is “major development” or not, is a matter of judgement for a decision-maker (i.e. RDC), and that judgment cannot be applied in isolation using rigid rules or criteria; it must take into account the specific and local circumstances of the application. It is, therefore, not possible at the plan-making stage to come to a view as to what is or is not major development in the AONB as this will depend on the specifics of a yet-to-be submitted planning application and the local context at the time of application. However, it is nevertheless helpful if the site assessment can flag whether individual sites have the potential to be considered major development at the decision-making stage.
- 5.21 It is considered that developments on HG6, HG17 and HG35 could comprise major development at the decision-making stage; this, and its implications, should be discussed with RDC.

Next Steps

- 5.22 HGPC are advised to discuss the findings of this report with RDC.
- 5.23 HGPC are advised to liaise with RDC to understand the change in language between the Rother Local Plan Core Strategy and the DaSA Local Plan, the evidence that supports this, to establish whether there is a requirement to plan for 75 dwellings or not.
- 5.24 If there is a requirement to plan for 75 dwellings, HGPC are advised to obtain specific evidence about the landscape capacity of the sites currently identified as ‘potentially suitable’ as well as sites HG11, HG22 and HG36 (currently identified as ‘not suitable’). This reflects the NPPF’s policy requirement to conserve and enhance landscape and scenic beauty within AONBs.
- 5.25 Evidence of this nature could:
- demonstrate that some of the sites (HG11, HG22 and HG36) do have capacity for development in landscape terms;
 - inform site specific design requirements that could be included within any site-specific site allocation policies; or
 - demonstrate insufficient environmental capacity to meet RDC’s spatial strategy.
- 5.26 Further, evidence of the ability of these sites to provide a suitable vehicle access must be sought if categorisation is considered, this could be obtained from the site promoters and considered by the relevant highways body.

5.27 Once the shortlist of potentially suitable sites is finalised (either based on the conclusions of this report or amended in line with the conclusions of this report and other evidence available to HGPC), HGPC should engage with RDC and the community to select a site or sites to be included as allocations in the draft NDP which best meets the objectives of the NDP.

5.28 The site selection process should be based on the following:

- The findings of this site assessment;
- Any other relevant evidence;
- Discussions with RDC;
- The views and opinions of the local community;
- The extent to which the sites support the vision and objectives for the NDP; and
- The potential for the sites to meet identified infrastructure needs of the community.

Viability

5.29 As part of the site selection process, it is recommended that the Group discusses site viability with RDC. Viability appraisals for individual sites may already exist. If not, it is possible to use the Council's existing viability evidence to test the viability of sites proposed for allocation in the NDP. This can be done by 'matching' site typologies used in existing reports with sites proposed by the group, to give an indication of whether a site is viable for development and therefore likely to be delivered. In addition, any landowner or developer promoting a site for development should be contacted to request evidence of viability.

