

# Strategic Environmental Assessment (SEA) for the Hurst Green Neighbourhood Plan

Environmental Report to accompany the Regulation 14 version  
of the Neighbourhood Plan

Hurst Green Neighbourhood Plan Steering Group

June 2022

## Quality information

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## Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1.0	27 <sup>th</sup> May 2022	Version for Neighbourhood Group's comment	13 <sup>th</sup> June 2022	Andrew Brown	Chair, Neighbourhood Group
V2.0	16 <sup>th</sup> June 2022	Regulation 14 consultation version	16 <sup>th</sup> June 2022	Nick Chisholm- Batten	Technical Director, AECOM

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# Non-Technical Summary

## What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Hurst Green Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the Hurst Green Neighbourhood Plan?

The Hurst Green Neighbourhood Plan (hereafter referred to as the “HGNP”) has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

## Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the HGNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2020), which includes information about the HGNP area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the HGNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the HGNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the HGNP has been assessed.
- The appraisal of alternative approaches for the HGNP.
- The likely significant effects of the HGNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the HGNP.
- The next steps for the HGNP and accompanying SEA process.

## Assessment of reasonable alternatives for the Hurst Green Neighbourhood Plan

### Initial shortlisting of sites

During the earlier stages of the HGNP's development, there was a recognition that the HGNP would potentially need to allocate sites for development.

In light of the above, Hurst Green Parish Council completed two local call for sites exercises (in 2018 and 2019), along with a review of Rother District Council's latest Strategic Housing Land Availability Assessment (SHLAA). This was with a view to identifying sites which could be considered as potential allocations for the HGNP.

The HGNP Steering Group (with support from an independent planning consultancy) has subsequently undertaken assessments of the various sites in the parish<sup>1</sup> in terms of their suitability, availability, and achievability for the purposes of a potential HGNP allocation.

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 NTS1** and shown in the figure within the main body of the Environmental Report (Chapter 4), 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 six homes have not been considered. Reflecting local policy, smaller sites are best placed to come forward as windfall allocations during the plan period.<sup>2</sup>

**Table NTS1 Sites taken forward for further consideration through the SEA process**

SEA ID	Name of site, address	Size (Ha) <sup>3</sup>
HG06	London Road	1.71
HG11	Cooks Field, Burgh Hill	1.54
HG22 /43	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

### Spatial strategy options considered through the SEA process

The housing requirement for Hurst Green identified within the Development and Site Allocations (DaSA) Local Plan is 75 dwellings (to be delivered on larger sites of at least six dwellings).

Since the adoption of the DaSA Local Plan in December 2019, an application for 20 dwellings on one of the sites considered through the site assessment process has been conditionally approved by Rother District Council, specifically: Site HG35 'Foundry Close' (reference: [RR/2019/2194/P](#)). Deducting this existing commitment

<sup>1</sup> The initial site assessment report contributes to the evidence base for the emerging HGNP and accompanies the HGNP at Regulation 14 consultation. A summary of the process, including further detail on the total number of sites which were considered and how they were shortlisted, is provided within the Neighbourhood Plan (within the 'Housing Allocations' chapter).

<sup>2</sup> The Rother Core Strategy states: "Developments of less than six dwellings, on currently unidentified sites, will count towards the overall rural housing numbers total as 'small-site windfalls'."

<sup>3</sup> Represents total site size and not necessarily total developable area.

from the housing requirement for Hurst Green leaves a residual target of 55 dwellings which is to be met through Neighbourhood Plan allocations.

To support the choice of a development strategy for the HGNP, the SEA process has assessed several spatial strategy options as reasonable alternatives<sup>4</sup>. 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<sup>5</sup>.
- **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.<sup>6</sup>
- **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.<sup>7</sup> 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 in the future.

## Appraisal findings

The appraisal considers the relative sustainability merits of each of the four 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 four options in relation to each theme considered.

**Table 4.2** to **Table 4.10** within the main body of the Environmental Report present the findings of the appraisal of the four spatial strategy options for each of the SEA themes. **Table NTS2** below summarises the rankings of the options with regards to their relative performance in relation to each SEA Theme. This is followed by a summary of the appraisal.

<sup>4</sup> This assessment of the spatial strategy options was completed in May 2021 to inform the neighbourhood planning process and was based on the most up to date information about the sites and their potential capacities at this time.

<sup>5</sup> The total number of homes stated within the options is based on the indicative capacities as determined through the initial site assessment process, and do not necessarily represent the total number which may come forward at the planning application stage. For example, capacities may reduce based on the constraints associated with the sites.

<sup>6</sup> 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).

<sup>7</sup> 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.

**Table NTS2 Development strategy options: summary of rankings by SEA Theme**

SEA theme	Option A	Option B	Option C	Option D
Air Quality	=1	=1	=1	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

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 neighbourhood area. However, as Hurst Green village benefits from the widest range of services and amenities within the neighbourhood 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.

From a landscape perspective, the whole of the neighbourhood area is within the High Weald AONB. In this respect, the potential site allocations considered through all four 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).

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.



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 neighbourhood area with concentrations of heritage features (including listed buildings, archaeological notification areas and ancient routeways).

Ecologically, none of the options are likely to have impacts on the integrity of any internationally 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.

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.

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.

### Preferred approach in the HGNP in light of the appraisal findings

Following the consideration of the assessment of spatial strategy options, the HGNP area seeks to deliver the housing requirement of 55 dwellings through the combination of site allocations proposed through Option B (see Policy HG2 'Housing Strategy'). Specifically:

- Site HG06: London Road (26 dwellings)
- Site HG11: Cooks Field, Burgh Hill (seven dwellings)
- Site HG22/43: Land opposite Hurst Green School (22 dwellings)<sup>8</sup>

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<sup>8</sup> Whilst it is recognised that the site is large enough to accommodate a higher number of dwellings, correspondence from Historic England on a recent planning application for this site (reference: [RR/2021/1816/P](#)) considered that the proposal (which was for 36 dwellings) would not respect the character of the historic parkland, causing harm to the significance of Iridge Place through unsympathetic change of its original setting. Within their correspondence, Historic England state that there may be scope for development within a reviewed boundary of reduced extent which would 1) reinstate a historic tree-lined boundary within the site, and 2) limit the amount of built development to the west of this boundary (i.e., the most sensitive locations).



The choice of site allocations has been informed by the findings of the site assessment undertaken for the HGNP, consultation events, and the SEA findings. The HGNP also states:

*“Extensive work led by AECOM has concluded that there are no sites within the neighbourhood area which are totally constraint-free; however subject to the mitigation of constraints, the options presented in the SEA represent a way to meet the required allocation with the least impact.”*

*“Whilst potential housing sites HG40 and HG42 were initially identified as being potentially suitable, there is only limited evidence of availability, and with no existing access to these sites, it is unclear whether acceptable access arrangements could be provided. In addition, early concepts for these sites did not propose the bringing forward of additional community benefit, a key aim of the Neighbourhood Plan.”*

In addition to these allocations, the Neighbourhood Plan allocates Site HG45: ‘Land Adjacent to Iridge Place TN19 7PN’<sup>9</sup> for four dwellings (see Policy HGSA4). As the total housing number to be delivered at this site is fewer than six dwellings, the site will be considered as windfall development by Rother District Council and therefore does not contribute to the housing requirement for the neighbourhood area. Nevertheless, the HGNP states that *“the site will contribute to local housing need and to the overall vision by contributing to green infrastructure (e.g., village pond and footpath connectivity to the Drewett Field)”*.

The HGNP also supports small-scale infill development subject to the provisions of Policy HG1 ‘Location of Development’ and local policy provision.

In this context, the HGNP supports an approach which seeks to deliver sustainable development which is sensitive to the environmental constraints within the HGNP area, and which is intended to meet specific housing requirements or other community objectives.

## Assessment of the Regulation 14 version of the Hurst Green Neighbourhood Plan

The Regulation 14 version of the HGNP presents 25 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received through community consultation, and through recommendations and suggestions proposed through the SEA process to date.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the Regulation 14 version of the HGNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the Regulation 14 version of the HGNP. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

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<sup>9</sup> Site HG45 was considered through the initial site assessment process, with the results of this process contributing to the evidence base for the HGNP (which accompanies the HGNP at Regulation 14 consultation). Policy provisions within the HGNP seek to mitigate the potential constraints to development at this location which have been identified through the site assessment process. As stated within paragraph 4.7 within the main body of this Environmental Report, sites with a capacity of fewer than six homes have not been further considered through the SEA, as they are best placed to come forward as windfall allocations during the plan period (reflecting local policy).

- Air Quality
- Biodiversity and Geodiversity.
- Climate Change.
- Landscape
- Historic Environment.
- Land, Soil, and Water Resources.
- Population and Community.
- Health and Wellbeing; and
- Transportation.

In the context of the above, the assessment has concluded that the Regulation 14 version of the HGNP is likely to have positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA Themes. This principally links to the HGNP's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), safeguard and improve the availability of services, facilities and amenities, and support opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The HGNP is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation.

With reference to the 'Biodiversity and Geodiversity' SEA Theme, the policies within the HGNP seek to protect the natural features of the neighbourhood area, which includes protecting designated sites and protected species, preserving and enhancing ecological networks, and supporting biodiversity net gain. In addition to this, policies aim to create, conserve, enhance and manage green spaces and connect areas of green infrastructure, facilitating the movement of wildlife through the neighbourhood area. The site-specific policies cover important aspects in relation to this topic, including the retention of existing trees and the creation of buffer zones around sensitive features. In this respect, the HGNP will likely result in positive effects.

In terms of the 'Climate Change' SEA Theme, the policies within the HGNP seek to mitigate the risk of surface water flooding present in some parts of the neighbourhood area. This is achieved through support for the provision of SuDS in the proposed developments, especially those that incorporate green spaces, green roofs, permeable surfaces, and rain gardens. In addition to this, policies seek to achieve energy efficiency and sustainable design within the built environment to reduce energy consumption and its impact on climate change. A range of sustainable design features will be actively encouraged for use in the development proposals. In this respect, the HGNP will likely result in positive effects, mitigating the impacts of climate change and reducing the CO<sub>2</sub> emissions produced within the neighbourhood area. However, this is dependent on the extent to which mitigation and adaptation measures are included within the design of new development areas.

The HGNP will also bring positive effects in relation to the 'Landscape' and 'Historic Environment' SEA Themes. These benefits largely relate to the HGNP's emphasis on protecting and enhancing the relationship between the village and the High Weald AONB, delivering high-quality design which respects and embraces the natural and

built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocations are sensitive from a landscape and heritage perspective, it is considered that the HGNP policies provide a detailed overview of the proposed mitigation and enhancement measures which positively address the sensitivities. Given the Hurst Green Masterplan and Design Codes document which accompany the HGNP also set out a comprehensive range of provisions relating to the natural and built environment, this will help provide an appropriate basis for any development proposals which may come forward during the plan period.

It is acknowledged that development proposals should encourage opportunities to help increase sustainability, connectivity, and accessibility (where possible). However, it is recognised that public transport options within the HGNP area are relatively limited in the absence of a train station and regular bus services. Nevertheless, policies within the HGNP aim to address as far as possible the impact of development on the A21 (London Road), which is already under pressure in terms of congestion. Moreover, policies highlight the importance of incorporating green infrastructure into roads and paths, as well as the connection of new developments to existing footpath and cycle networks (and facilitating active travel). In this respect, the HGNP will likely deliver positive impacts with regards to both the 'Transportation' and 'Air Quality' SEA Themes.

More broadly in relation to the 'Land, Soil, and Water Resources' SEA Theme, the HGNP outlines several provisions will help support the capacity of the landscape to regulate soil and water quality. However, the proposed site allocations have the potential to result in the permanent loss of areas of productive agricultural land.

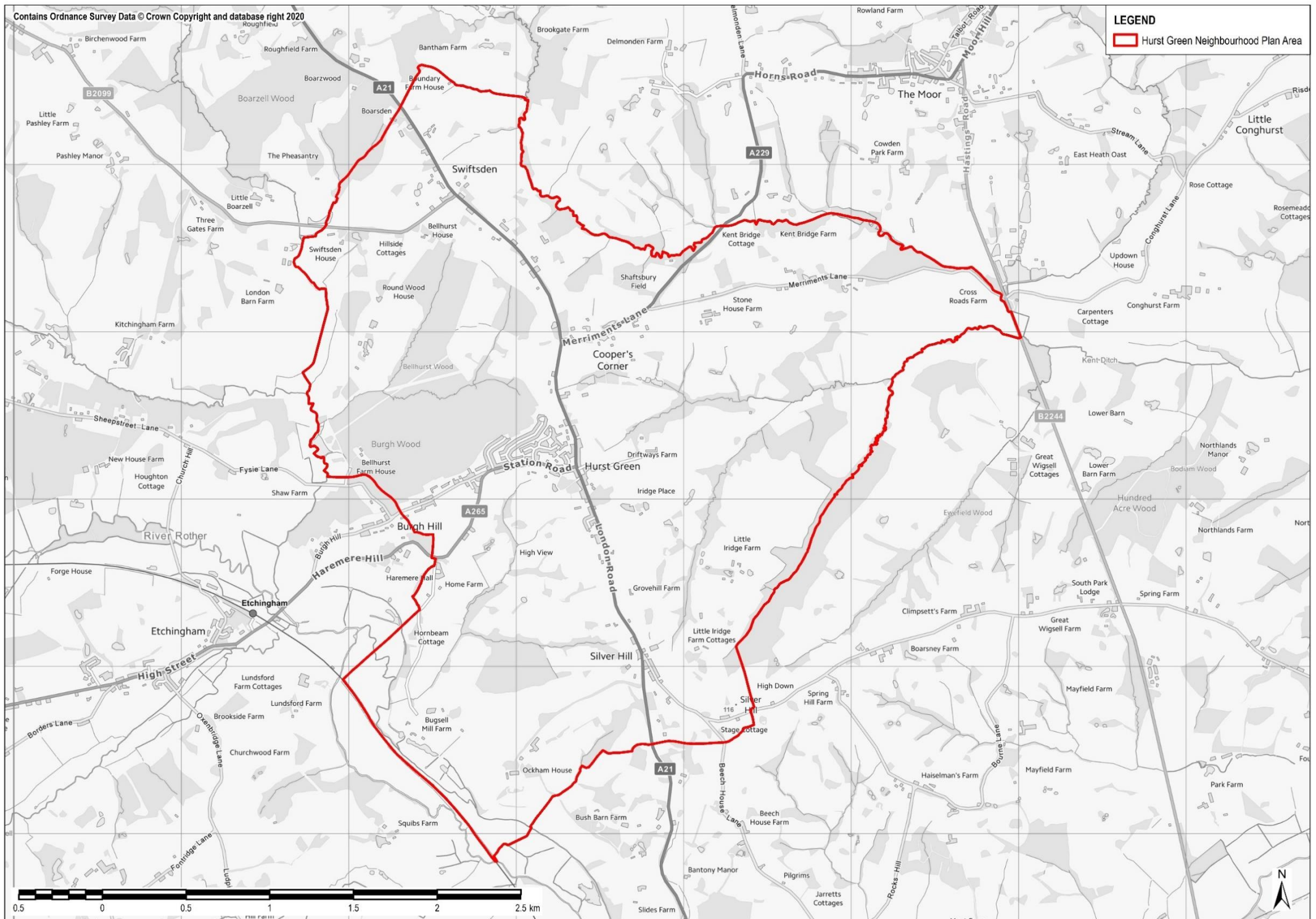
## Next steps

This Environmental Report accompanies the HGNP for Regulation 14 consultation.

Following consultation, any representations made will be considered by the HGNP Steering Group, and the HGNP and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the HGNP for submission to the Local Planning Authority, Rother District Council, for subsequent Independent Examination.

At independent Examination, the HGNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, HGNP will be subject to a referendum, organised by Rother District Council. If more than 50% of those who vote agree with the HGNP, then it will be 'made'. Once made, HGNP will become part of the Development Plan for the parish.





# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Hurst Green Neighbourhood Plan (HGNP).
- 1.2 The HGNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The HGNP is being prepared in the context of the Rother Core Strategy, adopted in September 2014, and the Development and Site Allocations (DaSA) Local Plan, adopted in December 2019.
- 1.3 It is currently anticipated that the HGNP will be submitted to Rother District Council later in 2022 for subsequent independent examination. Key information relating to the HGNP is presented in **Table 1.1**.

**Table 1.1. Key facts relating to the HGNP**

Name of Responsible Authority	Hurst Green Parish Council
Title of Plan	Hurst Green Neighbourhood Plan (HGNP)
Subject	Neighbourhood planning
Purpose	The HGNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Rother Core Strategy and the DaSA Local Plan.
Timescale	To 2039
Area covered by the plan	The neighbourhood area covers the Parish of Hurst Green, in Rother District (shown in the figure, above).
Summary of content	The HGNP will set out a vision, strategy, and range of policies for the neighbourhood area.
Plan contact point	Alison Eardley, Planning Consultant for the HGNP Email address: <a href="mailto:ajeardley@btinternet.com">ajeardley@btinternet.com</a>

## SEA Screening for the HGNP

- 1.4 The HGNP has been screened in by Rother District Council as requiring a Strategic Environmental Assessment (SEA).
- 1.5 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, HGNP has been screened in as requiring an SEA process for the following reasons:
  - The HGNP will allocate new development in the Parish. This includes potentially in environmentally sensitive locations, such as:
    - Locations within the setting of the High Weald Area of Outstanding Natural Beauty (AONB).
    - Locations with sensitivity to the historic environment; and
    - Locations with sensitivity to biodiversity.
- 1.6 Considering this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

## SEA explained

- 1.7 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.8 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 maximise the emerging plan's contribution to sustainable development.
- 1.9 Two key procedural requirements of the SEA Regulations are that:
  - i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues.
  - ii. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e., the Draft HGNP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 This 'Environmental Report' is concerned with item 'ii' above.

## Structure of this SEA Environmental Report

1.11 This document is the SEA Environmental Report for the HGNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

**Table 1.2 Questions that must be answered by the SEA Environmental Report to meet the regulatory<sup>10</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>11</sup>
What's the scope of the SEA?	<p>What is the plan seeking to achieve?</p> <ul style="list-style-type: none"> <li>An outline of the contents and main objectives of the plan.</li> </ul>
	<p>What is the sustainability 'context'?</p> <ul style="list-style-type: none"> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection objectives established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	<p>What is the sustainability 'baseline'?</p> <ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	<p>What are the key issues and objectives?</p> <ul style="list-style-type: none"> <li>Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.</li> </ul>
What has plan-making /SEA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with.</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>
What are the assessment findings at this stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the Regulation 14 version of the plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.</li> </ul>
What happens next?	<ul style="list-style-type: none"> <li>The next steps for the plan making /SEA process.</li> </ul>

<sup>10</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>11</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.



## 2. Local Plan context and vision for the HGNP

### Local Plan context for the HGNP

- 2.1 The HGNP is being prepared in the context of the Rother Local Plan, the key documents of which include the Rother Core Strategy<sup>12</sup> (adopted September 2014) and the Development and Site Allocations (“DaSA”) Local Plan<sup>13</sup> (adopted in December 2019). The Core Strategy sets the overall vision for future land use and provides the framework for the scale and distribution of development up to 2028. It also contains ‘core policies’ that address key issues facing the district, in relation to sustainable resource management, community development, housing, the economy, the environment and transport. The DaSA contains specific site allocations and sets out more detailed policies for the effective management of development in relation to key issues.
- 2.2 In this respect, Hurst Green is defined as a ‘Local Service Village’ within the Rother Core Strategy. Policy RA1 ‘Villages’ encourages high quality and sustainable economic growth by identifying sites for local job opportunities within the district, with Hurst Green identified in Figure 10 as a village demonstrating a particular need for employment floorspace. In order to meet housing needs and ensure the continued vitality of villages, Policy RA1 confirms that the provision of 1,670 additional dwellings (comprising existing commitments, new allocations and windfalls) will be delivered in villages over the plan period.
- 2.3 The residual housing requirement for Hurst Green identified within the DaSA to be delivered on larger sites (of at least six dwellings) is 75 dwellings<sup>14</sup>. Within the DaSA, Policy DIM2 ‘Development Boundaries’ states that new development shall be focused within defined settlement boundaries, with limited development permitted outside of these boundaries. Hurst Green is listed as a settlement which has a defined boundary (see Figure 14 within the DaSA). 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.
- 2.4 Rother District Council are in the early stages of undertaking a review of the Rother Local Plan<sup>15</sup>. The Emerging Local Plan<sup>16</sup> will set out how the district will

<sup>12</sup> Rother District Council (2014): ‘Rother Core Strategy’, [online] available to access via [this link](#)

<sup>13</sup> Rother District Council (2019): ‘Development and Site Allocations (DaSA) Local Plan’, [online] available to access via [this link](#)

<sup>14</sup> As of 1<sup>st</sup> April 2018

<sup>15</sup> In light of the provisional timings for the Emerging Local Plan as indicated in Rother District Council’s latest position statement (April 2022), it is anticipated that the HGNP will be submitted and adopted before any significant work is completed. In this respect, an early review of the HGNP may need to be completed in due course to take in to consideration any emerging policy requirements or revised housing numbers for the neighbourhood area.

<sup>16</sup> Rother District Council (2022): ‘Emerging Local Plan (2022-2039), Position Statement – April 2022’, [online] available to access via [this link](#)

grow sustainably up until 2039, and what it means for local communities. Intentions of the Emerging Local Plan also include aims which address and consider the implications of the climate emergency and biodiversity crisis. Based on the Council's latest position statement, which was published in April 2022, consultation on the preferred approach for the Emerging Local Plan (Regulation 18 consultation) is scheduled to take place in January 2023. The focus over the coming months is to develop an evidence base that responds to the Council's key objectives. Further information is available on Rother District Council's webpages.

- 2.5 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.

## Vision, aims, and objectives for the HGNP

- 2.6 Developed during the earlier stages of plan making and via community consultation, the vision for the HGNP is as follows:



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**Health and Happiness:** *Hurst Green will become a thriving, safe and friendly village within the High Weald, along with the hamlets of Swiftsden and Silver Hill, which foster a healthy lifestyle and encourage residents to live active, social, and meaningful lives.*

**Business, Economy and Tourism:** *We will strongly support local prosperity and will create a thriving village community that supports existing and new local businesses, and seeks to boast a prosperous, well-presented village, where people want to live, work and visit.*

**Housing:** *We will support sustainable and landscape-sensitive housing development that enables us to deliver on our vision and objectives, developing the facilities that are needed to address the current and future needs of our community.*

**Travel and Transport:** *We will support proposals that help to create an environment that will encourage walking, cycling and low carbon transport over car-use, particularly for shorter journeys in and around the parish. We will also work with partners to explore ways to reduce the impact of the A21 on the parish.*

**Land and Nature:** *We will go to great lengths to protect and promote our outstanding natural environment and will seek to improve access to the countryside and our nearby green spaces, restoring land for the benefit of people and wildlife.*

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## Vision Statement for the HGNP

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2.7 The vision statement for the HGNP is underpinned by six objectives for development during the plan period, as follows:

- To protect against inappropriate and speculative development and to provide guidance and greater influence over how Hurst Green should be developed in the future. This includes ensuring that new homes meet the particular needs of the local community.
- To promote opportunities for more sustainable modes of travel in and around the parish, while exploring ways to minimise the impacts of the A21 through the village.
- To create an environment that encourages residents to live active, social, meaningful lives that promote good health and well-being. This includes bringing forward action on facilities and improvements, which are needed by the village of Hurst Green; and the hamlets of Silver Hill and Swiftsden.
- To improve the visual appearance and overall perception of Hurst Green as a place where people want to live, work and visit. This includes conserving and enhancing the built and historic environment and improving the general street scene around the parish.
- To enhance existing, and create new, open green spaces, and improve access to the countryside. This includes identifying ways to support and enhance biodiversity.
- To increase business, retail, and tourism opportunities to encourage local employment, and grow the local economy.

## 3. What is the scope of the SEA?

### Summary of SEA Scoping

- 3.1 The SEA Regulations require that: *“when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England<sup>17</sup>. The High Weald AONB were also invited to provide comments on the scope of the SEA. These authorities were consulted on the scope of the HGNP SEA for a period of five weeks, between September and October 2020.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the HGNP.
  - Baseline data against which the HGNP can be assessed.
  - The key sustainability issues for the HGNP.
  - An ‘SEA Framework’ of objectives against which the HGNP can be assessed.
- 3.4 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

**Table 3.1 Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<p>Historic England</p> <p><i>Historic Environment Planning Advisor (email response received on 28<sup>th</sup> October 2020)</i></p> <p>Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout the preparation of the SEA of this plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment.</p>	<p>Comment noted.</p> <p>Potential heritage impacts associated with the proposals in the Neighbourhood Plan have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.</p>

<sup>17</sup> In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme’.

Consultation response	How the response was considered and addressed
Page 36 to 37, section 6.20 to 6.24 – This section would merit reference to NPPF footnote 63. <i>“Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets”</i> . It is possible to discover schedulable archaeology anywhere, but the likelihood is higher within archaeology notification areas.	The baseline information has been appropriately updated to reference the NPPF footnote. Specifically, this is presented in the policy review section for the ‘Historic Environment’ in Appendix A of this Environmental Report.
<b>Environment Agency</b> <i>Planning Advisor (email response received on 2<sup>nd</sup> November 2020)</i>	
We always recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, biodiversity.	Relevant objectives presented within the SEA Framework as included in Chapter 3 of this Environmental Report.
Together with Natural England, English Heritage and the Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. There is a useful check list in this document.	Comment noted.  The advice has been a useful reference point during the subsequent stages of the SEA.
We also recommend your SEA Scoping Report takes account of relevant Rother District's policies, plans and strategies including Rother District's Strategic Flood Risk Assessment, flood risk strategies (available <a href="#">here</a> ), and the South East River Basin Management Plan (available <a href="#">here</a> ).	The SEA process has considered relevant policies, plans and strategies, including those recommended.
<b>Natural England</b> <i>Consultations Team (email response received on 16<sup>th</sup> October 2020)</i>	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Comment noted.
<b>High Weald AONB</b> <i>Planning Advisor (email response received on 13<sup>th</sup> October 2020)</i>	
Landscape – It is recommended that the term ‘character and quality’ of landscapes and villagescapes is replaced by ‘natural beauty’ because conserving and enhancing natural beauty is the purpose of AONB designation. The term ‘natural beauty’ incorporates not just the look of the landscape but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries (Countryside Commission definition). The High Weald AONB Management Plan (available <a href="#">here</a> ) should be used to assess the impact of policies on natural beauty by testing them against the objectives (see template at the end of the Legislation and Planning Advice Note, available <a href="#">here</a> ).	Comment noted.  The AONB Management Plan has been a useful reference point during the subsequent stages of the SEA.  Potential landscape impacts associated with the proposals in the Neighbourhood Plan have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.

Consultation response	How the response was considered and addressed
<p>Landscape – In the Assessment Questions – “<i>Conserve and enhance the setting of the High Weald AONB and the Neighbourhood Plan area?</i>” implies that the AONB only covers part of the parish or that it excludes the village. The settlement of Hurst Green is as much part of the AONB as the fields and woodland around it, so it doesn’t make sense to talk about the ‘setting’ of the AONB. It is also not clear what “<i>Conserve and enhance local diversity and character?</i>” means. Diversity of what?</p>	<p>Comment noted.</p> <p>Potential landscape impacts associated with the proposals in the Neighbourhood Plan have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>Historic Environment – Whilst I understand why you have separated out historic environment from landscape for the purposes of the SEA, it needs to be acknowledged that these are all components of AONB character. Impacts on historic fields and field boundaries are often lost down the cracks between heritage and landscape and it is important that these are picked up within the SEA. The Historic Landscape Characterisation for Sussex is an important reference document for this issue. The full document is available <a href="#">here</a> and a simplified version is in our parish landscape character maps available <a href="#">here</a></p>	<p>Comment noted.</p> <p>The Historic Landscape Characterisation for Sussex has been a useful reference point during the subsequent stages of the SEA.</p>
<p>Land, soil, and water resources – The glaring omission here is that there is no objective or questions relating to soil, other than agricultural land classifications which are increasingly out of step with current thinking on the importance of soil. The biodiversity of soil is at least as important as above ground biodiversity and vital to both sustainable food production and carbon sequestration. Of more importance than agricultural grading is whether the soil has been disturbed (by tillage or other interventions) or chemicals applied that have reduced soil biodiversity. Most of the woodland and many of the fields in Hurst Green parish will have relatively undisturbed soils that have had minimal chemical application because they have historically been used for grazing livestock rather than arable production.</p>	<p>Comment noted.</p> <p>Potential impacts associated with the Neighbourhood Plan proposals (including with relation to land and soil resources) have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.</p>
<p>Land, soil, and water resources – Climate change and biodiversity loss are the two most important issues facing our planet. As such there should be a weighting in the SEA towards measures that help to combat them and against policies that exacerbate them. The carbon storage function of natural habitats including soil is an extremely important issue and it is considered that it should be reflected in the SEA and the consequences of policy choices on this function taken into account.</p>	<p>Comment noted.</p> <p>Potential impacts associated with the Neighbourhood Plan proposals (including with relation to climate change and biodiversity) have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.</p>



Consultation response	How the response was considered and addressed
Land, soil, and water resources – For most habitats, the majority of carbon stored is held in the soil – although the role of above and below ground biomass is also important. Carbon emissions can result from soil disturbance, from damage or even from management and restoration practices which remove or invert soil. It is particularly at risk if land is used for development as construction companies often start by stripping all the topsoil from a site and stockpiling it for disposal or later redistribution around the site. This immediately releases all the stored carbon into the atmosphere and soils take decades to recover from such treatment.	<p>Comment noted.</p> <p>Potential impacts associated with the Neighbourhood Plan proposals (including with relation to land and soil resources) have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.</p>
It is considered that the SEA should include an objective to protect natural habitats and soil and conserve and enhance their ability to store carbon. The questions asked when assessing policy options against this objective should consider the impact on existing carbon sinks in natural habitats and soils. This will be particularly important in assessing alternative sites as normal biodiversity measures do not take account of carbon sequestration, and in particular under-value the importance of permanent pasture to this function. This will necessitate information on sites such as the current land use (such as grassland or arable) and the likely soil disturbance required for the development – for example a steeply sloping site will need more soil disturbance than a flat one.	<p>Comment noted.</p> <p>Potential impacts associated with the Neighbourhood Plan proposals (including with relation to biodiversity, land, and soil resources) have been considered and discussed within the appraisal findings presented in Chapter 4 and Chapter 5 of this Environmental Report.</p>

3.5 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

## Key Sustainability Issues

### Air Quality

- There are no Air Quality Management Areas (AQMA) within Rother District, and the Annual Status Report notes that air quality levels are generally good.
- Nitrogen dioxide (NO<sub>2</sub>) is the key pollutant of concern, particularly along the A21 and wider road network within the neighbourhood area.

### Biodiversity and Geodiversity

- The nearest nationally designated sites are located approximately 5km to the north and to the south of the neighbourhood 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).
- There are six Sites of Nature Conservation Interest (SNCI) within or within proximity to the neighbourhood area, predominantly areas of ancient woodland (including Burgh Wood and Boarzell Wood) and areas of good quality semi-improved grassland.



- Priority Habitats located within or within proximity to Hurst Green include areas of coastal and floodplain grazing marsh, deciduous woodland (including ancient woodland), good quality semi-improved grassland, lowland meadows, and traditional orchard.
- The Sussex Biodiversity Records Centre contains records of protected or notable species within Hurst Green. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles.

## Climate Change

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

## Landscape

- The High Weald AONB is one of the best-preserved medieval landscapes in North West Europe, with the 2019-2024 Management Plan outlining several priority actions and objectives for the nationally protected landscape.
- The neighbourhood area is within the High Weald National Character Area (NCA), with the NCA profile for this landscape detailing five statements of environmental opportunity.
- The Rother Market Towns and Villages Landscape Assessment (2009) states that the area of greatest opportunity for further development in this village is to the east of the A21 in the more enclosed fields and close to the village boundaries. Areas to the south west are exposed to long views from the AONB countryside. Development has extended north of the village to the edge of the Ancient Woodland of Burgh Wood and there is little scope for more infill in this area.
- The neighbourhood area falls within the 'Upper Rother Valley' Landscape Character Area. Landscape action priorities include the need to control ribbon development, conserve the character of the historic settlements, the need to control traffic on rural lanes and protect the remote character.

- Rother District Council have designated Tree Preservation Orders (TPO), individual and areas, in the interest of their amenity value. This includes several within and adjacent to the built-up areas of the parish.
- The Rother Market Towns and Villages Landscape Assessment notes three key viewpoints in the neighbourhood area (viewed from the settlement of Hurst Green and looking out into the surrounding landscape).

## Historic Environment

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

## Land, Soil and Water Resources

- The provisional Agricultural Land Classification (ALC) dataset provided by Natural England indicates that the undeveloped areas of Hurst Green Parish are predominantly underlain by areas of Grade 3 land.
- The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England indicates that most of the undeveloped areas of land in the neighbourhood area have a moderate (20 – 60%) or low ( $\leq 20\%$ ) likelihood of containing BMV land.
- The water resources located within and within proximity to the neighbourhood area include a network of small streams and brooks, along with the River Rother. There are also drainage ditches located adjacent to field margins, including the Kent Ditch.
- None of the watercourses in the neighbourhood area recorded a 'good' overall water quality status based on the most recently completed water quality assessments by the Environment Agency in 2016.

- Reasons for Not Achieving Good Status (RNAGS) for the watercourses are primarily attributed to the following activities: poor soil and nutrient management, sewage discharge and treatment, and poor livestock management.
- The neighbourhood area overlaps with three surface water Nitrate Vulnerable Zones (NVZ): 'Kent Ditch' NVZ 'Limden' NVZ and 'Lower Rother from Robertsbridge to Iden' NVZ.

## Population and Community

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

## Health and Wellbeing

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

## Transportation

- There are no rail stations within the parish, with the nearest station accessible in the neighbouring settlement of Etchingham (approximately 2km to the south west).
- The neighbourhood area is served by seven bus services, with stops located along Station Road and London Road within the village centre.
- The primary route passing through the neighbourhood area is the A21 (London Road), an important strategic route which connects Hurst Green to London, Hastings, and parts of Kent. The route often experiences significant congestion.
- Residents within the neighbourhood area are concerned about parking, with nearly 70% of respondents to a local survey noting that they are unhappy with the parking situation for their road.
- The proportion of households in the neighbourhood area with access to at least two cars or vans (57.1%) is noticeably higher than the totals for Rother District (37.0%), South East England (39.7%) and England (32.0%).
- The most popular method of travelling to work in the neighbourhood area is via driving a car or van (48.4%), higher than the totals for Rother District (37.7%), South East England (41.3%) and England (37.0%).
- The percentage of residents in the neighbourhood area that catch a train, bus, minibus, coach or walk or cycle to work (10.6%), is lower than the totals for Rother District (12.4%), South East England (17.4%) and England (17.0%).

## SEA Framework

- 3.6 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’.
- 3.7 Each proposal within the submission version of the HGNP will be assessed consistently using the framework.

Table 3.2 SEA Framework of objectives and assessment questions

SEA Objective	Assessment questions to consider for the allocations / proposals within the HGNP
<b>Air Quality</b>	
Deliver improvements in air quality in the neighbourhood area	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce emissions of pollutants from transport?</li> <li>• Promote the use of low emission vehicles?</li> <li>• Promote enhancements in sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide and other pollutants?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals within the HGNP
<b>Biodiversity and Geodiversity</b>	
Protect and enhance all biodiversity and geodiversity	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the integrity of locally designated biodiversity sites located within proximity to the neighbourhood area?</li> <li>• Protect and enhance priority habitats and species?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate Change</b>	
Reduce the contribution to climate change made by activities within the neighbourhood area	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the number of journeys made?</li> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the neighbourhood area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>
<b>Landscape</b>	
Protect and enhance the natural beauty of landscapes and villagescapes.	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the setting of the High Weald AONB which covers the entire neighbourhood area?</li> <li>• Conserve and enhance locally important landscape and villagescape features within the neighbourhood area?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Protect locally important viewpoints contributing to the sense of place and visual amenity of the neighbourhood area?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals within the HGNP
<b>Historic Environment</b>	
Protect, conserve, and enhance heritage assets within the neighbourhood area	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts?</li> <li>• Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the East Sussex HER?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> </ul>
<b>Land, Soil and Water Resources</b>	
Ensure the efficient and effective use of land	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Safeguard best and most versatile agricultural land, which in the parish may comprise Grade 3a agricultural land?</li> <li>• Protect the integrity of mineral resources?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, reuse, and recycling of waste	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse, and recycling of waste?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
Use and manage water resources in a sustainable manner	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Protect surface water resources?</li> </ul>
<b>Population and Community</b>	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals within the HGNP
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types, and tenures	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>
<b>Health and Wellbeing</b>	
Improve the health and wellbeing residents within the neighbourhood area.	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health, and community facilities, for all age groups?</li> <li>• Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards?</li> <li>• Protect and enhance access to nature via greenspace and footpaths?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>
<b>Transportation</b>	
Promote sustainable transport use and reduce the need to travel	<p>Will the option /proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> </ul>



## 4. Consideration of reasonable alternatives through the SEA

### Introduction

4.1 In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, the following sections describe how the SEA process to date has informed the consideration of different spatial strategies for delivering growth in the neighbourhood area.

### Overview of plan making / SEA work undertaken since 2017

4.3 Significant public consultation has been carried out to date to support the emerging HGNP. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included (but is not limited to) the following key events, community surveys, and evidence base studies which have informed the development of the HGNP.

- Initial meetings and a kick-off events in February 2018 discuss the neighbourhood planning process and how to proceed. Subsequently, regular progress updates have been published on the Neighbourhood Plan website, accessible [here](#).
- Technical studies and community evidence base documents prepared between 2018 and 2020, including several surveys on key topics such as housing, business, traffic, and tourism (the results of which are accessible [here](#)), and a site options and assessment process.
- An exhibition in October 2021, with over 120 residents providing their views on the key objectives and outcomes for the Neighbourhood Plan. The feedback and results are accessible [here](#).

### Initial shortlisting of sites

4.4 During the earlier stages of the HGNP's development, there was a recognition that the HGNP would potentially need to allocate sites for development.

4.5 In light of the above, Hurst Green Parish Council completed two local call for sites exercises (in 2018 and 2019), along with a review of Rother District Council's latest Strategic Housing Land Availability Assessment (SHLAA). This was with a view to identifying sites which could be considered as potential allocations for the HGNP.

- 4.6 The HGNP Steering Group (with support from an independent planning consultancy) has subsequently undertaken assessments of the various sites in the parish<sup>18</sup> in terms of their suitability, availability, and achievability for the purposes of a potential HGNP allocation.
- 4.7 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 4.1** and shown in the figure which follows, 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 six homes have not been considered. Reflecting local policy, smaller sites are best placed to come forward as windfall allocations during the plan period.<sup>19</sup>

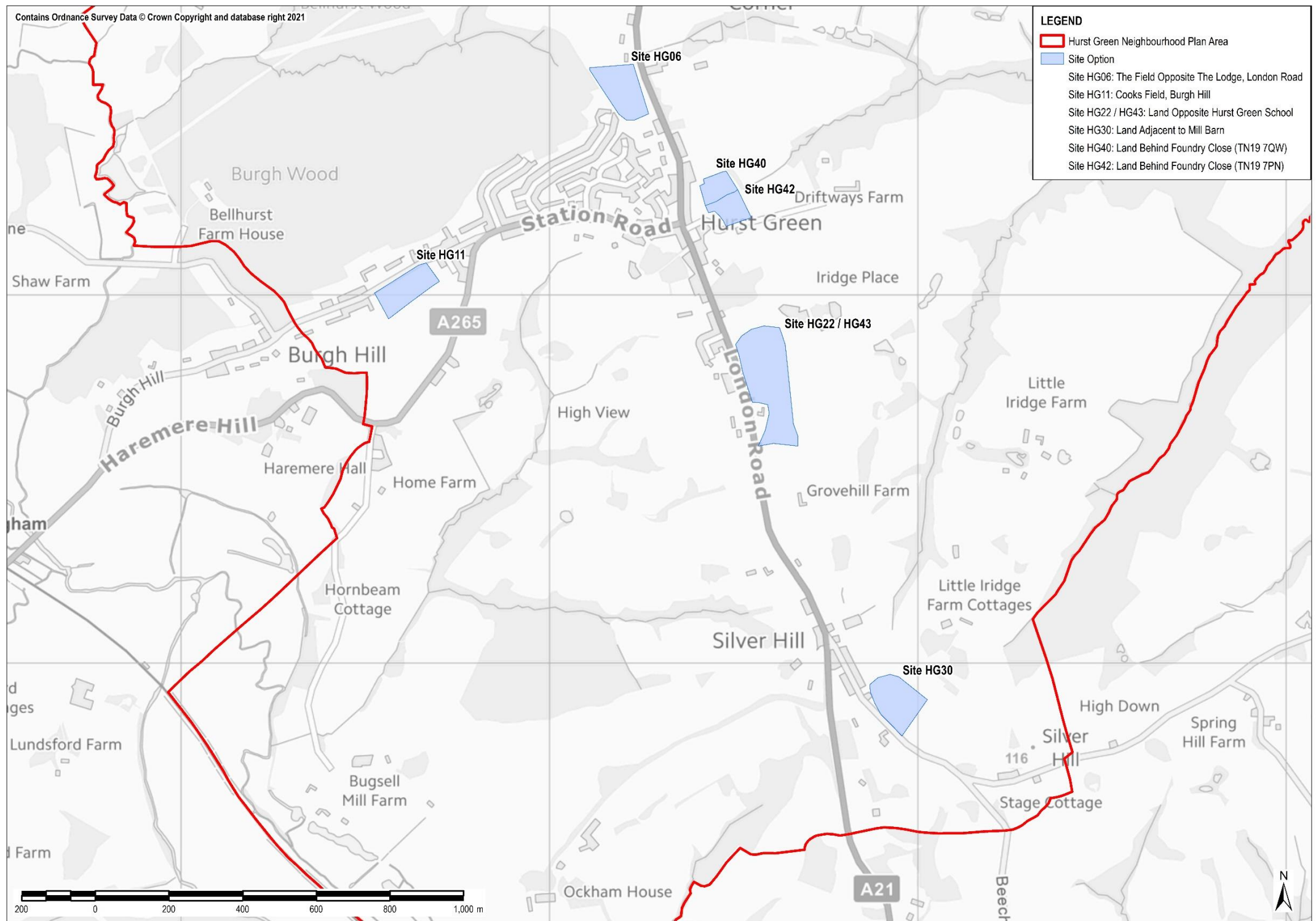
**Table 4.1 Sites taken forward for further consideration through the SEA process**

SEA ID	Name of site, address	Size (Ha) <sup>20</sup>
HG06	London Road	1.71
HG11	Cooks Field, Burgh Hill	1.54
HG22 /43	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

<sup>18</sup> The initial site assessment report contributes to the evidence base for the emerging HGNP and accompanies the HGNP at Regulation 14 consultation. A summary of the process, including further detail on the total number of sites which were considered and how they were shortlisted, is provided within the Neighbourhood Plan (within the 'Housing Allocations' chapter).

<sup>19</sup> The Rother Core Strategy states: "Developments of less than six dwellings, on currently unidentified sites, will count towards the overall rural housing numbers total as 'small-site windfalls'."

<sup>20</sup> Represents total site size and not necessarily total developable area.



## Spatial strategy options considered through the SEA process

- 4.8 As discussed within Chapter 2 of this Environmental Report, the housing requirement for Hurst Green identified within the Development and Site Allocations (DaSA) Local Plan is 75 dwellings (to be delivered on larger sites of at least six dwellings).
- 4.9 Since the adoption of the DaSA Local Plan in December 2019, an application for 20 dwellings on one of the sites considered through the site assessment process has been conditionally approved by Rother District Council, specifically: Site HG35 'Foundry Close' (reference: [RR/2019/2194/P](#)). Deducting this existing commitment from the housing requirement for Hurst Green leaves a residual target of 55 dwellings which is to be met through Neighbourhood Plan allocations.
- 4.10 To support the choice of a development strategy for the HGNP, the SEA process has assessed several spatial strategy options as reasonable alternatives<sup>21</sup>. 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<sup>22</sup>.
  - **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<sup>23</sup>.
  - **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<sup>24</sup>. 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 in the future.
- 4.11 In the context of the above, all three options include the two sites identified through the site assessments undertaken for the HGNP to date (section 4.6) as best suited for potential allocations. These sites are HG11 and HG22 / HG43.
- 4.12 The map overleaf visually represents these four options.

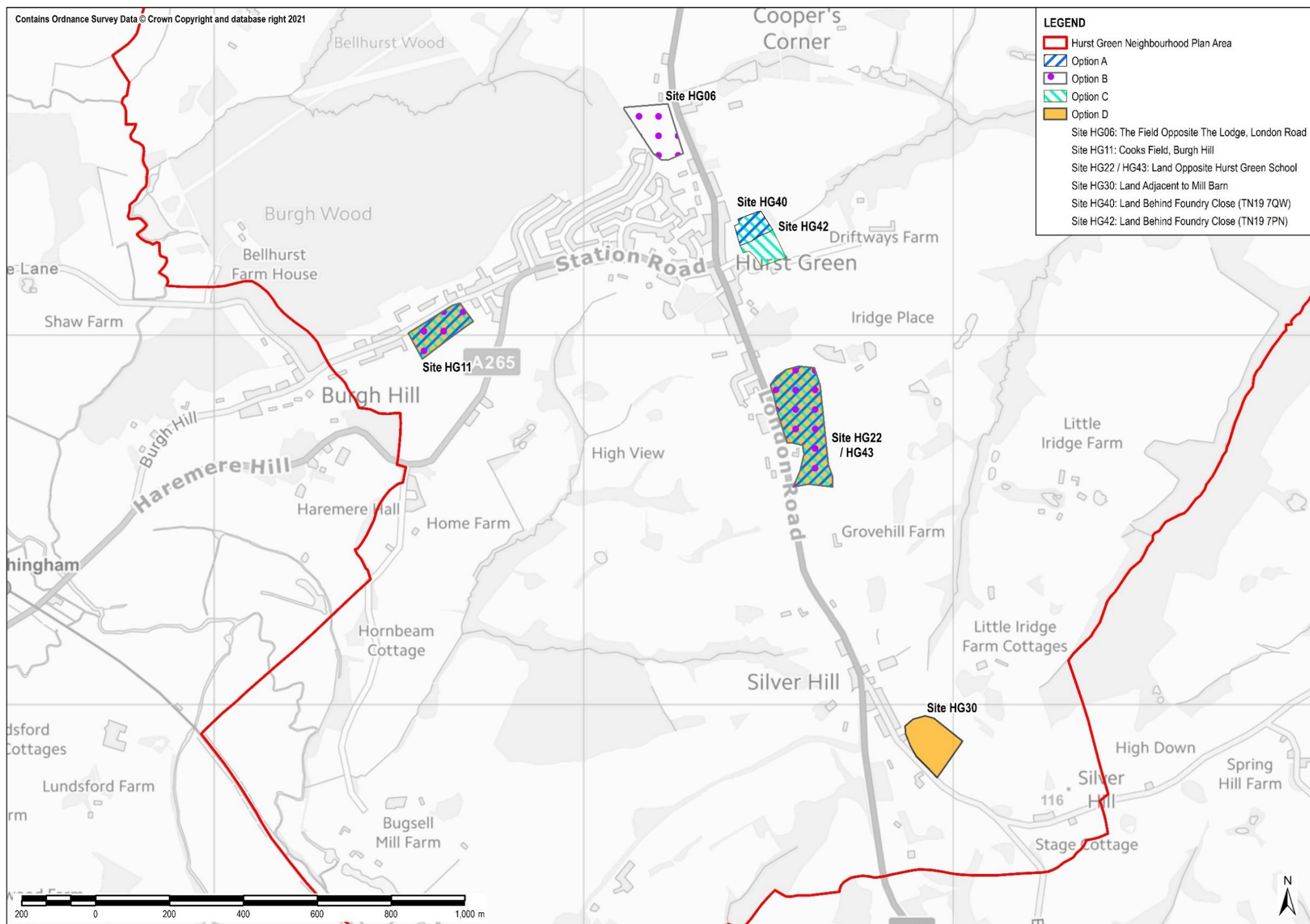
<sup>21</sup> This assessment of the spatial strategy options was completed in May 2021 to inform the neighbourhood planning process and was based on the most up to date information about the sites and their potential capacities at this time.

<sup>22</sup> The total number of homes stated within the options is based on the indicative capacities as determined through the initial site assessment process, and do not necessarily represent the total number which may come forward at the planning application stage. For example, capacities may reduce based on the constraints associated with the sites.

<sup>23</sup> 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).

<sup>24</sup> 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.





## Appraisal findings

### Approach to the appraisal

4.13 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

4.14 The appraisal considers the relative sustainability merits of each of the four 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 four options in relation to each theme considered.

4.15 Sources of information to support the appraisal has included (amongst others): Ordnance Survey maps, MAGIC Interactive Map<sup>25</sup>, the Environment Agency's Flood Risk Maps for England<sup>26</sup>, Natural England's Agricultural Land Classification maps<sup>27</sup>, Google Earth<sup>28</sup>, reports and interactive mapping layers available on Rother District Council's webpages, the East Sussex Historic Environment Record, and baseline studies provided by the HGPN Steering Group (including a High-Level Landscape Assessment Report<sup>29</sup> for the sites).

4.16 **Table 4.2** to **Table 4.10** below present the findings of the appraisal of the four spatial strategy options for each of the SEA themes.

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<sup>25</sup> MAGIC (2021): 'Interactive Map', [online] available to access via [this link](#)

<sup>26</sup> Environment Agency (2021): 'Flood Map for Planning', [online] available to access via [this link](#)

<sup>27</sup> Natural England (2021): 'Regional Agricultural Land Classification Maps and Likelihood of Best and Most Versatile Land', [online] available to access via [this link](#)

<sup>28</sup> Google (2021): 'Google Earth', [online] available to access via [this link](#)

<sup>29</sup> Harper Landscape Architecture (November 2020): 'High-Level Landscape Assessment Report'

**Table 4.2 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 (AQMA) located in the vicinity of the neighbourhood 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 Report<sup>30</sup> concludes that annual mean NO<sub>2</sub> concentrations recorded at continuous monitors and diffusion tubes in Rother District do not exceed levels for AQMA designation. 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). The A21 passes through the neighbourhood 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 NO<sub>2</sub> monitoring stations in Flimwell and in Robertsbridge (just outside of the neighbourhood 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 neighbourhood area in comparison to Options A-C, through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>. 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	1	1	4

<sup>30</sup> Rother District Council (2019): 2019 Air Quality Annual Status Report (ASR) [online] available to access via [this link](#)



**Table 4.3 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 neighbourhood area. The nearest European designated sites are located approximately 20km to the south east of the neighbourhood area, around the coastline between Hastings, Winchelsea, Rye, Lydd, and New Romney. The nearest nationally designated sites are located approximately 5km to the north and to the south of the neighbourhood area, specifically: Combe Well 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 neighbourhood area is not within any SSSI Impact Risk Zones for the types of development likely to come forward through the HGNP 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 District<sup>31</sup>. There are six SNCIs within or within proximity to the neighbourhood 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"> <li>• 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.</li> <li>• 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.</li> <li>• Site HG40: area of lowland meadows BAP priority habitat adjacent to the eastern site boundary.</li> <li>• Site HG42: area of lowland meadows BAP priority habitat located directly to the north east of the site.</li> </ul> <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

**Table 4.4 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 emergency<sup>32</sup> 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 emissions<sup>33</sup>. 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 neighbourhood 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 neighbourhood 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

<sup>31</sup> Rother District Council (2006): 'Local Plan Proposals Map & Hurst Green Inset Map 20', [online] available to access via [this link](#)

<sup>32</sup> Rother District Council (2019): 'Climate Emergency', [online] available to access via [this link](#)

<sup>33</sup> UK Gov (2017): 'Local Authority CO<sub>2</sub> emissions estimates 2005-2017 (kt CO<sub>2</sub>) - Full dataset' [online] available to access via [this link](#)

**Table 4.5 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 km<sup>2</sup> (including the whole of the neighbourhood area), the High Weald Area of Outstanding Natural Beauty (AONB)<sup>34</sup> 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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	1	3	4	2

<sup>34</sup> High Weald AONB Partnership (2019): 'Management Plan 2019-2024', [online] available to access via [this link](#)

**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>change without significant impacts on the surrounding landscape character and visual receptor sites.</p> <ul style="list-style-type: none"> <li>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 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.</li> </ul> <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 value<sup>35</sup>. 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>				

<sup>35</sup> Hurst Green Parish Council (2020): 'Community Evidence: TPOs in Hurst Green (Evidence 24), Silver Hill (Evidence 25) and Swiftsden (Evidence 26)', [online] available to access via [this link](#)

**Table 4.6 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 neighbourhood area, including 50 Grade II listed buildings, the Grade II* listed 'Iridge Place'<sup>36</sup>, and archaeological notification areas (ANAs)<sup>37</sup>. 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"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> <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"> <li>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.</li> <li>retention of traditional heritage features through the design of new development areas.</li> <li>proposals could reflect the distinctive and historical architectural style and design traditions established in the neighbourhood area, integrating with the historic topography, settlement form, historic street patterns and street lines.</li> </ul> <p>There are several ANAs located within the neighbourhood area, including adjacent to Site HG40 and Site HG42, and partly overlapping with the northern boundaries of Site</p>	1	1	3	3

<sup>36</sup> Historic England (2020): National Heritage List for England', [online] available to access via [this link](#)

<sup>37</sup> 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.



**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>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 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 neighbourhood 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 neighbourhood 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>				



**Table 4.7 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 neighbourhood 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.</p> <p>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 neighbourhood 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 4.8 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 neighbourhood 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 4.9 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) 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 neighbourhood 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 neighbourhood area in the settlements of Hawkhurst (to the north east), Robertsbridge (to the south) and Etchingham (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

**Table 4.10 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 neighbourhood 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 neighbourhood 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 neighbourhood 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 neighbourhood 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 Study<sup>38</sup>, 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 neighbourhood 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 neighbourhood 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

<sup>38</sup> Department for Transport (2020): 'National Travel Attitudes Study: Wave 4 (Provisional)': [online] available to access via [this link](#)

## Conclusions at this current stage

### Summary of appraisal findings

4.17 The table below summarises the rankings of the options with regards to their relative performance in relation to each SEA Theme.

**Table 4.11 Development strategy options: summary of rankings by SEA Theme**

SEA theme	Option A	Option B	Option C	Option D
Air Quality	=1	=1	=1	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

4.18 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 neighbourhood area. However, as Hurst Green village benefits from the widest range of services and amenities within the neighbourhood 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.

4.19 From a landscape perspective, the whole of the neighbourhood area is within the High Weald AONB. In this respect, the potential site allocations considered through all four 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).

- 4.20 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.
- 4.21 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 neighbourhood area with concentrations of heritage features (including listed buildings, archaeological notification areas and ancient routeways).
- 4.22 Ecologically, none of the options are likely to have impacts on the integrity of any internationally 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.
- 4.23 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.
- 4.24 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.



## Current approach in the HGNP and the development of policies

### Choice of sites taken forward for the purposes of the HGNP

4.25 Following the consideration of the assessment of spatial strategy options, the HGNP area seeks to deliver the housing requirement of 55 dwellings through the combination of site allocations proposed through Option B (see Policy HG2 'Housing Strategy'). Specifically:

- Site HG06: London Road (26 dwellings)
- Site HG11: Cooks Field, Burgh Hill (seven dwellings)
- Site HG22/43: Land opposite Hurst Green School (22 dwellings)<sup>39</sup>

4.26 The choice of site allocations has been informed by the findings of the site assessment undertaken for the HGNP, consultation events, and the SEA findings. The HGNP also states:

*“Extensive work led by AECOM has concluded that there are no sites within the neighbourhood area which are totally constraint-free; however subject to the mitigation of constraints, the options presented in the SEA represent a way to meet the required allocation with the least impact.*

*“Whilst potential housing sites HG40 and HG42 were initially identified as being potentially suitable, there is only limited evidence of availability, and with no existing access to these sites, it is unclear whether acceptable access arrangements could be provided. In addition, early concepts for these sites did not propose the bringing forward of additional community benefit, a key aim of the Neighbourhood Plan.”*

4.27 In addition to these allocations, the Neighbourhood Plan allocates Site HG45: 'Land Adjacent to Iridge Place TN19 7PN'<sup>40</sup> for four dwellings (see Policy HGSA4). As the total housing number to be delivered at this site is fewer than six dwellings, the site will be considered as windfall development by Rother District Council and therefore does not contribute to the housing requirement for the neighbourhood area. Nevertheless, the HGNP states that *“the site will contribute to local housing need and to the overall vision by contributing to green infrastructure (e.g., village pond and footpath connectivity to the Drewett Field)”*.

4.28 The HGNP also supports small-scale infill development subject to the provisions of Policy HG1 'Location of Development' and local policy provision.

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<sup>39</sup> Whilst it is recognised that the site is large enough to accommodate a higher number of dwellings, correspondence from Historic England on a recent planning application for this site (reference: [RR/2021/1816/P](#)) considered that the proposal (which was for 36 dwellings) would not respect the character of the historic parkland, causing harm to the significance of Iridge Place through unsympathetic change of its original setting. Within their correspondence, Historic England state that there may be scope for development within a reviewed boundary of reduced extent which would 1) reinstate a historic tree-lined boundary within the site, and 2) limit the amount of built development to the west of this boundary (i.e., the most sensitive locations).

<sup>40</sup> Site HG45 was considered through the initial site assessment process, with the results of this process contributing to the evidence base for the HGNP (which accompanies the HGNP at Regulation 14 consultation). Policy provisions within the HGNP seek to mitigate the potential constraints to development at this location which have been identified through the site assessment process. As stated within paragraph 4.7 within this Environmental Report, sites with a capacity of fewer than six homes have not been further considered through the SEA, as they are best placed to come forward as windfall allocations during the plan period (reflecting local policy).

4.29 In this context, the HGNP supports an approach which seeks to deliver sustainable development which is sensitive to the environmental constraints within the HGNP area, and which is intended to meet specific housing requirements or other community objectives.

## HGNP policies

4.30 To support the implementation of the vision statement for the Neighbourhood Plan, the Regulation 14 version of the HGNP puts forward 25 policies to guide new development within the HGNP area.

4.31 Policies were developed following extensive community consultation and evidence gathering and are listed below in **Table 4.12**.

**Table 4.12 HGNP policies**

Reference	Policy Name
<b>Spatial Strategy</b>	
Policy HG1	Location of Development
<b>Housing Requirements and Strategy</b>	
Policy HG2	Housing Strategy
Policy HG3	Meeting Local Housing Needs
<b>Character, Heritage, and Design</b>	
Policy HG4	Character of Development
Policy HG5	Design of Development
Policy HG6	Energy Efficiency and Design
Policy HG7	Enhancing the Public Realm
Policy HG8	Protecting Hurst Green's Dark Skies
<b>Environment and Green Space</b>	
Policy HG9	Protecting the Natural Features of the Parish
Policy HG10	Green Infrastructure
Policy HG11	Local Green Space
Policy HG12	Protection of Locally Significant Views
<b>Community Facilities</b>	
Policy HG13	A Village Hub for Hurst Green
Policy HG14	Sports and Leisure Facilities in Hurst Green
Policy HG15	Allotments and Community Growing Spaces
<b>Business, Economy and Tourism</b>	
Policy HG16	Promoting Sustainable Rural Tourism
Policy HG17	Supporting Local Employment Opportunities
<b>Getting Around – Sustainable Movement</b>	
Policy HG18	Encouraging Sustainable Movement
Policy HG19	Public Car Parking

Reference	Policy Name
Policy HG20	Residential Parking Provision
Policy HG21	Highway Capacity at Key Road Junctions
<b>Housing Allocations</b>	
Policy HGSA1	Site HG11: Cooks Field, Burgh Hill
Policy HGSA2	Site HG22 /43: Land opposite Hurst Green School
Policy HGSA3	Site HG06: The Field Opposite the Lodge, London Road
Policy HGSA4	Site HG45: Land adjacent to Iridge Place TN19 7PN

## 5. What are the appraisal findings at this current stage?

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current version of the HGNP. This chapter presents:
- An appraisal of the current version (i.e., the Regulation 14 version) of the HGNP under the nine SEA theme headings.
  - The overall conclusions at this current stage.

### Approach to this appraisal

- 5.2 The appraisal of the Regulation 14 version of the HGNP is presented below and is structured under the nine SEA Themes.
- 5.3 For each SEA Theme, 'significant effects' of the Regulation 14 version of the HGNP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment, as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the HGNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### Air Quality

- 5.5 There are no AQMAs located in the vicinity of the neighbourhood area, or within the wider Rother District. In this respect, none of the proposed site allocations have the potential to exacerbate air quality issues within an AQMA. Nevertheless, the A21 (London Road), which often experiences significant congestion, passes through the neighbourhood area. The NO<sub>2</sub> monitoring stations in Flimwell and in Robertsbridge, which are just outside of the neighbourhood area but also on the A21, have exceeded or are close to exceeding air quality standards at various points.
- 5.6 The proposed site allocations within the HGNP, apart from Site HG11, are located alongside the A21. In this respect, exposures to pollutants might take place for those properties which are situated right against this trunk road. This is recognised through Policy HG5 (Design of Development) which seeks to shield the community from the negative effects of the A21 (London Road) by ensuring that dwellings are set back from the road and buffered via tree planting to protect against road noise, intrusive vehicles, and air pollution. In

addition to this, Policy HG9 (Protecting the Natural Features of the Parish) and Policy HG10 (Green Infrastructure) seek to protect and enhance the local green and blue infrastructure network, which will likely have indirect positive effects in terms of air quality. Finally, Policy HG18 (Encouraging Sustainable Movement) seeks to encourage non-car modes of transport to access facilities within the neighbourhood area, which will also have positive effects in terms of air quality due to a reduction in private car usage and a focus on active travel.

## Biodiversity and Geodiversity

- 5.7 There are no internationally or nationally designated sites for biodiversity and/or geodiversity located within or within proximity to the neighbourhood area. In addition to this, the neighbourhood area is not within any SSSI Impact Risk Zones for the types of development likely to come forward through the HGNP during the plan period (i.e., residential, rural residential, and rural non-residential development).
- 5.8 With regards to local ecological networks, there are six Sites of Nature Conservation Interest (SNCIs) within or within proximity to the neighbourhood area, predominantly areas of ancient woodland and 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. Although none of the proposed site allocations are located within a SNCI, Site HG06 and Site HG22 /43 are adjacent to areas of BAP priority habitat, specifically:
- 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.
- 5.9 In respect of Site HG06, Policy HGSA3 outlines that a 15-metre buffer, at the very minimum, will need to be provided between ancient woodland and the proposed development. This will be accompanied by the creation of a village pond, which will serve as an attenuation pond, as well as green corridors linking the ancient woodland, pond, and green spaces, which will enhance the local green and blue infrastructure network. For Site HG22 / HG43, Policy HGSA2 states the development should strengthen the existing boundary planting with native species and enhance the historic treeline within the boundary, providing habitat provision and connectivity to the surrounding areas.
- 5.10 More broadly with reference to local ecological networks, Policy HG9 (Protecting the Natural Features of the Parish) recognises the distinctive features of the neighbourhood area that provide vital habitats for flora and fauna. In this respect, development proposals are required by the policy to maintain and enhance existing on-site biodiversity assets and make provision for wildlife needs. This includes protecting designated sites and protected species, preserving and enhancing ecological networks, and incorporating landscape buffers and open spaces. Development proposals that would achieve a net gain in biodiversity will be particularly supported. In addition,

Policy HG10 (Green Infrastructure) outlines that development proposals should be designed to create, conserve, enhance and manage green spaces and connect areas of green infrastructure, with the aim of delivering a measurable net environmental benefit for both wildlife and residents. Improvements to the local green and blue infrastructure network through the provision of these policies should positively facilitate the movement of wildlife and reduce pressures on wildlife, whilst enhancing biodiversity by offsetting any effects of noise and air pollution.

- 5.11 Overall, the HGNP policies should ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for development proposals which come forward during the plan period, whilst also delivering biodiversity net gains.

## Climate Change

- 5.12 The UK Government has outlined a commitment to secure a 'green recovery' from the Covid-19 pandemic. Reflecting the conclusions of the Institute for Government's 'Net Zero' report<sup>41</sup>, a green recovery is only likely to happen if net zero becomes a core part of the Government's thinking and its economic policy. Within the report, net zero is described as *"decarbonising not just the power sector but much more difficult sectors including transport, housing and agriculture, where progress has long been stalled and the UK is off track"*. In this respect, policies and proposals within the HGNP seek to reduce the reliance on fossil fuels and support the introduction of low carbon technologies.
- 5.13 A key policy in this regard is Policy HG6 (Energy Efficiency and Design), which outlines that the design and standard of development is encouraged to achieve the highest level of sustainable design, to reduce energy consumption and its impact on climate change. Sustainable design features, such as solar gain, sustainable building materials, insulation, double glazing, on-site renewable energy generation, grey water systems, and electric vehicle charging points will be encouraged. All these features will contribute to a reduction in the CO<sub>2</sub> emissions produced within the neighbourhood area, reducing its contribution to climate change. However, this is dependent on the extent to which these features are included within new development proposals.
- 5.14 Further contributing to climate change mitigation efforts, the proposed site allocations (see Policies HGSA1 – HGSA4) 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. This will reduce the need to travel.
- 5.15 In relation to adapting to the effects of climate change, the settlement of Hurst Green, where all the proposed sites are located, is entirely within Flood Zone 1. Given this, fluvial flood risk is unlikely to comprise a significant constraint to development. 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. The proposed site allocations have a 'very low' or 'low' risk. It is anticipated that surface water

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<sup>41</sup> Institute for Government (2020): 'Net zero: how government can meet its climate change target'. [online] available to access via [this link](#)



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. In this respect, Policy HG5 (Design of Development) highlights that proposals are required to provide Sustainable Drainage Systems (SuDS) on-site, unless there are clear reasons why this is not possible. The policy also states that the provision of SuDS as part of green spaces, green roofs, permeable surfaces, and rain gardens will be encouraged in the neighbourhood area. As well as positively contributing to climate change adaptation efforts, this also has the potential to lead to indirect positive impacts for biodiversity and the health and wellbeing of residents.

- 5.16 More broadly in relation to adapting to the effects of climate change, Policy HG10 (Green Infrastructure) encourages the use of permeable materials and natural features through design, which will indirectly address any flood risk concerns. Additionally, the protection of open spaces and habitats within the HGNP area through the provisions of Policy HG9 (Protecting the Natural Features of the Parish) and Policy HG11 (Local Green Space) will safeguard natural carbon sequesters located within the landscape (i.e., trees and hedgerows). These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues. It is also anticipated that the provisions of the NPPF and local policy will help to guide development away from the areas at highest risk of flooding.

## Landscape

- 5.17 The High Weald Area of Outstanding Natural Beauty (AONB), which covers the whole of the neighbourhood area, is one of the best-preserved medieval landscapes in North West Europe. 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. A key policy in this regard is Policy HG1 (Location of Development) which confirms that proposals outside of the development will be strictly controlled in the interests of conserving this nationally important landscape. Proposals shall only be supported in exceptional circumstances, subject to the criteria listed within Policy HG1.
- 5.18 As the proposed site allocations through Policies HGSA1 - HGSA3 are outside (but adjacent to) the development boundary, and within the High Weald AONB, development at these locations has the potential to adversely impact the special character and qualities of this nationally protected landscape in the absence of sensitive design. An overview of the landscape and villagescape considerations for each of the proposed site allocations (and how these have been addressed through HGNP policy provisions) is provided below:
- 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 specific Policy HGSA3 states that the more elevated sections of the site shall be retained for accessible open space, with a buffer provided between the ancient woodland (a key

contributing feature of the surrounding landscape character) and the proposed development.

- 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 specific Policy HGSA1 states (amongst other considerations) that the existing trees on the site will be retained, including a buffer for the existing tree preservation order (TPO) group within the site. Additional planting will be included to provide visual screening between the site and surrounding properties and positively integrate with and strengthen existing green and blue infrastructure networks. Important viewpoints should also be retained through design.
- 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 specific Policy HGSA2 stipulates that the path of the historic tree-lined boundary within the site should be retained and replanted. An area of publicly accessible green space should also be provided within the most sensitive locations of the site to minimise impacts on views and the wider setting of the village. Additional planting is encouraged to provide further screening.

5.19 The site-specific policies within the HGNP also confirm that the design of any new development areas shall be expected to relate to the local character and appropriately consider the provisions of the High Weald Management Plan, High Weald Housing Design Guide, Rother District Council Key Design Principles, Hurst Green Masterplan, and the Design Codes document. Along with the provisions of Policy HG4 (Character of Development), Policy HG5 (Design of Development) and Policy HG7 (Enhancing the Public Realm), the HGNP is strongly design focused. In this respect, the policies and proposals within the HGNP have a strong focus on protecting the sense of place and special qualities which contribute to its character (including the relationship between the village and the open countryside).

5.20 More broadly in relation to landscape and villagescape character, Policy HG1 (Location of Development) encourages proposals which are located within the most appropriate, sustainable locations, where the impact on the natural environment can be avoided. This includes retaining the rural nature of the neighbourhood area, in terms of size and character, and avoiding coalescence with nearby settlements of Etchingham and Silver Hill. Policy HG4 (Character of Development) defines six-character areas within the development boundary of Hurst Green. The policy outlines that development should conserve and, where possible, enhance the character area in which it is located, with design demonstrating how it has taken account of the local context, reflecting the character and vernacular of the area.

5.21 In terms of protecting the unique features of the neighbourhood area, Policy HG8 (Protecting Hurst Green's Dark Skies) highlights that new developments should not detract from the unlit environment of the neighbourhood area. Notably, dark skies are a key feature of the High Weald AONB and the neighbourhood area, which has some of the lowest levels of radiance in the district, despite the A21 (London Road) cutting through the area. In addition to this, Policy HG12 (Protection of Locally Significant Views) identifies two key

views in the neighbourhood area that are particularly significant in terms of landscape value, and which should be safeguarded from the impacts of development. This includes the view over the lowland meadows from the end of the footpath tree tunnel, and the view from the footpath opposite the church, looking eastward towards the lowland meadows.

- 5.22 With respect to non-residential development proposals which may come forward through the plan period, Policy HG16 (Promoting Sustainable Rural Tourism) outlines that development proposals that support sustainable rural tourism will be supported where the siting, scale and design has strong regard to the local character of the High Weald AONB, as well as regard to the High Weald AONB Management Plan. Any proposals for small-scale community renewable energy schemes (see Policy HG6) are also required to be sensitive to the surrounding landscape.
- 5.23 Overall, the HGNP policies have a strong focus on protecting and enhancing landscape and villagescape character, the quality of the public realm, and local distinctiveness.

## Historic Environment

- 5.24 The neighbourhood area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their heritage interest. In Hurst Green village, this includes 50 Grade II listed buildings, the Grade II\* listed Iridge Place<sup>42</sup>, and archaeological notification areas (ANA). With reference to the proposed site allocations within Policies HGSA1 - HGSA3, the key heritage constraints and considerations for development proposals (and how these have been addressed through HGNP policy provisions) are identified as follows:

- 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 specific Policy HGSA3 outlines that an accessible open space should be provided within the setting of the listed buildings. In addition to supporting enhancements to the setting of features and areas of historic environment interest, this has the potential to support and strengthen the character of the built environment.
- Site HG11 is not located within or within the setting of any heritage designations. In this respect, an allocation at this location is not likely to adversely impact the historic environment.
- 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

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<sup>42</sup> Historic England (no date): 'Iridge Place', [online] available to access via [this link](#)

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. Site specific Policy HGSA2 stipulates that the path of the historic tree-lined boundary within the site should be retained and replanted. An area of publicly accessible green space should also be provided within the most sensitive locations of the site to minimise impacts on views and the wider setting of the village. Additional planting is encouraged to provide further screening between the site and the village.

- 5.25 New development within the HGNP area shall also be expected to be taken forward in conjunction with the provisions of the Hurst Green Masterplan and the Design Codes document prepared to support the HGNP (see Policy HG4, Policy HG5, Policy HG7, and the site-specific Policies HGSA1 – HGSA3). Given these documents set out a comprehensive range of provisions relating to the built environment, this will help provide an appropriate basis for the conservation and enhancement of the historic environment surrounding any new developments which may be brought forward during the plan period.
- 5.26 Historic environment sensitivities are further reflected by HGNP policies and proposals which focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings.
- 5.27 For example, Policy HG1 (Location of Development) steers development to the most appropriate, sustainable locations, where its impact on the historic environment can be avoided. Adding to this, Policy HG4 (Character of Development) outlines that development proposals directly affecting heritage assets should respect the significance and context of the asset and demonstrate how they will contribute to the conservation and enhancement of the asset. Development proposals should also demonstrate that they have considered the potential impact on above and below ground archaeological deposits to ensure no archaeological evidence is lost.
- 5.28 More broadly, delivering net gains in biodiversity and facilitating green infrastructure enhancements can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. Key policies in this regard include Policy HG9 (Protecting the Natural Features of the Parish), Policy HG10 (Green Infrastructure) and Policy HG11 (Local Green Space) which are discussed in more detail within the 'Biodiversity and Geodiversity' and 'Landscape' appraisals, above. In addition to supporting enhancements to the setting of features and areas of historic environment interest, this has the potential to support and strengthen the character of the built environment.

## Land, Soil and Water Resources

- 5.29 The provisional agricultural land classification (ALC)<sup>43</sup> and best and most versatile (BMV) agricultural land<sup>44</sup> assessments by Natural England suggest that the undeveloped areas of the proposed site allocations consist of Grade 3 (good to moderate) agricultural land with a moderate likelihood (20 to 60%) of being underlain by BMV land. In this respect, development at all the proposed

<sup>43</sup> Natural England (2010): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to access via [this link](#)

<sup>44</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)', [online] available to access via [this link](#)

sites has the potential to result in the permanent loss of BMV land. With reference to non-residential developments which may come forward during the plan period, Policy HG6 (Energy Efficiency and Design) outlines that development proposals for landscape-sensitive, small-scale community renewable energy schemes will be supported only where it is demonstrated that the proposal does not result in the loss of BMV land. Additionally, proposals which would promote the most efficient use of land within the neighbourhood area (i.e., brownfield sites) is supported through Policy HG1 (Location of Development).

- 5.30 Regarding the water environment, there are no watercourses passing within or adjacent to the proposed allocations. However, all sites are within the 'Lower Rother from Robertsbridge to Iden' Surface Water Nitrate Vulnerable Zone (NVZ). As the HGNP only allocates land for residential development, such uses are not considered to significantly increase the risk of nitrate pollution to NVZs. However, development proposals should be encouraged to minimise the risks to nearby watercourses (and their catchments). A key policy in this regard includes Policy HG5 (Design of Development) which highlights that developments are expected to provide SuDS as part of green spaces, green roofs, permeable surfaces, and rain gardens (where appropriate). Policy HG6 also encourages proposals to reduce water consumption by utilising grey water systems, which will be beneficial for the conservation of water resources.
- 5.31 The HGNP also has a strong focus on protecting the open countryside from inappropriate levels of development. For example, several policies seek to protect key features of landscape and biodiversity interest and promote green space and open space. Key policies in this regard include Policy HG1 (Location of Development), Policy HG9 (Protecting the Natural Features of the Parish), Policy HG10 (Green Infrastructure) and Policy HG11 (Local Green Space). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the HGNP area and the protection and enhancement of key landscape and villagescape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

## Population and Community

- 5.32 With reference to new housing, the HGNP supports an approach which seeks to deliver sustainable development which is sensitive to environmental constraints, and which is intended to meet specific housing requirements or other community objectives. In this respect, the HGNP allocates three sites for housing development (see Policy HG2 'Housing Strategy' and site-specific Policies HGSA1 - HGSA3). The choice of site allocations has been informed by the findings of the site assessments undertaken for the HGNP, consultation events, and the SEA findings. This is further discussed within Chapter 4 of the Environmental Report. The total number of dwellings to be brought forward across the three sites (55 dwellings) will contribute to meeting local housing requirements. The HGNP also supports small-scale infill development subject to the provisions of Policy HG1 (Location of development) and local policy provision.



- 5.33 More broadly in relation to housing provision, Policy HG3 (Meeting Local Housing Needs) seeks to ensure that future development in the neighbourhood area contributes to identified local housing needs. The policy states the mix of housing sizes, types, tenures, and affordability in proposed development should assist in meeting the needs identified in the most recently available Hurst Green Local Housing Demand Survey. In terms of affordable housing, these should be delivered in accordance with local policy provisions and should be well integrated with market housing.
- 5.34 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 neighbourhood area, including a church, village hall, primary school, and a sports field. The proposed site allocations are located adjacent to the settlement boundary, within relative proximity to the village centre. Policy HG13 (A Village Hub for Hurst Green) recognises the value of local services and facilities in rural neighbourhood areas such as Hurst Green. The policy seeks to support proposals that would contribute to the development of a village hub for Hurst Green, creating a focal point in the village for local activities. This is important as Hurst Green village currently has no obvious village centre, with existing facilities feeling somewhat fragmented in nature. The village hub will be concentrated in the area around the village hall, combining existing facilities, including the park and children's playground, with new multi-purpose community facilities and public realm improvements.
- 5.35 Travel patterns are changing, with an increase in online service provision and more people, especially office workers, now working from home; a change which is being accelerated in response to the Covid-19 pandemic. Combined with improvements to broadband connectivity, this is likely to mean that more people can work or run a business from home, accelerating pre-pandemic trends which were already present in the parish. In this respect, Policy HG17 (Supporting Local Employment Opportunities) supports proposals that will provide working spaces that encourage homeworking and creative small industries through the provision of new buildings or units, or the conversion of existing buildings, as well as enabling extensions and small new garden offices. This will support the economic vitality of the neighbourhood area.

## Health and Wellbeing

- 5.36 The benefits to wellbeing and mental health resulting from close contact with the natural environment are well-documented. In this respect, development proposals should proactively seek to enhance the local green and blue infrastructure network. The proposed site allocations through Policies HGSA1 - HGSA3 are located within walking distance of the village hall, park, and children's playground in the centre of Hurst Green village, which the HGNP seeks to transform into a village hub (see Policy HG13). This is important as it will encourage residents to walk to access these facilities, contributing to both physical and mental health through physical activity and socialisation.
- 5.37 The quality of development is a key influence on the quality of life of residents. Along with the Hurst Green Masterplan and Design Codes document which accompany the Regulation 14 version of the HGNP, several policies also provide criteria and guidance for potential proposals with a view to implementing high quality design and layout within new development areas.



The provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe and secure, attractive, inclusive, and accessible, and does not cause unnecessary noise and light pollution. Key policies in this regard include Policy HG5 (Design of Development), Policy HG7 (Enhancing the Public Realm), Policy HG8 (Protecting Hurst Green's Dark Skies), and Policy HG18 (Encouraging Sustainable Movement). The quality of housing will also be supported by Policy HG6 (Energy Efficiency and Design) which set out several provisions which seek to support energy efficient and low carbon development. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living. In this respect the HGNP will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.

- 5.38 More broadly, HGNP policies and proposals have a strong emphasis on delivering public realm improvements (including through green infrastructure provision). Green infrastructure provides space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation<sup>45</sup>. Key policies in this respect include Policy HG10 (Green Infrastructure) and Policy HG11 (Local Green Space). This will support physical and mental health and wellbeing of the local community.

## Transportation

- 5.39 The impact of the Covid-19 pandemic means that the future baseline of travel demand is likely to be different for all residents. In the longer term it is hard to predict how behaviours will evolve and whether some of the travel responses observed during the national lockdowns will be maintained in some form. However, reflecting the results of the National Travel Attitudes Study, 94% of respondents thought it likely that they would continue to rely on active travel methods (walking and cycling) once travel restrictions were removed<sup>46</sup>.
- 5.40 With reference to local public transport networks, the HGNP area is not connected to the rail network. Although there are bus routes which pass through Hurst Green village and connect to the neighbouring towns of Hawkhurst and Hastings, services are relatively infrequent (roughly one bus every two hours, Monday to Friday, with no weekend service). Nonetheless, the HGNP has a strong focus on improving connectivity and accessibility within the neighbourhood area. A key policy in this respect is Policy HG18 (Encouraging Sustainable Movement), which states that new development proposals should ensure safe pedestrian access which links to existing footpath and cycle networks within the neighbourhood area.
- 5.41 The primary route passing through the neighbourhood 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. Other than Site HG11, the remaining site allocations are located alongside the A21, and in

<sup>45</sup> Natural England (2021): 'Green Infrastructure Network Framework' [online] available to access via: [this link](#)

<sup>46</sup> Department for Transport (2020): 'National Travel Attitudes Study: Wave 4 (Provisional)': [online] available to access via: [this link](#)

this respect they have the potential to exacerbate congestion on this key travel corridor. However, given the existing traffic flows along the A21, the delivery of 55 new dwellings within the neighbourhood area is unlikely to significantly impact congestion along the route. Nonetheless, Policy HG21 (Highway Capacity at Key Road Junctions) aims to address as far as possible concerns associated with congestion in the neighbourhood area, particular the A21 (London Road). The policy seeks to ensure that development proposals can demonstrate that they will not have a detrimental impact on any road junctions.

- 5.42 Further seeking to tackle congestion issues within the neighbourhood area, Policy HG19 (Public Car Parking) supports proposals which would enable the provision of additional, publicly accessible off-road car parking spaces to alleviate parking congestion along key routes into the area. Locations listed within the policy include Coronation Gardens, Great Oak, Foundry Close, Dairy Close, Station Road, and London Road. Additionally, Policy HG20 (Residential Parking Provision) stipulates that development proposals generating an increased need for parking must provide suitable parking (within the development boundary) in accordance with the recommendations set out in the Hurst Green Masterplan and Design Code document. The policy emphasises the importance of providing road safety for all users, including pedestrians and cyclists, and minimising the obstruction of the local road network.

## Conclusions at this current stage

- 5.43 In the context of the above, the assessment has concluded that the Regulation 14 version of the HGNP is likely to have positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA Themes. This principally links to the HGNP's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), safeguard and improve the availability of services, facilities and amenities, and support opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The HGNP is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation.
- 5.44 With reference to the 'Biodiversity and Geodiversity' SEA Theme, the policies within the HGNP seek to protect the natural features of the neighbourhood area, which includes protecting designated sites and protected species, preserving and enhancing ecological networks, and supporting biodiversity net gain. In addition to this, policies aim to create, conserve, enhance and manage green spaces and connect areas of green infrastructure, facilitating the movement of wildlife through the neighbourhood area. The site-specific policies cover important aspects in relation to this topic, including the retention of existing trees and the creation of buffer zones around sensitive features. In this respect, the HGNP will likely result in positive effects.
- 5.45 In terms of the 'Climate Change' SEA Theme, the policies within the HGNP seek to mitigate the risk of surface water flooding present in some parts of the neighbourhood area. This is achieved through support for the provision of SuDS in the proposed developments, especially those that incorporate green spaces, green roofs, permeable surfaces, and rain gardens. In addition to this, policies seek to achieve energy efficiency and sustainable design within the

built environment to reduce energy consumption and its impact on climate change. A range of sustainable design features will be actively encouraged for use in the development proposals. In this respect, the HGNP will likely result in positive effects, mitigating the impacts of climate change and reducing the CO<sub>2</sub> emissions produced within the neighbourhood area. However, this is dependent on the extent to which mitigation and adaptation measures are included within the design of new development areas.

- 5.46 The HGNP will also bring positive effects in relation to the 'Landscape' and 'Historic Environment' SEA Themes. These benefits largely relate to the HGNP's emphasis on protecting and enhancing the relationship between the village and the High Weald AONB, delivering high-quality design which respects and embraces the natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocations are sensitive from a landscape and heritage perspective, it is considered that the HGNP policies provide a detailed overview of the proposed mitigation and enhancement measures which positively address the sensitivities. Given the Hurst Green Masterplan and Design Codes document which accompany the HGNP also set out a comprehensive range of provisions relating to the natural and built environment, this will help provide an appropriate basis for any development proposals which may come forward during the plan period.
- 5.47 It is acknowledged that development proposals should encourage opportunities to help increase sustainability, connectivity, and accessibility (where possible). However, it is recognised that public transport options within the HGNP area are relatively limited in the absence of a train station and regular bus services. Nevertheless, policies within the HGNP aim to address as far as possible the impact of development on the A21 (London Road), which is already under pressure in terms of congestion. Moreover, policies highlight the importance of incorporating green infrastructure into roads and paths, as well as the connection of new developments to existing footpath and cycle networks (and facilitating active travel). In this respect, the HGNP will likely deliver positive impacts with regards to both the 'Transportation' and 'Air Quality' SEA Themes.
- 5.48 More broadly in relation to the 'Land, Soil, and Water Resources' SEA Theme, the HGNP outlines several provisions will help support the capacity of the landscape to regulate soil and water quality. However, the proposed site allocations have the potential to result in the permanent loss of areas of productive agricultural land.

## 6. What are the next steps?

- 6.1 This Environmental Report accompanies the HGNP for Regulation 14 consultation.
- 6.2 Following consultation, any representations made will be considered by the HGNP Steering Group, and the HGNP and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the HGNP for submission to the Local Planning Authority, Rother District Council, for subsequent Independent Examination.
- 6.3 At independent Examination, the HGNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.4 If the Independent Examination is favourable, HGNP will be subject to a referendum, organised by Rother District Council. If more than 50% of those who vote agree with the HGNP, then it will be 'made'. Once made, HGNP will become part of the Development Plan for the parish.

# Appendix A Context Review and Baseline

## A.1 Air Quality

### Policy Context

Key messages from the National Planning Policy Framework (NPPF)<sup>47</sup> include:

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

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

The government published the ‘UK plan for tackling roadside nitrogen dioxide concentrations’ in July 2017.<sup>48</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that “the link between improving air quality and reducing carbon emissions is particularly important” and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>49</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25-year plan directly relate to the air quality SEA theme.

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<sup>47</sup> HM GOV (2018): ‘Revised National Planning Policy Framework’, [online] available to access via [this link](#)

<sup>48</sup> DEFRA (2017) ‘UK plan for tackling nitrogen dioxide concentrations’ [online], available to access via [this link](#)

<sup>49</sup> HM GOV (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via [this link](#)

The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.<sup>50</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "the link between improving air quality and reducing carbon emissions is particularly important" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

In February 2020, the UK government updated the Clean Air Zone<sup>51</sup> Framework (2017)<sup>52</sup>, which sets out the principles for the operation of Clean Air Zones England and provides the expected approach to be taken by local authorities when implementing and operating a Clean Air Zone. Clean Air Zones bring together local measures to deliver immediate action to improve air quality and health with support for cities to grow while delivering sustained reductions in pollution and a transition to a low emission economy. Where a Clean Air Zone is introduced it will be identified in the local plans and policies, and local transport plan at the earliest opportunity to ensure it is consistent with wider ambition.

Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMA) if improvements are necessary. Where an AQMA is designated, an Air Quality Action Plan (AQAP) must then be put in place.

In September 2019, Rother District Council declared a climate emergency and pledged to become carbon neutral by 2030. The Draft Environment Strategy for Rother<sup>53</sup> (2020 – 2030) sets out how the council will deliver on this commitment. The plan is currently during the drafting stages following public consultation in May 2020. Priority number 3 'Air Quality' outlines the following actions for the wider district:

- We will explore the use of future planning policy to require electric vehicle charging points and cycle parking to all new homes and businesses.
- We will work with East Sussex County Council to deliver an Electric Vehicle Plan for the county which will bring forward EV charging points.
- We will reduce the need to own or use a car.

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<sup>50</sup> DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available to access via [this link](#)

<sup>51</sup> Defined as: 'an area where targeted action is taken to improve air quality and resources are prioritised and coordinated in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth'.

<sup>52</sup> Department for Environment, Food and Rural Affairs (2020) Clean Air Zone Framework: Principles for setting up Clean Air Zones in England [online] available to access via [this link](#)

<sup>53</sup> Rother District Council (2020): 'Draft Environment Strategy 2020-2030', [online] available to access via [this link](#)



- We will bring forward initiatives which encourage walking and cycling; this includes ensuring walking and cycling friendly development is encouraged through planning policy.
- We will explore ways to incentivise taxi drivers to take up electric vehicle use.
- We will explore options with partners and contractors to move away from diesel vehicles to electric fleet.

At the local level, Policy OSS3 'Location of Development' within the Rother Core Strategy and Policy DEN6 'Land Stability' within the DaSA directly relate to the Air Quality theme.

## Current Baseline

The most recently completed Air Quality Annual Status Report (ASR)<sup>54</sup>, published in July 2019 concludes that annual mean NO<sub>2</sub> concentrations recorded at continuous monitors and diffusion tubes in Rother District do not exceed levels for AQMA designation. Therefore, there are no AQMAs within the Rother District. The ASR also states that there have been no increases in annual mean NO<sub>2</sub> concentrations in any previous years since 2013.

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

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

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

## Future Baseline

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

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

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<sup>54</sup> Rother District Council (2019): 2019 Air Quality Annual Status Report (ASR) [online] available to access via [this link](#)

## A.2 Biodiversity and Geodiversity

### Policy Context

At the European level, the EU Biodiversity Strategy<sup>55</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

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

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

The Natural Environment White Paper (NEWP)<sup>56</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

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<sup>55</sup> European Commission (2011): 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020', [online] available to access via [this link](#)

<sup>56</sup> Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via [this link](#)

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020.
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas.
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

The UK Biodiversity Action Plan<sup>57</sup> (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'<sup>58</sup>.

The recently published 25 Year Environment Plan<sup>59</sup> sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably.
- Recovering nature and enhancing the beauty of landscapes.
- Connecting people with the environment to improve health and wellbeing.
- Increasing resource efficiency and reducing pollution and waste.
- Securing clean, productive, and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity and Geodiversity SEA theme.

Priority 6 of The Draft Environment Strategy for Rother (2020 – 2030) outlines the following actions for Hurst Green:

- We will encourage residents and community groups to take part in the 'Big Climate Fightback' by planting a tree.

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<sup>57</sup> JNCC (2007): 'UK BAP priority species', [online] available to access via [this link](#)

<sup>58</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to access via [this link](#)

<sup>59</sup> HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via [this link](#)

- We will set up a 'meet the target' page on the Rother District Council website which includes all reported tree planting and shows progress to 'doubling tree cover' in Rother.
- Where possible, we will increase tree coverage throughout the district on council owned land.
- We will reduce verge cutting and mowing; encourage wildflowers.
- We will develop a pollinator and pesticide policy which will detail how the council will maintain, protect and enhance key habitats over the long-term for the many species of insects that pollinate crops and wildflowers and commits the council to avoiding pesticides whenever possible on its sites including parks, recreation grounds, children's play areas, sports fields, downland, cemeteries and nature reserves.
- Policy EN5 'Biodiversity and Green Space' within the Rother Core Strategy and Policy DEN4 'Biodiversity and Green Space' within the DaSA directly relate to the Biodiversity and Geodiversity theme.

## Current Baseline

### European and nationally designated sites

There are no European or nationally designated sites for biodiversity located within or within proximity to the neighbourhood area.

The nearest European designated sites are located approximately 20km to the south east of the neighbourhood area, around the coastline between Hastings, Winchelsea, Rye, Lydd, and New Romney. The nearest nationally designated sites are located approximately 5km to the north and to the south of the neighbourhood area, specifically: Combwell Wood SSSI (to the north), Robin's Wood SSSI (to the north), and Darwell Wood SSSI (to the south).

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, the neighbourhood area is not within any SSSI IRZs for the types of development likely to come forward during the plan period, specifically: residential, rural residential, and rural non-residential.

### Locally designated sites

Sites of Nature Conservation Interest (SNCI) represent some of the most significant areas of semi-natural habitat in Rother District<sup>60</sup>. In this respect, there are six SNCIs within or within proximity to the neighbourhood area, predominantly areas of ancient woodland (including Burgh Wood and Boarzell Wood) and areas of good quality semi-improved grassland.

There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the neighbourhood area, including areas of coastal and floodplain

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<sup>60</sup> Rother District Council (2006): 'Local Plan Proposals Map & Hurst Green Inset Map 20', [online] available to access via [this link](#)

grazing marsh, deciduous woodland (including ancient woodland), good quality semi-improved grassland, lowland meadows, and traditional orchard.

The Sussex Biodiversity Records Centre contains records of protected or notable species within Hurst Green<sup>61</sup>. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats and ecological designations within and surrounding the neighbourhood area are likely to support populations of protected species.

The figure overleaf shows the location of the designated ecological sites within and within proximity to the neighbourhood area.

## Future Baseline

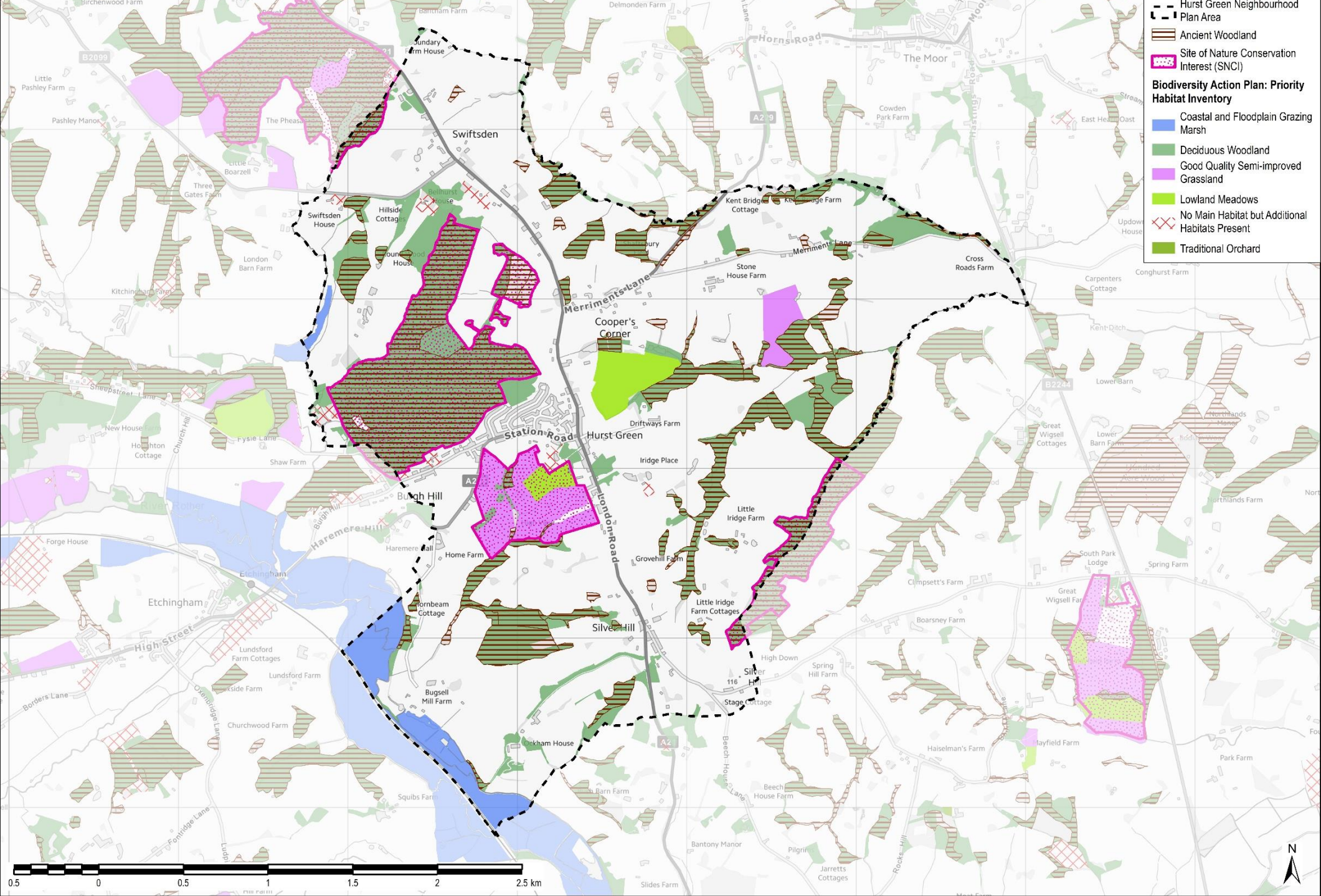
Habitats and species will potentially face increasing pressures from future development within the neighbourhood area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

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

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<sup>61</sup> Sussex Biodiversity Records Centre (2020): 'Data Request Service' [online] available to access via [this link](#)







## A.3 Climate Change

### Policy Context

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below<sup>62</sup> :

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

The UK Climate Change Act<sup>63</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

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

<sup>62</sup> GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to access via [this link](#)

<sup>63</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] available to access via [this link](#)

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

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

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

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

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

In September 2019, Rother District Council declared a Climate Emergency<sup>64</sup>. As well as the declaration itself, the council has indicated the following priorities:

- Pledge to do what is within our powers to make Rother District carbon neutral by 2030, taking into account both production and consumption emissions.
- Call on the Government to provide the powers and resources necessary for Rother District to achieve the target of becoming carbon neutral by 2030, and to implement best practice methods to limit global warming to 1.5°C.
- Report to full Council within six months with an Action Plan, outlining how the Council will address this emergency. The Carbon Neutral 2030 Action Plan will detail the leadership role Rother District will take in promoting community, public, business and other Council partnerships to achieve this commitment throughout the district. The Action Plan will also outline adequate staff time and resources to undertake the actions to achieve the target.
- To investigate all possible sources of external funding and match funding to support this commitment.
- Identify citizens across Rother who are climate champions for their communities and to use them to inform on ideas to implement locally.

Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to “explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy.”<sup>65</sup> Additionally, in response to the Covid-19 pandemic, the Green Alliance’s ‘Blueprint for a Resilient Economy’<sup>66</sup> (June 2019) report outlines the following five essential building blocks to support new long term employment opportunities, thriving businesses and a healthier, fairer society, whilst protecting against the potentially devastating future impacts of climate change and nature’s decline:

- Invest in net zero infrastructure.
- Restore nature.
- Stop wasting valuable resources.
- Ensure clean air and healthy places; and
- Make the recovery fair.

The Flood and Water Management Act<sup>67</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings and retrofitting properties at risk (including historic buildings).
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water.

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<sup>64</sup> Rother District Council (2019): ‘Climate Emergency’, [online] available to access via [this link](#)

<sup>65</sup> Client Earth (2019) Lawyers put local authorities on notice over climate inaction [online] available to access via [this link](#)

<sup>66</sup> Green Alliance (2020): ‘Blueprint for a Resilient Economy’, [online] available to access via [this link](#)

<sup>67</sup> Flood and Water Management Act (2010) [online] available to access via [this link](#)

- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere.
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).<sup>68</sup>

Further guidance is provided in the document 'Planning for SuDS'.<sup>69</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

The Local Flood Risk Management Strategy (2016-2026)<sup>70</sup> for East Sussex provides the framework for the management of local flood risk in the county for the ten-year period 2016 – 2026. This strategy is a high level, statutory document that sets out East Sussex County Council's approach to limiting the impacts of local flooding across the county. It also provides a strategic framework for the risk management authorities to work within and goes on to establish new standing advice on drainage issues in the county. The long-term aim of the strategy is to provide a co-ordinated approach to managing local forms of flood risk in East Sussex.

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

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

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

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

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

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

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<sup>68</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

<sup>69</sup> CIRIA (2010): 'Planning for SuDs – making it happen', [online] available to access via [this link](#)

<sup>70</sup> East Sussex County Council (2016): East Sussex Local Flood Risk Management [online] available to access via [this link](#)

## Current Baseline

### Contribution to climate change

**Figure A3.1** shows carbon dioxide emissions (t CO<sub>2</sub>) for Rother, East Sussex, the South East and England as a whole. Emissions data for Rother demonstrates a similar declining trend as county-level, regional and national statistics. However, Rother continues to demonstrate higher levels of CO<sub>2</sub> when compared to East Sussex. As of 2017, CO<sub>2</sub> levels in Rother District were, on average, 0.8 tonnes greater than East Sussex levels (3.6 t CO<sub>2</sub>). Levels of CO<sub>2</sub> have declined by approximately 35% between the period of 2005- 2017 in Rother District.

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

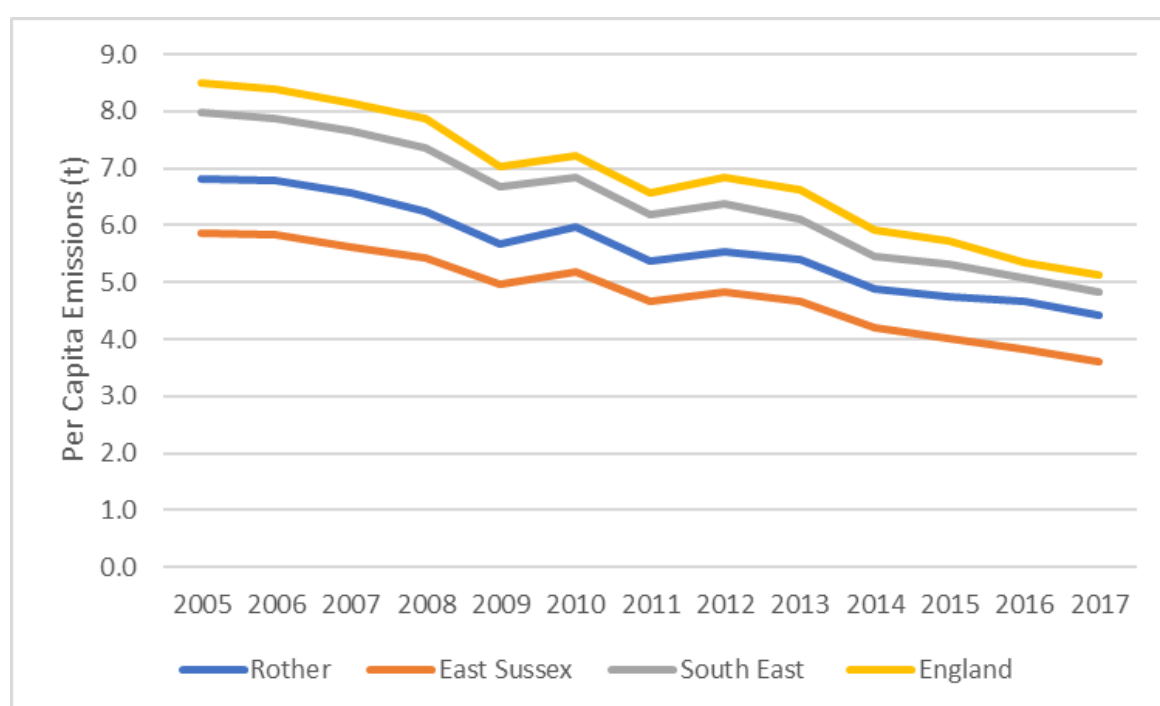


Figure A3.1 CO<sub>2</sub> emissions<sup>71</sup>

### Effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)<sup>72</sup> team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

<sup>71</sup> UK Gov (2017): 'Local Authority CO<sub>2</sub> emissions estimates 2005-2017 (kt CO<sub>2</sub>) - Full dataset', [online] available to access via [this link](#)

<sup>72</sup> Data released 26th November 2018 [online] available to access via [this link](#)

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for South East England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows<sup>73</sup>:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +20 to +30% in winter and -10% to -20% in summer.

Resulting from these changes, a range of risks may exist for the neighbourhood area, including:

- Effects on water resources from climate change.
- Reduction in availability of groundwater for extraction.
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;
- A need to increase the capacity of wastewater treatment plants and sewers.
- A need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased demand for air-conditioning.
- Increased drought and flood related problems such as soil shrinkages and subsidence.
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

### Flood risk

**Figure A3.2** shows fluvial flood risk within and surrounding the neighbourhood area. Areas of land within Flood Zone 3 are broadly confined to areas of land surrounding the main watercourses, including the River Rother (which passes alongside the south western boundary) and the Kent Ditch (to the north and north east of the neighbourhood area). However, the settlement of Hurst Green is located within Flood Zone 1 and therefore has a low risk of fluvial flooding.

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<sup>73</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via [this link](#)



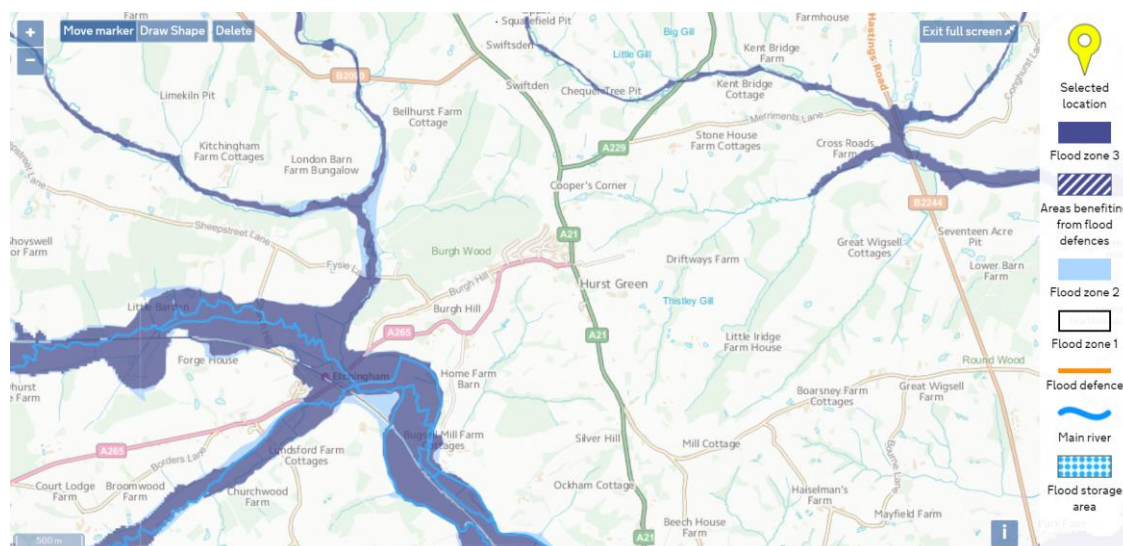


Figure A3.2 Fluvial flood risk within and surrounding Hurst Green<sup>74</sup>

**Figure A3.3** shows surface water flood risk within Hurst Green. Similar to the areas of fluvial flood risk, areas of highest surface water flood risk potential surround the broad corridors of the River Rother and Kent Ditch. Within the settlement of Hurst Green, areas at 'medium' to high' surface water flood risk are primarily located along the road network, including Vicarage Way, Great Oak, and Station Road.

Completed to contribute to the evidence base accompanying the emerging HGNP, a 'Flood Warning Area' has been identified in the southern section of the parish. This includes areas of land surrounding the River Rother, and primarily covers agricultural land (adjoining Bugsell Mill Farm Cottages) and the neighbouring settlement of Etchingham (to the west). This is shown in **Figure A3.4**.

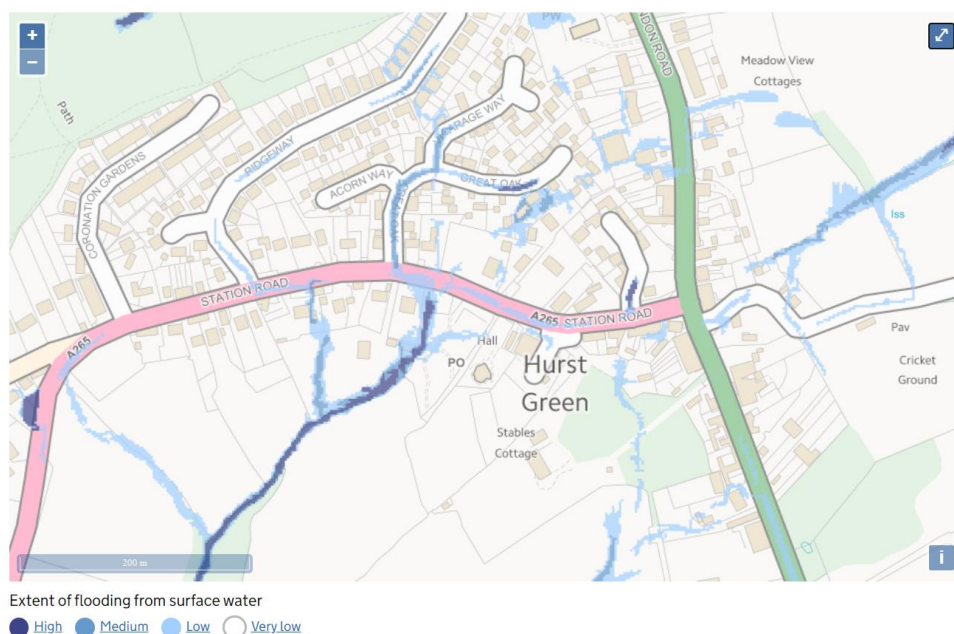


Figure A3.3 Surface water flood risk within Hurst Green<sup>75</sup>

<sup>74</sup> GOV.UK (2020): 'Flood Map for Planning', [online] available to access via [this link](#)

<sup>75</sup> GOV.UK (2020): 'Long term flood risk map', [online] available to access via [this link](#)

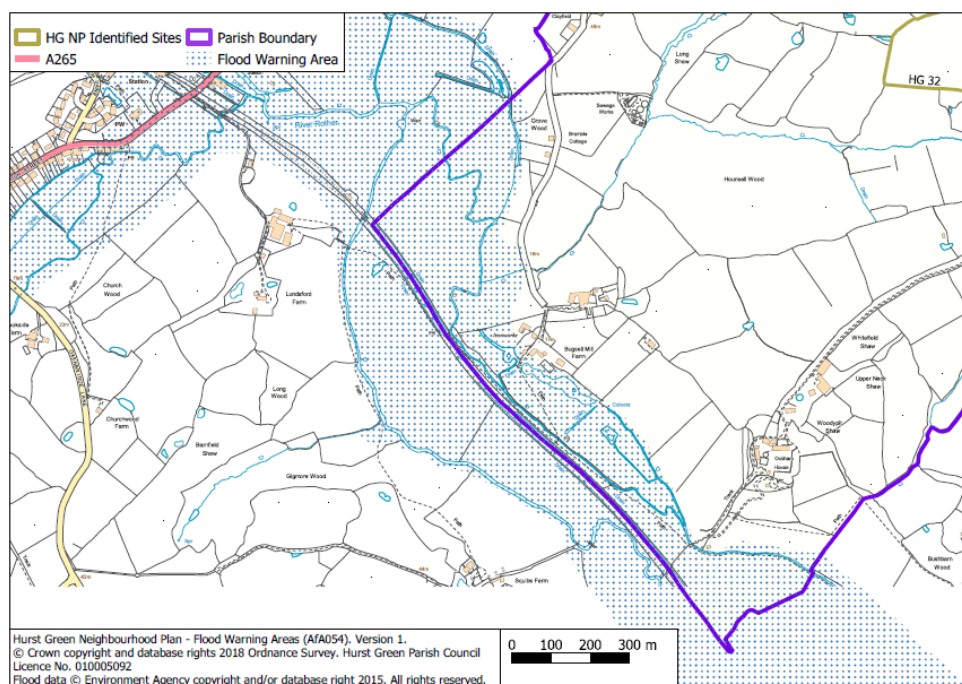


Figure A3.4 Flood Warning Areas within and surrounding Hurst Green Parish<sup>76</sup>

## Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the neighbourhood area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

Implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the neighbourhood area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the neighbourhood area would contribute to increases in the absolute levels of greenhouse gas emissions.

## A.4 Landscape

### Policy Context

The European Landscape Convention<sup>77</sup> of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000

<sup>76</sup> Hurst Green Parish Council (2020): 'Community Evidence 10A and 10B: Flood Warning Areas', [online] available to access via [this link](#)

<sup>77</sup> Council of Europe (2000): 'European Landscape Convention', [online] available to access via [this link](#)

and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.

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

- ‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’
- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’
- ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’

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

The High Weald AONB Management Plan (2019-2024)<sup>78</sup>, sets out the long-term objectives for conserving the designated landscape and the local authorities’ ambitions for how the High Weald will be looked after for the next 5 years. The document outlines the following objectives for the AONB:

- Objective G1: To restore the natural function of rivers, water courses and water bodies.
- Objective G2: To protect and enhance soils, sandstone and outcrops, and other important landform and geological features.
- Objective G3: To help secure climatic conditions and rates of change which support continued conservation and enhancement of the High Weald’s valued landscape and habitats.

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<sup>78</sup> High Weald AONB Partnership (2019): ‘Management Plan 2019-2024’, [online] available to access via [this link](#)

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

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



- Policy OSS1 Overall Spatial Development Strategy
- Policy OSS3 Location of Development
- Policy RA3 Development in the Countryside
- Policy EN1 Landscape Stewardship

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

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

## Current Baseline

### Nationally protected landscapes

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

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

- An oceanic climate featuring cool temperatures relative to the latitude, a narrow annual temperature range with few extremes, and rain throughout the year.

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

## National Character Areas

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

The Statements of Environmental Opportunity (SEOs) associated with the High Weald NCA are as follows<sup>79</sup>:

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

## Local landscape character

Landscape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape character can

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<sup>79</sup> Natural England (2013): 'NCA Profile 122: High Weald (NE508)', [online] available to access via [this link](#)



assist in the assessment of the likely significance of effects of change resulting from development and the value of landscape, both in visual and amenity terms.

Completed in August 2009, the Rother Market Towns and Villages Landscape Assessment (2009)<sup>80</sup> aimed to define the relative capacity of the landscapes around existing settlements to accommodate new housing and business developments. In this respect, the neighbourhood area falls within the 'Upper Rother Valley' Landscape Character Area, described as follows:

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

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

"(the village) is severed west from east by the busy A21. The area of greatest opportunity for further development in this village is to the east of the A21 in the more enclosed fields and close to the village boundaries. Areas to the south west are exposed to long views from the AONB countryside. Development has extended north of the village to the edge of the Ancient Woodland of Burgh Wood and there is little scope for more infill in this area."

### Tree preservation orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity' the local planning authority will likely take into consideration the following criteria<sup>81</sup>:

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

In this context, Rother District Council have designated TPOs (individual and areas) in the interest of their amenity value, including several within and adjacent to the built-up areas of the parish. These are available to view on Rother District Council's Planning and Building Online Mapping Tool<sup>82</sup>, and shown below in **Figure A4.1**, **Figure A4.2** and **Figure A4.3**.

<sup>80</sup> Rother District Council (2009): 'Market Towns and Villages Landscape Assessment', [online] available to access via [this link](#)

<sup>81</sup> GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via [this link](#)

<sup>82</sup> Rother District Council (2020): 'Planning and Building Online Mapping Tool', [online] available to access via [this link](#)

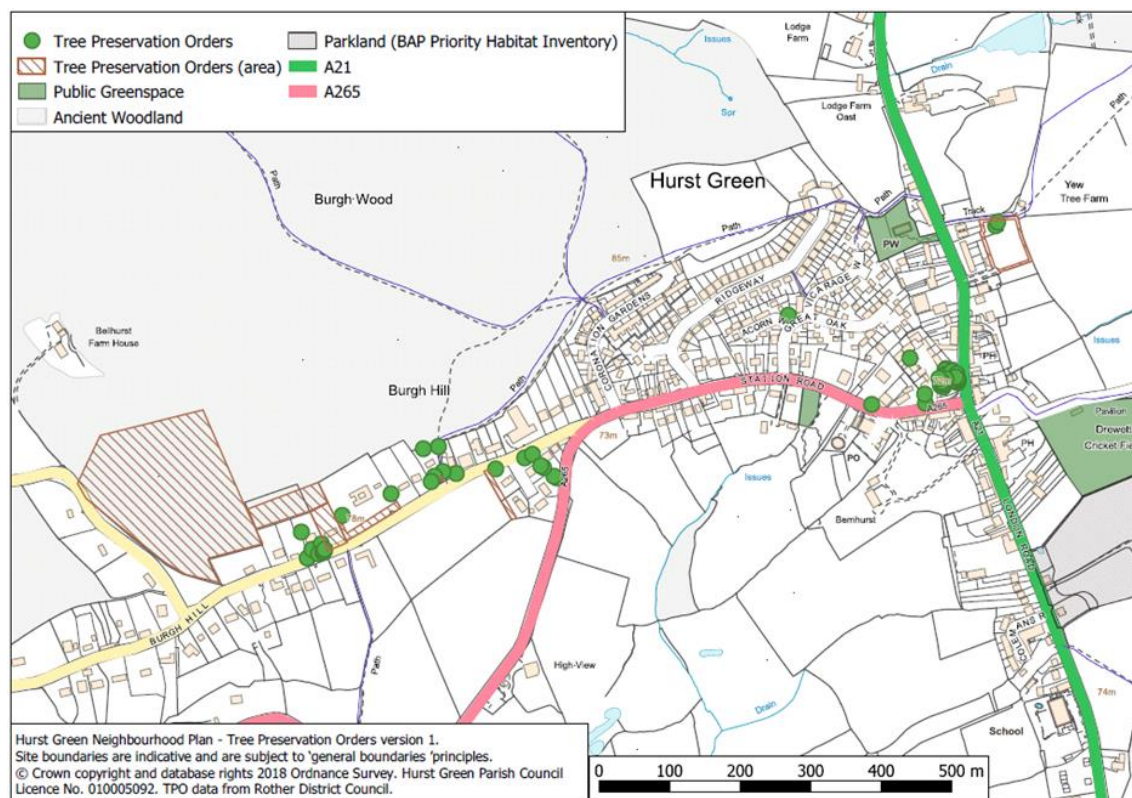


Figure A4.1 TPOs within the settlement of Hurst Green<sup>83</sup>

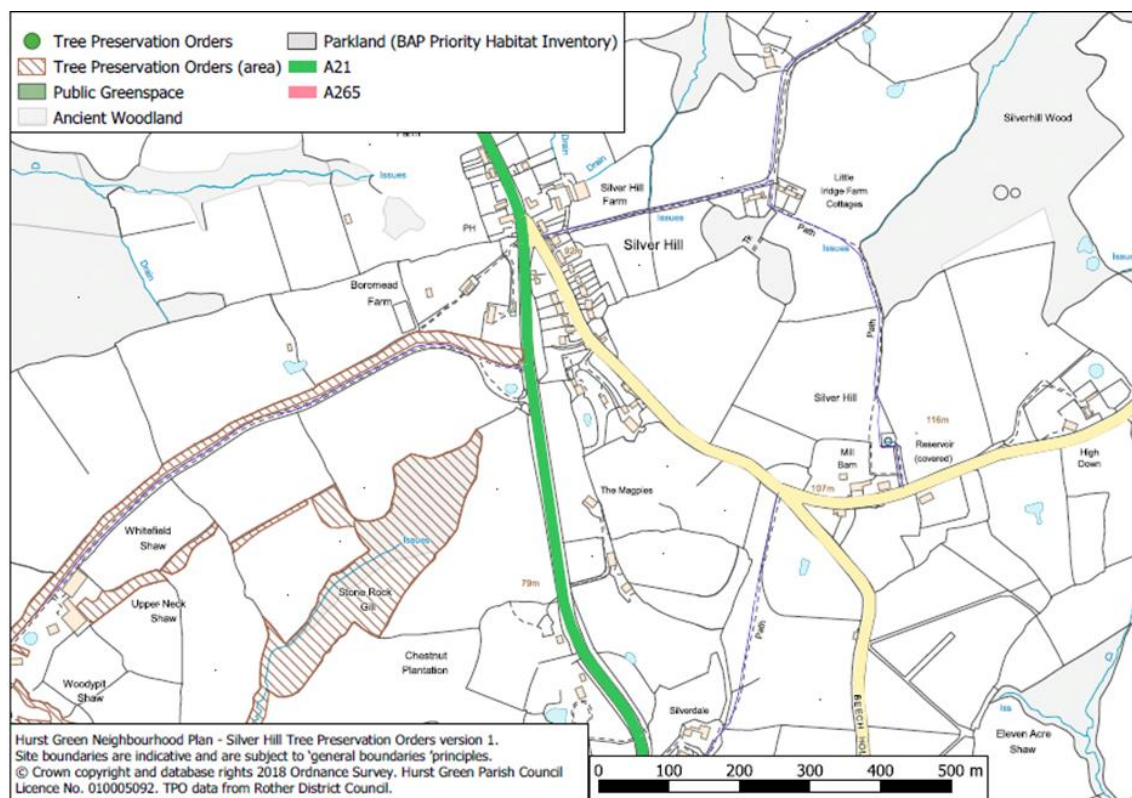


Figure A4.2 TPOs within the settlement of Silver Hill (southern section of the neighbourhood area)

<sup>83</sup> Hurst Green Parish Council (2020): 'Community Evidence: TPOs in Hurst Green (Evidence 24), Silver Hill (Evidence 25) and Swiftsden (Evidence 26)', [online] available to access via [this link](#)

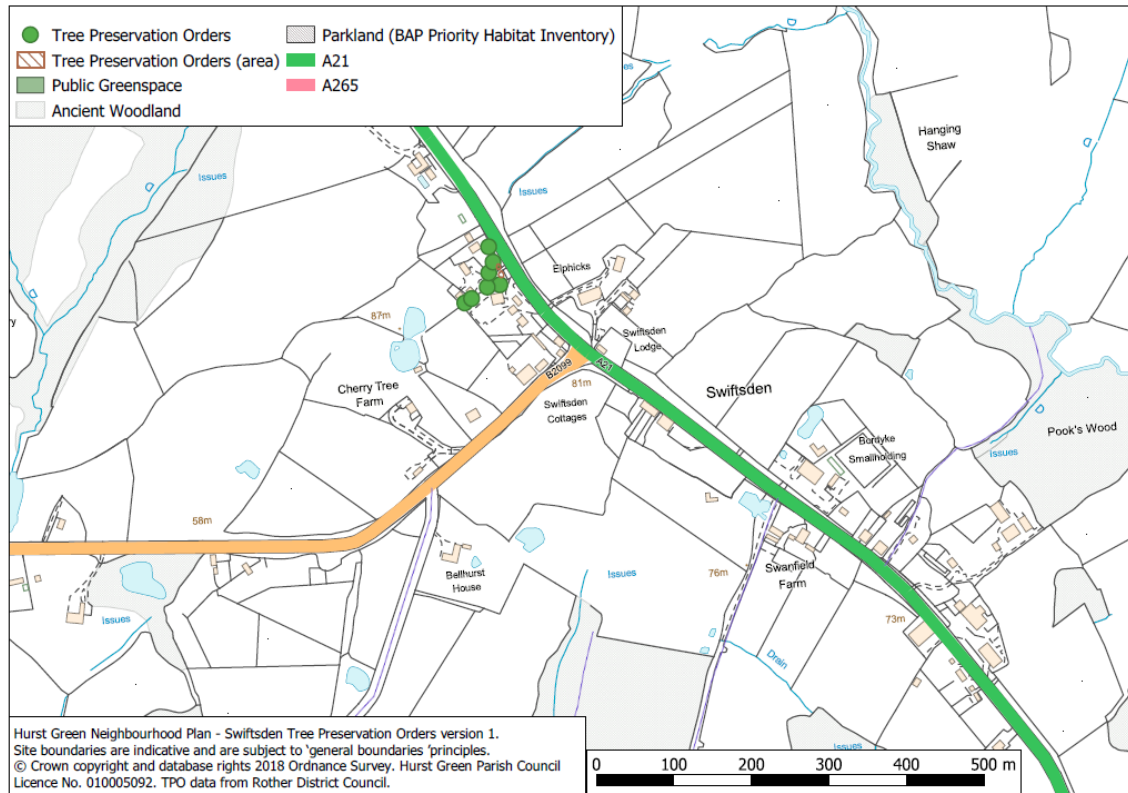


Figure A4.3 TPOs within the settlement of Swiftsden (northern section of the neighbourhood area)

### Visual amenity

It is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

In this respect, the Rother Market Towns and Villages Landscape Assessment notes three key viewpoints in the neighbourhood area (viewed from the settlement of Hurst Green and looking out into the surrounding landscape), depicted in **Figure A4.4** below.



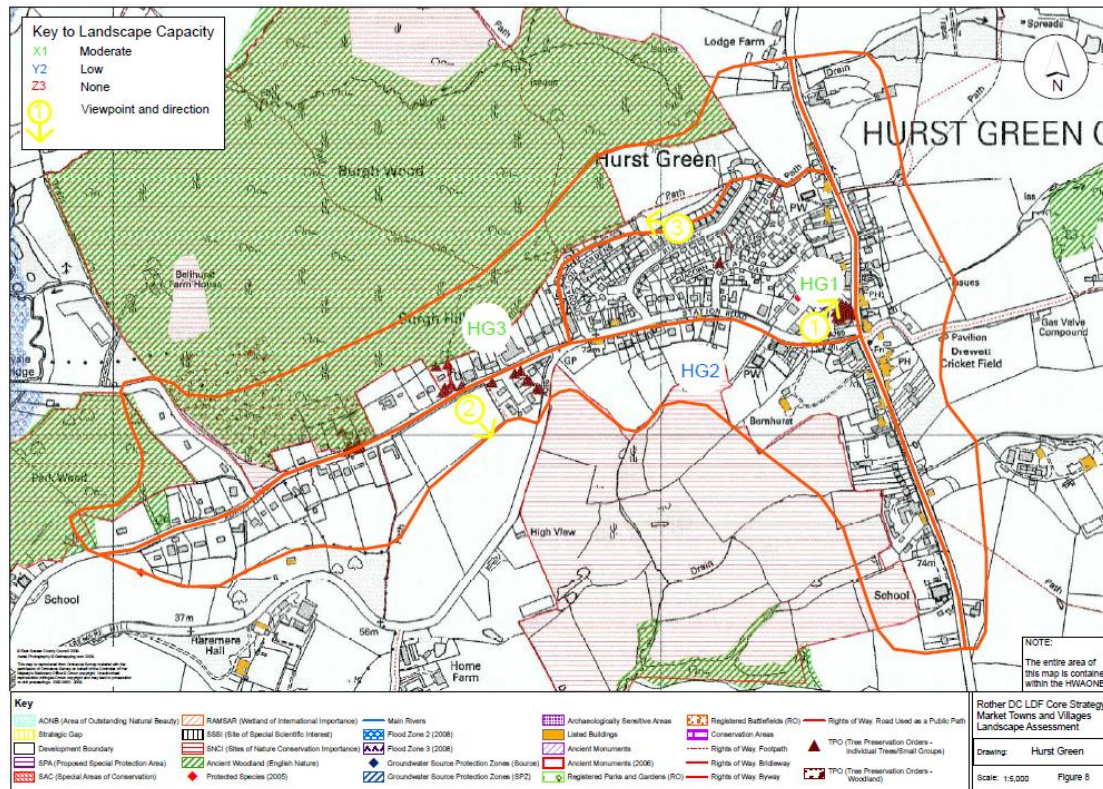


Figure A4.4 Key viewpoints (and directions) within the neighbourhood area

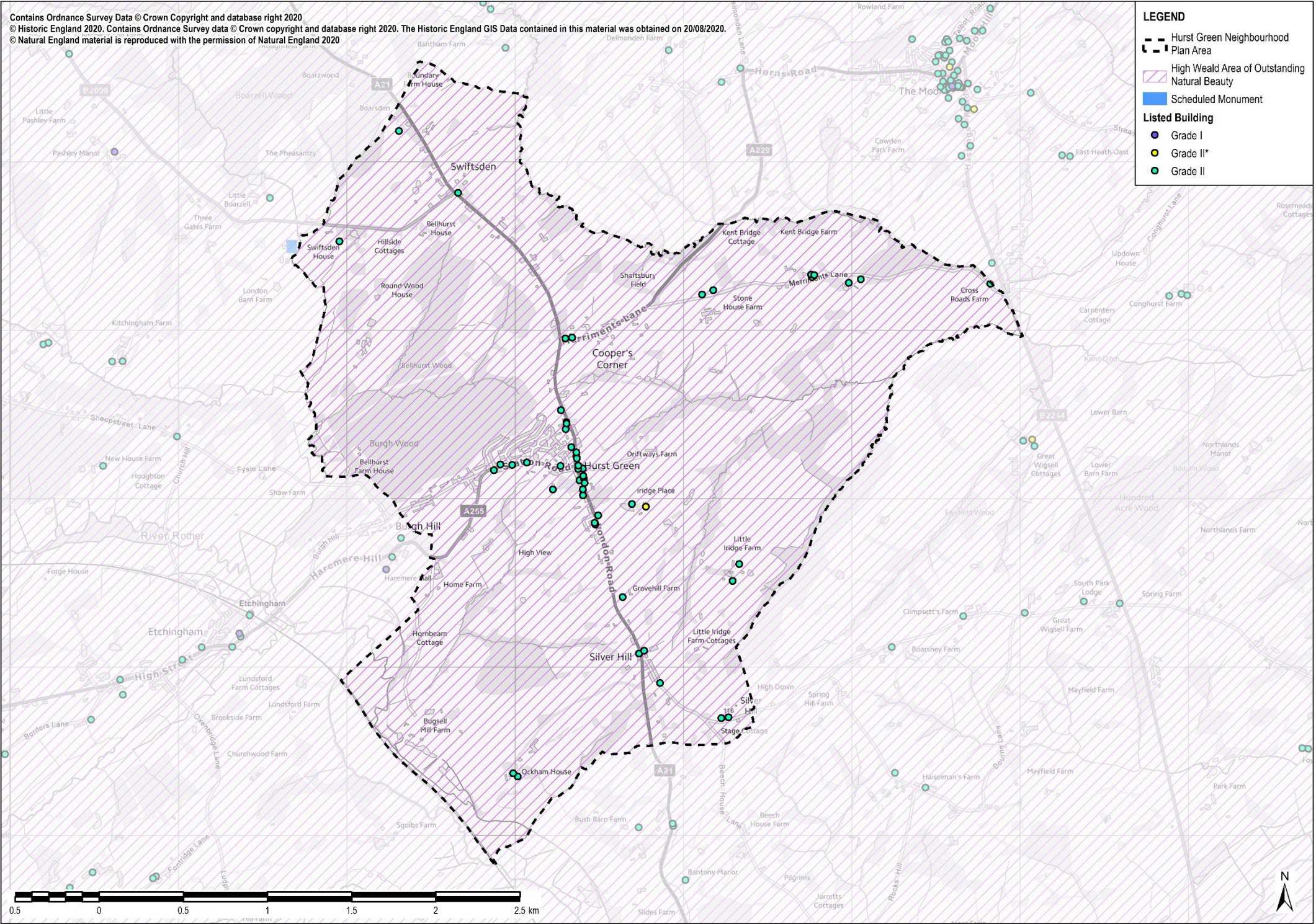
## Future Baseline

New development has the potential to lead to incremental but small changes in landscape and villagescape character and the natural beauty in and around the neighbourhood area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the HGNP, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the neighbourhood area.



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## A.5 Historic Environment

### Policy Context

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

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

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

The Government’s Statement on the Historic Environment for England<sup>84</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

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

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 – Second Edition (February 2019)<sup>85</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and

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<sup>84</sup> HM Government (2010): ‘The Government’s Statement on the Historic Environment for England’, [online] available to access via [this link](#)

<sup>85</sup> Historic England (2019): ‘Conservation Area Designation, Appraisal and Management: Advice Note 1 (second edition)’, [online] available to access via [this link](#)



- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>86</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)<sup>87</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>88</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

The Sussex Historic Landscape Characterisation documents (2010)<sup>89</sup> provides an understanding of the historical and cultural origins of today's landscape and the processes of land use change which have shaped it. It highlights that the neighbourhood area is home to historic field boundaries and medieval field systems, which are key character components of the High Weald AONB.

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

- Policy RA1: Villages
- Policy RA3: Development in the Countryside
- Policy RA4: Traditional Historic Farm Buildings

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<sup>86</sup> Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to access via [this link](#)

<sup>87</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition', [online] available to access via [this link](#)

<sup>88</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via [this link](#)

<sup>89</sup> West Sussex County Council (2010): 'Sussex Historic Landscape Characterisation', [online] available to access via [this link](#)

## Current Baseline

### Historic evolution of the parish

The following paragraphs have been taken from the Hurst Green Parish Council website<sup>90</sup>, the High Weald AONB Management Plan<sup>91</sup>, and the Hurst Green Parish Historic Settlement Factsheet<sup>92</sup>, and describe the historic evolution of the parish:

*“The Civil Parish of Hurst Green was created in 1952 out of lands taken from the centuries-old parishes of Salehurst, Etchingham, and to a lesser extent, Ticehurst. Hurst Green's own parish church, Holy Trinity, was built in 1884. Much of the story of Hurst Green is entwined with the history of these other three parishes.*

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

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

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

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

The High Weald AONB is also characterised by dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries. These farmsteads are presented in **Figure A5.1**.

<sup>90</sup> Hurst Green Parish Council (n.d.): 'A history of Hurst Green' [online] available to access via [this link](#)

<sup>91</sup> High Weald Joint Advisory Committee (2019): 'High Weald AONB Management Plan' [online] available to access via [this link](#)

<sup>92</sup> Hurst Green Parish Council (2017): 'High Weald AONB Hurst Green Parish Historic Settlement Factsheet' [online] available to access via [this link](#)

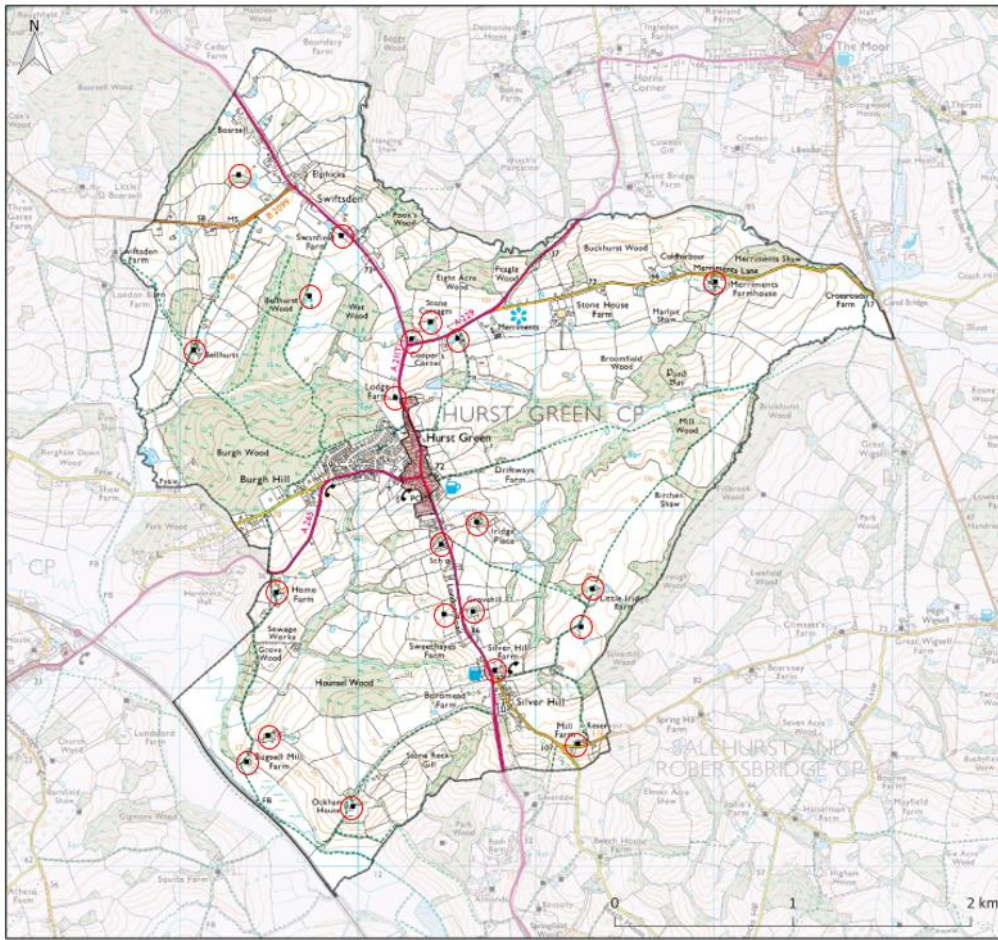


Figure A5.1 Historic farmsteads in Hurst Green (circled in red)

The historic character of the High Weald is also characterised by ancient routeways (now roads, tracks and paths) in the form of ridge-top roads and a dense system of radiating droveways. Ancient routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks. These ancient routeways are depicted in **Figure A5.2** (below).



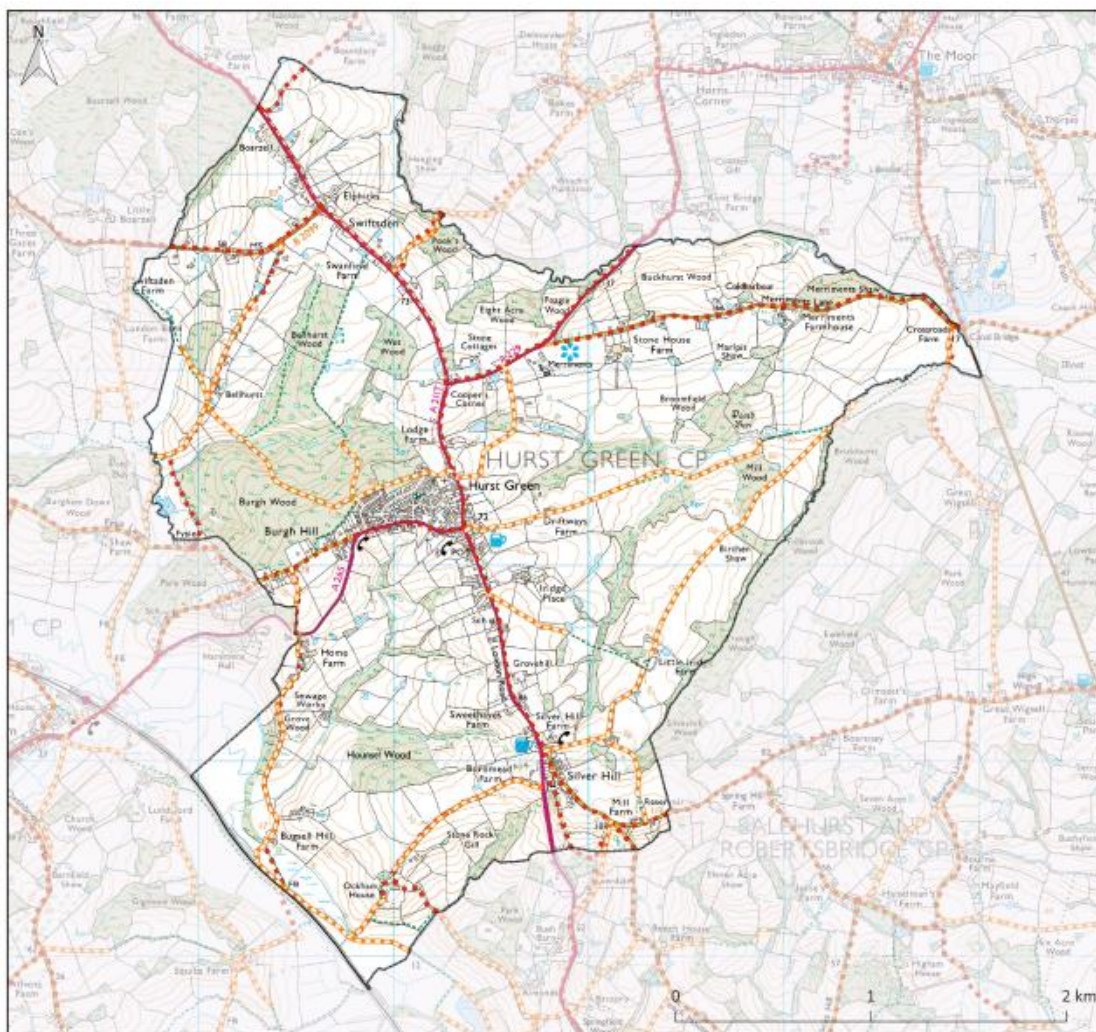


Figure A5.2 Ancient routeways within the neighbourhood area (roads shown in red, public rights of way shown in orange)

## Designated heritage assets and areas

The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.

An overview of the designated historic environment assets present in the neighbourhood area is provided below, with the map at the end of Chapter 5 (above) highlighting the location of these assets.

## Listed buildings

Listed building are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.<sup>93</sup> The neighbourhood area contains 50 Grade II listed buildings, no Grade I and one Grade II\* listed buildings<sup>94</sup>. The Grade II\* listed building is 'Iridge Place'.

<sup>93</sup> Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available to access via [this link](#)

<sup>94</sup> Historic England (2020): National Heritage List for England', [online] available to access via [this link](#)

## Scheduled monuments

The Ancient Monuments and Archaeological Areas Act (1979)<sup>95</sup> allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites which are protected under the Act. In this regard, there are no scheduled monuments within the neighbourhood area itself. However, the 'Old Boarzell moated site 100m north east of Swiftsden Farm, Little Swiftsden' Scheduled Monument is located directly adjacent to the north western boundary of the neighbourhood area.

## Registered parks and gardens, and historic battlefields

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. There are no registered parks and gardens within the neighbourhood area.

Historic England's Register of Historic Battlefields identifies important English battlefields. Its purpose is to offer them protection through the planning system, and to promote a better understanding of their significance and public enjoyment. No historic battlefields are in the neighbourhood area.

## Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>96</sup>. There are ten conservation areas within Rother District<sup>97</sup>, none of which are within or within proximity to the neighbourhood area.

## Locally important heritage features

As referenced in the NPPF footnote 63, *"Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets"*. It is possible to discover schedulable archaeology anywhere, but the likelihood is higher within Archaeological Notification Areas (ANAs).

ANAs define presently known and recorded areas of heritage sensitivity which have the potential to contain further presently un-recorded features of archaeological and historic interest within Rother District. In this respect, there are several ANAs located within the neighbourhood area, shown overleaf in **Figure A5.3** (Hurst Green), **Figure A5.4** (Swiftsden), and **Figure A5.5** (Silver Hill)<sup>98</sup>.

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what

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<sup>95</sup> Ancient Monuments and Archaeological Act (1979) [online] available to access via [this link](#)

<sup>96</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via [this link](#)

<sup>97</sup> Rother District Council (2020): 'Conservation Areas', [online] available to access via [this link](#)

<sup>98</sup> Rother District Council (2020): 'Community Evidence: Archaeological Notification Areas (evidence documents 11-13)', [online] available to access via [this link](#)

people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

The East Sussex Historic Environmental Record (HER)<sup>99</sup> identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the neighbourhood area. Following a high-level review of the East Sussex HER, there are a total of 81 records within Hurst Green. This includes records of farmhouses and cottages, woodlands, and monuments.

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

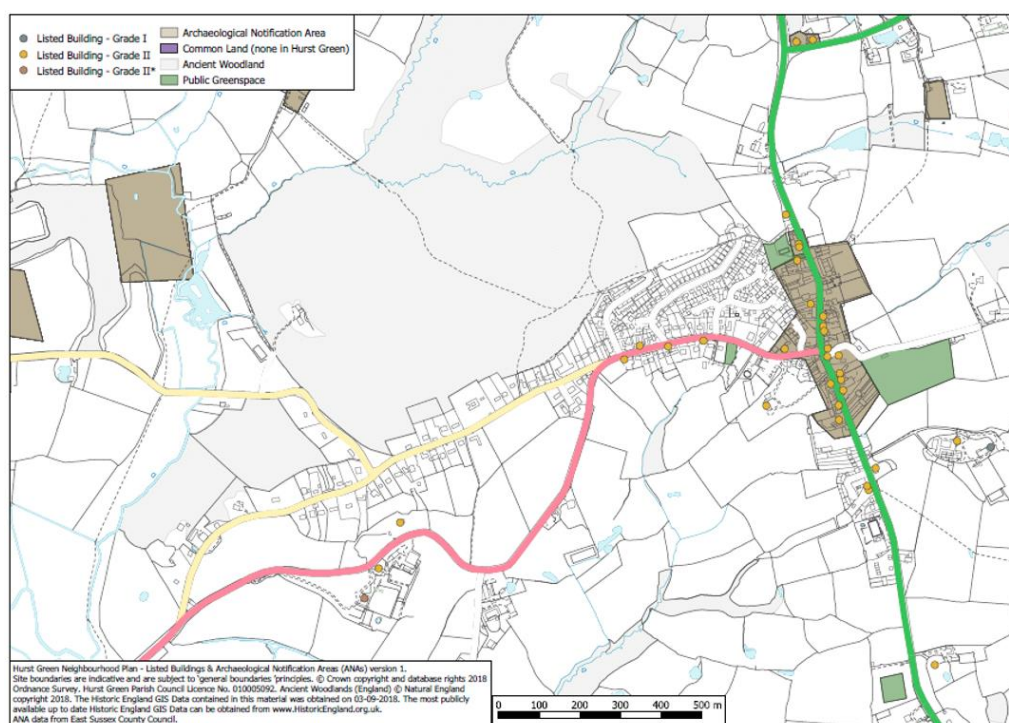


Figure A5.3 ANAs within the settlement of Hurst Green

<sup>99</sup> Heritage Gateway (2020): 'Advanced Search – East Sussex HER', [online] available to access via [this link](#)



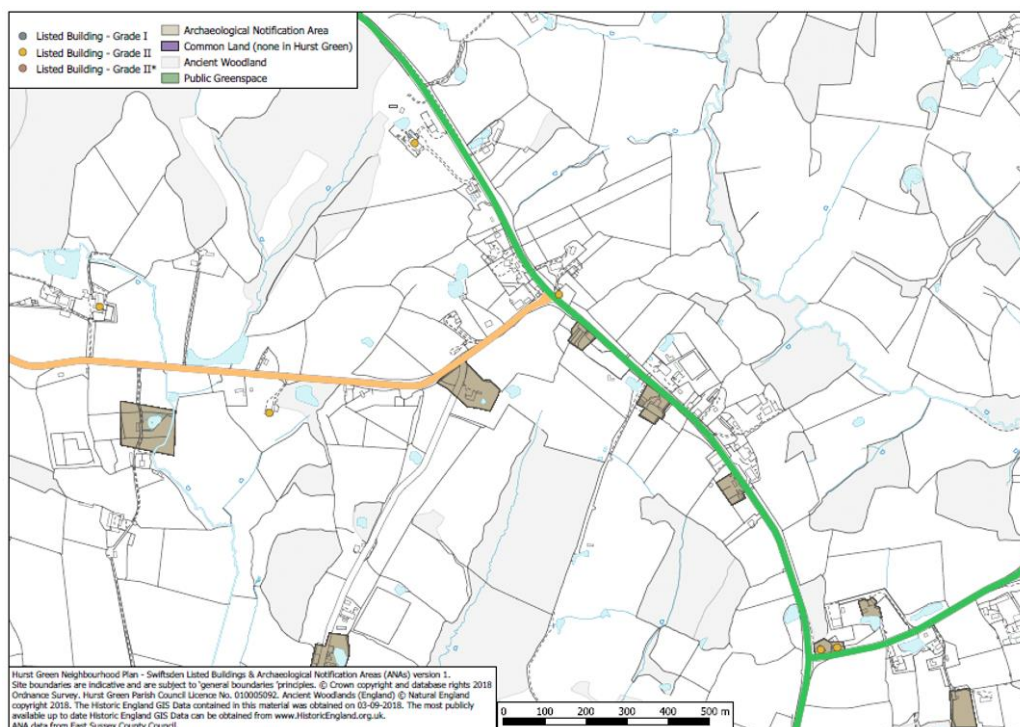


Figure A5.4 ANAs within the settlement of Swiftsden (northern section of the neighbourhood area)

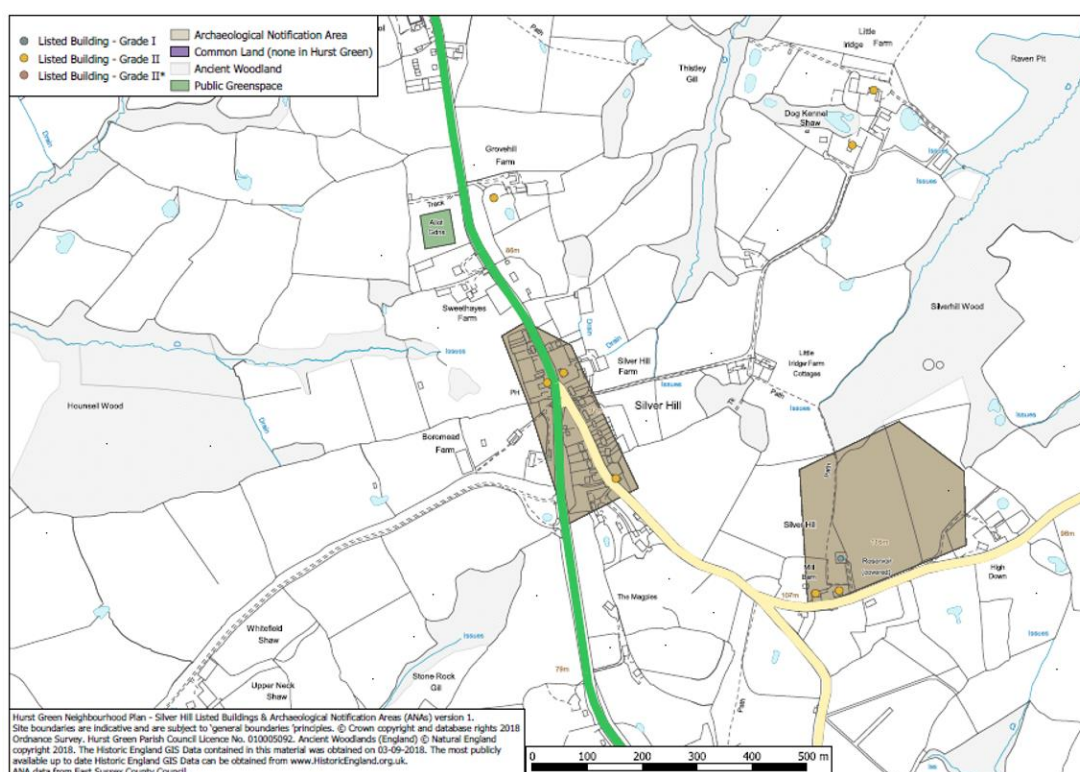


Figure A5.5 ANAs within the settlement of Silver Hill (southern section of the neighbourhood area)

## Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck

sites and conservation areas deemed to be 'at risk'. According to the 2019 Heritage at Risk Register for London and South East England<sup>100</sup>, none of the heritage assets within the neighbourhood area are at risk.

It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk.

## Future Baseline

New development areas in the neighbourhood area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the neighbourhood area there may be opportunity for new development to enhance the historic setting of the parish's settlements, support historic landscape character and better reveal assets' heritage significance.

## A.6 Land, Soil and Water Resources

### Policy Context

The EU's Soil Thematic Strategy<sup>101</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems.
- Promote the sustainable use of water.
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances.
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Key messages from the NPPF include:

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<sup>100</sup> Historic England (2019): 'Heritage at Risk Register for South East England', [online] available to access via [this link](#)

<sup>101</sup> European Commission (2006): 'Soil Thematic Policy', [online] available to access via [this link](#)

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
  - b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'
- 'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Land, Soil and Water Resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>102</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>103</sup>, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing

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<sup>102</sup> Defra (2009): 'Safeguarding our Soils: A strategy for England', [online] available to access via [this link](#)

<sup>103</sup> Defra (2011): 'Water for life (The Water White Paper)', [online] available to access via [this link](#)

ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

In terms of waste management, the Government Review of Waste Policy in England<sup>104</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan<sup>105</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>106</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. Hurst Green falls within the South East River Basin District and the December 2015 Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment<sup>107</sup>.

The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. These documents are<sup>108</sup>:

- The Waste and Minerals Plan (adopted February 2013); and
- The Waste and Minerals Sites Plan (adopted February 2017).

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

## Current Baseline

### Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for the areas of undeveloped land in Hurst Green. The provisional ALC dataset provided by Natural England indicates that the undeveloped areas of Hurst Green Parish are predominantly underlain by areas of Grade 3 agricultural land. The neighbourhood area therefore has the potential to contain some of the best and most versatile land for agricultural purposes.

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<sup>104</sup> Defra (2011): 'Government Review of Waste Policy in England', [online] available to access via [this link](#)

<sup>105</sup> DEFRA (2013) Waste Management Plan for England [online] available to access via [this link](#)

<sup>106</sup> Directive 2008/98/EC

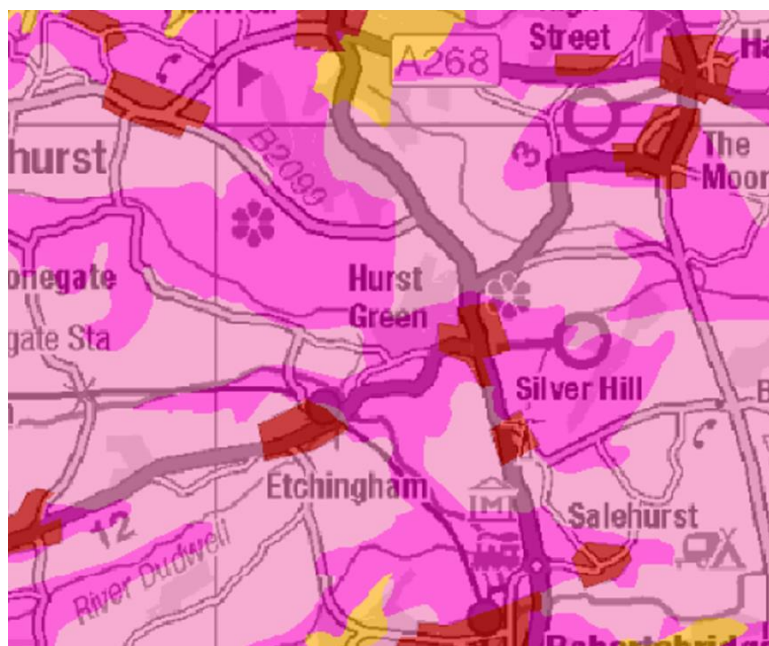
<sup>107</sup> Environment Agency (2015): 'South East River Basin Management Plan', [online] available to access via [this link](#)

<sup>108</sup> East Sussex County Council (2020) 'Waste and Minerals Local Plan for East Sussex', [online] available to access via [this link](#)



However, in the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e. best and most versatile land) or Grade 3b land.

The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England<sup>109</sup> provided by Natural England indicates that most of the undeveloped areas of land in the neighbourhood area have a moderate (20 – 60%) or low (<= 20%) likelihood of containing BMV land. This is shown below in **Figure A6.1** (darker pink areas represent moderate likelihood, with the lighter pink areas representing low likelihood).



**Figure A6.1 Predictive BMV agricultural land quality for Hurst Green**

In addition to the productivity of soil in terms of agricultural use, soil also contributes to belowground biodiversity and carbon sequestration, which are vital for sustainable food production. Notably, the disturbance of soil (i.e., by tillage or other agricultural methods) or the application of chemicals (i.e., fertilisers and pesticides) can reduce belowground biodiversity and carbon sequestration. In this respect, most of the woodland and many of the fields in the neighbourhood area are likely to have relatively undisturbed soils that have had minimal chemical application because they have historically been used for grazing livestock rather than arable production.

### Water resources and quality

The water resources located within and within proximity to the neighbourhood area include a network of small streams and brooks, along with the River Rother which passes alongside the south western boundary. There are also drainage ditches located adjacent to field margins, including the Kent Ditch which passes alongside the northern boundary of the neighbourhood area.

Hurst Green is within the South East River Basin District, specifically within the 'Rother Levels' Operational Catchment and the 'Rother Upper' Operational

<sup>109</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic Scale Map for the South East Region (ALC018)', [online] available to access via [this link](#)

Catchment. As shown on the Environment Agency's Catchment Data Explorer, the following watercourses are located within the neighbourhood area:

- Kent Ditch (alongside the northern boundary).
- Lower Rother from Etchingham to Scott's Float (southern and south eastern section); and
- Limden (alongside the western boundary).

Based on the most recently completed water quality assessments by the Environment Agency in 2016, the 'Kent Ditch'<sup>110</sup> watercourse has a 'poor' ecological status and a 'good' chemical status. The reasons for not achieving 'good' status (RNAGs) for the watercourse are associated with the following activities: private sewage treatment, sewage discharge (continuous), and poor livestock management.

Based on the most recently completed water quality assessments by the Environment Agency in 2016, the 'Lower Rother from Etchingham to Scott's Float'<sup>111</sup> watercourse has a 'moderate' ecological status and a 'good' chemical status. The RNAGs for the watercourse are associated with the following activities: poor soil management, poor nutrient management, natural mineralisation, and sewage discharge (continuous).

Based on the most recently completed water quality assessments by the Environment Agency in 2016, the 'Limden'<sup>112</sup> watercourse has a 'poor' ecological status and a 'good' chemical status. The RNAGs for the watercourse are associated with the following activities: sewage discharge (continuous), poor nutrient management, poor livestock management, and poor soil management.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the neighbourhood area overlaps with three surface water NVZs, specifically:

- 'Kent Ditch' NVZ (north eastern and eastern sections).
- 'Limden' NVZ (western and north western sections) and
- 'Lower Rother from Robertsbridge to Iden' NVZ (central and southern sections).

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.

## Mineral resources

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

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<sup>110</sup> Environment Agency (2016): 'Catchment Data Explorer: Kent Ditch', [online] available to access via [this link](#)

<sup>111</sup> Environment Agency (2016): 'Catchment Data Explorer: Lower Rother from Etchingham to Scott's Float', [online] available to access via [this link](#)

<sup>112</sup> Environment Agency (2016): 'Catchment Data Explorer: Limden', [online] available to access via [this link](#)



safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance<sup>113</sup>.

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

## Future Baseline

Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the neighbourhood area and wider area.

Due to the potentially limited prevalence of BMV agricultural land within sections of the undeveloped areas of the parish, new developments which are located outside of the settlement are less likely lead to losses of higher quality (best and most versatile) agricultural land.

## A.7 Population and Community

### Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.

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<sup>113</sup> GOV.UK (2014): 'Minerals Guidance', [online] available to access via [this link](#)

- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>114</sup> warns that society is underprepared for an ageing population. The report states that 'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

At the local level, the following policies from the Rother Core Strategy directly relate to the Population and Community theme:

- Policy CO1: Community Facilities and Services
- Policy CO2: Provision and Improvement of Healthcare Facilities
- Policy CO3: Improving Sports and Recreation Provision
- Policy CO4: Supporting Young People
- Policy CO5: Supporting Older People
- Policy CO6: Community Safety
- Policy LHN1: Achieving Mixed and Balanced Communities
- Policy LHN5: Sites for the Needs of Gypsies and Travellers
- Policy LHN6: Gypsies, Travellers and Travelling Showpeople Criteria
- Policy EC1: Fostering Economic Activity and Growth
- Policy EC2: Business Land and Premises
- Policy EC3: Existing Employment Sites

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<sup>114</sup> Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available to access via [this link](#)

- Policy EC4: Business Activities Elsewhere Within the District
- Policy EC5: Support for Key Sectors
- Policy EC6: Tourism Activities and Facilities
- Policy EC7: Retail Development

The following policies from the DaSA directly relate to the Population and Community theme:

- Policy DCO1: Retention of Sites of Social or Economic Value
- Policy DEC1: Shopfronts, Signage and Advertising
- Policy DEC2: Holiday Sites
- Policy DEC3: Existing Employment Sites and Premises
- Policy OVE1: Housing Supply and Delivery Pending Plans

## Current Baseline

### Population

Based on the 2011 Census data as shown in **Table A7.1** (below), the population of Hurst Green increased by approximately 1.4% between 2001 and 2011, lower than the observed increases for Rother District (6.0%), South East England (7.9%) and England (7.9%). Approximately 1.6% of the population of Rother District live within Hurst Green.

The estimated population of Hurst Green in 2018 was 1,592 residents, an increase of approximately 7.5%<sup>115</sup>. This indicates that the rate of population growth in the neighbourhood area in the last decade was higher than the observed rate of growth between 2001-2011.

**Table A7.1 Population change (2001 to 2011)**

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

### Age Structure

Generally, there is a similar proportion of residents within the 60+ age category within the neighbourhood area (22.6%) in comparison to the totals for South East England (23.4%) and England (22.3%). However, this total is noticeably lower than the total for Rother District (37.2%). This is shown in **Table A7.2** (below).

In contrast, a higher proportion of residents are within the working age categories (25-44 and 45-59) in the neighbourhood area (47.8%) in comparison to the totals for Rother District (38.6%), South East England (46.4%) and England (46.9%).

<sup>115</sup> City Population (ca 2018): 'Hurst Green: Parish in South East England', [online] available to access via [this link](#)

Additionally, 29.6% of residents within the district are within the younger age categories (0-15 and 16-24), lower than the totals for South East England (30.2%) and England (30.8%), but higher than the total for Rother District (24.2%).

**Table A7.2 Age structure, 2011**

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

## Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on the Census information presented in **Table A7.3** (below), out of the 52.1% of households which are deprived in the district, the majority are deprived in one or two dimensions. This is similar to the regional and national averages. Overall, fewer households are deprived in the neighbourhood area in comparison to the totals for Rother District, South East England, and England.

**Table A7.3 Household deprivation**

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

## Housing Needs

The HGNP local housing demand survey was conducted across Hurst Green from March to May 2019 and was completed by approximately 40% of households in the Parish. The main findings of the survey are summarised below<sup>116</sup>:

- 78% of households live in accommodation suitable for their needs.
- 22% of households are living in accommodation that is not suitable for their needs.
- 72% of households say that the Hurst Green area is their preferred place to live.
- 28% of households say that the Hurst Green area is not their preferred place to live. Top reasons being a) limited facilities, b) road noise / traffic and c) it being difficult to meet people and make friends.
- 30 local households are looking for homes in the parish, including:
- 23 local households looking for homes in Hurst Green village.
- 3 local households looking for homes in the Silver Hill area.
- No local households were looking for homes in the Swiftsden area.
- 4 local households looking for homes elsewhere within the Hurst Green parish boundaries (rural Hurst Green).

## Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.

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<sup>116</sup> Hurst Green Parish Council (2020): 'Community Evidence 35 – Hurst Green Neighbourhood Plan Local Housing Demand Survey', [online] available to access via [this link](#)



- ‘Geographical Barriers’: relating to the physical proximity of local services
- ‘Wider Barriers’: relating to access to housing, such as affordability.
- Living Environment: The quality of the local environment, with indicators falling categorised in two sub-domains.
  - ‘Indoors Living Environment’ measures the quality of housing.
  - ‘Outdoors Living Environment’ measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
  - Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
  - Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

In this respect, the neighbourhood area falls within the Rother 001C LSOA, which is ranked amongst the 30% least deprived neighbourhoods in England<sup>117</sup>.

## Education

Skills and education are a key factor in driving economic growth. The 2011 Census data indicates that the neighbourhood area has a lower proportion of residents with no qualifications (19.2%) when compared to Rother District (24.7%). However, this total aligns with the regional and national averages.

The neighbourhood area has a higher proportion of residents who have a level 4 qualification or above (28.7%) when compared to Rother District (25.5%). However, this total also aligns with the regional and national averages. This is shown in **Figure A7.1** below.

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<sup>117</sup> DCLG (2020): ‘IMD 2019 Mapping Tool’, [online] available to access via [this link](#)

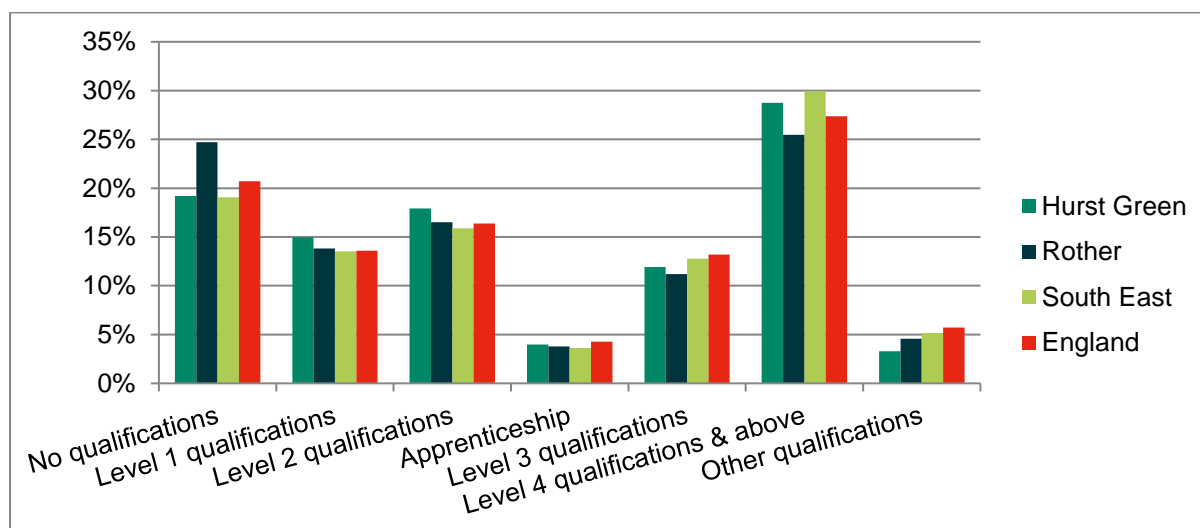


Figure A7.1 Highest level of qualification

## Employment

Based on the 2011 Census data shown in **Figure A7.2** (below), the following three occupation categories account for the greatest proportion of residents in the neighbourhood area:

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

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

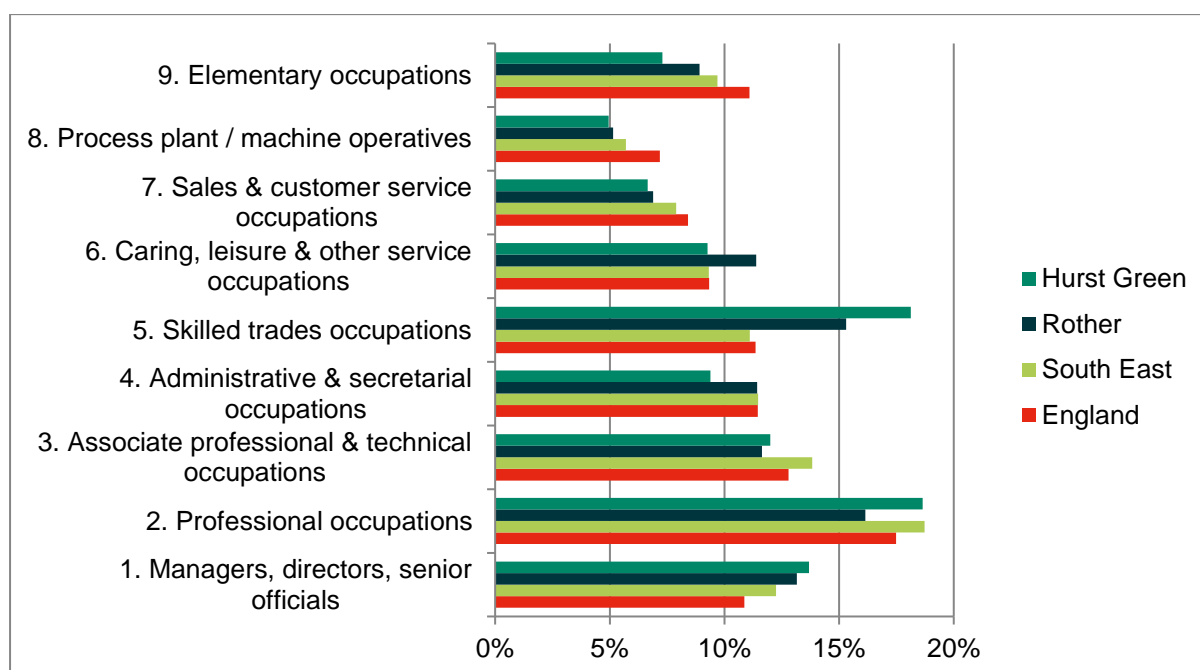


Figure A7.2 Occupation of residents aged 16 to 74

## Community assets and infrastructure

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

Additionally, there are a handful of clubs and societies listed on the Hurst Green Parish website<sup>118</sup>, which include Hurst Green Historical Society, District Community First Responders, and the Hurst Green Allotments Association.

## Future Baseline

As the population of the neighbourhood area continues to age, this could potentially negatively impact upon the future vitality of the local community in the neighbourhood area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g., size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and HGNP. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

As the requirements of the working population continue to change, particularly in response to the Covid-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices. This is echoed within the place making principles outlined in the UK Government's recent Planning White Paper<sup>119</sup> which was released in August 2020.

Additionally, the facilitation of high-quality and superfast broadband in rural areas will be required to ensure that everyone has equal opportunities and access to the digital economy. Furthermore, the regeneration of redundant or underutilised brownfield land across the district (including the densification of existing areas) will help to support local employment opportunities and reduce the need to commute to surrounding areas.

## A.8 Health and Wellbeing

### Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
- 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local

<sup>118</sup> Hurst Green Parish Council (n.d.): 'Local Groups and Clubs', [online] available to access via [this link](#)

<sup>119</sup> MHCLG (2020): 'Planning for the Future – White Paper', [online] available to access via [this link](#)

shops, access to healthier food, allotments and layouts that encourage walking and cycling.’

- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>120</sup> (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).<sup>121</sup>

The report highlights that:

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

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Policy CO2 ‘Provision and Improvement of Healthcare Facilities’ within the Rother Core Strategy and Policy DHG5 ‘Specialist Housing for Older People’ within the DaSA directly relate to the Health and Wellbeing theme.

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<sup>120</sup> The Marmot Review (2011): ‘The Marmot Review: Implications for Spatial Planning’, [online] available to access via [this link](#)

<sup>121</sup> Health Equity in England: The Marmot Review 10 Years on (2020) [online] available to access via [this link](#)

## Current Baseline

### Green Infrastructure Networks

Health is a cross-cutting topic and there are natural synergies with other SEA themes including climate change, population and community, and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.

The Green Infrastructure Study (2011-2028)<sup>122</sup> completed by Rother District Council presents specific recommendations for Hurst Green to improve access to green open spaces, based on current deficits, with the findings indicating a need for more allotment spaces.

Additionally, Stage Field is an underused historic public open space gifted to the area in 1949 by Colonel T B. Hornblower. The Parish Council took on a 999 year lease of the field in 2010. Situated on one of the highest points in the county, the field has commanding views over the surrounding area. The Parish Council recently obtained planning permission for a new access point with improved visibility and a small parking area. This has now been completed and has opened the field for greater access<sup>123</sup>.

### Public Health Profile

Public Health Profiles for England provide a 'snapshot' of the overall health of a local authority. The Public Health Profile for the Rother District provides the following summary:

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

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<sup>122</sup> Rother District Council (2016): 'Green Infrastructure Study', [online] available to access via [this link](#)

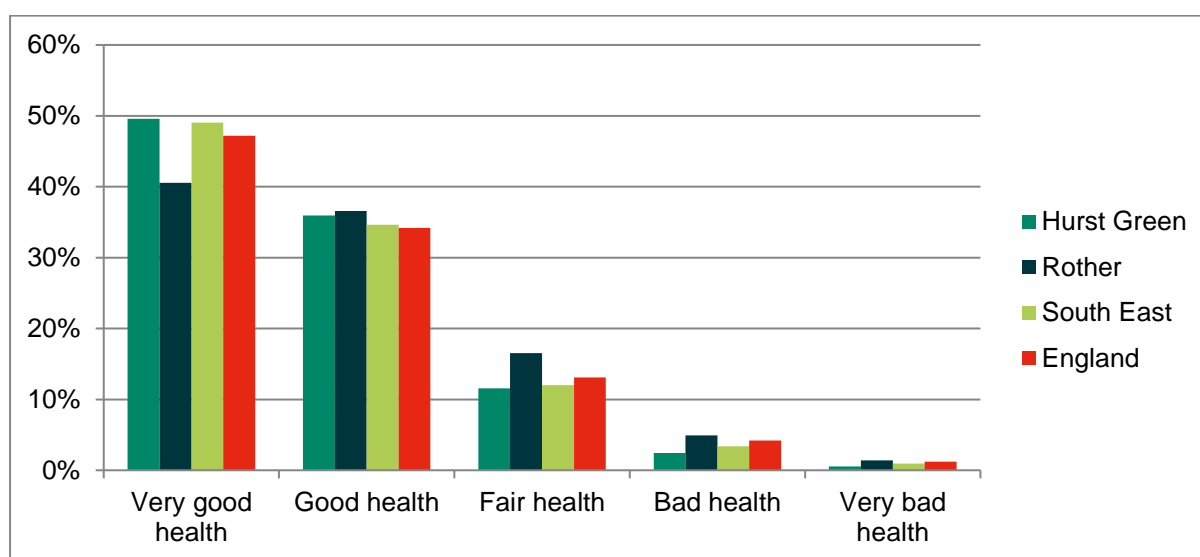
<sup>123</sup> Hurst Green Parish Council (no date): 'New Entrance and Parking at the Stage Field off the Bodiam Road in Silver Hill', [online news article] available to access via [this link](#)



## Indicators of health and wellbeing

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality and the living environment previously discussed in detail in **Chapter 8**.

Based on the 2011 Census data as shown in **Figure A8.1** (below), 85.5% of residents in the neighbourhood area consider themselves as having 'very good health' or 'good health', higher than the totals for Rother District (77.2%), South East England (83.7%) and England (81.4%). Additionally, 3.0% of residents in the neighbourhood area consider themselves to have 'bad health' or 'very bad health', lower than the regional and national trends.



**Figure A8.1** General health of residents

As shown in **Table A8.1** (below), the total percentage of residents within the neighbourhood area who report that their activities are limited either 'a little' or 'a lot' (13.6%) is lower than the total for Rother District (23.4%), South East England (15.7%), and England (17.6%).

**Table A8.1** Long-term health category

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

## Future Baseline

Health and wellbeing levels within the neighbourhood area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.

However, an ageing population within the neighbourhood area may increase the reported cases of disability, reduce the levels of good health, and place future

pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e., elderly population).

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes, and some forms of cancer.

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

## A.9 Transportation

### Policy Context

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

Key messages from the NPPF include:

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

Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the East Sussex Local Transport Plan (2011)<sup>124</sup> sets out the future direction for planning and providing the transport

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<sup>124</sup> East Sussex County Council (2011): 'Local Transport Plan 3 (2011 to 2026)', [online] available to access via [this link](#)

infrastructure and services needed to deliver sustainable economic growth and support additional housing in the county up to 2026.

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

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

## Current Baseline

### Rail network

There are no rail stations within the parish, with the nearest station accessible in the neighbouring settlement of Etchingham (approximately 2km to the south west). The station provides direct services to London Charing Cross (approximately an hourly service), Tunbridge Wells, Sevenoaks, Battle and Hastings (approximately a half hourly to hourly service), operated by Southeastern trains<sup>125</sup>. Journey times are approximately 76 minutes to London Charing Cross and 30 minutes to Hastings.

### Bus network

The neighbourhood area is served by the following bus routes:

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

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

### Road network and congestion

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

Following the HGNP Local Housing Demand Survey, the HGNP conducted a survey of local residents around their attitudes to car parking<sup>126</sup>. Results of the survey are summarised below:

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<sup>125</sup> National Rail (2020): 'Etchingham Station Details' [online] available to access via [this link](#)

<sup>126</sup> Hurst Green Parish Council (n.d.): 'Local parking survey proves that Hurst Green does not have enough safe parking for residents' [online] available to access via [this link](#)

- Nearly 70% of residents said they were unhappy with the parking situation in their road, rising to over 80% of residents who lived on Station Road and London Road.
- 100% of residents who lived in Coronation Gardens, Foundry Close, Great Oak and Dairy Close were unhappy with the parking situation in their road.
- 90% agreed that Hurst Green does not have enough available and safe car parking for residents.
- Nearly a quarter of residents reported that their car or vehicle had been damaged whilst parked on the road or pavement around Hurst Green. While less than 3% of residents thought it was safe to park or leave their vehicle parked on the A21.
- 91% of respondents were concerned about people parking on the pavements and grass verges around Hurst Green.
- 85% of respondents were concerned about parking on Station Road (the road the Village Hall is on) near to the junction of the A21.
- 71% of respondents would be supportive of the Parish Council providing nearby allocated car parking spaces to rent at low cost.
- 82% of respondents were supportive of double yellow lines near to road junctions in and around Hurst Green.

### Access to cars and vans

Based on the 2011 census data presented in **Figure A9.1** (below), 91.7% of households in the neighbourhood area have access to at least one car or van, which is higher than the totals Rother District (81.0%), South East England (81.4%) and England (74.0%).

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

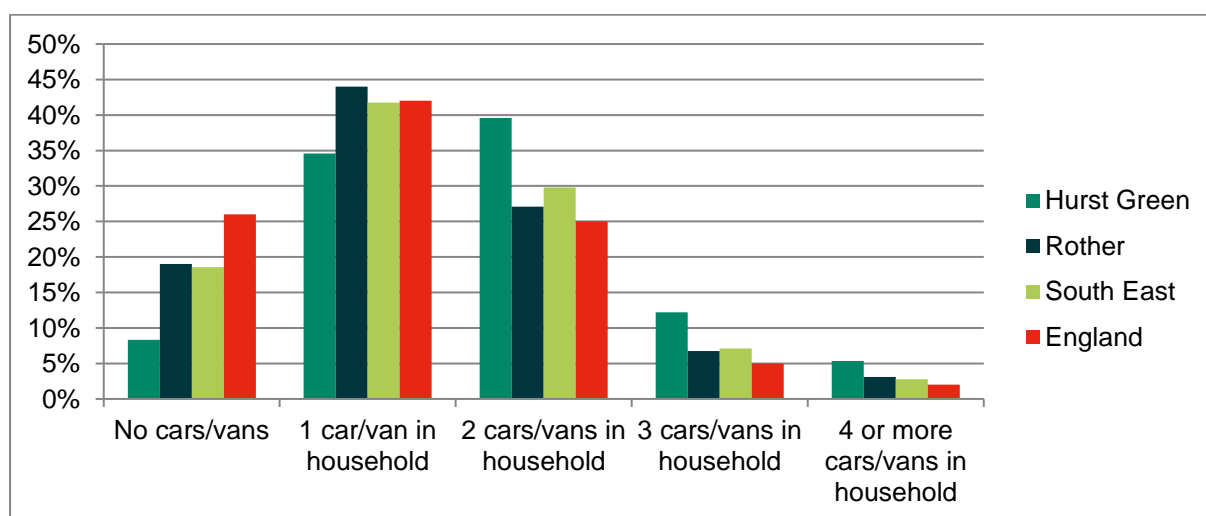


Figure A9.1 Car ownership

## Method of travel to work

As shown in **Figure A9.2** (below), the most popular method of travelling to work in the neighbourhood area is via driving a car or van (48.4%), higher than the totals for Rother District (37.7%), South East England (41.3%) and England (37.0%).

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

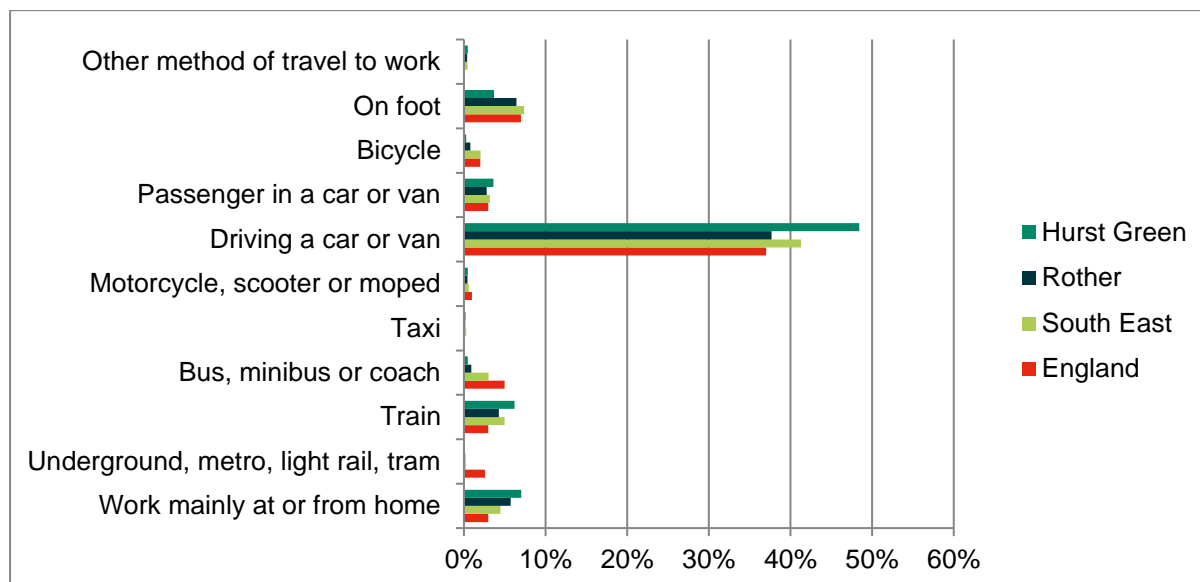


Figure A9.2 Method of travel to work

## Future Baseline

New development has the potential to increase traffic and cause congestion within the neighbourhood area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e., rush hours). This is significant in the local context, due to the pressures from the local road network.

However, development within the neighbourhood area has the potential to lead to enhancements to the transport network in order to promote more sustainable modes of travel, such as pedestrian and cycle networks.

Additionally, there are opportunities to improve public transport networks within the neighbourhood area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e., remote) working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

The recovery from the Covid-19 epidemic has the potential to change travel patterns in the village in the short, medium and (potentially) longer term.



