

Hurst Green Neighbourhood Plan 2021-2039

Pre-Submission Consultation Version, Strategic Masterplan and Design Codes Document

Regulation 14 Comments of Rother District Council

Overview

The Plan is well-produced, user-friendly and the use of parish photos and maps throughout gives context to the text. The evidence base is comprehensive and it is clear that the community are committed to understanding the issues of their parish. We are particularly pleased to see support for a village hub, more local leisure and green spaces and EV charging points. We also feel there is a further opportunity to incorporate more parish specific policies in line with Planning Practice Guidance (PPG) on a neighbourhood plan, paragraph 041: 'It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.'

The Plan must be in conformity with the strategic policies of the Local Plan but there is no need to repeat it, and as mentioned in earlier correspondence there are times that the draft NP policy is not as robust as the Local Plan which may cause problems when the plan comes to examination. PPG is clear that 'Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy.' Decision-takers will consider the NPPF, the Local Plan and the HGNP together when determining a planning application, therefore there is no need for the HGNP to repeat national or local policy. The policies in the Local Plan Core Strategy are all strategic, in the DaSA the relevant strategic policies are DHG1 Affordable Housing, DHG2 Rural Exception Sites, and DEC3 Existing Employment Sites and Premises.

Neighbourhood Plan Policies

HG1 Location of Development - As advised previously, Criterion A only is necessary in this policy. The other criteria risk diluting the Local Plan countryside policies and a better approach would be to refer to the Local Plan policies. As written, there is a risk of conflicting with the PPG advice that NDPs should not undermine the deliverability of the Local Plan.

HG3: Meeting local housing needs – Criterion A does not read well and is difficult to follow. Recommended text:

'The mix of housing sizes, types, tenures and affordability in proposed development should assist in meeting needs identified in the most recently available Hurst Green Local Housing Demand Survey as reasonably practicable and subject to viability considerations.'

Criterion B – Thank you for amending to DHG1 as previously advised, however earlier comments still apply. This criterion is superfluous and can be deleted.

HG4: Character of Development - The supporting text for this section is thorough and has regard to existing guidance from the AONB Unit and RDC. The character areas are well defined and clear to a decision maker.

B. (i) – previous comments still apply. The text of criterion (i) is already correctly located within the supporting text and not needed again in the policy.

C. – This criterion does not add value to the existing Local Plan heritage and listed building policies EN1,2 and 3, however while the policy doesn't add significantly to existing national and local plan policy, it highlights an important consideration and we do not object to its inclusion.

D. – As above.

HG5- Design of Development – This is a strong design policy with good references to other national and local policy. Whilst the policy doesn't add significantly to existing national and local plan policy, it highlights an important consideration and we do not object to its inclusion.

HG6: Energy efficiency and design – This is a very long policy and would benefit from being more concise for ease of interpretation by decision-takers.

Criterion A – Delete ‘...where measures will not have a detrimental impact on character, landscape and views’ as this is covered in the first part of the sentence.

Criterion C - Reword as:

‘Development proposals for renewable, community-scale energy schemes that contribute towards reducing greenhouse gas emissions and carbon zero targets where it can be demonstrated that the proposal’ etc.

HG7: Enhancing the public realm – We’re pleased to see the addition of this new policy, however the policy is still focussed on the public realm associated with development proposals; we would recommend expanding the policy to cover the other public realm works/improvements (as set out in para 6.28) that aren’t necessarily associated with development, e.g. those that come under the remit of ESCC, such as pedestrian crossings and footpath design.

HG8: Protecting Hurst Green’s Dark Skies –

Criterion iii) – ‘as sensitively as possible’ is subjective and will be difficult for a decision-taker to interpret. We suggest this is re-worded as as ‘*within a site, locating and orientating development to minimise light pollution.*’

HG9: Protecting the natural features of the parish -

Criterion vii) – this can be deleted as dark skies are covered in HG8 and this criterion does not add to this. Overall, there are many criteria in this policy and deleting any repetition will make it more accessible to a decision-taker.

HG10: Green infrastructure – As commented previously, the policy is comprehensive and would benefit from identifying more potential sites or projects in the parish.

HG11: Local Green Space – ‘Amend Green belt’ to ‘AONB’.

HG13: A village hub for Hurst Green – This will be a great asset to the village. We understand the need for the existing criteria, but think there is also scope for criteria to promote and support opportunities to include renewable energy e.g. solar panels, ground source heat pumps to the pavilion and car park and educational interactive play equipment, which may allow the PC to apply for 'green' funding: a 'Green Village Hub'.

The associated map (Fig 10.1) indicates the Hub as being in a different location.

HG14: Sports Leisure facilities in Hurst Green – We are pleased to see the site specific Drewett's Field criteria.

HG15: Allotments and community spaces – We support the protection of existing allotment spaces and the creation of additional allotments but please note that allotments have different criteria to community growing spaces i.e. allotments are generally much larger, require a water supply, parking and storage space (sheds) for equipment etc. They are usually run by the Parish Council and can serve people from all over the village/town. The policy intent seems to be more focussed towards the concept of community growing spaces, which we also support for the locations mentioned. CGS tend to be much smaller interventions e.g. raised planters, and more local to residents. We are pleased to see that the supporting text suggests community growing spaces for new development, growing spaces within new development would always identify as community growing spaces as allotments are for wider public use. The policy would benefit from identifying a potential site for the new allotment, is the Station Road/ Burgh Hill proposal for an LGS or allotment? It should be included in the policy as could other potential LGS sites.

Housing allocations

Policy HGSA1: Cook Field Burgh Hill - The prevailing character and pattern of built form here is directly lining Burgh Hill, i.e. frontage development to the upper part of the site. Lower siting would represent greater incursion into the countryside. We recommend making this restriction more robust in the policy. The policy would benefit from some clarity regarding which is the 'lower' part of the site.

Policy HGSA2: Land opposite Hurst Green School – This site is the subject of an extant planning application.

HGSA3: Land at London Road – This site is the subject of an extant planning application.

HGSA4: Land adjacent to Iridge Place – The site has substantial tree coverage and labelled 'deciduous woodland' in NP map 7.1. Development on this site would involve extensive tree removal which would conflict with Core Strategy policies and the High Weald Management Plan as well the NDP's Policy HG9.

Strategic Masterplan Document

The document generally has good strategic/place-making intentions.

- **Page 8 map** - The new proposed '*new connection*' on A265 (linking to south of site HG11) seems unappealing for pedestrians, and are there landscape/topographical issues? We also do not support the '*new connection*' on southern side of site HG11 and (8) '*potential small viewing space on new pedestrian link*' – this introduces activity on the countryside edge of this allocation, see Policy HGSA1 comments above.
- **Page 8 map** - crossings (4) and (5) on A21 will require discussion with Highways England.

- The 'Village Green' concept seems to be divided between two locations; one green space at Village Hub, and one proposed associated with allocation site HG22/43. How does this work – does it dilute the concept?
- There is no clear mention of potential public realm improvements to streets/roads to improve access and pedestrian experience – particularly with regard to Station Road and A21 – Is there an opportunity to use the NP to engage with Highways England on potential improvements in the built core of the village?

Design Codes Document

Generally good landscape and streetscape analysis and guidance, the document reflects national and local policy and sits well alongside other design guidance, e.g. the High Weald AONB Housing Design Guide.

- Section 2.4 'Movement & Transport' doesn't seem to have been carried forward into proposals in Strategic Masterplan (see comments above).
- Section 3 – Design Codes – good guidance, perhaps a caveat is needed to explain that grey blocks in explanatory diagrams are purely to illustrate the specific urban design point of each Design Code point, and are not intended to represent wider acceptable built plan form. For example, there are lots of diagrams featuring a 'permeable' cul-de-sac where the 'ticked' scheme shows public paths on blank sides of buildings, and where the buildings are rather segregated and fail to tightly define the space. It may cause problems if developers think this is the correct way to arrange a 'square' or embrace a green space for example.
- The versions of this diagram on p.70 illustrate a valid point about car-parking and left-over space but have the unfortunate consequence of dismissing (with a 'cross') a built form layout that sometimes might more successfully define a central space (with a revised parking strategy) – be clear about the specific issue that's illustrated in each diagram, sometimes a couple of options may help.

- The diagram on p.66 is confusing – what is it trying to show? It seems to be promoting a fairly isolated new development. This may need rethinking.
- Diagram on p.67 (parking) – we do encourage a mix of parking strategies, including small parking courts (as does the High Weald AONB Design Guide). To avoid confusion, this diagram should be expanded to show an acceptable rear parking court, as well as the unacceptable large tarmacked parking area. The parking diagrams on p.71 are very good
- 3.2 – Case Studies – this is a very interesting range, we recommend an introductory caveat to explain that each of these display *some* though not necessarily *all* of the relevant design, placemaking principles and requirements.

Mapping

Development boundary – Please make sure that the boundary is a solid line throughout (including proposed extensions) and there are no visible gaps e.g. obscured by another line.

Employment sites – these are plotted on the policies map, however they are not mentioned in HG17 and therefore not protected by this policy. Please omit from the map or amend the policy to reflect the existing sites.