

Regulation 18 – Response to the High Weald AONB Unit Objection

Site HG4 – Land at The Lodge, Hurst Green

We are grateful to the High Weald AONB Unit for its role in safeguarding this nationally important landscape. We fully recognise that great weight must be given to conserving and enhancing natural beauty and that development within a National Landscape must be approached with care, proportionality and a landscape-led mindset.

We also want to acknowledge openly that we are still at the Regulation 18 stage of the Local Plan process. This is the first, formative consultation stage, where the Council is testing options, gathering evidence and beginning to shape policy. At this stage, no developer has yet been appointed for HG4, and it would not be appropriate or proportionate to prepare the full suite of technical assessments, design details or modelling that will accompany later stages of the plan, particularly at Regulation 19 and, ultimately, at planning application stage.

However, being early in the process does not lessen our commitment. We fully respect the AONB Unit's guidance and the principles of the High Weald Management Plan, and we are entirely prepared to engage with all detailed landscape, ecology, transport, design, heritage and visual assessment requirements at the appropriate time, using qualified specialists in partnership with Rother District Council and the AONB Unit.

Our purpose at Regulation 18 is therefore to explain, clearly and constructively:

1. Why HG4 is an appropriate and carefully moderated direction for growth at Hurst Green, based on settlement-wide landscape evidence, containment, existing boundaries and the ability to moderate effects through enforceable design-code measures.
2. How we intend to conserve and reinforce key High Weald characteristics, such as shaws, hedgerows, field pattern, dark skies, and woodland margins, through a dual safety infrastructure & landscape-led masterplanning approach.
3. Why HG4 provides a unique public-interest benefit by enabling land assembly for the long-sought A21/Coopers Corner safety solution, which serves the existing community, future residents and the wider travelling public.
4. How we will work collaboratively with Rother District Council, the AONB Unit, National Highways and East Sussex County Council to refine, evidence and secure the necessary safeguards as the Local Plan moves from Reg 18 to Reg 19.

We offer this response with respect for the designation, appreciation of the AONB Unit's expertise, and a genuine commitment to ensuring that, as HG4 progresses through the Local Plan, it does so in a way that conserves, enhances and enables—for the landscape, for the village, and for the community that lives here.

Key points at a glance:

- Contained, edge-of-village site with limited wider visibility; effects moderated by a binding site-specific design code (buffers, stepped density, shaws/hedgerows, dark skies, GI/SuDS).
- Public-interest benefit: HG4 uniquely enables the Coopers Corner/A21 safety solution through safeguarded land and delivery mechanisms.
- Full alignment with ESCC's Reg 18 transport stance: bus contributions, early active-travel links, EV provision, Construction Logistics Plan, and monitor-and-manage approach.
- Sound, proportionate Reg 18 position: we recognise this is an early stage (no developer yet) and commit to detailed assessments at Reg 19/application stage.

Note on third-party representations: We also acknowledge the representation made by CPRE Sussex. CPRE is an important advocacy organisation, but not a statutory consultee, and the weight given to its views depends on site-specific evidence. In this case, CPRE's comments on HG4 do not engage with the site's containment, the design-code moderation proposed, the County Council's transport position, or the unique enabling-land role for a safety solution at Coopers Corner. We therefore invite the Council to place primary weight on statutory and technical evidence and to treat CPRE's comments as non-statutory advocacy rather than site-specific planning analysis.

1) "Major development" is a matter of planning judgement, not a label applied by numbers alone.

Whether a proposal constitutes "major development" in a National Landscape is not determined solely by unit count. It requires a judgement about nature, scale, setting and the scope to moderate harm. In HG4's case:

- The site forms a contained, edge-of-village parcel, enclosed by shaws, hedgerows, woodland belts and local topography.
- Wider visibility is limited; skyline effects can be avoided with height control and a stepped density that places the lowest intensity at the rural edge.
- A design-code-led scheme will retain and reinforce field boundaries and hedgerows, create a green-blue network and apply dark-skies lighting and view management.

This evidence weighs against an automatic "major development" classification and demonstrates clear capacity to moderate effects.

2) Settlement pattern: a contained, logical extension rather than an intrusion

The High Weald's settlement character includes compact villages and incremental edge growth along existing routes. HG4 is directly adjacent to built form, reads as a logical continuation of the village edge, and can:

- Deliver soft, treed transitions at the countryside interface;
- Maintain and reinforce historic field boundaries;

- Protect key views through massing control and buffer planting.

This is not a “gross conflict” with settlement pattern; it is the least intrusive direction for growth at Hurst Green.

3) Enclosure is characteristic of the High Weald — site-specific capacity still matters

Enclosure alone does not pre-determine sensitivity. The High Weald’s small, irregular fields, hedgerows and shaws create intrinsically contained landscapes. HG4 mirrors those characteristics. With existing boundaries and topography, and with the committed design code, landscape effects are limited, localised, and capable of being moderated in a manner consistent with National Landscape objectives.

4) Public interest and exceptional circumstances: HG4 uniquely enables the Coopers Corner safety solution

Plan-making must consider need, alternatives, and the public interest. For Hurst Green:

- A21/Coopers Corner safety is a long-recognised issue.
- HG4 is the only realistic landholding able to assemble the enabling land next to the junction to facilitate a long-term safety solution.
- As sole landowners we have set out a clear Enabling Statement, offering land for revised junction geometry, turning provision, improved pedestrian facilities & active-travel links, with delivery mechanisms available (through S106/Highways agreements) & phasing aligned to the corridor programme.

5) Reasonable alternatives: none provide the same combined benefits with lower landscape risk

Hurst Green is constrained throughout. Settlement-wide AECOM statutory assessment indicates the eastern side of the A21 — where HG4 sits — offers the strongest potential for accommodating growth due to enclosure, containment by existing boundaries and adjacency to the settlement edge. There is no like-for-like alternative capable of delivering both homes and the enabling land for Coopers Corner with less harm.

6) From mitigation to enhancement: a design code that strengthens High Weald qualities

Beyond mitigation, HG4 will secure net betterment by:

- Reinforcing hedgerows and shaws, retaining field pattern and woodland margins;
- Designing SuDS as landscape features and creating a connected green-blue network;
- Delivering on-site biodiversity net gain informed by proportionate ecological appraisal;
- Applying dark-skies principles and careful view management;
- Providing quiet, accessible outdoor places and well-overlooked paths consistent with rural character.

This directly supports the High Weald’s landscape components for fieldscape, routeways, woodland and perceptual qualities.

7) Transport alignment with the County: cooperative, proportionate, deliverable

The County Council's Regulation 18 position anticipates bus service contributions for HG3/HG4, early active-travel links, EV provision, a Vision & Validate/Monitor & Manage approach, and Construction Logistics aligned with the Freight Strategy. As landowners we accept and commit to these requirements. The scheme is delivery-ready with clear hooks for conditions and S106, providing confidence to the plan-making authority.

8) Social wellbeing and inclusive access: lived experience matters

Our family submissions explain how the A21 currently removes independence, especially for our middle son, a vulnerable young adult with [REDACTED], and how safe paths, formal crossings and quiet seating are essential to his everyday life. These are material planning considerations for a safe, inclusive place and should be considered to reinforce the public-interest case for the junction solution and village-edge improvements.

9) Suggested allocation wording (to secure safeguards and public benefits)

To address the AONB Unit's concerns and lock in delivery, we recommend these concise additions:

1) Safeguarded Land – Coopers Corner

"The allocation will safeguard the land reasonably required to enable an agreed Coopers Corner junction solution, in consultation with National Highways and the local highway authority; delivery triggers/phasing to be agreed and secured by legal agreement."

2) Landscape-Led Design Code

"A site-specific design code shall secure: hedgerow/shaw retention and reinforcement; lower-intensity, treed edges; green-blue corridors and SuDS as landscape features; view management; and dark-skies-compliant lighting across the site."

3) Biodiversity & Ecology

"A proportionate ecological appraisal will inform a Biodiversity Net Gain strategy delivering on-site habitat creation, ecological connectivity and long-term management, with buffers excluding formal play and lighting where necessary."

4) Transport and Access (County-aligned)

"Proportionate bus service contributions and bus stop upgrades; early delivery of walking/wheeling/cycle links; EV charging to county standards; and a Construction Logistics Plan aligned with the County Freight Strategy."

Conclusion

When site-specific evidence and the correct national tests are applied, HG4 is a sensitive, contained and enhancing allocation that delivers compelling public-interest benefits:

- A dual safety & landscape-led scheme with limited wider visibility and enforceable mitigation;
- Net environmental betterment to High Weald characteristics;
- A unique enabling role for long-awaited, settlement-wide A21/Coopers Corner safety improvements;
- Cooperative alignment with County transport strategy and delivery tools;
- Inclusive access and real-world safety gains for current and future residents.

Respectfully, we request that HG4 is retained in the emerging Local Plan and that the allocation wording is refined as above to secure the landscape safeguards and unlock the Coopers Corner solution for the benefit of the whole community.

We are trying to do everything we possibly can to work with all stakeholders and ensure that the development of HG4 is as sensitive and thoughtful as possible, ensuring a safer and stronger future for Hurst Green.

Notes on alignment with our existing submissions

This response reflects our Policy Alignment Matrix commitments (landscape buffers, dark skies, GI/BNG, parking, design transitions, the A21 interface, and the enabling role for Coopers Corner).

It is consistent with our Additional Supporting Information (non-designation of The Lodge, settlement-wide sensitivity with capacity at the eastern edge, documented National Highways engagement in 2024, and deliverability in single ownership with developer interest and viability testing).

We submit this response in **good faith**. Our intention has been to engage openly, listen carefully, and present a balanced, evidence-based view of **HG4**—not only as the landowners, but as **members of the Hurst Green community** who care deeply about the character, safety and wellbeing of our village.

We value the **Hurst Green Neighbourhood Plan** and the community effort behind it. We recognise that the High Weald National Landscape is a precious asset that deserves great care. Our approach has therefore always been both **landscape-led** and **safety-infrastructure-led**, reflecting the dual reality in Hurst Green: the need to respect the High Weald, and the equally pressing need to address the longstanding **safety problems on the A21 and at Coopers Corner**.

We also understand that, at first glance, a larger, coordinated allocation may attract immediate objections. However, we respectfully ask all stakeholders to take a step back and consider the **whole-village benefits** that a well-planned scheme can unlock—benefits that cannot be secured through smaller, piecemeal or reactive development.

In addition to landscape and safety benefits, **HG4 can make a meaningful contribution to local housing supply**, giving **growing families in Hurst Green the ability to stay**, rather than being forced out of the village by lack of suitable homes, and also attracting **new families** who will help sustain the village's long-term **vibrancy, viability and community life**. A coordinated, design-led allocation offers what scattered, small sites cannot: integrated green infrastructure, safe walking and wheeling routes, affordable homes delivered in one place, and the land needed to achieve long-awaited changes to the A21.

We believe we are in a **rare but precious position** to support Hurst Green's future:

- by shaping a **contained, sensitive, landscape-respectful** extension to the village;
- by offering the **safety-critical enabling land** needed for improvements at Coopers Corner;
- by helping secure **affordable and family housing** that supports local people; and
- by reinforcing the qualities that make the High Weald special.

Our aim is a future for Hurst Green that is **safer, stronger and more connected**, while remaining unmistakably **of the High Weald**.

We would welcome the opportunity to continue working **collaboratively** with Rother District Council, the High Weald AONB Unit, East Sussex County Council, National Highways and the local community, so that—together—we shape a carefully moderated, locally responsive outcome that **conserves, enhances and enables** for the benefit of the whole village.