

Additional Representation – Response to HGPC Social Media Posts (Regulation 18)

Submitted by the Landowners of HG4 – Land at The Lodge, London Road, Hurst Green

Materiality: This submission addresses consultation accuracy and interpretation. It explains why recent HGPC public communications & social posts should carry limited evidential weight at Regulation 18, given their selective use of figures and omission of relevant, Parish-held policy information.

Purpose of this submission (in addition to our formal Reg 18 representations):

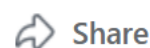
- To respond to the Hurst Green Parish Council (HGPC) public communications, Facebook posts and infographics.
- To highlight material omissions, selective presentation of facts, and misleading impressions created by those posts.
- To ensure that Rother District Council (RDC) is aware that the HGPC messaging does not reflect the full body of information available to the Parish nor the content of the made Hurst Green Neighbourhood Plan (HGNP).
- To request that RDC treat the HGPC social-media commentary with limited evidential weight when weighing consultation responses.

HGPC objection and evidential weight: HGPC’s public communications ahead of and during Reg 18 make clear a settled opposition to HG4 and present residents with selective, outdated figures while **omitting** relevant Parish-held evidence and adopted HGNP objectives for A21 safety and movement improvements. We respectfully request that RDC **records** HGPC’s statutory objection but affords it **limited evidential weight** relative to the Reg 18 evidence base and the made HGNP. In particular, HGPC’s stance **dismissing HG4 as “not justified”** disregards both the plan-led delivery route set out in the HGNP and HGPC’s **own Coopers Corner supporting paper** evidencing long-standing safety need.

Access & ethics: We note that while the HGPC post is publicly visible, some stakeholders – including us as landowners – were unable to comment while others could. While social media is informal, communications from a public body during a statutory consultation should strive for openness and even-handed engagement.



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Summary for Local Residents: Hurst Green Parish Council response to Rother's Draft Local Plan (2025–2042)

Hurst Green Parish Council has reviewed Rother District Council's draft Local Plan and is raising strong concerns about how much development is being proposed for Hurst Green. The Parish Council is not against new homes in principle, but says growth must be based on local evidence, fit the village, and be supported by roads, services and utilities.

The main issue is the sudden increase in the number of homes proposed for Hurst Green. In the earlier 2024 consultation, the figure was 38 homes. In the 2026 draft plan, this rose to 185 homes, with no clear published village-level evidence explaining why. The Parish Council says this is too much for a village like Hurst Green, especially as existing approved sites already provide a significant number of homes.

A major concern is Site HG4 at The Lodge, London Road, where around 150 homes are proposed. The Parish Council objects strongly to this site and says it should be removed from the plan. Their reasons include: it is open countryside, it sits within the High Weald National Landscape, it would urbanise the edge of the village, and it conflicts with the recently adopted Hurst Green Neighbourhood Plan. They also argue the site has serious constraints including highway danger on the A21, flood and drainage concerns, landscape harm, ecology issues, a gas main crossing the land, and possible effects on heritage and dark skies.

The response also highlights infrastructure problems. Hurst Green already has no GP surgery, no secondary school, limited local services, poor parking, and heavy dependence on cars. The A21 through the village is described as a major safety issue, especially for pedestrians and schoolchildren. The Parish Council says roads, active travel routes, water supply, drainage and utilities are already under pressure, and there is no clear funded plan showing how these problems would be solved before major growth takes place.

On other sites, the Parish Council supports HG1 and HG2, which already have permission, and supports HG3 in principle but only if it is changed. They want HG3 to be lower density, to include better parking, and to prioritise affordable homes for people with a local connection.

Overall, the Parish Council says the draft plan is unsound as it affects Hurst Green. It believes the plan ignores local evidence, overrides the village's Neighbourhood Plan too soon after it was adopted, and proposes growth that the village's landscape, roads and services cannot support. It is asking Rother District Council to reduce Hurst Green's housing requirement, keep HG1 and HG2, amend HG3, and delete HG4 completely.

Web: <https://www.hurstgreen-pc.gov.uk/>
Facebook: <https://www.facebook.com/hurstgreenpc/>



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Register your thoughts with Rother in response to Question 2 of the draft Rother plan by emailing consultation@rother.gov.uk. Must be done by 23rd March 2025

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Hurst Green Parish Council

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Hurst Green is not against new homes. But housing numbers must be based on evidence, not unexplained increases. The draft Local Plan raises Hurst Green's figure from 38 to 185 homes.

Residents deserve to see the justification.

The Parish Council is asking for a fairer, evidence-based approach that reflects the village's size, services and infrastructure.

Register your thoughts with Rother in response to Question 2 of the draft Rother plan by emailing consultation@rother.gov.uk. Must be done by 23rd March 2025

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Infrastructure Concerns

Is Hurst Green's infrastructure ready for large-scale growth?

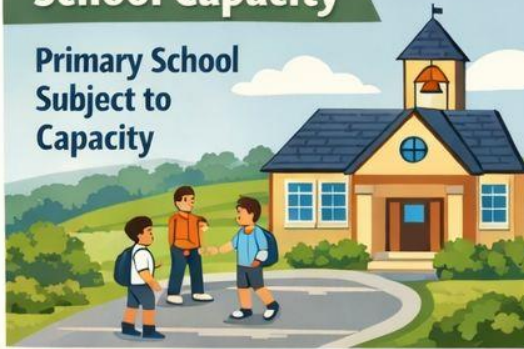
Pressure on Roads

Congested
& Busy Roads



School Capacity

Primary School
Subject to
Capacity



GP Services

Long Waits
to See a Doctor



Water & Sewage

Aging Systems
Under Strain



Can our village cope with more homes?

Investment in infrastructure must **come first.**





Hurst Green Parish Council

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Rother draft plan - key response #2

Hurst Green already faces major infrastructure pressures.

The A21 is a serious safety concern, roads across the area are under strain, there are no safe active travel links, and water and drainage issues remain unresolved.

The Parish Council is calling for a credible, funded Infrastructure Delivery Plan before further large-scale growth goes ahead.

Register your thoughts with Rother in response to Question 5 of the draft Rother plan via Rother's website

Rother District Council - Rother Local Plan 2025-2042 – Development Strategy and Site Allocations

1) The “38 homes” narrative is not a formal planning baseline

The “38 homes” figure presented in HGPC’s posts reflects early scoping from a policy-only phase. It was not a settled or published settlement requirement. The current Regulation 18 stage is the first to present site allocations with capacities for public scrutiny and refinement. This is the proper context for testing numbers and attaching infrastructure requirements.

2) HGPC’s posts omit adopted HGNP objectives that change the planning balance

The made HGNP sets specific infrastructure and safety priorities – including junction solutions at Coopers Corner and A21/Station Road, safer routes to school, walking and cycling links that avoid reliance on the A21, appropriate off-street parking to reduce on-pavement parking, dark-skies-friendly lighting, and improvements to the public realm. HGPC’s social posts do not reference these adopted objectives, creating an incomplete account of local policy and how mitigation is intended to be delivered.

Why this matters: these improvements require scale to deliver. Allocation-scale development such as HG4 provides a viable and customary mechanism to secure the requested safety and movement works through

planning obligations and phasing. Presenting development solely as a burden, without noting the HGNP's delivery route, risks misrepresenting the balance of the adopted plan.

3) Long-standing A21/Coopers Corner safety concerns are downplayed in the posts

A21/Coopers Corner has long been cited locally and nationally as a serious road safety concern requiring major intervention, alongside calls for improved crossings, gateway measures and safer routes to the primary school. HGPC's recent posts about the draft Local Plan do not reference this context. The effect is to emphasise burdens while omitting the very safety outcomes the community has consistently requested. Allocation-scale development offers a practical route to secure these works through binding obligations and triggers.

4) Constraints listed by HGPC are addressed by plan-led mitigation – not reasons to halt plan-making

The issues listed by HGPC (roads, school capacity, primary care, water) are precisely those addressed through a plan-led approach using allocation-specific obligations, delivery triggers and phasing. It is not a planning reason to oppose all growth simply because constraints exist; the test is whether proportionate mitigation can be secured. Allocation-scale development is the normal route to funding junction upgrades, safer-routes-to-school improvements, and active-travel links at the scale previously advocated locally.

5) The posts imply unanimity that does not exist

HGPC's social posts speak in collective absolutes. In practice, consultation exercises routinely evidence a range of resident views. Over-stating consensus risks distorting the perception of local opinion within the Reg 18 record.

6) Summary of omissions and their effect

HGPC's posts:

Omit: adopted HGNP infrastructure and safety priorities; long-standing A21/Coopers Corner safety concerns; Councillor Brown's 2019 Coopers Corner study; that allocation-scale development is the delivery pathway for these improvements; that "38 homes" was not a formal planning expectation; and that constraints are normally addressed through mitigation.

Emphasise instead: outdated or informal figures; one-sided concerns; a narrative of unresolvable strain; and an implied village consensus.

Road Safety Improvements at Coopers Corner: Supporting Paper [Download the HGPC-hosted study](#) from the Hurst Green Parish Council website.

We note that the Coopers Corner 'Road Safety Improvements' paper is published on the Hurst Green Parish Council's own document repository, and therefore constitutes HGPC's **own evidence**; its omission from recent HGPC posts materially affects the weight that should be attached to those posts.

The effect is an incomplete and inaccurate picture for residents and decision-makers unless balanced by accurate submissions, including this one.

7) Our position

We welcome scrutiny of HG4. We support a plan-led approach that secures safety, infrastructure, connectivity, environmental quality and phased delivery. We object to selective or incomplete public statements during a statutory consultation that omit material policy context and restrict even-handed

engagement. It is important that RDC recognises these omissions when considering the weight to attach to HGPC's social-media commentary.

8) Respectful Request to Rother District Council

- Treat the HGPC social-media posts with limited evidential weight within the Reg 18 record due to their selective presentation and omissions.
- Acknowledge that HGPC's posts are not a full or balanced summary of local planning evidence or community aspirations and should not be afforded disproportionate weight.
- Continue to assess HG4 against adopted HGNP objectives, current Reg 18 evidence, and normal plan-led mitigation practice, with appropriate phasing and obligations.
- Given HGPC's pre-declared opposition and the omission of both the made HGNP objectives and HGPC's own Coopers Corner evidence, we ask that their objection—**which dismisses HG4 as “not justified”—is recorded but afforded limited evidential weight, with HG4 assessed against the Regulation 18 evidence and adopted neighbourhood policies.**

As elected representatives, HGPC members have a clear social and civic responsibility to present a balanced account of policy and evidence to the whole parish, not only the elements that support a particular narrative. On the evidence set out above—namely, the omission of HGNP policies that the Council itself promoted and the acknowledged funding reality discussed at recent public meetings—this standard has not been met.

Taken together—the omission of the made HGNP's delivery policies in current posts, the Parish Council's own public statements about funding constraints and the limits of lobbying, and earlier campaign activity by some members during the HGNP referendum that did not consistently present the same caveats—there is now credible evidence of a *systemic pattern* of selective communication by HGPC. Elected members have a social and civic duty to provide balanced, whole-parish representation; repeatedly presenting only part of the policy and delivery context falls short of that standard, risks misleading by omission, and reasonably raises concerns that such conduct may bring the Council into disrepute by failing to reflect the adopted framework and the interests of all residents.

Given the Parish Council's own confirmation that neither they nor the District Council possess the funding to deliver the HGNP's infrastructure objectives without contributions secured through plan-led development, HGPC's current stance amounts to advocating for an outcome that cannot fulfil the made Neighbourhood Plan. This creates a clear policy contradiction: the Council is promoting a position that removes the only delivery mechanism identified in the HGNP. While this does not imply improper intent, it does demonstrate a form of lobbying for an outcome that is not capable of achieving the parish's adopted objectives, and it raises legitimate questions about whether residents are being fully informed of the practical consequences of this approach.