

Crowhurst Neighbourhood Plan

Crowhurst Parish Council response to Initial Questions from the Independent Examiner

1. *The Environment Agency commented at Reg16 that the wording for Ancient Woodland needs strengthened “to follow Rother DC policy EN17”. I can’t find a policy EN17 in any of the policy documents – including the emerging plan? Can you assist with what may be referred to here please?*

I think they mean EN1 in chapter 17 of core strategy but will let RDC answer this one.

2. *Policy CF1 on Community Facilities needs to be specific on the facilities to be protected, and it has listed them. However the term “but not limited to” is too vague, would a reference to any future facility be useful here instead? Please let me know if there is any other existing facility that should be specified at this point.*

The community facilities to be protected are shown on Map 6 (Crowhurst Station, Village Hall, Primary School, St Georges Church, BMX bowl (owned by a private individual), Methodist church, Plough Inn, and the Play area, Pavilion, Youth Club Hut and Tennis Courts on the Recreation Ground). These are the ones we would like to protect. The community buildings listed are a subset of those facilities and related more to those places that may be able to host "a wide range of village activities" as mentioned in point CF1.1. If we do need to list all the buildings then the Methodist Chapel and Plough Inn (already listed as an Asset of Community Value) should be included. Although the Station is a community facility and a building, it would not really be hosting any activities other than being a Station so would not need to be listed. Adding in a point about future facilities/buildings would be good as we are hoping to have another play area and possibly a small community area in the new housing developments.

3. *The same policy CF1 includes ‘the recreational ground’. I assume this is the Recreational Ground that is to be designated a Local Green Space? If so, the protection in policy CF1 being less strong and including reference to future ‘dual use’, the Recreational Ground should not be included in it. There is a potential conflict that makes policy regarding that Local Green Space less clear. Questions 4 and 5 also refer to policy about recreational facilities, and you may like to consider clarifying for me your preferred approach to recreation in the Plan generally.*

The Recreation Ground is a community facility and was therefore put in CF1. It might look a little odd if it was not mentioned as a community facility. The support for keeping it as an open area/recreation ground was high, hence why it was also put in as part of the Local Green Space designation. Maybe CF1 could be reworded as the facilities of the Recreation Ground (Tennis Courts, Play Area, Youth Club Hut and playing pitches)? The Parish Council are also looking at refurbishment/extension of the Pavilion and Play Area and do not wish to rule this type of development out.

Crowhurst has a lot of open areas including formal (the Recreation Ground) and more informal areas - Fore Wood Nature Reserve, Crowhurst Nature Reserve, the Churchyard plus the extensive network of Public Rights of Way (PRoW) around the village. We would like to protect these as much as possible while still allowing "development" that may improve access/use of these areas.

4. *Policy CF2 refers to 'recreational open space'. I am not clear what these are? Presumably the Recreational Ground LGS, and anything else? The policy actually seems to be mostly concerned with footpaths and informal recreation: would this be sensible to reference in the policy title?*

We would be happy to be guided in better wording or title. A lot of the policy is about footpaths. We would like to protect PRoWs (and the spaces/fields they go through). However, we were also thinking of recreation spaces as being places that residents can go for peace and quiet, health and wellbeing. These spaces include the Church Yard, Crowhurst Nature Reserve, Fore Wood, Recreation Ground (all listed as LGS). There are also informal open areas that children use but these would be difficult to list. As mentioned before, we are also hoping to get another play area in one of the housing developments. CF2.4 talks about protecting sports and play facilities and encouraging more. We would welcome your opinion on whether this should be moved to policy CF1.

5. The wording of Policy CF3 is not very clear to me. The reference to 'existing facilities' would be relevant to the Recreational Ground, but not any of the other proposed designations I'd have thought. The protection is meant to be of an equivalent level as green belt, and offering prior approval to development rather than dealing with any future proposal with regard to its usefulness or otherwise to the reasons for the designation seems to me to be all that needs to be said. I would therefore propose that for clarity the words 'remain of a similar scale and bulk as existing facilities' be removed. Your view on this would be appreciated.

Yes, the wording "...remain of a similar scale and bulk as existing facilities.." primarily relates to the Recreation Ground. The other areas may need some kind of development in future (e.g shed in Church Yard, improved main track in Fore Wood to allow better access for coppicing/woodland management) but we would hope that removing that wording is unlikely to open the door for inappropriate development.

6. *The Proposals Map shows a potential diversion of a footpath, which is a highways matter not a land-use planning issue. If however what was intended was an additional link to the footpath network rather than a path diversion that would be a land-use proposal. Can you clarify what was intended here please?*

As part of the infrastructure improvements, and in line with our village surveys, we are proposing a new car parking area by the Church Yard. We have thought carefully about the landscaping and design as it is next to an important open area defined on Map 2. The car park should serve 2 purposes:

- a) provide extra parking for the Village Hall, Church and school so reducing problem parking in the area, particularly around the Forewood Lane/Station Road junction which is where PRoW 6a starts;
- b) be an amenity for residents and visitors to access the PRoW network. The 1066 Country Walk Bexhill Link passes along Forewood Lane by the entrance of the proposed car park. PRoW 6a starts at Forewood Lane on the far side of the church from the proposed car park and passes through the field to the south of the proposed car park.

As part of the amenity use of the proposed car park, we felt that there should be a link to both the 1066 Country Walk and PRoW 6a and that this was an integral part of the design/use of the proposed car park. This proposal has been part of our ongoing consultations. For various reasons (including public safety and heritage crime affecting the Manor Ruin, which is a scheduled ancient monument), the landowner's preferred option is for PRoW 6a to start at the proposed car park, rather than add an extra footpath into the field. We realise that an isolated proposal to alter a footpath is usually a matter between the landowner and Highways (East Sussex Rights of Way) and Highways will make the final decision. However, the NP team felt that in order to be fully transparent, and in response to a resident comment on the draft plan, the proposal about altering PRoW 6a should be included in the submission plan maps. This ensures the intent is clear, even if we do not have the final say in the alteration of PRoW.

We welcome your opinion on the best way to comply with what is supposed to be included in neighbourhood plans and our desire to be open and transparent with our residents.

As has been made clear in all meetings about this proposal, the landowner is a member of the NP steering group and a Parish Councillor.

7. *The Ministerial Statement of March 2015 has banned use of technical standards in neighbourhood plans apart from the floorspace standards and Building for Life. Building for Life was design guidance rather than technical standards, and of course it is promoted in the NPPF 2019 version. However Policy CB1 is requiring that all buildings be built to the higher than basic accessibility standards of the building regs, and this seems to be to be an undifferentiated application of a technical standard. I consider use of this technical standard permissible in neighbourhood plans where it is requiring homes to be suited to older and less mobile people specifically, but my understanding here is that you wish the standard to be applied in any new home. Again comments welcome.*

According to the 2011 census, the 65+ group is the second largest demographic in Crowhurst. The largest being 45-64yrs. So, Crowhurst has an ageing population. That was the purpose of mentioning the accessibility standards within the NP. However, to avoid complications, we wanted to align ourselves with the RDC Development and Sites Allocation plan. Initially we thought that would mean that a proportion of homes in multiple dwelling developments (eg. 11+) would need to accord with the standard. However, the submission version of the DaSA (which is currently having its own independent examination) does say that RDC is adopting the optional Building Regs for Adaptable/Accessible homes and requires all new homes to meet the M4(2) accessibility standard. So, we do not feel that we are asking for anything out of line with RDC policy. Strictly speaking, as it is RDC policy, we should not need to mention it as it should be a requirement anyway, but because we know we have an ageing population in Crowhurst, we did want to ensure it was part of our plan too. Rather than specifically mentioning only M4(2), we would be amenable to rewording to something along the lines of ..."new housing shall comply with National Floorspace standards, Building for Life standards and should accord with the Optional Building Regulations for accessible and adaptable homes, as adopted by Rother District Council."

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