

# The SEA Report

Submission version – Regulation 16



## Non Executive Summary

1. The purpose of this Strategic Environmental Assessment (SEA) report is to provide an environment assessment under the SEA Directive to assess whether the plan will have significant effects on the environment, by implementation of its policies and proposals. The Strategic Environmental Assessment has had regard to the requirements of EU Directive in order the likely effects of the plan is properly assessed having regard to reasonable alternatives, with the overall objective of avoiding or minimising harm to the environment.
2. The plan has been prepared by Crowhurst Parish Council in order to deliver the growth specified by the Rother District Council Core Strategy and also to guide development in the Parish up to 2028. The plan will cover the whole of the Crowhurst Parish which was designated as the Neighbourhood Area in October 2015. This report relates to the submission plan which is due to be released for consultation in late 2018.
3. The plan will include a number of policies relating to a number of issues including economic, social and environmental considerations which are localised to the Parish. Once adopted this will form part of the development plan and it vital this plan is consistent and takes account of other relevant plans and programmes. The plan will sit alongside the Core Strategy and at present the saved polices of the Rother Local Plan 2006. However, it is likely by the time the plan is adopted the District Council's Development and Allocations Plan will also be part of the development plan. This will be considered in decision making alongside other guidance such as National Policy such as the NPPF, NPPG and other material considerations such as ministerial statements. The plan must also take account of other stakeholder plans and programmes including the High Weald Management Plan, those of the Environment Agency, Natural England which seek to protect and enhance the natural environment, communities and provide opportunities for communities and businesses.
4. The above matters are relevant to the plan making process and the plan was screened into the SEA process due to the AONB landscape and substantial natural and historic assets found within the Parish. This includes a large part of the Parish being AONB, with the remainder being the setting to this designated landscape, three areas designated as SSSIs, BAP Habitats and watercourses which themselves bring flooding and water quality considerations, including a groundwater protection zone. The Parish also presents valuable assets in respect of the built environments, including many listed buildings, a scheduled ancient monument and potential for archaeology. These assets and designations combine to present a significant environmental asset which is sensitive to development and presents a context for a tranquil but vibrant village and its community. The plan seeks to preserve and take opportunities for enhancement, whilst seeking to deliver the infrastructure, including homes that the community needs.
5. The baseline study identified a number of key issues that the plan is seeking to address and whilst these are not serious or immediate, they are issues that the plan seeks to improve upon while preserving the special qualities of the Parish having regard to potential pressures and impacts that have been identified. This includes potential development pressures on the intervening areas between the dispersed parts of the village, flooding issues and impacts on ecology and wildlife connectivity. Due to the high value of the parish environment, the challenge is delivering the growth whilst preserving and where possible enhancing such an environment.
6. In the screening opinion issued by the District Council, the matters to be scoped into this SEA were determined and these matters enabled a number of SEA objectives to be formed and provide the framework for the assessment of the preferred plan against any reasonable alternatives. These matters largely correlated with the matters raised as being important to residents in the village surveys and range from economic, social and environmental factors. The SEA framework and topics are set out on the following page:

SEA topic	SEA Objectives
Accessibility to services and facilities	Improve accessibility to services and facilities for all ages across the Districts
Transport and air quality	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
Land, water and natural resources	Improve efficiency in land use and encourage the prudent use of natural resources
Climate Change	Reduce emissions of greenhouse gases
Flood Risk	Minimise the risk of flooding and resulting detriment to people and property  Reduce existing risk where possible through design
Water conservation	Maintain, improve and manage water resources in a sustainable way
Biodiversity	Conserve and enhance biodiversity and geodiversity
Natural Environment – Landscape Character	Protect and enhance the high quality natural environment
Built Environment	Protect and enhance the high Quality Built environment

7. In order to deliver the aims and desires of the local community and Parish Council, a vision was set for the plan and a number of objectives which can be divided into economic, social and environmental matters. This sought to provide the basis from which policies and the strategy could be developed. These objectives were tested against the SEA objectives to ensure there was synergy between the objectives and to highlight any potential conflict which may suggest a different approach. As can be seen in the table on the next page, there is predominately a positive relationship between the objectives and no negative correlations which confirm the plan has quite rightly prioritised the protection and enhancements of those matters scoped into the assessment.

Objective (see preceding page for full NDP objective)	1. Efficient use of land and resources	2. Reduce road congestion, pollution and air quality	3. Improve accessibility to services and Facilities	4. Protect and enhance the natural environment – Landscape character	5. Protect and enhance the built environment and heritage	6. Conserve and enhance biodiversity and geodiversity	7. Maintain, improve and manage water resources in a sustainable way	8. Reduce emissions of greenhouses gasses	9. Minimise the risk of flooding and resulting detriment to people and property
<b>Environmental</b>									
1. Landscape Character	+	0	0	+	+	+	+	+	+
2. Biodiversity	+	0	0	+	0	+	+	+	+
3. Protect important landscape features	+	0	0	+	+	+	+	+	+
4. Protection from flood risk	+	0	0	+	+	+	+	0	+
5. Use of SUDS	+	0	0	+	0	+	+	0	+
6. Heritage Protection	+	0	0	0	+	0	0	+	0
7. Well designed/local character	0	0	0	+	+	0	0	0	0
8. Landscape and ecological led development	+	0	0	0	0	+	+	+	+
<b>Social</b>									
1. Promote strength of community	0	0	0	0	0	0	0	0	0
2. Support and enhance community features	+	+	+	0	0	0	0	0	0
3. Design/Access	+	0	+	+	+	0	0	+	0
4. Deliver housing need and mix	?	?	+	?	?	0	0	0	0
5. Maintain and enhance open spaces	+	+	+	+	+	+	0	+	+
6. Improve access to facilities	+	+	+	0	0	0	0	+	0
7. Dual access of facilities	+	+	+	0	0	0	+	0	0
8. Social, Health and Education	+	+	+	0	0	0	0	0	0
<b>Economic</b>									
1. Support new and existing businesses	?	?	+	?	?	0	0	0	0
2. Support new and existing tourism enterprises	?	?	+	?	?	0	0	0	0
3. Ensure development is viable	+	0	0	0	0	0	0	0	0
4. Provision of infrastructure	+	+	+	0	0	+	+	+	+
5. Ensure new development provides safe access and maximises public transport	0	+	+	0	0	0	0	+	0

8. The NP strategy was assessed alongside the potential reasonable alternatives that were identified in order that the effects on the environment were minimised. Potential alternatives were identified in relation to three issues: housing need; the development boundaries, the allocated sites and finally the plan and its policies.
9. In terms of housing need, the alternative option to housing need was either no growth or a much higher level of growth, both of which would not be in conformity with the Strategic Core Strategy and thus were not considered to be reasonable alternatives. Thus the preferred approach was to meet the Core Strategy target with an element of flexibility, through the allocation of three small sites in or near the edge of the development boundary. This includes the encouragement of the development of a brownfield site within the existing development boundary through its allocation. This will meet the plans objectives and housing need whilst offering a degree of flexibility in respect of delivery over the plan period. As can be seen by this assessment, the additional growth over that of the Core Strategy would not cause harm to the wider Parish and thus would not be contrary to the SEA objectives
10. In respect of the development boundaries, there were a number of options that could have been considered in respect of the approach the designation of these boundaries, such as having no boundary, or the extension of the development around all the built parts of the village. However, having regard to the SEA objectives, these other options would have had unacceptable impact on landscape, access and biodiversity considerations and thus were not considered to be reasonable alternatives.
11. In respect of the site allocations, the other sites were considered against assessment criteria which were devised to take account of the SEA topics and objectives and other considerations such as local and national planning policy. This resulted in the site assessment process being aligned with producing the most appropriate sites according to their effects on the SEA topic and which could be mitigated or avoided in order the chosen site achieved the best outcome in environmental terms. Having regard to the need for sites to be related to the village settlement and to be available and deliverable, there was only a small selection of sites that could have been considered reasonable alternatives to the chosen sites in principle. Whilst many of these sites did not proceed to the second stage of the site assessments due to their impacts on principle matters, for robustness, these sites have been tested against the SEA objectives and considered as reasonable alternatives in this report. However, these are not considered to have performed well against the SEA objectives and would have negative impacts on certain key topics such as landscape and would be in conflict with the available evidence to the plan. The sites taken forward are considered to perform the best in respect of the SEA objectives and the environment. Other Stage two sites (which could have been potential alternatives) were removed from the process on account of the land becoming unavailable during this process and thus were also not considered to be reasonable alternatives to those chosen. Thus on this basis the allocated housing sites are considered to be justified in environment terms having regard to any reasonable alternatives.
12. It is considered the chosen sites perform the highest against the SEA objectives. In terms of the objective to protect and enhance landscape character, it is acknowledged that two of the new allocated housing sites would utilise greenfield land within the AONB and that these might be considered major development as a result of the quantum required to meet the housing target and need identified in the evidence base. However, it has been shown this can be achieved without harm to the landscape character of the Parish and there are no reasonable alternatives to the approach and thus would comply with Paragraph 116 of the NPPF as set out in the next paragraph. Notwithstanding this position, it is understood the District Council do not consider the allocated sites to be major development in any case.
13. The site assessment background paper shows a robust site selection process and that there were no other suitable sites available within the non-AONB areas of the Parish and the allocated sites would perform the best in terms of land within the AONB areas of the Parish having regard to the

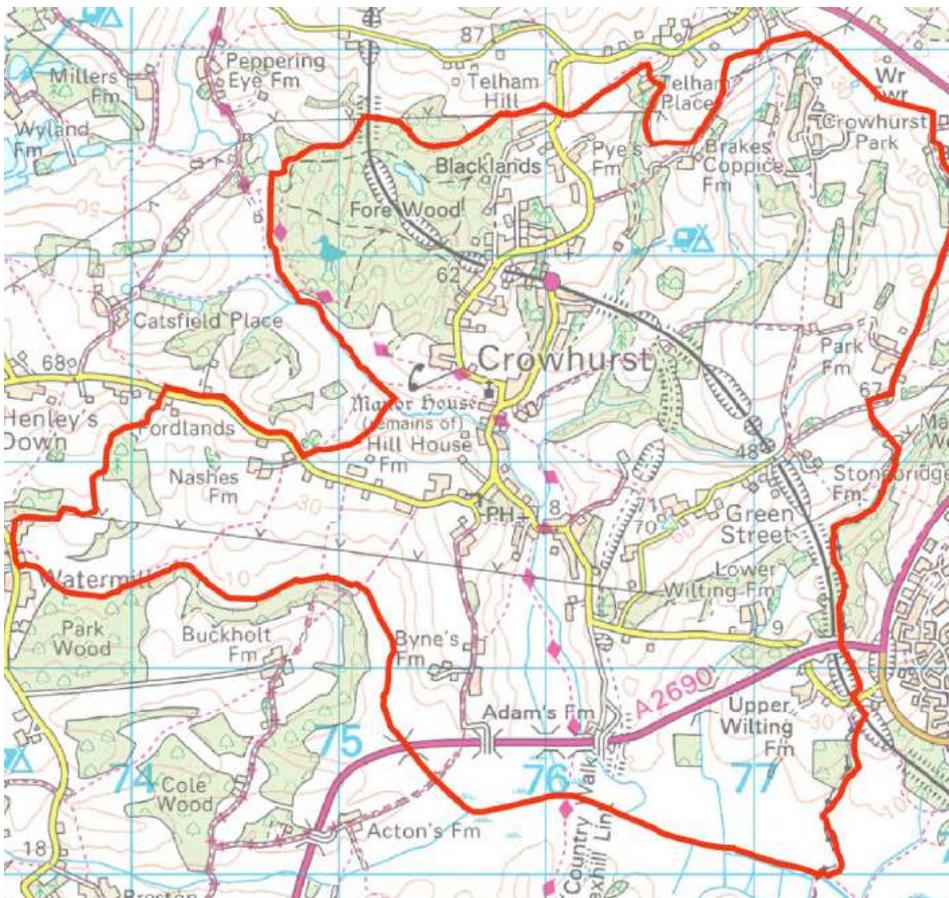
landscape evidence base and other factors. Thus the allocation of land within the AONB is considered justified on account of the lack of available or suitable sites outside the designated area and the need to deliver a housing need which has been set by the Core Strategy and shown within the evidence base. Having regard to the policy tests in Paragraph 115 and 116, it is considered the allocations would, if necessary, meet the test of exceptional circumstances to justify major development if one considers the sites to represent major development.

14. Firstly, there is an identified housing need which is required to be met by the plan and it has been shown through the site assessment process that there is no scope for delivering this need on land outside of the AONB within the Parish. It is reasonable to require this need to be delivered within the Parish boundary. Thus the first two points of Paragraph 116 are met. Lastly, the approach to the allocation through a landscape assessment has sought to minimise detrimental impacts on landscape character as the two sites that were identified as being available and suitable have been subject to detailed site specific landscape assessments. This will ensure the final developable site is restricted to an area which can be developed without detrimental impacts on landscape character subject to appropriate landscape mitigation. This landscape mitigation strategy forms part of the proposed policy for each site.
15. The allocated sites also perform well in terms of accessibility to services and facilities as these are located within a central position within the village, which already contain buildings, and together with other policies it is considered the plan has a neutral impact on efficient use of resources. The allocations and policies of the plan also have a positive to neutral impact in respect of the other SEA topics and objectives, including biodiversity, built environment, water resources and climate change, air quality, accessibility and flood risk. For example, the flood risk policies will help alleviate existing flooding issues whereas without such as a policy, this would not occur. Without a policy in place on these matters, there was potential for negative effects or at best, there would be no opportunity for enhancement or addressing the matters at the local scale. Furthermore, in respect of CIL receipts, there would be no direction as to how monies should be spent in order they deliver the infrastructure most in need within the Parish. The plan provides this direction putting this towards improving access and community facilities where they are required locally, such as footpath routes.
16. The allocated sites and their policies are considered to provide positive and neutral effects on the environment, with the policies securing landscape mitigation and integration of SUDS within new development. These would locate housing where occupier has reasonable access to services and facilities and would deliver other benefits whilst preserving and where possible enhancing the matters subject of the SEA objectives. The alternative of not having robust policies would potentially result in harm to the environment and the other sites considered under the site assessments would have caused harm to the environment and the matters subject of the SEA framework.
17. Lastly, the effects of the plan and its broader policies were assessed in respect of the ten topics with the reasonable alternative having no policy in place or other sites being available. It was considered of the ten topics, the plan and its policies would have either positive or neutral effects with the alternative of having no policy having neutral or negative effects on the SEA topics.
18. In summary, the plan delivers 30 homes (including a site within the existing development boundary for 6 units) over the plan period which will minimise its impacts on the environment and will deliver sustainable development as envisaged by the SEA Directive and the NPPF. The preferred strategy to housing growth, the allocation of sites, the designation of the development boundary and the policies of the plan will avoid or minimise environmental effects as opposed to any alternative approach. The plan and its policies will have neutral or positive effects on the SEA topics and thus will ensure the environment of the Parish and its community is preserved and enhanced over the plan period.
19. The plan will be monitored by the Parish and the District in cooperation and the Parish Environmental, Flood and Heritage Groups will monitor the plan having regard to the SEA indicators set out in the District council's Annual Monitoring Plan (AMR).

## Section 1- Introduction

### Background to the Plan

- 1.1 The Crowhurst Neighbourhood Development Plan (CNDP) has been prepared to plan for the sustainable growth of the village in terms of meeting the identified needs of the Parish and its community. The plan has been developed following the adopted of the Rother District Council Core Strategy (RDCCS) which was adopted in 2014. The RDCCS sets out the strategic policy for the wider district and allocated a level of growth for the main towns and villages across the rural area and the allocations to deliver this growth is to be contained within the Rother District Council Development and Site Allocations (DaSA) plan or through Neighbourhood Plans. As Crowhurst indicated they would wish to develop a neighbourhood plan, the 20 homes allocated for the village are to be delivered through the Crowhurst Neighbourhood Development Plan (CNDP)
- 1.2 Crowhurst Parish Council (CPC) submitted its intention to develop a neighbourhood plan when it submitted its request to designate the neighbourhood plan area in October 2015. This defines the plan area as the Crowhurst Parish boundary as shown on Figure 1 below. In November 2016, CPC requested a Strategic Environmental Assessment (SEA) screening opinion from RDC which confirmed the need for a Strategic Environment Assessment of the plan. This screening opinion also confirmed the scoping opinion provided for the DaSA was applicable to all neighbourhood plans within the District and confirmed the matters and objectives that should be scoped in for assessment through the SEA process.



## Figure 1 The Neighbourhood Plan Area

1.3 The Neighbourhood Plan seeks to deliver the identified housing growth of a minimum 20 homes as set out in the RDC Core Strategy and will provide a framework for sustainable growth within the Parish having regard to the strategic policies of the District, National Planning Policy and the opportunities and constraints of the Parish. The Plan has been prepared by the Neighbourhood Plan (NP) Steering Group and a number of sub-task groups including those relating to land use, the environment, heritage and flooding which has gathered the evidence and contributed to the development of the vision, plan strategy and detail. Alongside this preparation, there has been regular consultation with the community including two village surveys, exhibitions, events and public meetings.

1.4 From this process there was a vision which was formed which seeks to achieve the following:

*'The plan will maintain the village's rural character by protecting the countryside and environment around within the village and its boundaries, promoting community spirit and enhancing infrastructure, facilities and services for residents of all ages'*

The NP Steering group agreed the following objectives which would deliver this vision and would provide the basis from which policies and any allocations would be developed. To accord with the National Planning Policy Framework (NPPF) and the three dimensions to sustainable development, the NP objectives are split into environment, social and economic objectives of the plan and its policies which are set out later in this report.

1.5 The plan will seek to deliver at least the 20 homes identified by Rother Core Strategy and also will guide development within the village and the countryside of the Parish in a manner which will accord with national and local policy and local aspirations in order the special qualities of the Parish are preserved and enhanced for the benefit of the community and the wider area.

### The Structure of the Report.

1.6 The Plan process has followed the SEA process carefully to ensure the approach to defining the preferred strategy and its policies have addressed the requirements set out in the Directive in order to achieve sustainable development and to ensure a high level of protection to the environment and to integrate environmental considerations into the plan process. This Environmental Report will be structured to provide the information set out in paragraph 2.6 below which highlights the relevant stages of the process. This will be structured as follows:

1.7 **Section 2-** This section will deal with the methodology showing how the NP has approached the SEA process, how this has shaped the policies and plans and how any alternatives were identified and considered and how mitigation was addressed. How effects were assessed and how the plan considered mitigation measures.

1.8 **Section 3-** The context of the SEA in relation to the Neighbourhood Plan, overview of the Parish and the baseline of the existing environment conditions. It will also identify what matters are likely to be affected by the plan and what key issues there are facing the Parish. This will also highlight any relevant national or local policies or objectives relevant to these considerations and how these will be applied to the plan preparation. This section is important to this environment statement as the SEA is reliant on a scoping decision at a District level so it is important to understand the Parish environment, its condition, characteristics and the relevant policy context. This will also set out the SEA framework and objectives.

- 1.9 **Section 4 and 5** – This will assess the neighbourhood plan objectives and give a summary of options assessed and reasonable alternatives and likely significant effects. The potential mitigation effects were also discussed and any resulting changes to options. This section will explain the rationale to why the preferred option was chosen in order to minimise environmental effects and to achieve sustainable development.
- 1.10 **Section 6**- Will deal with monitoring and why it is required and how the plan will be monitored and will set out a proportionate monitoring programme and indicators.

## Section 2 - Methodology

- 2.1 It is a requirement that an SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposes the SEA Directive (2001/42/EC) into national law. In-line with the SEA Regulations, and the National Planning Practice Guidance (NPPG), a report (known as the environmental report) must be published for consultation alongside the draft Plan (i.e. pre-submission) that assesses the likely significant effects of implementing 'the Plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the Plan.
- 2.2 The Neighbourhood Plan has had regard to the SEA as set out in the SEA Directive and has followed the process set out in law which is encapsulated in a flow diagram shown in Figure 2 on the next page.
- 2.3 Throughout the process the Neighbourhood Plan Group (NPG) has worked with RDC to ensure compliance with the regulations and undertook Stage A (screening) and in January 2017 received confirmation that an SEA was required. Rother confirmed the following points as justification as to why a SEA was required:
- (1) *The CNP will allocate sites and form part of the 'development plan' and thereby exert a direct and substantial influence over development proposals coming forward in the period.*
  - (2) *The characteristics of the area covered by the CNP (as set out in Schedule 1(2) of the regulations).*
  - (3) *The CNP needs to consider important environmental factors, notably the area is wholly within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty, as well as the proximity of heritage assets, flood risk areas, a ground water source protection zone, a site of special scientific interest (SSSI) and other environmental assets.*

The above was taken from the screening letter from RDC but point 3 is factually incorrect. Whilst the majority of the Parish is with the AONB, the southern part is not, albeit this does represent the setting to the AONB and thus is also of significant landscape importance.

- 2.4 The SEA Regulations require that: "*When deciding on the scope and level of detail of the information that must be included in the [environmental] Report, the responsible authority shall consult the consultation bodies [Natural England, Historic England and the Environment Agency] by reason of their specific environmental responsibilities, [the consultation bodies] are likely to be concerned by the environmental effects of implementing plans*". The District Council confirmed in the Screening Opinion that as the Neighbourhood Plan would essentially fulfil a level of growth already accounted for in the Core Strategy, the Neighbourhood Plan could rely on the scoping opinion undertaken for the DASA and advised of the issues and objectives should be scoped in for the SEA. Whilst some of this are not strictly environmental issues such as access to services, this has the potential to impact on the environment through increased car usage and thus could have air quality impacts and is necessary to address as part of the future strategy for the village. The matters scoped in for assessment are as follows:

1. Natural resources
2. Air Quality/Road Congestion
3. Accessibility to services and facilities
4. Landscape/Natural Environment
5. Built Environment/Heritage
6. Biodiversity
7. Water Resources
8. Climate Change
9. Flood Risk

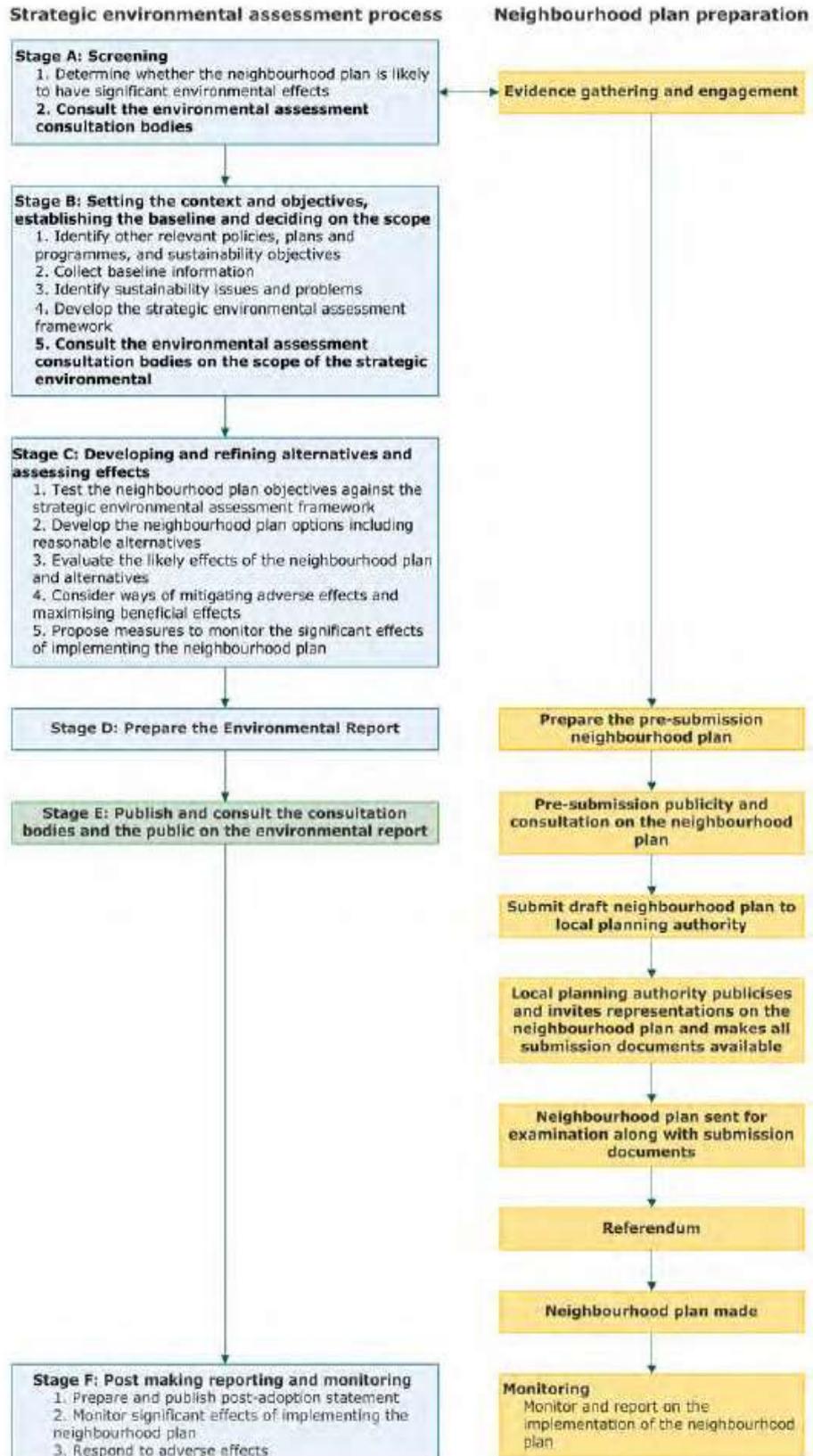


Figure 2 The SEA process

2.5 Thus, from the above, Stage B, the scope of the Strategic Environment Assessment was confirmed without a requirement for a formal scoping exercise as this is covered under the umbrella of the RDC

scoping report for its emerging DaSA. Section 3 of this report has in any case identified the relevant policies, plans and programmes and sustainability objectives and had collected baseline data for the issues that have been scoped in and what identified what the relevant key issues are for the Parish. As there was no requirement for a formal scoping report, the information that would have been contained within a formal scoping report such as the relevant policies, baseline information and sustainability issues and problems will be discussed in Section 3 below along with the SEA framework and objectives for the plan.

2.6 The SEA process is a collaborative process which is integral to plan making from the evidence gathering stage, through identifying potential options up to the decision of identifying the preferred option. The plan throughout its preparation took account of various options, with the intention of minimising or avoiding environmental impacts and having regard to reasonable alternatives. This included the creation of a SEA framework having regard to the issues that have been scoped in and the creation of SEA objectives which seek to test the environmental effects of the plan. This enables the vision and the NP objectives to be tested and to ensure the development of the strategy and any reasonable alternatives have regard to these objectives. This also enables one to predict the effects of the plan, including alternatives and mitigating any potential adverse effects and the monitoring of the environmental effects of the plan's implementation. Section 4 and 5 below set out the process of this and how the scheme meets the requirements of Annex 1 of the Directive which is set out below;

1. An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
3. The environmental characteristics of areas likely to be significantly affected
4. Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC
5. The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors
7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of competency encountered in compiling the required information)
9. A description of measures envisaged concerning monitoring in accordance with Article 10

2.2 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small parish area. It focuses only on the requirements of SEA and does not extend to cover the wider sustainability attributes of a Sustainability Appraisal. These will be addressed in the Basic Conditions Statement in due course, in respect of demonstrating that the Neighbourhood Plan will contribute to the achievement of sustainable development.

2.7 It is considered this report and its contents meet the above requirement and demonstrate how the plan has minimised its impacts on the environment having regard to reasonable alternatives and that no significant effects will result.

## Section 3 – The SEA Context

### Relevant policies, plans and programmes

- 3.1 Prior to the gathering of the baseline information, it is necessary to understand the context of the Neighbourhood Plan and its relationship with other policies, plans and programmes to ensure it is consistent with any relevant objectives and that there is a coherent approach to achieving sustainable development. This would comply with Stage B1 (as set out in Figure 2) and a list of the relevant plans are listed in **Appendix 1** and a short summary of the most relevant are now discussed. These documents provide useful tools to understand the baseline information of the Parish and local area and are also discussed in that context below.
- 3.2 Of most relevance is the Strategic Policy of the District Council, the RDC Core Strategy 2014 and the emerging RDC DaSA which are parent and sister documents to the Crowhurst Neighbourhood Development Plan. Due to the need to comply with the Strategic Policies of the area and to ensure compliance with the wider development plan, the policies and objectives have been key to the preparation of the CNDP. Furthermore, the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG) are also key having regard to the need for NPs to be compliant with National Policy. Other documents such as those relevant to specialist subject areas such as biodiversity, flooding, housing and socio-economics and others are discussed below in relation to the baseline information.
- 3.3 Other documents include those produced by stakeholders or organisations with an interest in the local area and their plans and programmes are also relevant. These include documents such as the High Weald Management Plan which sets out objectives for the protection and management of the AONB landscape along with other documents such as the Sussex Biodiversity Partnership Action Plan, Flood Management Plans and strategies of Historic England and Natural England.

## **Crowhurst – The Baseline Conditions of the Parish**

### *The Village, its facilities and the community*

- 3.4 Crowhurst is on the southern border of the Rother district, just north-west of St Leonards and Hastings, straddling the edge of the High Weald Area of Outstanding Natural Beauty and is a dispersed linear settlement located along the original road from Telham to St Leonards to the south. The village itself can be considered in three parts, with active agricultural land being the dominant land use in and around the village and the wider Parish. The village currently has a population of around 891 residents (source; 2011 census) in 327 dwellings. The population has a high proportion of 45-64 year olds and over 65s with these age groups making up 53% of the population. The housing stock within the village is relatively dominated by larger homes, with 38% of the housing being 4 bedroom or more and only 28% being 1 or 2 bedroom. However, 58% of houses are being occupied by only 1 or 2 people. In terms of the health of the population, 20% of the community are suffering from a long-term illness with 8% severely limited in relation to their day to day activities.
- 3.5 RDC confirm there are currently 4 households on the waiting list for a home in Crowhurst and the housing needs survey undertaken in the village suggest around 22 households needing homes over the coming years, most of which are wanting 1 or 2 bedroom homes. (source: Crowhurst Housing Survey 2017)
- 3.6 In terms of local facilities, the village has a Primary School, Village Hall and Church within the central part of the village and other community facilities such as youth club, recreation ground and pavilion and a public house in the southern part of the village. However, there are no shop or retail facilities within the village. The nearest shop is at Tesco in St Leonards (3 miles) or in Battle (4 miles) where the local doctor's surgeries are also located. There are also leisure facilities at Crowhurst Park which is located to the north east of the Parish but some of these are restricted by private membership.

There is also a mainline railway station, located to the north of Station Road which connects the village with larger centres such as Hastings, Battle, Tunbridge Wells, Sevenoaks and London. Whilst the village has access to primary education, the nearest secondary school is in Battle which is 4 miles from the village.

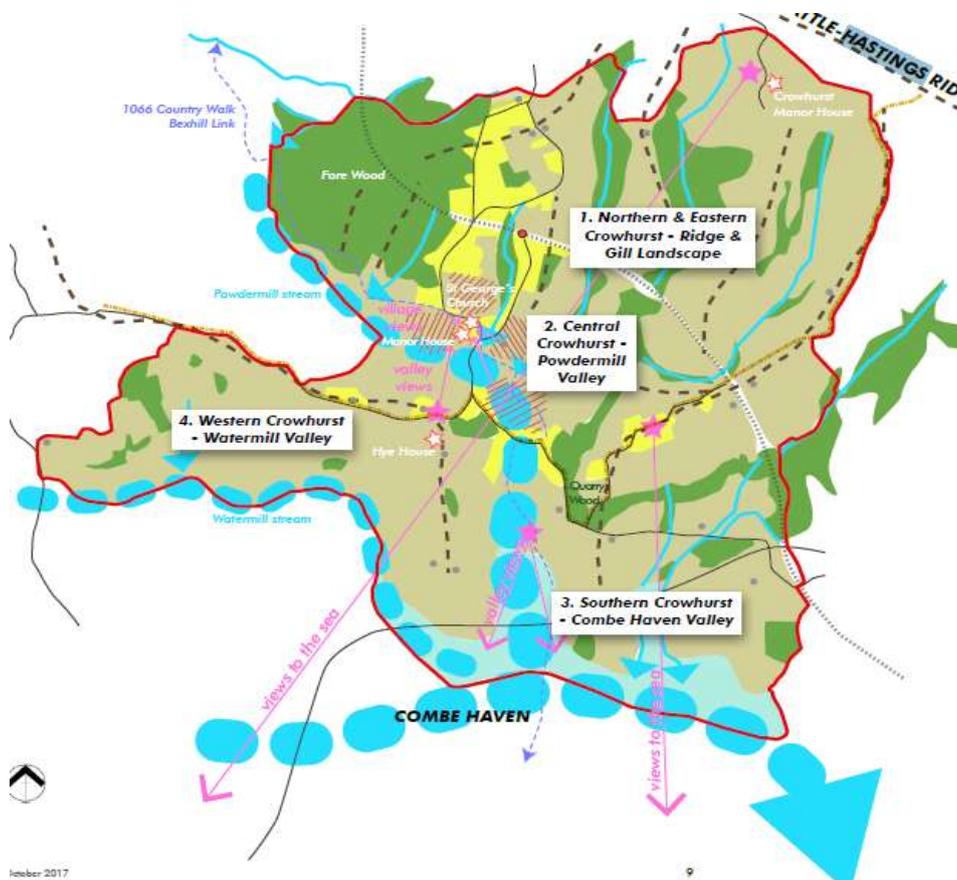
- 3.7 Due to the fragmented settlement pattern of Crowhurst, whereby the village is divided into three parts, residents have varying access to these facilities with only a short length of pedestrian footpath, limited to about 250m to either side of the school and the remainder of village is accessible by foot only via public footpaths across open countryside or walking along the country lanes which presents highway safety issues. Crowhurst does not have a shop and thus is reliant on out commuting to Battle or Hastings via relatively narrow country lanes. There are also no regular bus services that connect the village with other centres. In local surveys, pedestrian safety and traffic calming was raised as priority issues.
- 3.8 Despite the railway connections, Crowhurst residents have high car ownership with 41% of households having two cars which compares to 27% in the Rother District. In relation to work, 67% of residents are economically active with a high number of self-employed (19%) and 24% of people working from home. However, 69% of people use private transport to travel to work with only 9% using the mainline railway station (Census:2011). Crowhurst does also have a higher number of residents compared to the District average of people employed in professional disciplines and also has a higher number of people qualified at degree level and above. Whilst the Parish is a relatively rural area, with housing and agriculture being the major uses, there are also number of businesses in the area, ranging from self-employed/sole traders, holiday homes and tourism facilities, a wellness retreat and the Crowhurst Leisure Park. These all provide direct and indirect benefits to the local economy.
- 3.9 Lastly, the village is served by main drainage from Forewood Rise southwards and on initial discussions with Southern Water, the numbers of houses proposed by the NP would not affect drainage capacity. The remainder of the village is served by septic tank solutions. Parts of the village are served by high speed broadband which is vital to support home working and local businesses. There is no gas to the village and heating is reliant on electricity, oil and LPG. The level of fuel poverty within the local super output area was calculated at 12% in the 2011 census, with 73% of those people being over 65 years of age.
- 3.10 In summary, the village can be seen as a prosperous village with an increasingly aging population with its housing stock failing to provide options for younger people and families as well as to people wanting to downsize. The village is relatively well served by community and rural pursuits but the lack of shops and connections has led to a reliance on out-commuting and use of car travel, despite the good connections and services offered by the mainline station. The lack of safe connectivity between the parts of the village is likely to compound these issues and contribute to congestion and potential for conflict between vehicles and pedestrians at peak times.

### *Landscape of Crowhurst*

- 3.11 The northern and central parts of the village are located within the High Weald Area of Outstanding Natural Beauty (AONB) as can be seen in Figure 4 with the non-AONB areas shown in dark grey. The High Weald Management Plan (2014-2029) considers there to be five main components of the AONB landscape;
- Geology, landform, water systems and climate
  - Settlement
  - Routeways
  - Woodlands
  - Field and Heath
- 3.12 The Crowhurst Parish is representative of this character and its landscape is largely unspoilt and unaffected by modern development. Crowhurst is a dispersed agricultural settlement with winding

valleys and streams which converge in the Combe Haven basin. There are numerous areas of ancient woodlands, ghylls and small irregular shaped fields and historic routeways within the Parish remain intact with these either representing the main highways through the village or well used public footpaths. Whilst the southern part of the Parish is not within the AONB, the areas still presents similar landscape characteristics and would represent the setting to the designated area

3.13 One of the distinctive features which results from the topography and layout of development is the strong visual connectivity between the village and the landscape – offering uncluttered longer and shorter distance views from the built up area. The Crowhurst Landscape Character, Sensitivity and Capacity Assessment (CLCSCA) 2017 defines 4 main character areas to the Parish which have been broken down into further 17 sub areas. This study had regard to the earlier East Sussex County Landscape Assessment (ESCLA) which defined Crowhurst as falling within the Combe Haven Character Area and which formed the evidence base to the RDC Core Strategy. The NP is also informed by a Heritage and Character Assessment (CHCA). The unique landscape features can be seen below in Figure 3:



**Figure 3 Landscape Features**

3.14 The County Assessment and the two local assessments undertaken confirm the landscape is representative of the special qualities of the AONB and is in good condition with few intrusive features and the landscape features are relatively intact in the Crowhurst area. The landscape of the Parish would fully align with the qualities set out in the High Weald Management Plan including dispersed settlements, ancient and historic routes and ancient woods and irregular fields. There is also a strong sense of place and rural tranquillity which are major contributors to the AONB character and its setting. The ESCC Landscape Assessment and the CLCSCA confirm the landscape around Crowhurst to have a low landscape capacity and that this strong and intact landscape character is made more sensitive by the location of the village within a valley which increases visual permeability by reason of valley views and from public footpaths. The footpaths and roadways of the Parish follow

ancient and historic routeways which are an integral part of the Parish landscape and these can be seen below in **Figure 4** on the following page which also shows the AONB boundary. In addition to the natural environment of the Parish landscape, there are heritage assets that form a historic association with this natural heritage, for example the 13<sup>th</sup> century manorial ruins and the numerous other listed buildings which sit within the landscape, and are fundamental to the village's sense of place. The CLCSCA and the CHCA highlight the potential vulnerability of the landscape between the various parts of the village where this abuts existing settlement edges and this may impact upon the rural characteristics of the Parish.



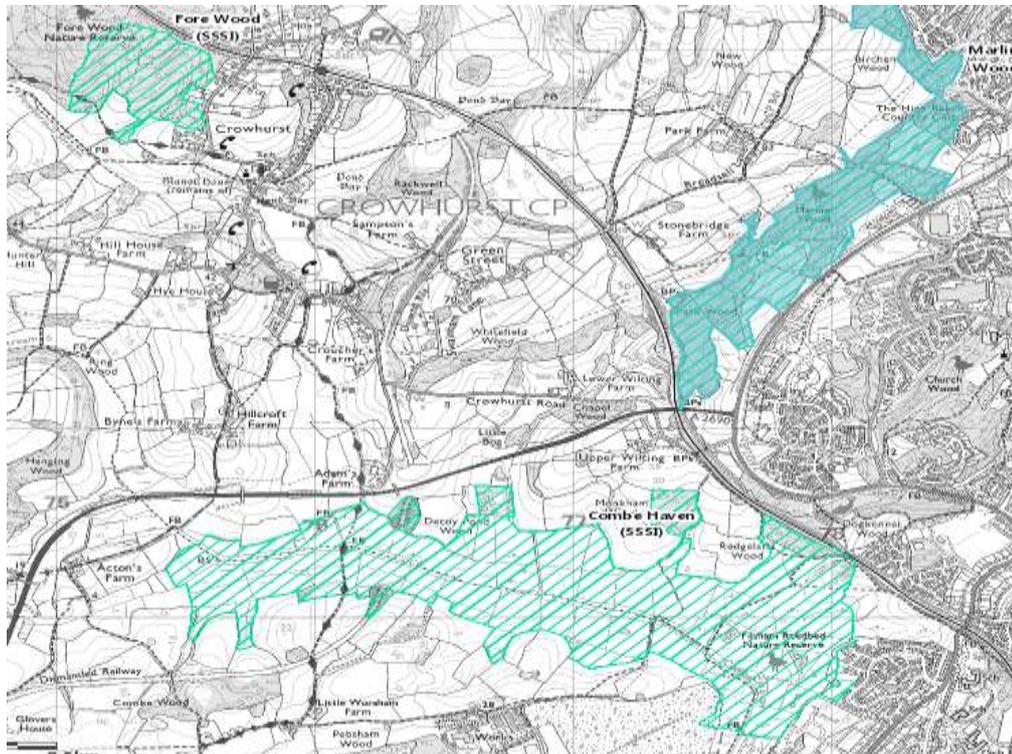
**Figure 4 AONB Boundary (white AONB and dark grey non-AONB) and Historic Routeways (dotted line)**

- 3.15 This open and tranquil character is key to the identity of the Parish and the setting of the village itself and this unspoilt landscape character lends to a feeling of remoteness and strong rural character which has largely survived despite its relatively close proximity to larger settlements. The dispersed nature of the village places further pressure on the intervening areas for new development, which themselves are major contributions to the rural character of the Parish and the wider AONB and its setting.
- 3.16 To the north east of the village, the RDC Local Plan designated a part of a Strategic Gap which seeks to prevent coalescence between Battle and Hastings. As part of the evidence base, RDC are planning to amend the boundary of the strategic gap, including the deletion of part of the existing gap to the north and extension of the gap to the east which will bring the strategic gap to the eastern edge of Station Road and to the south of the village. This policy is more of a spatial strategy to prevent sprawl but this could have contributed to the openness of the landscape in these areas.
- 3.17 The National Planning Policy Framework (NPPF) places great weight on the conservation of the landscape and scenic beauty of the High Weald Landscape and sets out a presumption against major development within such areas unless there are exceptional circumstances. Due to the boundary line of the AONB running through the southern part of the Parish, the site assessment and housing allocation will have to have regard to the scope for developing outside the AONB as there is a policy preference to conserve such areas. However, having regard to the central part of the village containing the key amenities and public transport connection being within the AONB, if any major development is proposed, it would be necessary to justify any development within the AONB. This

would include the need for the development, any scope for developing outside the area and the opportunity for avoiding any detrimental effect on such landscapes. The site assessments were based on an understanding of such a planning context and a solid evidence base of the qualities of the landscape of the Parish.

*Biodiversity/the Natural Environment*

3.18 The Parish contains a wealth of biodiversity rich areas such as the Combe Valley Countryside Park. There are also three Sites of Special Scientific Interest (SSSI), including the Fore Wood RSPB nature reserve, a local nature area of woodland (Quarry Wood), another Combe Valley SSSI on the Eastern edge of the Parish and several areas of Ancient Woodland across the Parish. A number of Ghylls and watercourses including the Powdermill and Rackwell streams also provide wetland environments within the Parish. Having regard to the Fore Wood SSSI this was designated in 1966 for it being only one of five Ghyll Woodlands in East Sussex and for the wide variety of birdlife. Combe Valley SSSI was designated for its range of habitats including meadow, wetland and woodland areas. Marline Valley Woods SSSI lies to the east of the Parish and was designated in 1986 for its woodland and ghyll environment. All SSSIs have a favourable condition.



**Figure 5 Areas of SSSI within parish**

3.19 In addition to these protected areas, there are other nature areas such as the Quarry Wood nature reserves and other areas of high biodiversity value such as the former railway cutting, the church yard and the wider natural context to the village which has many of the original hedgerows and aged and veteran trees intact. There are also other habitats which remain unprotected including wildflower meadows, ponds and watercourses which are integral to the health of the natural environment. The Parish also has extensive tracts of Ancient Woodland which can be seen in the Figure 6 below along with BAP priority areas including woodland, grassland and marsh areas which can be seen in Figure 7 on the following page.

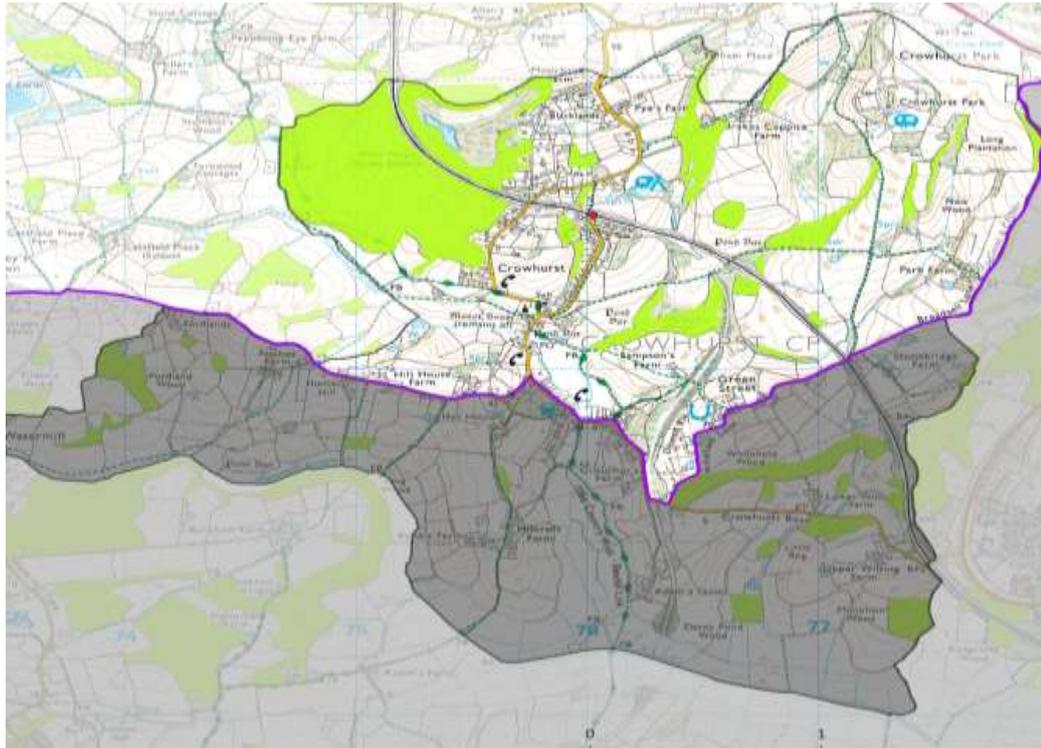


Figure 6 Ancient woodland area in green

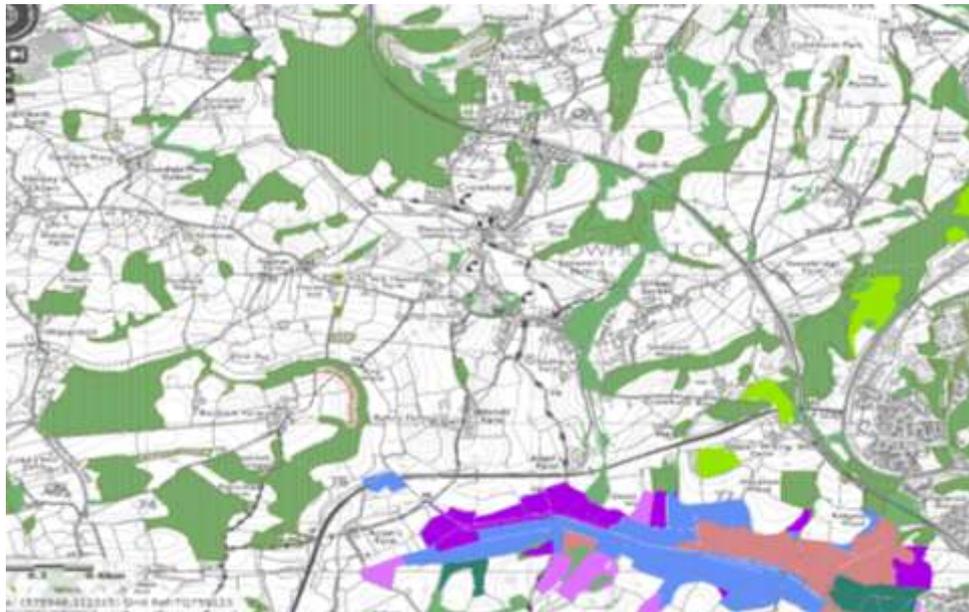


Figure 7 BAP Habitat

### *The Built Heritage of the Parish*

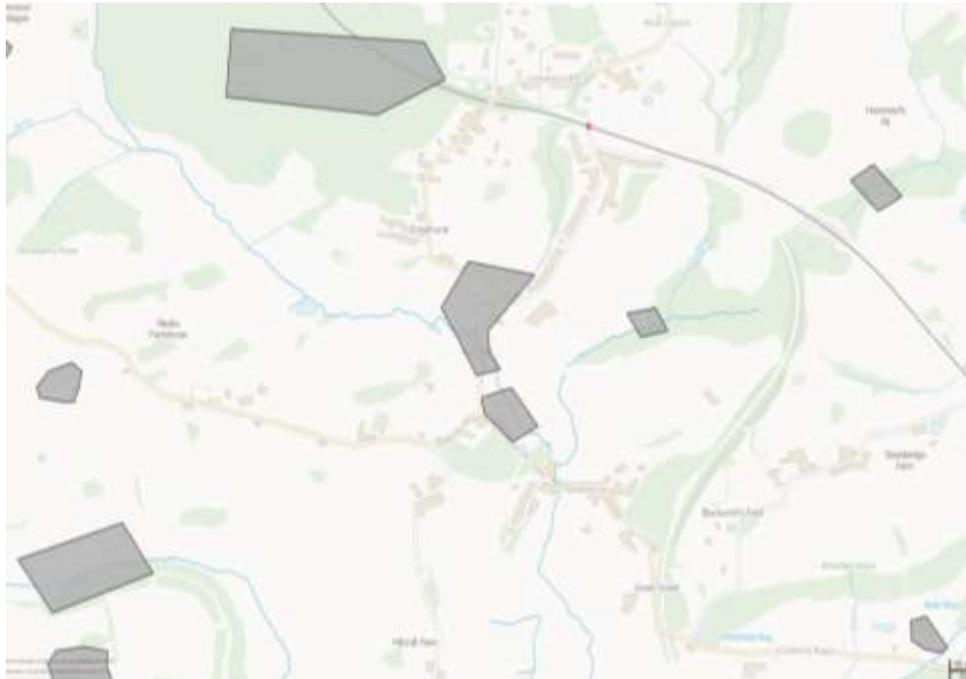
3.17 The first mention of Crowhurst is in 771 AD when King Offa of Mercia gives Bexhill and the wooded outland of Crowhurst (8 hides), to the Bishop of Selsey. The village has an extensive history, being linked with the Norman invasion and later with the iron ore industry and contains a wealth of built heritage in terms of its settlement, its buildings and archaeology. The manorial ruins, which occupy an imposing position in the centre of the village, date from the 13<sup>th</sup> Century and are a scheduled ancient monument (SAM). The Grade I St Georges Church, which dates from the 12<sup>th</sup> Century, lies in the

centre of the village and there are 25 other listed buildings located within the Parish. The Historical Heritage of Crowhurst Paper and the CHCA, which form part of the evidence base to the NP, provides a detailed history of the village and its buildings. Figure 8 below shows the listed buildings in the Parish.



**Figure 8 Listed Buildings in the Parish**

3.18 Furthermore as part of the NDP preparation and evidence base, the CHCA identified a number of non-designated heritage assets and some commentary on the dispersed settlement pattern of the village which it concluded should be protected for heritage and character purposes and would be classified as a heritage asset by the NPPF. In addition to these heritage assets, there is a potential for a wealth of Archaeological Deposits within the Parish, with the recent Bexhill to Hastings Link Road, now named the Combe Valley Way, construction finding evidence of utilisation of the area as early as the prehistoric period (Mesolithic to Bronze Age). In reference to this rich potential for below ground archaeology, there are several Archaeological Notification Areas (ANA) in the Parish, which require a much fuller assessment of the impacts of new development on potential deposits. A map showing the ANAs is shown in Figure 9 below:



**Figure 9 Grey areas showing ANA's**

#### *Land use, soil and water resources*

3.19 The village occupies a rural location which is predominately agricultural land with two concentrated areas of housing and other mostly community land uses and a lower density housing area in the north. Aside from these areas, the wider landscape is largely undeveloped with sporadic collections of farm development or other rural enterprises such as tourism sites or small scale commercial development. The Crowhurst Leisure Park to the north east of the Parish presents a further area of built development which has historically developed around the Historic Manor House which itself is a statutory listed building. However, this is some distance from the main village. Thus in terms of previously developed land this is mainly restricted to existing built development within the confines of the village and the majority of the Parish being greenfield and agricultural land which is both pastoral and arable in nature. Having regard to the Natural England Agricultural Land Classification, the agricultural land around the village is a mix of Grades 4 and 5 which are considered to be 'good to moderate' and 'poor' with better quality soils in the more rural areas of the Parish. It can be seen in Figure 10 that the areas to the north are good soils (green) with the remainder areas around the village being poor soils (yellow).

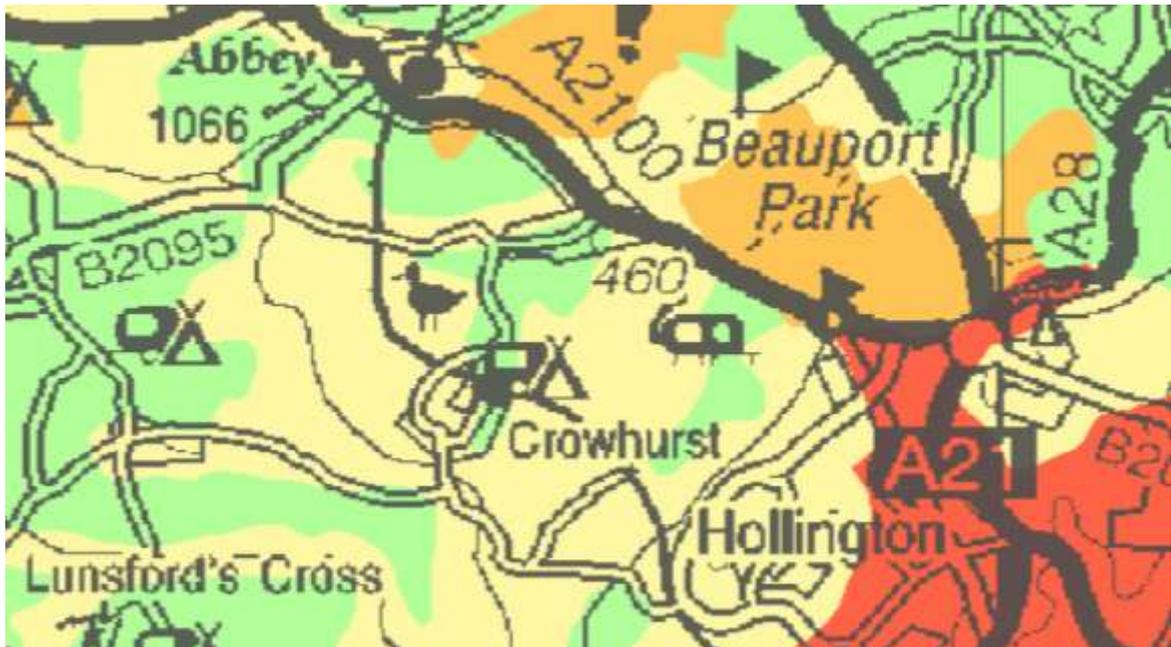


Figure 10 Agricultural Soil Classification

3.20 The area within the Fore Wood has a groundwater protection zone (GPZ) to the north west of the village which is designated to protect drinking water and groundwater which is sensitive to pollution and contamination. Whilst this is designated, this is largely contained within an area covered in woodland and other habitat. The area is defined by the Environment Agency as being a principal aquifer and capable of storing high levels of water and may support river flows, in this case the Powdermill stream.

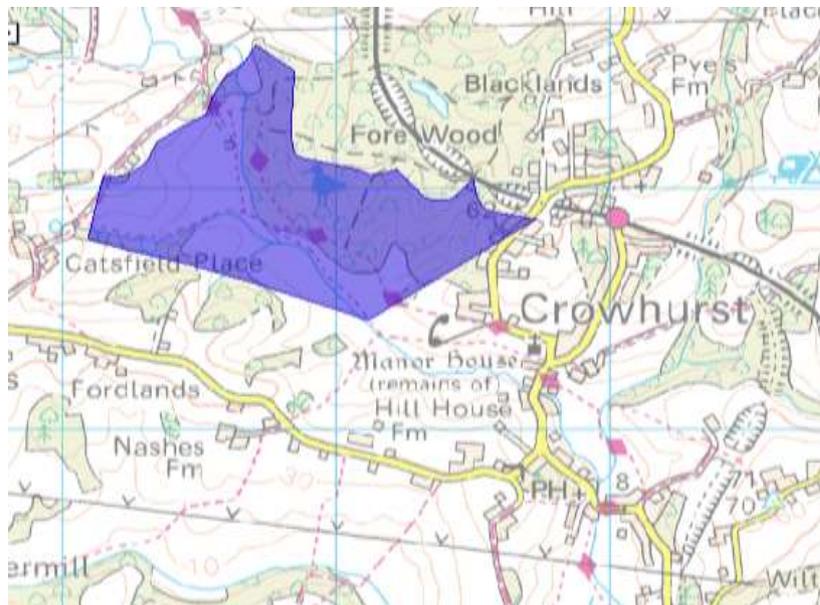


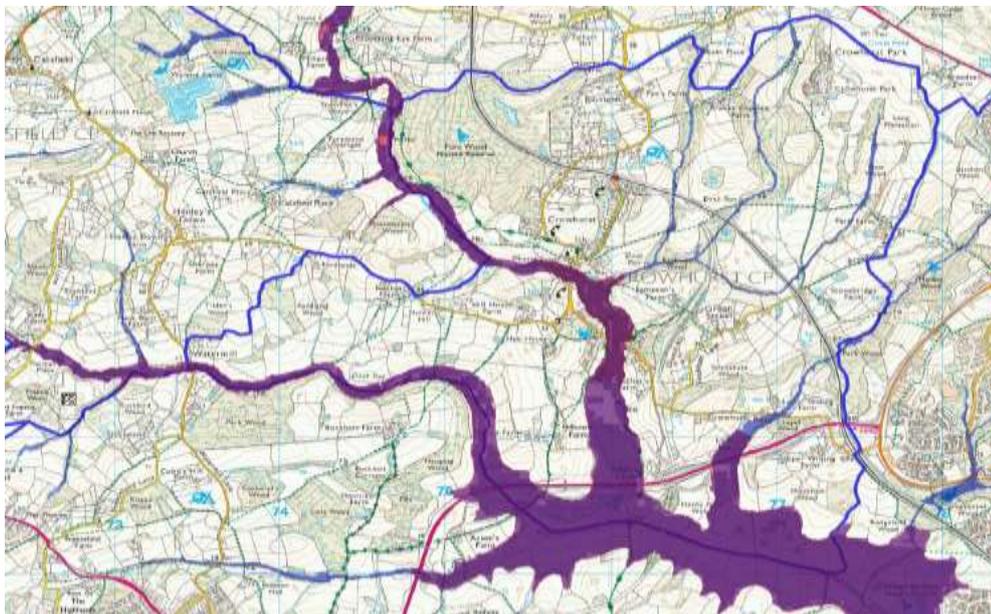
Figure 11 Groundwater Protection Zone

### *Flooding Issues*

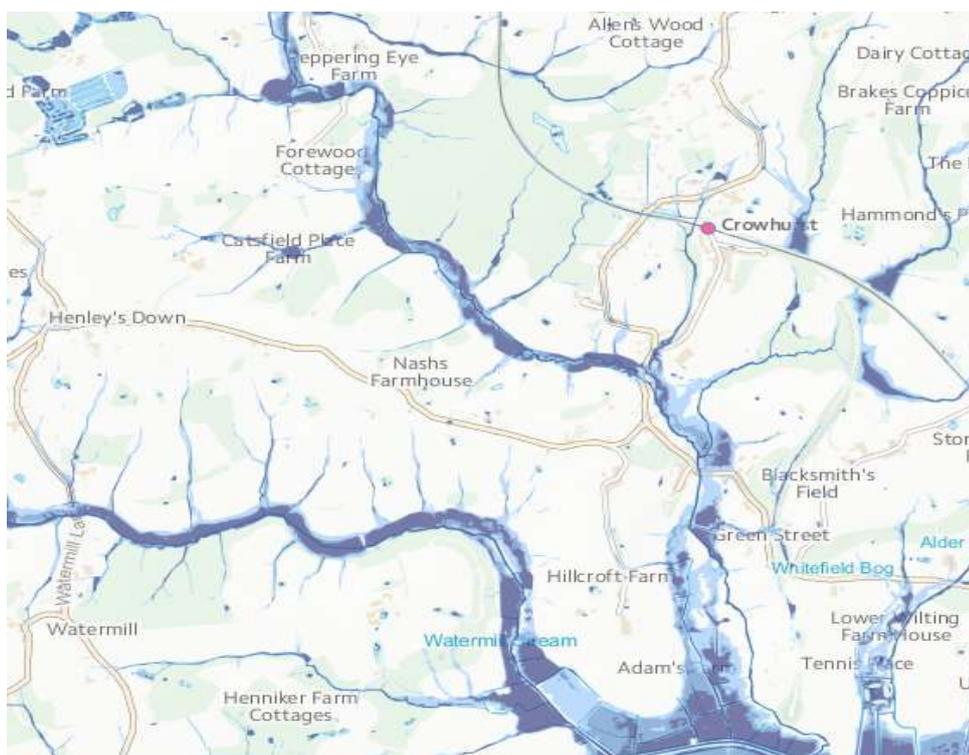
3.21 The Parish has a wide network of streams and watercourses with the main streams being the Powdermill and Rackwell Streams. In medieval times the sea came to the village and parts of the village are below sea level. Parts of the village fall within flood zones 2 and 3 as defined by the Environment Agency, these parts largely following the line of these and other watercourses. These

are shown on Figure 12 on the following page. These streams are part of the wider Combe Haven catchment which is a tidal system. There are parts of the village prone to fluvial, groundwater, sewer and surface water flooding with this recognised in the Strategic Flood Risk Assessment (SFRA) and the Cuckmere and Sussex Havens Catchment Management Plan (CaSHCMP) Evidence suggests that the Forewood Lane (lower), Station Road, Sandrock Crescent and Hill and large parts of the village suffer from Surface Water flooding including the areas above and also Lower Wilting, Sampsons Lane and Forewood Lane (higher).

3.22 The CaSHCMP notes that further action in Crowhurst is needed to tackle anticipated rises in flood risk. Although fewer than 20 homes are at risk of fluvial flooding, the main risk is from surface water flooding. The SFRA confirmed 12 properties flooded in 2012. This is due to the steep upper reaches of Combe Haven and to restrictions in the flow of channels, especially at times of heavy rainfall. Further local information on flooding can be found in the Watercourses and Flooding document in the Supplementary Documentation. The SFRA plan confirms current investment in preventing flooding is appropriate but measures such as new woodland and uses of SUDS should help alleviate potential increase in flood risk from climate change including the surface water risks shown on Figures 12 and 13 below:



**Figure 12 Areas of Flooding in Crowhurst**



**Figure 13 Areas at risk of surface water flooding**

### *Air Quality and Human Health*

3.23 The rural nature of the Parish makes air quality less of an issue than in more urban areas but the recent completion of the Combe Valley Way to the southern edge of the Parish has introduced a potential source of air pollution to the Parish although it is acknowledged the number of sensitive receptors in this area is low. Furthermore, there is no Air Quality Management area (AQMA) designated in and around the Parish and having regard to data derived from the nearest air quality monitoring point in a neighbouring parish on the A2100, the recorded NO<sub>x</sub> levels are below the mean no<sub>2</sub> objectives (source; Rother Air Quality Annual Status Report).

3.24 Notwithstanding the Parish has little issues when one has regard to the national air quality objectives, the rural location of the Parish in connection with its low accessibility to shops and some other services increases the reliance on the motor vehicle as does the fragmented settlement pattern of the village which makes access between the various parts of the village more difficult. Furthermore, due to the concentration of uses within the central part of the village, there can be congestion at school drop off and pick up times and when events occur at the village hall and the Church. Whilst, the presence of a mainline railway station presents an opportunity to increase sustainable modes of travel, at present there is a reliance on the motor vehicle within the village which has potential for localised air quality impacts. As set out above car ownership in the Parish is greater than the rest of the District and the UK in general.

3.25 Whilst these levels are not likely to result in exceedance of the relevant standards or present an impact whereby intervention is necessary, policies should seek to maximise opportunities to reduce reliance on the motor car and congestion at peak times and promote sustainable modes of travel.

### *Climate Change*

3.26 There are many strands to the matter of climate change but the SEA objective was screened in for the purposes of reducing carbon emissions. There is no data available for the Parish at a local level, with the nearest data set available for the District. In 2012 Rother as a District expended 598 kilo tonnes of carbon and in 2010 consumed 4,978 KWh of electricity and 15953 of gas. This compares to 4,197

and 13,379 in Hastings, the nearest borough and similar in population terms. The total energy consumption by the District was 1,880 GWh, which is high when compared to Hastings 1,292 and Lewes 1,797 but comparable to Wealden 2,964 which has a larger population. The picture of this matter shows a declining consumption from 2005 to 2010 but there is still a significant drive to reduce energy consumption and overall emissions. In Crowhurst, there is no parish wide data from which to draw from but having regard to the overall picture in Rother DC, it can be inferred that similar trends exist within the Parish and efforts should continue to address this matter through policy to reduce consumption and overall emissions. This issue somewhat links with the matters of accessibility and also through the quality of housing stock and design which can reduce overall consumption levels and emissions. This is an issue which can only be dealt with as a strategic issue alongside such other matters.

## **Key Issues**

- 3.27 Having regard to the existing context of the village, there are a number of key issues that will affect the plan and also could be potentially impacted upon. Due to its rural location, the access to services is varied and there is a reliance on the motor car despite the mainline railway station with the village. There are also poor connections between the various parts of the village as a result of its dispersed nature, meaning car travel is often used for travel within the village itself. This choice of travel has potential to cause congestion and localised air quality impacts and with future growth, albeit small, this has potential to exacerbate these issues. The village has a good range of community facilities for its size, but needs to investigate provision of other services and facilities within the village and encourage greater use of the railway, a significant asset in terms of reducing car travel.
- 3.28 The village has a high proportion of older people with a lack of smaller housing, in which to promote downsizing (which would free up larger homes) or starter homes, both house types which could increase the choice for younger people and small families and prevent people moving away from the village. The ageing population also has potential impacts on social and health care, facilities which are not found within the village. From the housing survey undertaken in the village there are a number of households living within the same housing unit who will need to move over the plan period which suggests a market and affordable housing need within the village, particularly in relation to smaller units.
- 3.29 The high value ecological and landscape features of the village and wider Parish are currently in good condition and this requires careful management over the plan period to ensure these natural assets are maintained and enhanced. Both the Crowhurst Heritage Character Assessment (CHCA) and the Crowhurst Landscape Character, Sensitivity and Capacity Assessment (CLCSCA) considers the intervening areas between parts of the village to be key contributors to local landscape character but are also vulnerable to encroachment. Furthermore, the SSSI and other ecological features can be affected by indirect sources, such as disturbance, lighting and flooding. Having regard to the wider general decline in British wildlife, it is also considered that the plan needs to encourage opportunities for reversing this general trend.
- 3.30 The location of the High Weald AONB landscape and its boundary which cuts through the Parish. Aside from the aforementioned need to conserve and enhance such character, these different landscape designations are a key issue in the Parish in respect of the delivery of housing to meet its Core Strategy allocation. The central and northern parts of the village and Parish are within the designated area with the southern fringe located outside of this area. It is also relevant to note that the key village amenities and the mainline railway station are within the AONB (the latter likely to have a factor which led to the designation of housing through the Core Strategy) and thus there would be preference from a sustainability/accessibility perspective to locate development within the central and northern parts where occupiers can access such facilities without reliance on car travel. However, this locational desire potentially conflicts with the planning policy position of the NPPF, which seeks to prioritise development, particularly major development, in areas outside these areas and thus the plan needs to consider these conflicting matters as part of its approach to the plan and any allocated development.

- 3.31 The village currently suffers from surface water and fluvial flooding and various stakeholder management plans suggest further measures to reduce this risk particularly with the increased risk from climate change. Furthermore, there is risk of surface water flooding in many parts of the village which has resulted from a number of factors. There are a number of homes at risk and thus a coordinated approach to reducing such risk and incorporating some of the recommendations of the various management plans is required.
- 3.32 In terms of land and resources, the Parish does not possess many brownfield sites in and around the village and thus there will be a need to make efficient use of any site for new development in order to protect the wider rural character of the village and if possible utilise sites that have already been developed, even if these are agricultural (and thus not brownfield as defined by the NPPF). The quality of the agricultural land is not a major constraint to development although the need to conserve water resources, including the Groundwater Protection Zone, is key having regard to the surface water and fluvial flooding that has taken place within the village.
- 3.33 The village has a rich built heritage and the location of the SAM and the Grade I church within the central part of the village, which is open to valley views, makes these vulnerable to impacts on their historic settings. Furthermore, there is a no designated conservation area and there are number of unlisted buildings within the village which are broadly unprotected in planning terms notwithstanding their contribution to the wider village character. This character issue needs to be addressed through the plan to ensure local character and key contributors are maintained over the plan period.

### **The SEA Framework**

- 3.34 Along with topics scoped into the SEA process, there are a number of SEA objectives which will seek to address these key issues and which provide the intention of what wants to be achieved in terms of these matters and provide a basis against which the NP will be tested. This will provide the framework which will assess the potential environment effects of the plan and allow reasonable alternatives and their effects to be considered in order the final strategy minimised impacts on the environment.
- 3.35 As set out above, the existing village has a number of special qualities of which there are policy, legislative and local reasons to preserve and, where possible, enhance for future generations and also some key issues which the plan will seek to address. With this in mind and having regard to the scoping opinion of Rother District Council, the SEA framework has been created which will seek to test the approach of the CNDP. This will include a number of strategic objectives which have been created to minimise effects on the environment. The plan has considered possible indicators which could assess the success of the plan against these objectives and also possible measures that could be contained with the plan.

3.36 The Strategic Topics and Objectives can be seen below in Figure 14.

SEA topic	SEA Objectives	Possible SEA indicators	CNDP Measures
Accessibility to services and facilities	Improve accessibility to services and facilities for all ages across the Districts	Improvement in access to a variety of services Bus services Footpath improvements	-Encourage dual use of facilities. -Footpath improvements and infrastructure -Location of development
Transport and air quality	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Air quality monitoring data Air Quality Management Area Future survey/census to assess level of out commuting/car ownership/distance to work/use of public transport	-Location of development to encourage greater use of rail -Policies to encourage better access between parts of village -Policies to reduce out commuting
Land, water and natural resources	Improve efficiency in land use and encourage the prudent use of natural resources	Brownfield register and council Annual Monitoring Report	- Development be focussed on brownfield land or developed land -Locating of development close to village facilities -Avoid high quality agricultural land -Protection of GPZ
Climate Change	Reduce emissions of greenhouse gases	Energy consumption data Carbon emissions data	- Help encourage sustainable construction and renewable energy - Location of development -SUDS
Flood Risk	Minimise the risk of flooding and resulting detriment to people and property  Reduce existing risk where possible through design	Reduction in number of flood events and their severity	-Prevent development on Flood Risk 2 and 3 - Policies to require flood risk to be addressed as part of development and to provide betterment where possible.
Water conservation	Maintain, improve and manage water resources in a sustainable way	Water consumption data and water quality data	-Prevent pollution to water resources -Protect GPZ -Preserve resources and reduce consumption -SUDS

Biodiversity	Conserve and enhance biodiversity and geodiversity	Natural England condition reports Ecology records data Ancient woodland data Survey/mapping of ponds/significant trees and hedgerows New planting records	-Protect existing habitat and biodiversity. - grasp opportunities for enhancement -Protect existing designated sites, features and connectivity
Natural Environment – Landscape Character	Protect and enhance the high quality natural environment and Landscape Character including that of the High Weald AONB	High Weald Management Plan Landscape assessments	-Policies to prevent harm to landscape character -Policies to ensure impacts be successfully mitigated or avoided
Built Environment	Protect and enhance the high Quality Built environment	Heritage at risk registers Information from planning applications	-Policies ensure heritage assets are protected -Policies preserve and enhance the existing built environment including non-designated heritage

**Figure 14- SEA Objectives, Indicators and Possible Measures**

### **Difficulties in the SEA Framework**

- 3.37 The framework has been created based upon the main issues that were scoped into the Environment Report by the District Council although these topics are generally those which are relevant to the Parish and the aspirations of local people. However, some of the issues, such as air quality and water resources, are difficult to address at a local level, such as Crowhurst, and thus the policies and the effects of the plan have sought to contribute to these aims where it is practicable, even if these are more aspirational in nature. This is certainly true in respect of strategic matters such as water quality and consumption and air quality which are cross border issues even at a District level. Therefore, whilst these matters are largely beyond the scope of this plan, the plan has sought to contribute to these wider aims where it is possible.
- 3.38 Secondly, the assessment of these more strategic objectives has been largely reliant on third party data or evidence prepared in respect of other plans and projects as the scale of the CNDP is such that individual parish assessments were neither appropriate nor proportionate to the scale of the aims and objectives of the plan or indeed the resources of the Parish. That being said where impacts are more localised such as those on the landscape or the built environment, specific assessments have been carried out and have informed the process and the steering group has sought to gain evidence through networking with Stakeholders and through the District Council.

## Section 4- Assessment of the Neighbourhood Plan and Alternatives

- 4.1 To ensure the objectives of the NDP are consistent with the SEA framework, it is necessary to test these local level NDP objectives with the more strategic SEA objectives to ensure the framework of the plan is sound. The vision of the plan is:

*'The plan will maintain the village's rural character by protecting the countryside and environment around the village and its boundaries, promoting community spirit and enhancing infrastructure, facilities and services for residents of all ages'*

- 4.2. The NDP objectives were formed to align with the roles of the planning system as defined by the NPPF and places a local emphasis on the delivery of the aims within the CNDP. The objectives are set out below:

### Environmental

1. To preserve, and where possible enhance, the distinct rural landscape character of Crowhurst and the High Weald AONB and its setting including its rural lanes, important open spaces and views and the distinct settlement pattern of the village.
2. To preserve and where possible enhance the biodiversity value of the Parish including the creation or protection of green corridors and wildlife connectivity and notable areas within the Parish including but not limited to the SSSI at the Fore Wood RSPB reserve, Quarry Wood Nature Reserve, Combe Haven Country Park. New development will be required to achieve net gain in biodiversity where possible.
3. To protect important landscape features within the Parish such as trees, hedgerows, verges, ponds and watercourses and their contribution to landscape and biodiversity and maintain the integrity of the role of the Strategic gap.
4. Ensure that development is safe from flooding and other environmental impacts such as contamination, pollution and equally development does not impact upon the high environmental quality of the parish. Where possible, development should aim to reduce flood risk elsewhere.
5. To promote sustainable development including the use of sustainable drainage systems (SUDS), sustainable construction techniques and renewable energies.
6. To preserve and, where possible, enhance the special character of the heritage assets of the village including listed buildings and their settings, non-designated heritage assets, archaeology, ancient and historic routeways and the historic form of the village settlement pattern.
7. Ensure development is well designed and new development is consistent with the local architectural vernacular and local character in general.
8. Ensure development is landscape and ecologically led so the rural character of the village is maintained.

### Social

1. Promote and reinforce the existing strength of community within the Parish and maximise opportunities for social inclusion by all sectors of the community.
2. To support and enhance community facilities that will meet current and future demands e.g. village hall, recreation ground, village pub, Youth Club hut, Parish Room and support opportunities for new facilities e.g. a shop, where needed.
3. Ensure development seeks to support raising of design standards and inclusivity in terms of accessibility and adaptability having regard to floorspace standards, lifetime homes and other quality standards.
4. Deliver the homes that meet the needs of the community including, but not limited to, first time buyers, up and down sizers, the elderly and those who cannot currently access the housing market.

5. Maintain and enhance areas of open space and, where possible, encourage new open space, sports and play space facilities and ensure access to the countryside is maintained for all.
6. Improve access to local facilities, where possible, including maximising opportunities for utilising public transport and other local services.
7. Support use of existing facilities for community events including potential for dual use of facilities to maximise opportunities for social and community interaction.
8. To support social, health and educational opportunities, facilities and activities for all residents, but particularly children and young people.

### **Economic**

1. Support and improve links with new and existing rural businesses through sympathetic small scale development, particularly that which can reduce out-commuting.
  2. Support and improve links with new and existing tourism facilities which in turn will support the use of other facilities within the village
  3. Ensure new development is viable in order to ensure prompt delivery in line with the needs of the community.
  4. Ensure that adequate infrastructure is provided alongside new development to ensure access, services and quality of life is maintained for both new and existing residents.
  5. Ensure new development promotes safe access for pedestrians and vehicles and is able to support opportunities for utilising public transport.
- 4.3 The CNDP objectives will now be tested against the SEA framework created in Section 3 to ensure there is synergy between the plan objectives and the SEA objectives to ensure the plan seeks to minimise the environmental effects of the plan and achieve sustainable development over the plan period. This process will also highlight and help formulate any potential alternatives which could avoid or mitigate identified conflict or impacts. For ease of reference the objectives of the NDP are compared against the SEA objectives and any positive, negative, neutral or indeed uncertain relationships are identified. The following symbols are used +=positive, -=negative, O =neutral and ? =uncertain.

Objective (see preceding pages for full CNDP objective)	1. Efficient use of land and resources	2. Reduce road congestion, pollution and air quality	3. Improve accessibility to services and facilities	4. Protect and enhance the natural environment	5. Protect and enhance the built environment and heritage	6. Conserve and enhance biodiversity and geodiversity	7. Maintain, improve and manage water resources in a sustainable way	8. Reduce emissions of greenhouses gasses	9. Minimise the risk of flooding and resulting detriment to people and property
<b>Environmental</b>									
1. Landscape Character	+	O	O	+	+	+	+	+	+
2. Biodiversity	+	O	O	+	O	+	+	+	+
3. Protect important landscape features	+	O	O	+	+	+	+	+	+
4. Protection from flood risk	+	O	O	+	+	+	+	O	+
5. Use of SUDS	+	O	O	+	O	+	+	O	+
6. Heritage Protection	+	O	O	O	+	O	O	+	O
7. Well designed/local character	O	O	O	+	+	O	O	O	O
8. Landscape and ecological led development	+	O	O	O	O	+	+	+	+
<b>Social</b>									
1. Promote strength of community	O	O	O	O	O	O	O	O	O
2. Support and enhance community features	+	+	+	O	O	O	O	O	O
3. Design/Access	+	O	+	+	+	O	O	+	O
4. Deliver housing need and mix	?	?	+	?	?	O	O	O	O
5. Maintain and enhance open spaces	+	+	+	+	+	+	O	+	+
6. Improve access to facilities	+	+	+	O	O	O	O	+	O
7. Dual access of facilities	+	+	+	O	O	O	+	O	O
8. Social, Health and Education	+	+	+	O	O	O	O	O	O
<b>Economic</b>									
1. Support new and existing businesses	?	?	+	?	?	O	O	O	O
2. Support new and existing tourism enterprise	?	?	+	?	?	O	O	O	O
3. Ensure development is viable	+	O	O	O	O	O	O	O	O
4. Provision of infrastructure	+	+	+	O	O	+	+	+	+
5. Ensure new development provides safe access and maximise public transport	O	+	+	O	O	O	O	+	O

Figure 15

4.4 Figure 15 above shows a general synergy between the SEA objectives and the CNDP objectives, which seek to achieve similar goals in protecting and enhancing the environment whilst delivering the needs of the community in a sustainable manner. The relationship between the objectives are generally positive with other impacts either being neutral or uncertain. Where relationships are uncertain this provides the basis for justifying the mitigation to be provided within the policies to enable for any effects to be avoided. In the cases identified above it is considered it is likely to be possible having regard to the likely scale of development in this plan. This process has allowed a number of alternatives to be devised which would be tested alongside the preferred strategy of the plan. It can be seen that there are reasonable alternatives that can be identified in relation to the following matters;

- (1) Housing need
- (2) Development Boundaries
- (3) Site Allocations
- (4) The policies of the plan

### **Housing need**

- 4.5 Information for reasonable alternatives for housing need has been taken from the following sources; The Rother Core Strategy and its evidence base, other information held by Rother DC and evidence gathered by the Crowhurst village surveys. Policy RA1 of the Core Strategy sets out the strategy for the rural areas of the District, including Crowhurst, which includes the delivery of 1,670 dwellings over the plan period. Part of this allocation includes 20 new homes within Crowhurst. In addition to this, Rother DC confirmed there are currently 4 households on the waiting list for an affordable home within the Parish and the village survey confirmed a local need for housing, particularly for smaller units.
- 4.6 The preferred option seeks to provide a housing allocation that will meet the housing need set for Crowhurst in Policy RA1 in the RDC Core Strategy through the provision of small sites within or to the the edge of the village development boundary. In fact, the plan will provide an additional 10 dwellings having regard to the 6 units to be provided at the brownfield site within the existing development boundary and this will add flexibility to the delivery of housing over the plan period. This decision was taken to enable on-site affordable housing to be delivered on the other sites and to meet the need within the village. This is considered to be a reasonable and proportionate approach to meeting housing need in the context of available land and the identified constraints which include landscape, ecology and flood risk. The landscape assessments and wider environmental assessment within this document show this level of growth in the manner proposed can be delivered without any significance harm subject to the implementation of the policies.
- 4.7 The potential alternatives include the do nothing scenario which would include no new housing within the Parish and rely on windfall development coming forward over the plan period. However, this alternative would mean the plan would not be in conformity with the parent Core Strategy document and thus would not pass the basic conditions set out in Section 61K of the Town and Country Planning Act 1990. Furthermore, with this alternative, the matters of meeting affordable housing need, increased investment in access, community facilities and other related benefits would not occur. Whilst this would not have the landscape impacts associated with the preferred options, with the appropriate mitigation which would be secured by the policies, these impacts would be minimised. For the above reasons, this alternative is not considered reasonable and thus does not required further testing.
- 4.8 The other alternative would be a much higher level of growth than that set out in Policy RA1 of the Core Strategy and thus would not be in conformity with settlement strategy of the Core Strategy. However, it should be noted the NDP is slightly over delivering on housing need through the inclusion of an additional brownfield site and in order to secure affordable homes on the other two

sites. Furthermore, the site assessment process has shown that the majority of all other available or deliverable sites would have unacceptable impacts on the environment. The sites that have progressed through the site process, have been limited to areas whereby landscape mitigation can be secured to avoid any detrimental effects. Thus, at the current time there is no opportunity for additional growth above that of the identified sites without causing serious impacts on the environment of the Parish. Therefore this alternative is not considered reasonable and does not require any further testing

- 4.9 In summary, it is considered the preferred option is the most appropriate option on the basis it will conform to the strategic policies of the Core Strategy and will maximise the sustainable growth of the village in a manner which will have a wider benefits and which through mitigation can avoid any significant impacts on the environment. This preferred option will deliver small sites which can mitigate their impact and which will be well related to the village and its context. The additional housing number will add flexibility to meeting the need over the plan period and will contribute to meeting affordable need within the village. Thus having regard to the above points, the no growth or a much higher growth are not reasonable alternatives.

### **Development Boundary**

- 4.10 In the 2006 RDC Local Plan, the development boundary was tightly drawn around the settlement areas of the Station Road area and the southern part of the village which contains the Pub and other residential development. This is shown in **Appendix 2**. Having regard to the Core Strategy policy OSS2 which specifies the use of development boundaries as a tool to guide development, the development boundary to the village has to be an integral part of any future strategy. This has potential for future environmental effects, both negative and positive. The location of the development boundary is obviously linked to the site assessment process but the review of the boundaries also had to take into account whether parts of the village that were previously excluded from the settlement should now be included and vice versa. The following options had been identified as alternatives;

- a. No development boundary and development assessed on a general policy basis
- b. Development boundary as the 2006 Plan but the boundary adapted to include the new site allocations and Forewood Rise, a modern housing development.
- c. As option b but with the inclusion of the northern part of the village along Forewood Lane.

- 4.13 Option a was not considered appropriate as it would not be considered in general conformity with the strategic policies of the Core Strategy and also would lead to a reduction in the protection of the open landscape between the parts of the village, land which is identified as a key contributor to the landscape value of the Parish and which has pressures for encroachment and suburbanisation. As such this is not considered to be a reasonable alternative.

- 4.14 Option c could be a reasonable alternative and thus was subject to further testing as can be seen below;

Option for development boundary	SEA Objectives									Justification for selecting/not selecting
	1. Land resources	2. Congestion	3. Accessibility	4. Nat Environment	5. Heritage	6. Biodiversity	7. Water	8. Climate Change	9. Flood Risk	
Option B (selected)	O	O	+	+	+	O	O	O	O	Maintains protection on land between parts of the village, a key contributor to village and landscape character. Avoids intensification of other parts of the village
Option C (not selected)	O	?	+	-	-	?	O	O	?	Northern part of village low density and status within development boundary could lead to intensification of uses that leads to erosion of landscape and built character.

- 4.14 Option C was not considered appropriate having regard to the potential impacts this option could cause to the character of the village. The northern part of the village is of relatively low density and, by bringing this area within the development boundary whereby development would be considered acceptable in principle, this could lead to pressure for redevelopment, such as sub division, demolition and intensification of uses, which could erode its rural character and its wider contribution to the character of the village.
- 4.15 The preferred option was identified as Option B on the basis this maintained the strong landscape protection of the intervening land between the parts of the village but brought the areas subject to future development outside of the more restrictive countryside policies. The inclusion of Forewood Rise within the development boundary was also considered logical due to its urban form, the fact many of these properties are now in private ownership so not a rural exemption site, and an infill planning approval from the council which suggest this part of the village is part of the settlement rather than countryside in planning terms. Also as one of the proposed allocated sites lies adjacent to this area, it is reasonable to include this part of the village within the settlement boundary. This approach is supported by the evidence of the Crowhurst Landscape Character, Sensitivity and Capacity Assessment which placed significant value on the surrounding landscape of the village, including those intervening areas between the parts of the village.
- 4.15 Therefore, it is considered option b, is the preferred option and it is the most appropriate strategy which would minimise landscape impacts and protect the village character and its AONB landscape alongside other benefits to accessibility and biodiversity.

## Site Allocations

4.15 The preferred strategy includes the allocation of three sites within the village at the following locations

- Land at Station Road/Forewood Lane (CH1)
- Land adjacent to Forewood Rise (CH2)
- Land adjacent to Railway Station (CH3)

4.16 The proposed allocation of these sites followed a site assessment process whereby 38 sites were assessed for their availability, suitability and deliverability for accommodating the minimum 20 new homes within the Parish (other sites were assessed for other uses). This process is set out in more detail in the Site Assessments Background Paper but essentially the sites that were identified and were assessed were potential options to the preferred strategy. However, to ensure the site assessment process aligned with the SEA process and the SEA framework, the criteria for assessing sites was devised having regard to the SEA objectives in order the eventual chosen sites had the most positive outcomes in respect of the framework. This consistency can be seen below in Figure 16.

	Criteria	Compatibility with SEA Framework
1	Potential to provide affordable housing and a mix of house types	Accessibility
2	Adjacent to and within 1000m of the facilities of one part of the village such as the school, village hall, recreation ground and pub via a safe walkable route	Transport Accessibility Air Quality/emissions
3	Within 1000m of the railway station	Accessibility Air Quality/emissions
4	Development can secure a safe access to the site	Accessibility
5	Development should have low visual impact from viewpoints within the village	Landscape Heritage
6	Development should be low key in respect of wider landscape and respect local landscape and settlement character including AONB location	Landscape Heritage
7	Can retain significant natural features such as trees and hedgerows and no significant loss is caused	Landscape Heritage Biodiversity Flood risk Air quality
8	Will have a low impact on Biodiversity and has potential to provide an enhancement to wildlife	Biodiversity
9	Will not impinge upon a flood zone or local water resources and that the site can manage its water resources without impact on other properties.	Flood Risk Water consumption
10	Development will maintain the character and setting of the historic environment of the village or any heritage assets	Landscape Heritage

**Figure 16 Site Selection Criteria**

4.17 As set out in the background paper, there were many sites which were assessed, notwithstanding the fact they were not put forward by the landowner, as many had presented potential for housing development. If the sites had proved suitable, further enquiries would have then have been made with the registered owner if necessary. However, many of these sites were discounted for other planning reasons such as landscape impact or access issues but it highlights the robustness of the site assessment process that these sites were assessed nonetheless. However, as many of these sites were discounted for fundamental planning reasons or land availability these were considered not to be reasonable alternatives and thus have not been tested any further. The full list of sites can be seen in Appendix 2 to this report or within the Site Assessments Background Paper. However, for the purposes of this SEA process, the alternatives to be referenced will be restricted to those considered to be available and deliverable and which met the general policy parameters such as being located near/adjoining the village development boundary and could comply with relevant planning policy requirements such as flood risk and biodiversity. The requirements of the AONB policy were also considered having regard to the general policy in respect of major development within the AONB.

4.18 The following available sites, set out in Figure 17, have been considered as part of the Site Assessment process and their status as reasonable alternatives have been assessed below against the SEA objectives. As can be seen below, these alternative sites are limited and some of those shown in the table that were originally a potential alternative, sites 18 (including 34, 35 for access) and 32, became unavailable and thus ceased to be a reasonable alternative. It can be seen that those potential sites would have a greater impact on the SEA objectives and instead, it is considered the preferred strategy will adhere to the SEA objectives and will not have significant effects on the environment subject to mitigation. The number in bracket relates to the site reference number in the Site Assessment Background Paper.

Site and site ref	SEA Objectives									AONB	Reasons and justification for not selecting
	1. Land resources	2. Congestion	3. Accessibility	4. Nat Environment	5. Heritage	6. Biodiversity	7. Water resources	8. Climate Change	9. Flood Risk	Is the land within the AONB (for purposes in respect of Para.116 of the NPPF)	
South of Broadfield (4)	O	O	+	-	?	?	O	O	O	YES	High degree of landscape visibility and would be located in a landscape gap which the landscape assessment considered was key to parish landscape character. Would promote urban sprawl and erosion of important open landscape. Potential impacts on SSSI opposite, Access and loss of hedgerow, cutting into bank. Discounted on landscape grounds
Land at Forge Cottage (6)	O	?	+	-	?	O	O	O	O	YES	High visibility in wider landscape and would create a block of development detached from existing built form. Access would be difficult due to levels and would be highly prominent in setting of church. Also located within area identified by landscape assessment as being a key contributor to landscape character.

Land to rear of Plough PH (18, 34 and 35) No longer a reasonable alternative	○	○	-	○	○	○	○	○	○	NO	Non-AONB location and potential for new development subject to mitigation although performs less well access to railway station. Was dependent on sites 34, 35 or 36 for access and upgrades to Royal Oak Lane. Progressed to Stage Two but access through adjoining sites became unavailable so site not deliverable and thus not a reasonable alternative.
Land at Forewood (27)	-	○	+	-	○	-	○	○	○	YES	Land is a residential garden but includes area within Fore Wood SSSI and Ancient Woodland so would be unacceptable in principle
Land at Coombe Dell (32) No longer a reasonable alternative	+	○	○	+	○	○	○	○	○	YES	Site considered to be potentially acceptable for development subject to investigation on access, density and layout. Site proceeded to Stage 2 of the site assessment process but deemed unsuitable on density/character reasons. Also the land became unavailable and withdrew from NDP process so no longer a reasonable alternative.
Land between Brakes Coppice and Christian Healing Centre (51)	○	○	-	-	○	○	○	○	○	YES	Land is seen in a countryside context which would be detached from the settlement of the village. Access to the village would also be subject to walking on a unlit road which is currently 60mph.

Figure 17- Alternative sites

4.19 Of the site process, eight individual sites (albeit 5 potential development sites) proceeded to the second stage. This included sites 1, 11, 32 and 3 and 41 (one development site) and 18, 34, 35 (one development site). Sites 4, 6, 27 and 51 did not proceed to the next stage of the site assessment on account of their landscape and other impacts and their conflict with the landscape and other evidence that supports the plan. Two of the five development sites that did proceed to stage 2 of the site assessments (sites 18, 34, 35 and 32) failed at this stage due to becoming unavailable and/or suitability issues and thus were no longer reasonable alternatives. They have been included in the above table for reference purposes. The preferred strategy allocates 12 homes each on the sites at Station Road (policy CH1, site 1) and Land south of Forewood Rise (policy CH2, sites 3 and 41) and 6 homes at Land adjacent to the Station (policy CH3, site 11) which will more than meet the minimum allocation set out in RA1 of the Core Strategy. These sites were subject to a more detailed landscape assessment whereby the site boundaries have been reduced to an area whereby it was considered development could take place without harm, subject to a detailed planting strategy. The detailed justification and individual site assessment documents can be seen in the background paper but in summary the reasons for their allocation can be summarised below in Figure 18.

Site and site ref	SEA Objectives									Justification for selecting
	1. Land resources	2. Congestion	3. Accessibility	4. Nat Environment	5. Heritage	6. Biodiversity	7. Water resources	8. Climate Change	9. Flood Risk	
Station Road (1)	?	+	+	?	0	0	0	0	0	Occupies a very central location which has footpath access and good access to the main parts of the village and the railway station. The allocated site is a reduced part of the original submitted land which has been assessed as being developable without any detrimental impacts subject to a landscape mitigation strategy and development being sensitively designed (informed by a landscape assessment – stage 2 of the site assessment process).
Land south of Forewood Rise (3 and 41)	0	+	+	?	0	0	0	0	0	The site again occupies a very central location with good access to the central part of the village along a safe footpath route and also has good access to the railway station. Also, this site achieves a significant distance from the Fore Wood SSSI and the original submitted site has been reduced to an area considered to be developable without harm to the wider landscape character (informed by a landscape assessment – stage 2 of the site assessment process).
Land adjacent to railway station (11)	+	+	+	0	0	?	0	0	0	This site forms part of the former station land and thus although overgrown could be considered to be brownfield land. The land is covered with a number of trees but these have been assessed by Rother DC to be of low value and quality. Site is set within the built environment of the village and thus has little impact on the wider AONB landscape.

Figure 18- Preferred sites

4.20 Having regard to the above, aside from the SEA objectives, it is also clear the approach to the site selection meets the required approach to the conservation of the High Weald AONB. As set out in the baseline section of this statement, the southern part of the Parish may have offered opportunities to develop land outside of the designated area which would have been the preference to the CDNP. However, as can be seen from the above, only sites 18, 34-36, represented available land with a non-AONB location and these were progressed to the next stage of the site assessment

process. Whilst these would have been reasonable alternatives, during the Stage Two assessment, sites 34-36 became unavailable and as this land would have provided the access to Site 18, Site 18 became undeliverable as a result. Thus there remains no other available or suitable sites outside of the AONB area in order to meet the Parish Housing need, and CH1-3 were allocated and are considered to be justified in respect of the AONB policies. The sites have been subject to a landscape assessment and subject to the policy, which includes the need to secure the identified landscape strategy, the effects on the landscape will be minimised.

- 4.21 It is considered the alternatives to the site allocations taken forward in the preferred strategy do not perform as well against the objectives or the objectives of the CNDP or the evidence base to the plan and the preferred strategy and allocations are justified for taking forward to the next stage.

## Section 5- Assessment of the draft Crowhurst Neighbourhood Development Plan

### The Policies of the CNDP

- 5.1 The aim of this part of the report, is to present an assessment of the effects of the pre-submission plan and its policies. This is centred on the nine SEA topics that were identified during scoping.

- Natural resources
- Air Quality/Road Congestion
- Accessibility
- Landscape/Natural Environment
- Built Environment/Heritage
- Biodiversity
- Water Resources
- Climate Change
- Flood Risk

- 5.2 For each topic a range of sustainability objectives (as identified through scoping) are listed. Taken together, the topics and objectives provide a methodological ‘framework’ for assessing the Plan’s likely significant effects.

- 5.3 The assessment takes account of the criteria presented within Schedule 2 of the SEA Regulations. So, for example, account is also taken of the potential for timescale and reversibility of the effects to be taken into account, i.e. the potential for the Plan to impact on the baseline in combination with other plans, or unplanned activity.

- 5.4 In assessing the impacts of the plan and its policies, the following symbols will be used
- + Positive implications
  - Negative implications
  - = No/negligible implications
  - ? Uncertain implications
  - X No link to the relevant topic

#### Natural Resources

Does the plan improve efficiency in land use and encourage the prudent use of natural resources?

- 5.5 The evidence base highlighted a lack of available brownfield land within and around the village for redevelopment, other than sites with existing businesses and other uses which suggest these are currently viable. The evidence base also suggested a lower grade soil with most soils in and around the village being of a poor grade as per the Agricultural Soil Classification System. The presence of water courses and springs and identified surface water issues in and around the village also present a need to conserve water and run-off to minimise related impacts in the village.
- 5.6 Despite the lack of brownfield land, the site allocations policies which relate to 3 sites across the Parish all incorporate some degree of the reuse of existing developed land, even if these do not strictly meet the NPPF definition of previously developed land. Whilst, sites CH1 and CH2 relate to agricultural and private equestrian uses, the sites contain existing buildings and uses which will be replaced by the new housing and thus could be considered to accord with the efficient use of land resources. In terms of site CH3, this site previously formed part of the station yard and thus can also be considered to be brownfield land. Therefore whilst the status of the three sites may be not strictly accord with the NPPF definition of previously developed land (PDL), they all present evidence of reusing land which has been previously developed and thus will reduce pressure on unspoilt and undeveloped land elsewhere in the Parish which has greater landscape or amenity value.
- 5.7 The design policy CB1 seeks to encourage technologies within new development that conserves natural resources such as renewable energies and sustainable design features such as grey water harvesting. The Heritage Policy CB2, the Community Facilities Policy CF1 and the Economic Sustainability Policy CC1, all encourage the reuse of existing buildings and facilities to ensure priority is placed upon conversions and reuse of existing resources. Furthermore, Policy CC1 also encourages the reuse of brownfield land outside development boundaries for economic purposes providing new buildings are small scale. The flood risk policy CE5 encourages the use of SUDS which utilise natural resources to manage flood risk and reduce flood risk elsewhere.
- 5.8 Other policies such as those relating to biodiversity and landscape policies and protection of natural resources could be said to have a minor positive effect on the use of natural resources by their role in the eco systems but at the scale of the CNDP these impacts are largely negligible.
- 5.9 Overall the plan is considered to have a neutral impact on use of natural resources as although the allocated sites will maximise use of developed land, there will be some loss of greenfield land. However, it is considered the impacts are minimised and the policies relating to sustainable construction features and priority for reuse of existing building stock will overall create a neutral impact on this matter.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
+	=	=	=	=	+
CH1	CH2	CH3	CB1	CB2	CF1
-	-	+	+	+	+
CF2	CF3	CC1	CC2		
=	=	+	+		

Alternatives

- 5.10 The alternative would have been to have no policy on renewables or sustainable construction feature which would have not grasped opportunities when they arise. Having no policy on the reuse of buildings for community and business use would largely rely on the strategic policies of the Core Strategy which would have created a similar impact albeit without the localised focus on development.

**Air Quality/Congestion**

Will the plan Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage?

- 5.11 The evidence base and baseline information confirmed a lack of data relating to this matter with the nearest data point outside the Parish to the north east which was not in excess of the national air quality objectives. However, from information gained from the village surveys, there is localised congestion in the central part of the village at school pick up and drop off times and at events associated with the Village Hall and Church.
- 5.12 Whilst these are very localised and would not represent severe impacts referred to by Paragraph 32 of the NPPF, it is necessary for the plan to minimise any effects, both individually and cumulatively, and to encourage and maximise use of sustainable modes of travel in order any resultant effects include benefits to the village and wider area. The presence of a railway station and a good quality footpath network provides a basis to encourage sustainable modes within the village and also for rail travel to replace car trips for commuting and other longer range trips.
- 5.13 Policy CS1 sets the tone for addressing this issue by seeking to locate development within the development boundary which naturally draws development to an area whereby the village facilities and rail connections would be within walking distance.
- 5.14 The housing sites allocated by Policy CH1, CH2 and CH3 are all located on the main pedestrian footpath to the central part of the village (and to the 1066 Country Walk which links to the southern part of the village) and are all within 1km of the railway station (the industry standard for walking trips) which presents real potential for encouraging sustainable modes of travel and easing congestion and reducing trips for existing and new residents, including those short trips between different parts of the village. It is considered the location of development minimises the potential impacts of congestion related to the housing growth as far as is practicable although one must be realistic that car use will still be the dominant mode of travel due to the rural location of the Parish. Due to the type of unit and occupier proposed at site CH3, the effects on air quality of this site are considered to be negligible. However, the policy aim is to reduce such dependence and encourage other travel modes, especially within the village itself.
- 5.15 Policy CC1 which relates to business seeks to promote development that prevents out commuting such as home working and live work units and Policy CC2 seeks to support High Quality Broadband connections as part of new development. Policy CF2 and CC2 also support improvements to the off road footpath network, notably the link between Forewood Lane (next to site CH1) to Sampsons Lane, which links the central (and railway station) and southern parts of the village. This priority on improving walking routes between the different parts of the village has the potential to reduce car trips within the village and reduce congestion at peak times and reduce air quality impacts. These links and emphasis on linking live and work elements (in accordance with the NPPF) has the potential for creating minor positive benefits on congestion.
- 5.16 The construction of the Combe Valley Way has introduced air quality sources to parts of the Parish at its outer edge but due to the limited scope of the CNDP there is little policy mechanisms to address this but the impacts should be monitored to see whether there is a need for any policy intervention required in the future.
- 5.17 The landscape impacts and biodiversity policies are not particularly linked to access or road congestion although the retention of landscape features such as hedging and trees and the landscape and ecology led nature of the plan presents the potential for local flora to help combat air quality effects of development, for example the inclusion of hedging, lime trees and other nitrogen fixing species. These policies have potential for very minor positive effects.

5.18 Overall, the plan seeks to implement a policy regime which locates development where sustainable modes of travel can be encouraged and methods of working that minimises the need for travel. Whilst the location of the sites are centrally located to minimise internal trips within the village, the rural location of the village and lack of facilities such as shops may lead to very minor negative effects on congestion at peak times. However, having regard to the strong landscaping policies, economic and infrastructure approach, it is considered the plan will have negligible impacts on Road Congestion and Air Quality impacts and will accord with the SEA objective in minimising the effects as far as possible.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
+	=	=	+	=	=

CH1	CH2	CH3	CB1	CB2	CF1
=	=	=	=	=	+

CF2	CF3	CC1	CC2
+	=	+	+

Alternatives

5.19 The alternative would be no policies relating to improvement of access within the village which would not have grasped the opportunity to reduce car travel within the village which has benefits. The alternative of having no policy on home working/broadband connections would mean reliance on the strategic policies of the Core Strategy to prevent impacts which would broadly be similar albeit without the localised policy focus which has its own benefits. The locational emphasis of the site assessment process would also not have contributed to aligning growth with access to sustainable modes of travel. Furthermore, the allocation of 20 homes in the District without this policy structure would have resulted in the same number of trips albeit without the above approach to minimise and mitigate effects.

**Accessibility**

Will the plan improve accessibility to services and facilities for all ages across the District

5.20 The evidence base demonstrate that the village enjoys good access to community facilities (including open space and to countryside) and primary education but suffers from relatively poor access to healthcare, retail and convenience facilities and secondary education. Due to the limited scope of the NP and the viability issues associated with supporting new facilities such as retail and healthcare, the policies have sought to improve the existing facilities and the scope of their provision and encourage a modal shift in travel choices. In respect of housing, the evidence base suggests there is a need for additional affordable homes and smaller types of housing to appeal to younger people and downsizers.

5.21 This matter somewhat overlaps with the SEA objective relating to congestion and Policy CS1 seeks to direct development to areas of the village with greater access to education, community and other facilities, such as retail provision in larger nearby centres such as Hastings and Battle, which are accessible via the railway links. This approach along with the allocation of growth (through policies CH1-3) within the central parts of the village, provides potential for residents to view rail connections

as a feasible alternative to car travel. Policy CF1 seeks to protect existing community uses and encourage development where dual uses of existing facilities is feasible, for examples retail use within the pub and multi-uses of community facilities for various uses. This protection and encouragement of new facilities, will provide positive effects on the matter of accessibility. Policy CF2 proposes improvement to footpaths which should improve accessibility. Policies CC1 and CC2 which encourage home working, live-work spaces and the necessary infrastructure provide a strong basis on which to reduce out commuting and provide access to jobs and employment in this rural context.

- 5.22 The site assessment process placed access to public transport and key village amenities as essential requirements of potential housing sites and it is considered the allocations optimise this.
- 5.23 Due to the limited scope of the CNDP, it is relatively difficult to design a policy mechanism which can address the wider issues but it is considered that where policies are able to influence this at the very local level, they provide the potential for positive effects although it will be for the community to try and realise these benefits over the plan period.
- 5.24 The policies relating to landscape, heritage, design, and biodiversity are largely unrelated to this topic so have neither negative nor positive effects.
- 5.25 Overall, it is considered the plan will maximise the potential for the sustainable growth to maintain existing levels of access but present a context whereby enhancements and improvements can be made for both existing and proposed residents.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
+	=	=	=	=	=
CH1	CH2	CH3	CB1	CB2	CF1
+	+	+	+	=	+
CF2	CF3	CC1	CC2		
+	=	+	+		

Alternatives

- 5.26 The alternative would have been to have no policies relating to encouraging sustainable modes of travel and work or improving access within the village which would likely retain the status quo with little improvement. Furthermore, had the emphasis of the site assessment on access not be so robust, it is likely the housing sites would not have contributed to supporting increased access to facilities and modes of travel. Unlike the preferred strategy, the alternative would have had neutral impacts and would have not have provided a framework for seeking improvements which could be delivered by future Community Infrastructure Levy (CIL) receipts.

**Natural Environment/Landscape Character**  
 Does the plan protect and enhance the high quality natural environment?

- 5.27 The evidence base set out in the CLCSCA and the CHCA concluded a high value landscape for the Parish both in terms of the AONB landscape and also the non-AONB area which in the most part

forms the setting to the AONB and offers similar unspoilt characteristics. The evidence base places value on the dispersed village settlement pattern, its tranquil and unspoilt rural character but highlights potential pressures for development on those intervening areas of land between the different parts of the village. Furthermore, the local community places a priority on the protection on this character and the rural feel of the village. The need for new growth invariably has potential for adverse effects in a rural context such as Crowhurst but it is considered the policies will ensure suitable mitigation and potential for enhancements.

- 5.28 The policies of the CNDP are landscape and ecology led which allow the sustainable growth of the Village, but which seek to protect the identified landscape character of the village. It is considered Policy CS1 places a presumption on the protection of the wider landscape character directing the more significant development to the established built up parts of the village or to the new allocations. Policies CE1, CE2, CE3, CE4 and CE5, which when applied individually and in combination, will have positive effects on the natural environment, through retention of existing landscape character and features and new landscaping as an integral part of development. The inclusion of an ANOB specific policy will also reinforce and enhance the special character of the High Weald area of the Parish in line with the High Weald Management Plan. Policy CB1 which relates to design will reinforce this landscape and ecology led approach to new development. Policy CE5 which advocated the inclusion of SUDS also presents the potential for flood risk issues to be addressed through measures which can enhance the wider landscape. Policies CF2 and CF3 seek to protect the rural character and environment of the village so are positives.
- 5.29 As a result of paragraph 116 of the NPPF, the approach to the allocation of the sites sought to identify land outside the AONB but it has been demonstrated there are no suitable sites available or suitable. Thus the process led to the identification of sites that are well related to the village and which are able to avoid any detrimental impact on the AONB landscape. This was achieved by site specific landscape assessments for each Stage 2 approach which assessed what parts of the available land, subject to a landscape strategy, could be developed without adverse impacts. The designation of the land for housing strictly assigns with this assessment and the relevant policies will require the strategy to be implemented as part of the development. Whilst it is accepted the development of sites CH1 and CH2 will invariably have impacts on landscape character in the short term (discussed further below), the landscape evidence confirms the allocated site areas can be developed without adverse impact, subject to implementation of the suggested landscape strategy. This latter requirement will be a requirement of the policy to ensure no, or minimal, adverse impacts will be caused after maturity of the scheme. The policy also requires the scale and layout of the development to be informed by a landscape assessment to ensure no impacts are caused to landscape character. Due to the location of site CH3 amongst existing built form, it is not considered there will any negative impacts from this subject to design and landscape considerations which will be secured by the policy wording.
- 5.30 Whilst, CF1 and CC1 could have minor impacts on landscape character, notably small scale business/tourism schemes, the policy criteria requires new development to accord with landscape character and provide landscaping which would minimise local impacts.
- 5.31 Overall, it is considered the CNDP will have an overall positive effect on the natural environment.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE4
+	+	+	=	+	=
CH1	CH2	CH3	CB1	CB2	CF1
=	=	=	+	+	=

CF2   CF3   CC1   CC2  
 +   +   =   =

Alternative

5.32 The policies of the CNDP protect and seek to enhance the identified landscape features, view and character. Without a policy, the impacts would be based on a generic policy which is open to interpretation, without the local context and thus without these policies there would have been potential for minor adverse impacts.

**Built Environment/Heritage**

Does the plan protect and enhance the high quality built environment?

Does the plan preserve the built heritage of the village including archaeology?

- 5.33 The Parish has been seen to have a rich and varied heritage and a built environment that contrasts across the NP area. The policies seek to protect identified heritage assets including statutory protected assets and those which has been identified through the evidence base to the NP but which are nonetheless important to the wider village character. The general approach is one of protection, both of the asset and its setting and enhancement with encouragement given to long term viable uses and where assets can be restored and maintained in good condition.
- 5.34 Policy CB1 which relates to design and Policy CB2 which is the specific heritage policy which provides suitable protection and encouragement for enhancement. CB1, being a more general policy, requires development to have regard to its wider context with CB2 protecting assets and their setting. This latter policy is particularly effective as it also protects non-designated heritage assets and below ground archaeology, which have little protection in the strategic policies, in accordance with the NPPF. It is considered this policy context provides an effective framework to encourage sustainable management of Crowhurst’s historic environment.
- 5.35 The policies relating to community and economic sustainability, Policy CF1 and CC1, offer support to the reuse of heritage assets for viable long term uses and the protection and support of community assets offered by CF1 support identified heritage assets such as the School (Grade II), Church (Grade I) and the Pub (non-designated heritage asset and designated Asset of Community Value). The support of local country routes (CF2), Local Green Spaces (CF3), Tourism (CC1) and local footpath improvements (CC2) also provide a context whereby the significance of the historic environment can be understood and enjoyed by local residents and visitors alike.
- 5.36 The allocated sites at CH1, CH2 and CH3 are considered to preserve the setting of identified heritage assets and will preserve the historic environment.
- 5.37 Policies CE1, CE2, CE4 and CS1 have relevance to the historic environment by ensuring development preserves its natural setting which has a positive impact although CE3 and CE5 have little relevance.
- 5.38 Overall, it is considered the plan will have positive effects on the Historic and Built Environment of the Parish.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
+	+	+	X	+	X
CH1	CH2	CH3	CB1	CB2	CF1
=	=	=	+	+	+
CF2	CF3	CC1	CC2		
+	=	+	+		

Alternatives

- 5.39 This would mean no policies relating to heritage which would be reliant on the strategic policy of the Core Strategy and statutory controls. This means non-designated heritage assets would remain at risk and less emphasis would be placed on the wider settlement pattern which is acknowledged by the CNDP evidence base. Thus the benefits gained by the CNDP policies would not be realised to the same extent and would largely secure a neutral effect on the Historic Environment.

**Biodiversity**

Does the plan conserve and enhance biodiversity and geodiversity

- 5.40 As set out in the evidence base, the village has a wealth of biodiversity rich environments, ranging from nationally significant sites to those at the local level which offer wildlife connectivity and habitat. Due to the local desire to preserve the natural environment of the village, the approach to the NDP has been one focussed on being landscape and ecology led so the principle assets of the village are preserved and enhanced.
- 5.41 The strategy of directing most development to the village confines by CS1 and protection of landscape character CE1 will also preserve existing unspoilt landscapes which are rich in habitat and ecological value.
- 5.42 Policies CE2, CE3, CE4 and CE5 seek to retain significant landscape features and encourage proper consideration of ecology in the initial stages of a development proposal and ensure this guides the development concept through to fruition. The protection of landscape features, wildlife corridors and relationship of a site with its wider natural context as well as provision of new habitat planting provides a positive context whereby enhancements in biodiversity can be made. Policy CE5 also encourage the dual approach of dealing with drainage in an ecological friendly manner recognising that such wetland areas can be designed for wildlife rather than engineered SUDS. This will protect the statutory designated sites down to the localised habitat including Priority Habitats identified in the Parish. Policies CF2 and CF3 will enhance biodiversity by protecting open and natural spaces and Local Green Space.
- 5.43 Sites CH1 and CH2 currently presents low value for biodiversity with most value confines to boundary hedgerows and trees. The policy criteria require these existing areas to be retained and new planting to be secured. Landscape buffers will create ecological benefits along with the new habitat required by policies CE3 and CE4.
- 5.44 The remainder of the policies including the design, heritage, community and business policies will neither have negative or positive effects and those policies require new development will be compliant with other policies of the development plan, ensuring biodiversity to be maintained.

- 5.45 It is considered the policies will create positive effects on biodiversity, protecting existing areas of value to biodiversity and creating a framework for enhancements.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
+	+	+	+	+	+
CH1	CH2	CH3	CB1	CB2	CF1
+	+	+	=	=	=
CF2	CF3	CC1	CC2		
+	+	=	=		

Alternatives

- 5.46 The alternatives are no policies relating to protection and enhancement of biodiversity, instead relying on the generic policies of the Core Strategy which would not identify important local features, connections or habitats. Also the CNDP policies have a greater emphasis on development being informed by ecology and landscape and thus introduce potential enhancements for development from the very minor development up to major schemes. The alternative would not secure the protection and enhancement opportunities provided by the CNDP policies.

**Water Resources**

Does the plan maintain, improve and manage water resources in a sustainable way

- 5.47 As set out in the evidence base, the village has a wealth of water resources in the form of streams, springs and ponds with risks of fluvial and surface water flooding. The proximity of these to existing properties presents potential for conflict with pollution and other impacts, but at present there is little evidence of pollution. The policies seek to maintain this complex of water resources in a good condition over the plan period and seek efficient use of such resources in new developments.
- 5.48 As with other more strategic issues, the limited scope of the NDP makes such an issue difficult to address at this policy scale and thus the policies have sought to maximise positive effects where they are able and to protect existing resources. This will be consistent with the strategic policies
- 5.49 There is a groundwater protection zone in the Fore Wood area of the village which means this would be susceptible to pollution but none of the sites allocated under CH1-3 will impact upon this zone.
- 5.50 Many of the policies are largely unrelated to this subject but policy CE5 seeks to protect and maintain the complex of water resources within the Parish including the groundwater protection zone. The policy also requires the integration of SUDS which will seek to reduce flood risk elsewhere and avoid effects from pollution. Policy CB1 also encourages the use of sustainable construction features which will also encourage more efficient use of water resources in the parish and CC2 requires suitable drainage to be provided as part of development.
- 5.51 Overall the plan is considered to have minor but positive effects on water resources.

Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
=	=	=	=	=	+

CH1	CH2	CH3	CB1	CB2	CF1
=	=	=	+	=	=

CF2	CF3	CC1	CC2
=	=	=	=

### Alternatives

- 5.52 The absence of policies of flood risk would have meant less emphasis on local issues such as the protection of the Groundwater protection zone and the SUDS provision and pollution controls that are built into policy CE4 and so the policy would have been reliant on the generic Core Strategy and does not give applicants as much clarity as the CNDP policy.

#### **Climate Change**

Does the plan seek to reduce carbon emissions?

Is the plan equipped to deal with the effects of climate change?

- 5.53 The CNDP seeks to deliver the requirement set out in the Core Strategy with the additional number of units proposed in order that on site affordable housing can be delivered on two of the sites having regard to the NPPG thresholds. Thus the wider effects of this scale of development have been considered at the higher District level. Notwithstanding this, the effects of climate change on flooding and biodiversity are relevant to the Parish.
- 5.54 Policies CE2, CE3 and CB1 encourage new landscaping and planting and CE4 seeks to retain landscape features which would have benefits in reducing emissions. Policy CE5 seeks to prevent flood risk elsewhere and encourage the inclusion of SUDS which will seek to secure an improvement in terms of reducing surface water flooding within the village which could increase as result of climate change. This integral approach to SUDS on all new development could have a minor positive effect on increasing resilience to flooding in the village.
- 5.55 Policy CB1 also encourages the inclusion of renewable energy sources and sustainable construction features which would reduce reliance on fossil fuels and greater at-source energy generation. This potentially has minor benefits in reducing emissions and addressing climate change. As set out above in relation to location of development within the village (CS1), encouragement of use of rail connections and reducing out commuting (CC1 and CC2), the policies seek to minimise effects of new development. It is recognised due to the rural location of the village, there will be some increased car trips as a result of business, housing and other development although these effects will have been considered at the Rother DC Core Strategy and have been mitigated where possible.
- 5.56 Overall, it is considered the development will have a negligible impact on carbon emissions although the plan provides a framework to reduce this over the plan period.

### Policy Testing

CS1	CE1	CE2	CE3	CE4	CE5
=	=	+	+	=	+

CH1	CH2	CH3	CB1	CB2	CF1
-	-	=	+	=	=

CF2    CF3    CC1    CC2  
 =       =       =       +

Alternative

The absence of policies relating to flooding, biodiversity and policies relating to design and business would leave the village less equipped to address climate change and reduce emissions. Had the site assessments not placed greater emphasis on access, there could have been greater reliance on car travel and less opportunity to encourage the use of rail connections. The inclusion of SUDS also ensures the village is better equipped to deal with pressures from increased surface water flooding and other climatic impacts.

**Flood Risk**  
 Does the plan minimise the risk of flooding and resulting detriment to people and property  
 Does the plan reduce existing risk where possible through design?

- 5.57 The evidence base identified a flood risk from fluvial and surface water sources and that the Parish has a network of watercourses, ponds and ditches that largely drain to the Coombe Haven catchment. The policies of the plan seek to protect and maintain this network and their functional flood plain and also provide proactive framework to protect residents from further risk and where it is practicable that development secures a betterment in flood risk terms. Policy CE5 states in surface water flood risk areas, development should incorporate SUDS which create secures an improvement in run-off rates and elsewhere incorporate SUDS to maintain green field run off-rates. The policies also maintain the NPPF policy of directing development to areas of lowest flood risk and the prevention of increasing flood risk elsewhere. Policy CB1, which relates to design also specifies the use of porous construction for areas of hardstanding such as driveways, and the integration of SUDS within schemes such as use of rain gardens and water butts which will help reduce flooding downstream in times of heavy rainfall or flood events. Policy CC2 requires all development to be served by adequate drainage in terms of surface water and foul drainage.
- 5.58 Polices relating to business, housing and community will be subject to the flood risk policies and thus will have neutral to positive impacts on the SEA objective.
- 5.59 It is considered the provision of SUDS and the protection of the existing blue infrastructure network, there will be minor positive effects on reducing flood risk and ensure new development can take place without increasing flood risk elsewhere.

Policy Testing

CS1    CE1    CE2    CE3    CE4    CE5  
 =       =       +       +       =       +

CH1    CH2    CH3    CB1    CB2    CF1  
 =       =       =       +       =       =

CC1    CC2  
 =       +

Alternative

- 5.60 The alternative would be to have no policy relating to Flood Risk and integration of flood measures in design. Essentially development would rely on generic flood risk policies, EN6 and EN7 of the Core Strategy which would not relate to the local circumstances of the Parish such as dealing with surface water. Development under 10 units would not automatically include SUDS or design to support reduction in flood risk.

**The Preferred Housing Allocations**

Do they accord with the SEA objectives?

Site at Station Road (Policy CH1)

- 5.61 This site is centrally located and the policy to deliver the 12 homes allocated at the site which seeks to deliver a mix of units including those which will appeal to elderly or young people. This site will also secure affordable homes and is located on the only formal pedestrian route with good access to the railway station and to the central part of the village. Thus the site performs well in terms of accessibility to services and other modes of travel at the village level.
- 5.62 The site is located on a greenfield site which includes a derelict barn and whilst the site would not be considered PDL on account of its agricultural roots, it does in some way utilise previously developed land having regard to this existing built form. Thus whilst the loss of some greenfield land represents a negative impact in the case of loss of natural resources, the effect is reduced by the existing built context, which reduces the overall harm. Following the site assessment process the allocation is also justified as development within the AONB on the basis of the need, lack of scope for developing outside the AONB and the inclusion of a landscape strategy as an integral part of the allocation.
- 5.63 The site is centrally located and next to a SHLAA site previously identified (although with possible issues relating to flooding and stability) and is located adjacent to agricultural buildings and residential development opposite. The site was part of the Stage Two landscape assessment which considered the allocation site to be developable without harm to the wider landscape subject to a mitigation strategy. The policy seeks to secure this strategy and require the overall scale to be informed by a landscape assessment at the application stage and the removal of the fire damaged barn will also have benefits. It is considered subject to this mitigation the site will have a neutral impact on the natural environment.
- 5.64 In terms of biodiversity, the site appears to have limited existing ecological value and the implementation of the landscape strategy, SUDS and compliance with the biodiversity policies, the allocation can have a positive impact on biodiversity.
- 5.65 In terms of water resources and flood risk, it is considered the inclusion of SUDS which would seek to secure an improvement in reducing surface flood risk and pollution prevention strategy it is considered the scheme would have minor beneficial effects on this matter.
- 5.66 The site is sufficiently removed from the setting of the SAM to the west to protect its setting and this matter would be considered in more detail at the application stage. The site is close to the heritage centre of the village but following the heritage policy CB2 should mitigate any effects.

- 5.67 In terms of air quality and congestion, the provision of 12 homes would have limited impact but the relatively close proximity to the railway and other local footpath improvements would present an attractive alternative for encouraging sustainable modes of travel.
- 5.68 In summary, it is considered site CH1 would not have significant impact on the environment and has the opportunity to create benefits in a number of topic areas.

### Land south of Forewood Rise (Policy CH2)

- 5.69 This site is centrally located and the policy is to deliver the 12 homes allocated at the site which seeks to deliver a mix of units including those which will appeal to elderly or young people. This site will also secure affordable homes and is located on the only formal pedestrian route with good access to the railway station and to the central part of the village. Thus the site performs well in terms of accessibility to services and other modes of travel. The retention of the footpath as part of the scheme along with children's playspace also provides benefits to the community in terms of access.
- 5.70 The site is located on a greenfield site which includes existing stables and whilst the site would not be considered PDL, it does in some way utilise previously developed land. Thus whilst the loss of some greenfield land represents a negative impact in the case of loss of natural resources, the effect is reduced by this existing built context and its location close to the modern estate to the north.
- 5.71 The site was part of the Stage Two landscape assessment which considered the allocation site to be developable without harm to the wider landscape subject to a mitigation strategy. The policy seeks to secure this strategy as part of the policy and subject to this mitigation the site will have a neutral impact on the natural environment.
- 5.72 In terms of biodiversity, the site achieves significant separation from Fore Wood SSSI and the site itself appears to have limited value other than its boundary trees/hedgerows. The implementation of the landscape strategy, SUDS and compliance with the biodiversity policies, the allocation can have a positive impact on biodiversity.
- 5.73 In terms of water resources and flood risk, it is considered the inclusion of SUDS which would seek to secure an improvement in reducing surface flood risk and pollution prevention strategy it is considered the scheme would have minor beneficial effects on this matter.
- 5.74 The site will have no impact on any heritage asset and will seek to relate to and enhance the Forewood Rise development to the north.
- 5.75 In terms of air quality and congestion, the provision of 12 homes would have limited impacts but the relatively close proximity to the rail and other local footpath improvements would present an attractive alternative.
- 5.76 In summary, it is considered site CH2 would not have significant impact on the environment and has the opportunity to create benefits in a number of topic areas.

### Land Adjacent to the Railway Station (Policy CH3)

- 5.77 The site is allocated for 6 homes which would be a flatted development which seeks to take advantage of its location directly adjacent to the local rail links and thus its accessibility is excellent in local terms. The scheme forms part of the former station area so would be brownfield in nature and thus perform well in terms of reducing loss of land resources. The scheme will be located amongst the built part of the village and subject to the policy requirement to limit heights to 2 storeys, it is considered no impacts will be caused to the built or natural environment. Whilst the site is currently covered with woodland, these trees were subject to a review from RDC who confirmed they were not of sufficient value to constrain development. The policy requires any application to be informed by a tree survey and ecology reports to ensure development takes account of this existing context and any feature of value is retained.
- 5.78 The scheme requires sufficient parking to be provided as part of the scheme which will prevent adverse effects on the road network but the access to rail travel will reduce occupiers need for a car. The policy requires inclusion of SUDS and other feature which will have benefits to water consumption, flood risk and air quality issues.
- 5.79 In summary, it is considered site CH2 would not have significant impact on the environment and has the opportunity to create benefits in a number of topic areas.

### Alternatives

- 5.80 These are discussed above but in summary, the sites chosen for allocation within the preferred strategy focus on selecting sites within, or close to, the existing village envelope where access to the railway station or other facilities can be reached on foot. Furthermore, having regard to the evidence of the CLCSCA and CHCA, the sites have been selected where these avoid and protect important landscape considerations and to avoid impacts on other environmental matters such as biodiversity and flood risk. In short, whilst there were other sites identified within the confines of the village such as sites 4 and 6, these were considered to perform less well in terms of landscape impact and would be highly visible in the short and medium views from within and into the village. The identification of the Station site also selects a brownfield site, a resource which is uncommon within the Parish, and thus the reuse of previously developed land accords with the priority of PDL as far as the plan has been able to do so.

### **Summary of the likely effects of the preferred plan**

- 5.81 The CNDP has been prepared to provide a positive context for new development whilst protecting the special qualities of the Parish area including its invaluable landscape, wildlife and natural and built environment. This objective has been integral to the preparation process from the very start to ensure any new allocations and policies can preserve and enhance this special environment whilst recognising there is always some impact of development, even in the early stages and thus the plan seeks to ensure any impacts can be mitigated or avoided. It can be seen that the plan will deliver 30 new homes over the plan period, which is in excess of the RDC Core Strategy allocation but this will deliver market and affordable homes in a sustainable manner. However, at a strategic scale this is relatively minor development and will have little impact beyond the immediate site area and their localities. However, the above assessment shows the preferred strategy is the most appropriate having regard to minimising environmental effects having regard to the reasonable alternatives. Thus the assessment demonstrates there are no significant effects on the environment as a result of the plan and any impacts can be adequately mitigated. A summary of the effects of the plan are summarised below in Figure 19.

SEA Topic	Effects over time	Can the effect be measured?	Comment
Improve Accessibility	Positive	Yes- Census AMR CIL monitoring	The strategy has maximised opportunities for access as far as constraints will allow
Reduce congestion/increasing travel choice	Minor Positive	Yes-Census data Travel Plan monitoring Air quality data CIL Data	The strategy has maximised opportunities to reduce reliance on car and promote other travel options
Efficiency in land use	Neutral	AMR	The strategy has sought to minimise use of greenfield land and policies encourage reuse of buildings and brownfield site
Reduce emissions	Minor Positive	District data	Landscape, design and access policies support reduction in carbon emission albeit difficult to address and monitor at very local level
Minimise impact of flooding	Positive	Flood events and surface water flooding Planning application and SUDS provision	SUDS/Flood risk policy seek to address issues and implement policies of the catchment management plan and other documents
Maintain/ improve water resources	Minor Positive	SUDS provision and environmental agency data Water consumption data	The use of SUDS and policies protecting blue infrastructure and design to reduce consumption will help meet this objectives
Conserve and enhance biodiversity	Positive	Natural England conditions Parish Environmental groups	The ecology led nature of the plan will protect existing habitat and seek to deliver positive gains in all parts of development.
Conserve and enhance natural environment	Positive	Landscape assessments	The policies will protect landscape value of parish and ensure development protects the identified character of the Parish including the High Weald AONB
Conserve and enhance Built Environment	Positive	Heritage at Risk	The policies provide a wider protection for the local built environment and encourage reuse of these assets for sustainable means

**Figure 19 Likely effects of the preferred strategy**

## **Section 6- Monitoring**

- 6.1 The plan will be monitored by the Parish and the District in cooperation. The Parish Council and/or its designated group will monitor the plan having regard to the SEA indicators and those set out in the District council's Annual Monitoring Plan.

# Appendix 1

**Table of Relevant policies, plans, strategies, programmes and sustainability objectives**

Title	Date
<b>International</b>	
Kyoto Protocol to the United Nations Framework Convention on Climate Change	1997
United Nations. Report of the World Summit on Sustainable Development (WSSD), Johannesburg – Commitments arising from Johannesburg Summit.	2002
International Convention on Biological Diversity 1992 & 2010	2010
Millennium Development Goals (UN). Goal 7 – Ensure Environmental Sustainability: <ul style="list-style-type: none"> <li>• Target 1: Integrate the principles of sustainable development into country policies and programmes and reverse the loss of environmental resources.</li> <li>• Target 2: Reduce biodiversity loss, achieving by 2010 a significant reduction in the rate of loss.</li> </ul>	On-going
UNESCO World Heritage Convention	1972
<b>European Union</b>	
European Spatial Development Perspective	1999
European Landscape Convention	2004
European Strategy on Sustainable Development	2001 and 2009 Update
EU Seventh Environmental Action Plan to 2020	2013
European Communities Directive on the Conservation of Wild Birds. Directive 2009/147/EC (this is the codified version of Directive 79/409/EEC as amended)	2009
EC Council Directive on the Conservation of Habitats and of Wild Fauna and Flora 92/43/EEC	1992
The Landfill Directive (1999/31/EC)	1999
EU Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources	1991
EU COM (2002) 581 final: Proposal for a Directive concerning the quality of bathing water	2002
EU Water Framework Directive (2000/60/EC)	2000
European Thematic Strategy for Soil Protection 2006	2006
The Directive on Waste. Directive 2008/98/EC	2008
Waste Electrical and Electronic Equipment (WEEE) Directive 2002/96/EC	2002
EU Directive 2002/49/EC relating to the assessment and management of	2002

Title	Date
environmental noise	
EU COM (06) 848: Renewable Energy Road Map	2006
Renewable Energy Directive 2009/28/ec	2009
EU Air Quality Directive - Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	2008
EU Biodiversity Strategy to 2020	2011
<a href="#">European Site Conservation Objectives for Pevensey Levels SCI (UK0030367)</a>	2014
<b>National</b>	
National 'Planning Practice Guidance' (PPG)	2012
<a href="#">National Planning Policy Framework</a> CLG Mar-12	2012
Local Planning Regulations CLG Jul-11	2011
<a href="#">National Infrastructure Plan</a> Treasury Oct-10	2010
CLG <a href="#">Localism Act</a>	2011
<a href="#">Water Act</a>	2003
HM Treasury and Dept. of Business, Innovation & Skills Policy Statement 'Planning for Growth'	2011
Department of Health 'White Paper - Healthy Lives, Healthy People'	2010
<a href="#">Marine and Coastal Access Act</a>	2009
DEFRA Marine Policy Statement	2011
The Conservation of Habitats and Species Regulations 2010 (Chapter 8 covers Land Use Plans)	2010
Waste Regulations 2011 (England and Wales)	2011
DEFRA <a href="#">National Policy Statement for Waste Water</a>	2012
National Waste Strategy	2007
DECC. National Policy Statement 1 – Overarching National Policy Statement for Energy	2011
DECC. National Policy Statement 3 for Renewable Energy Infrastructure (EN-3)	2011
DECC. National Policy Statement 2 for Fossil Fuel Electricity Generating Infrastructure (EN-2)	2011
DECC. National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)	2011
DECC. National Policy Statement for Electricity Networks Infrastructure (EN-5)	2011
DECC. National Policy Statement for Nuclear Power Generation (EN-6)	2011
Dept. of Business, Innovation & Skills 'Local growth white paper'	2010
CLG, DEFRA, DTI, DfT White Paper 'Planning for a Sustainable Future'	2007
<a href="#">Town and Country Planning Act 1990</a>	1990
Planning and Compulsory Purchase Acts 2004 and 2008	2004 & 2008
DEFRA Sustainable Development Strategy 'Foundations of our Future'	2002
DfT 'Towards a Sustainable Transport System: Supporting economic Growth in a Low Carbon Economy'	2007
Planning (Listed Buildings and Conservation Areas) Act	1990
White Paper Heritage Protection for the 21st Century	2007
DCMS 'The Historic Environment: a Force for Our Future'	2001
Ancient Monuments and Archaeological Areas Act	1979
DEFRA 'Future Water: The Government's Water Strategy for England	2008
ODPM 'The Planning response to Climate Change: advice on better practice'	2004
DEFRA 'Climate Change Act'	2008

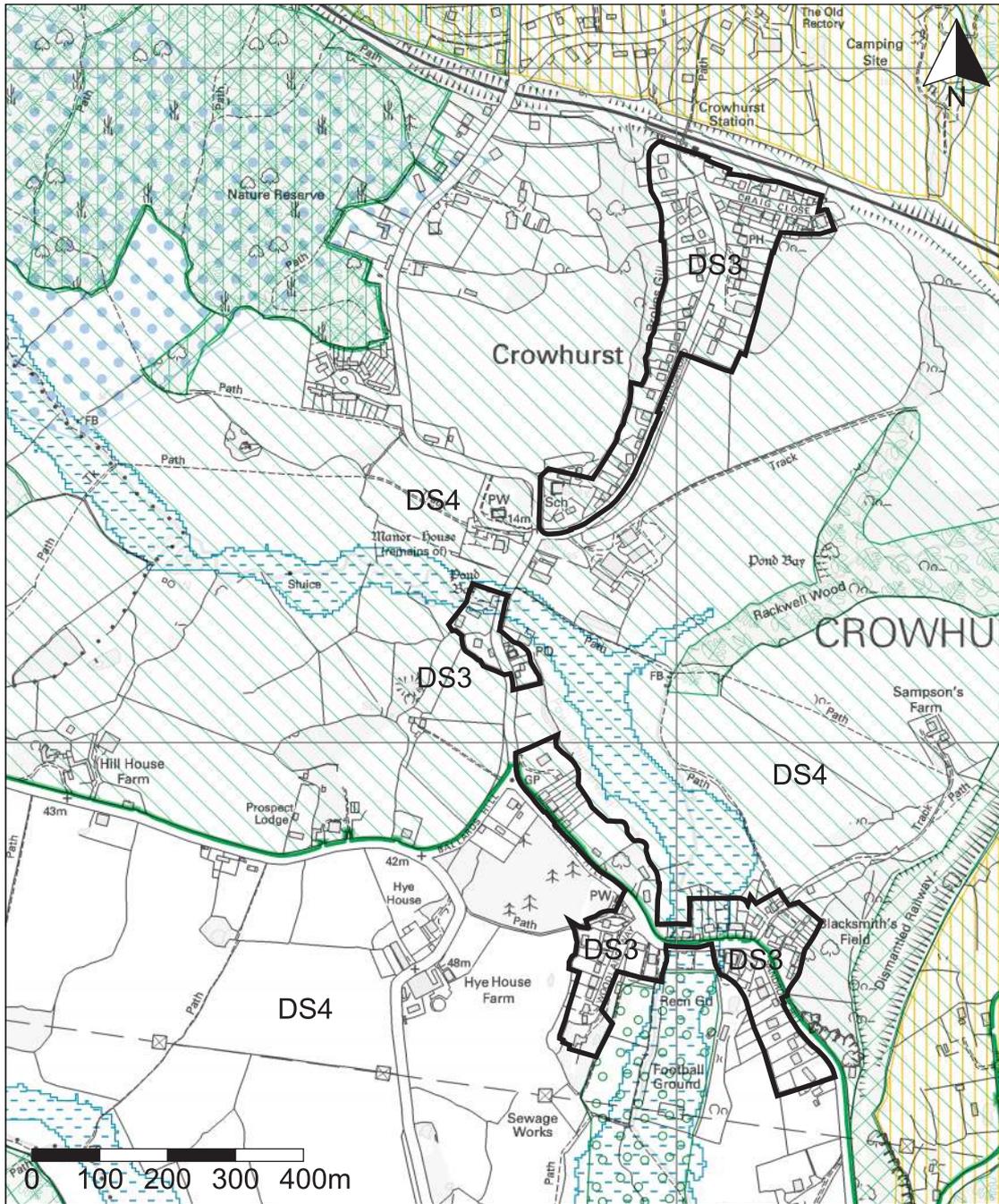
The Air Quality (England) Regulations 2000 and 2002 Amendment	2000 & 2002
DEFRA 'Air Quality Strategy for England, Scotland, Wales and NI'	2011
DEFRA 'Strategy for Sustainable Farming and Food'	2004
DfT 'Delivering a Sustainable Transport System'	2008
Wildlife and Countryside Act 1981 (as amended)	1981
Biodiversity: UK Action Plan	2007
The Government's Strategy for Combined Heat and Power to 2010	2002
DTI 'Energy White Paper, Meeting the Energy Challenge'	2007
DTI Energy Review 'The Energy Challenge'	2006
DEFRA <a href="#">Securing the future: delivering UK sustainable development strategy</a>	2005
UK Climate Change Programme	2006
Countryside and Rights of Way Act (CROW)	2000
Working with the Grain of Nature – A Biodiversity Strategy for England	2002
Making space for water Taking forward a new Government strategy for flood and coastal erosion risk management in England	2005
<a href="#">Safeguarding our soils: A Strategy for England</a> Defra	2009
The <a href="#">Flood and Water Management Act</a> 2010 HMSO	2010
<a href="#">The Pitt Review: Learning Lessons from the 2007 Floods</a> Independent Report to Government	2008
<a href="#">Soil Action Plan for England 2004-2006</a> Defra	2004
Environment Agency 'Water for people and the environment: <a href="#">Water Resources Strategy for England and Wales</a> '	2009
DEFRA <a href="#">Making space for water: Taking forward a new Government strategy for flood and coastal erosion risk management in England.</a>	2005
<a href="#">Future water: the Government's water strategy for England</a> DEFRA Feb-08	2008
<a href="#">Water for Life (White Paper)</a> DEFRA Dec 2011	2011
<a href="#">Government Review of Waste Policy in England</a> Defra 2011	2011
DfT <a href="#">White Paper: Creating Growth, Cutting Carbon</a>	2011
Department for Transport <a href="#">Guidance on Accessibility Planning in Local Transport Plans</a>	2004
Department for Transport <a href="#">Delivering a Sustainable Transport System</a>	2008
Department for Transport <a href="#">Active Travel Strategy</a>	2010
DEFRA <a href="#">Noise Policy Statement for England</a>	2010
DoH <a href="#">White Paper – Healthy Lives, Healthy People</a>	2010
DECC 'Home Energy Conservation Act 1995 (HMSO)'	2013
Energy Act	2008
DECC <a href="#">UK Renewable Energy Strategy</a>	2009
DECC <a href="#">Microgeneration Strategy</a>	2011
CLG & DfT 'Manual for Streets 1 & 2'	2007
English Heritage 'Conservation Principles, Policies and Guidance'	2008
National Parks & Countryside Act	1949
Environmental Protection Act	1990
DEFRA <a href="#">Marine Policy Statement</a>	2011
Ministry of State for Environment and Agri-Environment 'Nottingham Declaration on Climate Change'	2000
DECC <a href="#">Beyond Copenhagen: The UK Government's International Climate Change</a>	2010

Title	Date
<a href="#">Action Plan</a>	
<a href="#">Climate Change Act</a>	2008
Conservation (Natural Habitats &c) Regulations	2010
DEFRA <a href="#">Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011)</a>	2011
Natural Environment and Rural Communities Act	2006
DEFRA <a href="#">Natural Environment White Paper</a> Defra	2011
The Environment Act	1995
Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Working Together for Clean Air	2011
CLG 'Code for Sustainable Homes': <a href="#">Setting the Sustainability Standards for New Homes</a> and accompanying <a href="#">Technical Guidance - November 2010</a>	2008 & 2010
RTP/Planning & Climate Change Coalition 'planning for climate change – guidance and model policies for local authorities	2010
English Partnerships and the Housing Corporation 'Delivering Quality Places, Urban Design Compendium 2'	2009
Environment Agency 'Groundwater Protection: Policy and Protection'	2013
<b>Regional</b>	
South East England Biodiversity Forum 'South East Biodiversity Forum'	2009
Forestry Commission 'Seeing the Woods for the Trees – Regional Forestry Framework'	2004
English Heritage 'Heritage Counts 2013: The State of the South East's Historic Environment'	2013
English Heritage 'Streets for All – South East' – a regional English Heritage guide to the management of streets and public open spaces	2006
<b>Sub Regional / County</b>	
Pride of Place – a Community Strategy for East Sussex	2003
ESCC, SDNPA and B&HCC 'Waste and Minerals Local Plan for East Sussex'	2013
East Sussex and B&Hove Waste Local Plan (Saved Polices only)	2006
East Sussex and B&Hove Minerals Local Plan (Saved Polices only)	1999
Southern Water 'Water Resource Management Plan 2015-2040'	2014
South East Water 'Water Resource Management Plan 2015-2040'	2014
NHS East Sussex Downs & Weald 'Investing in Life'	2009
East Sussex Downs & Weald PCT, Hastings & Rother PCT 'Reducing Health Inequalities in East Sussex'	2010
East Sussex and Brighton & Hove <a href="#">Construction &amp; Demolition Waste SPD</a>	2006
Sussex Biodiversity Partnership <a href="#">From Rio to Sussex Action for Biodiversity: a Biodiversity Action Plan for Sussex</a>	1998
Sussex Biodiversity Opportunity Areas	2009
South Foreland to Beachy Head Shoreline Management Plan	2006
Environment Agency Catchment Flood Management Plan: Rother and Romney	2009
Rother <a href="#">Catchment</a> Abstraction Licensing Strategy	2013
ESCC 'Strategic Open Space Study'	2011
<a href="#">East Sussex 'Green Infrastructure Study'</a>	2014
East Sussex Environment Strategy Group 'East Sussex Environment Strategy'	2011

Title	Date
ESCC 'Climate Change Strategy'	2009
ESCC 'East Sussex Local Transport Plan 3' 2011-2026 (LTP3)	2011
High Weald AONB Joint Advisory Committee 'The High Weald AONB Management Plan (2014-19)'	2014
Environment Agency ' River Basin Management Plan South East River Basin District	2009
South East Coastal Group 'Beachy Head to Selsey Bill Shoreline Management Plan First Review Final Report'	2006
East Sussex Landscape Character Assessment	2010
East Sussex Energy Partnership	On-going
East Sussex Joint Waste Strategy 2014 to 2025	2014
<a href="#">Natural England 'Site Improvement Plan for the Pevensey Levels' (SIP171)</a>	2014
<b>Local / District</b>	
Rother District Local Plan	2006
Rother District Core Strategy	2011
Rother District Core Strategy 'Equalities Impact Assessment'	2011
Neighbourhood Plans	various
Rother Community Plan	2004
Rother Corporate Plan Draft 2014-2021	2014
Rother Economic Regeneration Strategy 2010 – 2015	2010
Rother Crime and Disorder Reduction Strategy 2005-2008	2005
Rother Cultural and Leisure Strategy	2006
Rother District Council Housing Strategy 2009-2013	2009
Rye Conservation Area Appraisal	2006
Battle Conservation Area Appraisal	2006
Bexhill Town Centre Conservation Area Appraisal	2004
Sedlescombe Conservation Area Appraisal	2004
Robertsbridge Conservation Area Appraisal	2009
Rother District Council Local Plan <a href="#">Background Evidence Studies</a> . Various including: Rother Open Space, Sport and Recreation Study, Green Infrastructure Study, Landscape Assessments, Strategic Planning Study, <a href="http://212.104.140.187/Background-Evidence">http://212.104.140.187/Background-Evidence</a> Low Carbon & Renewable Energy Potential Study, Housing Studies & Papers, Transport Studies & Papers, Economic & Commercial Studies & Papers, Infrastructure Delivery Plan, Procedural Papers, Consultation Statements and Spatial Area Studies.	Various
Neighbouring Authority Local Plans	Various
Parish Local Action Plans	Various

## **Appendix 2**

**CROWHURST, Inset Map No.12**



	Development Boundary		SSSI (Site of Special Scientific Interest)
	Strategic Gap		SNCI (Site of Nature Conservation Importance)
	Proposed Countryside Park		Ancient Woodland
<b>DS3</b>	Policy Numbers (eg. DS3)		Flood Zone 3 (2006)
	AONB (Area of Outstanding Natural Beauty)		Groundwater Source Protection Zones (SPZ)