

# Burwash Neighbourhood Development Plan

Strategic Environmental Assessment (SEA) Report  
**2019-2028**

Published by Burwash Parish Council under the Neighbourhood  
Planning (General) Regulations 2012 and EU Directive 2001/42  
on Strategic Environmental Assessment

To accompany the Pre-Submission version of the Neighbourhood  
Development Plan (Regulation 14)

**May 2019**



## CONTENTS

<b>Section 1: Background</b>	<b>[2]</b>
Introduction	
Why is an Environmental Report needed?	
Purpose of this Environmental Report	
Methodology	
Baseline characteristics	
Constructing the framework	
<b>Section 2: Assessing the objectives of the BNDP</b>	<b>[15]</b>
<b>Section 3: Assessment of the policies of the BNDP</b>	<b>[21]</b>
<b>Section 4: Conclusion</b>	<b>[24]</b>

## GLOSSARY

## APPENDICES

### Appendix 1: Screening determination

### Appendix 2 : Relevant Plans & Programmes

## List of Figures

**Figure 1:** Flow Diagram showing the relationship between the SEA process and production of the neighbourhood plan

**Figure 2:** Conservation Area map

**Figure 3:** Listed Buildings map

**Figure 4:** Designated neighbourhood area map

## List of Tables

**Table 1:** Constructing the Framework

**Table 2:** BNDP Objectives against assessment framework

**Table 3:** Assessment of the BNDP policies

**Table 4:** Summary table of the effects of the plan

## SECTION 1

### Introduction

1.1.0 A strategic environmental assessment has been undertaken to inform the Burwash Neighbourhood Development Plan (BNDP). This Environmental Report supports the BNDP and shows the effects on the environment, in line with the requirements of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC. This draft report is being consulted upon at the same time as the Pre Submission BNDP in May 2019 in accordance with the Environment Assessment Regulations.

### Why is an Environmental Report needed?

- 1.2.0 There is no legal requirement for a neighbourhood plan to have a sustainability appraisal (as set out in section 19 of the Planning and Compulsory Purchase Act 2004). However, a Basic Condition for a neighbourhood plan is to “be in compliance, and not breach, any EU Obligations”, particularly those that have been incorporated into UK law.
- 1.2.1 There are a number of Directives of relevance to the environment, although when it comes to neighbourhood planning there are 3 that are explicitly directed in Planning Policy Guidance (PPG)<sup>1</sup>. This document relates to the requirements of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC about protecting the environment through integrating environmental considerations into the formulation of plans or programmes. Therefore the focus of this document is on the environmental effects that could be caused as a result of the Burwash neighbourhood plan.
- 1.2.2 A Screening of the Neighbourhood Plan was submitted to Rother District Council (RDC) on 6<sup>th</sup> September 2018. This was sent to the statutory bodies for consultation and a final response from the District Council received on 19th October 2018. This can be seen in **Appendix 1**.
- 1.2.3 Additionally, it should be noted that in terms of the Habitats and Birds Directives<sup>2</sup>, relating to conservation interests and protecting or improving the condition of designated sites is also relevant. These Directives have been transposed into UK law as the Conservation of Habitats and Species Regulations 2010. A screening exercise was carried out in the Core Strategy Development Plan Document Appropriate Assessment Screening Report<sup>3</sup>. Due to the position of the Parish, beyond the usual distance of 10km from a European site, it would not be expected that anything proposed in the BNDP will have an impact on site integrity. As such, no Appropriate Assessment is required of the BNDP. This was confirmed in a letter from Rother District Council on 19th October 2018, where they confirmed that an HRA is not required.<sup>4</sup>

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<sup>1</sup> Paragraph 078 of Planning Practice Guidance

<sup>2</sup> 92/43/EEC and 2009/147/EC

<sup>3</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=15112&p=0>

<sup>4</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=26381&p=0>

## Purpose of this Environmental Report

- 1.3.0 The purpose of this Environmental Report, which accompanies the submission version of the Burwash Neighbourhood Development Plan, is to:
- Identify, describe and evaluate the likely significant effects of the BNDP and alternatives; and
  - Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.
- 1.3.1 The Environmental Report contains:
- An outline of the contents and main objectives of the BNDP and its relationship with other relevant policies, plans and programmes;
  - Relevant aspects of the current and future state of the environment and key sustainability issues;
  - The SEA Framework of objectives against which the BNDP has been assessed;
  - The appraisal of alternative approaches for the BNDP;
  - The likely significant environmental effects of the Plan;
  - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Plan; and
  - The next steps for the BNDP and accompanying SEA process.

## Methodology

1.4.0 The methodology has incorporated all those that are necessary as set out in the legislation. This is an iterative process and incorporates stages for public consultation on the documents produced. **Figure 1** sets out the relationship between the SEA process with the production of the Neighbourhood Plan. This document represents the first available regarding expected impacts on the environment of the BNDP.

1.4.1 The work relating to each of the stages set out in **Figure 1** for the BNDP is briefly explained here.

### *Screening*

1.4.2 Though small in scale, as the Neighbourhood Plan may be allocating sites, providing an overall framework for development and the Parish contains sensitive natural and heritage assets that may be affected by the proposals in a plan, an environmental report is required. The exact process and response relating to this can be seen in the preceding Introduction section.

### *Scoping*

1.4.3 The first stage of forming this SEA Scoping Report has been the collation and formation of environmental and related information on the Parish. In forming the suggested framework to be used, a review of those established for the DASA incorporating elements agreed at a County level, was done. The majority of the focus in forming the framework has related specifically to the environmental issues of particular relevance to the Parish.

1.4.3 Consultation at this stage is only required to be with the three statutory bodies who have responsibility for the natural and built environment, regarding the scope and detail of the assessment. Rother District Council processes mean that this is integrated into the screening stage and the response that they provide to that. The final framework was marginally amended

to take account of comments received in the response from the statutory conservation bodies and Rother District Council.

- 1.4.4 The baseline of the Parish in the following section of this report contains thematic topics from Annex I of the SEA Directive.

#### *Environmental Report*

- 1.4.5 The environmental report is the main part of the process and is required to include information on the likely significant effects of implementing the plan and any 'reasonable' alternatives taking account of the objectives plus geographical scope of the plan. Annex 1 sets out the 13 thematic issues that must be considered in terms of likely significant effects including the requirement for the cumulative and interrelationship between these, plus measures to prevent; reduce; and as fully as possible offset any significant effects of implementing the plan.

#### *Post-Adoption statement*

- 1.4.6 Once the plan has been through the further stages of passing the examination, referendum and is 'made' by the District Council, a short statement is required reporting on how the plan took environmental considerations into account and the monitoring that is to be taken forward.

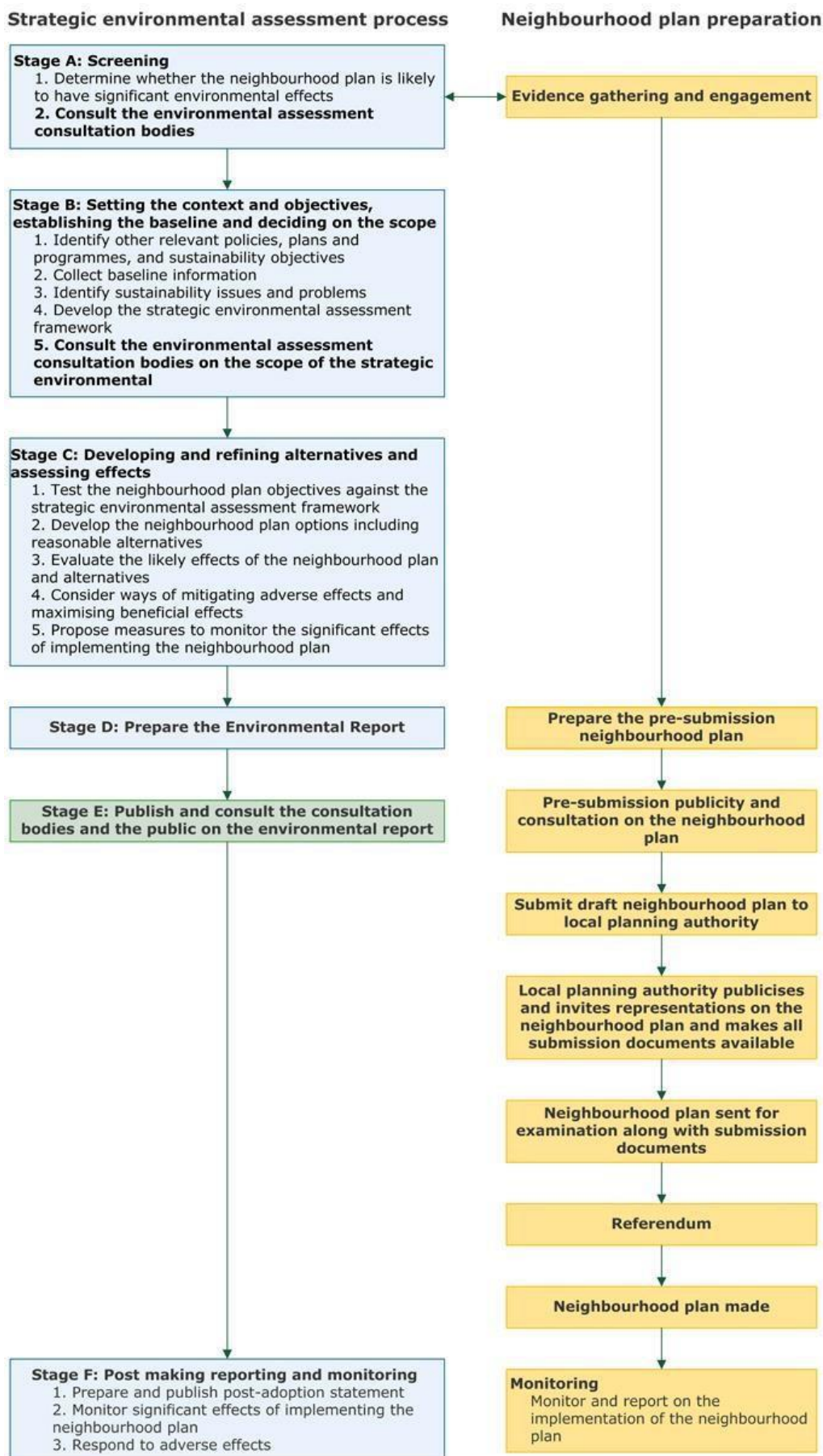
### **Restrictions that have applied to the method**

- 1.4.7 Although a neighbourhood development plan is a lower tier than a core strategy, it should be remembered that it is still a project level document. Therefore, the content of the BNDP cannot provide information that would be expected for an application or site. In terms of this assessment therefore the same is applicable and it should be remembered that accurately predicting all effects will not be absolute as more detailed information will be needed (i.e. design). Reflecting this, especially in terms of synergistic or cumulative impacts, causes professional judgement to be needed. A clear example of where this applies, is in terms of exact impacts of climate change because although there is a greater level of evidence, this is not always as firm as for other topics.
- 1.4.8 The formulation of the methodology began with the information contained within the Development and Site Allocations (DASA) Sustainability Appraisal Scoping Report<sup>5</sup>. Following this the first action was a review of the relevant plans and programmes, which can be found in **Appendix 2**. The content of these documents has been the first point of reference for collating the baseline, along with information and statistics from more localised sources. However, there are a number of thematic areas where no more localised information was available and this has been reflected in the assessment.

**Figure 1:** Flow Diagram showing the relationship between the SEA process and production of the neighbourhood plan

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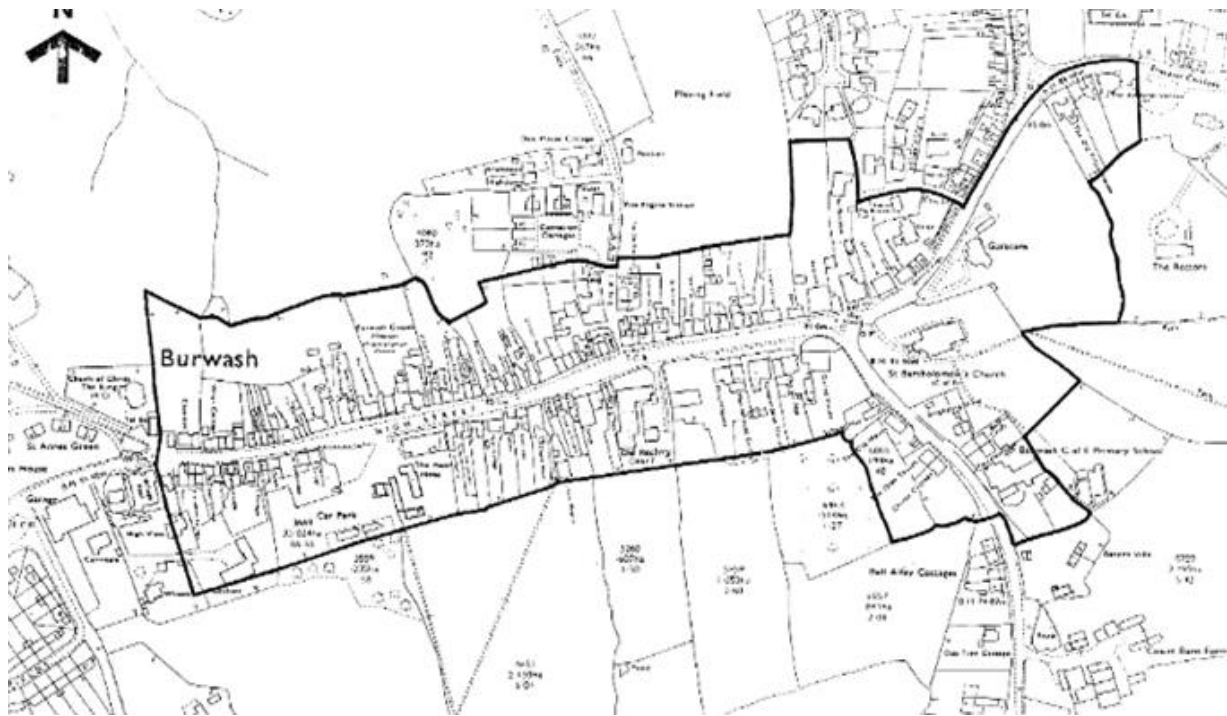
<sup>5</sup><http://www.rother.gov.uk/CHttpHandler.ashx?id=15112&p=0>



## Baseline characteristics

- 1.5.0 The Burwash Neighbourhood Development Plan is being prepared to be in general conformity with the provisions of the Rother Local Plan and national planning policies.
- 1.5.1 The Rother Core Strategy was adopted in 2014. The Core Strategy, which forms Part 1 of the Local Plan, is the key planning policy document within the Rother Local Plan. It sets the overall vision and objectives for development in the district up to 2028 and includes policies relating to the scale and distribution of development across its towns and rural areas. It also contains 'core policies' that address key issues facing the district, in relation to sustainable resource management, community development, housing, the economy, the environment and transport.
- 1.5.2 In relation to housing delivery in the Neighbourhood Plan area, the Core Strategy suggests that the 52 homes should be delivered in Burwash Parish between 2011 and 2028. It is important to note that while the Plan acknowledges this requirement, it does not propose any housing allocations.
- 1.5.3 The Core Strategy will be accompanied by, when adopted, the Development and Site Allocations Local Plan (DaSA). The DaSA will form Part 2 of the Council's new Local Plan and develops the spatial strategies and core policies set out in the Core Strategy. It reviews existing site allocations and development boundaries and will allocate specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also put forward more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues.
- 1.5.4 Burwash Parish has been inhabited since pre-historic times, with archaeological findings at Willingford Bridge dating to the Stone Age and evidence of iron age inhabitants from the Roman Forge, also located in Burwash Weald. At the time of the Norman Conquest, Burwash was a hill-top settlement with a wooden church which was replaced in 1090 by the stone church of St Bartholomew's.
- 1.5.5 Burwash gained a reputation in the 18th and 19th centuries for smuggling; several smugglers' graves can still be seen in the churchyard of St Bartholomew's. The main route connecting Heathfield and Hawkhurst, then a toll-road and now the A265 was a notorious spot for highwaymen. Today, the Parish retains very many of the characteristics of its rich history. The communities in the three villages, Burwash, Burwash Weald and Burwash Common, continue to enjoy the surrounding protected High Weald Area of Outstanding Natural Beauty (AONB).





**Figure 2: Conservation Area map**

1.5.6 Burwash village High Street makes up most of the Parish Conservation Area. Its Medieval and Georgian homes and frontages – mixing hung tiles finishes, white weatherboarding, wooden sash windows and tall chimneys – have earned Burwash its reputation as one of the most historically significant and prettiest villages in East Sussex and gives it its distinctive character. A total of 137 buildings within Burwash Parish are listed, including 74 located on the High Street alone.



(a) Listed building identification in and around Burwash High Street

LEGEND ▲ Listed building

**Figure 3: Listed Buildings map**



- 1.5.7 Most of the housing in the Parish is set either on the prominent ridgetop or along the several historic routeways which radiate steeply downwards into the Rother and Dudwell valleys on either side of the ridge and continue as meandering rural lanes. The Parish was selected by English Heritage in its 2005 Historic Landscape Characterisation Project as a classic example of the landscape features of the Upper Rother and Dudwell High Weald Area of Outstanding Natural Beauty comprising the spectacular valley landscapes with far-reaching views to the north and south across a series of ridges, floodplains and ancient woodland and with some of the best-preserved medieval field systems to survive unscathed in northern Europe. When considering future developments it is vital that these important historical features are protected and retained.
- 1.5.8 Burwash Common and Burwash Weald are predominantly linear settlements along the A265 road. Many houses sit on individual plots with generous gardens and behind mature hedges and fences. There is an attractive mixture of traditional Georgian and Victorian cottages and farmhouses. Those houses that have mostly been added singly or in small clusters reflecting the historical settlement pattern.
- 1.5.9 There has been a number of post-war 'estate' developments, Highfields, Rother View, Rosemary Gardens, Strand Meadow, Hornbeam and Beechwood Close, The Old Orchard and most recently, Morris Close which was completed in 2018. In addition, four units on the Old Laundry site were completed in 2016, and the rebuild of Rectory Court which is currently underway in the High Street adds another unit of housing to the original number. Some designs have complemented the traditional style of the locality better than others, and some designs have been unsuitable for their AONB setting
- 1.5.10 In regards to the characteristics of the area covered by the BNDP (as set out in Schedule 1(2) of the regulations), it is worth noting particularly that:
- a) the area is wholly within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty;
  - b) The historic core of Burwash is a Conservation Area, sitting astride a principal High Weald ridge;
  - c) Aside from the Conservation Area designation, there is a rich historic legacy in many Listed Buildings, many of which fall within an Archaeological Notification Area.
- 1.5.11 The review of the baseline information above plus the responses to the screening mean the following sustainability aspects would occur relating to the environment without the BNDP:
- 1. As the population ages there will be increased need for ease of access to services and facilities;
  - 2. Warmer, wetter winters predicted will mean there will be increased occurrence of flooding if no action is taken;
  - 3. Potentially drier summers will also mean a greater number of restrictions on water usage and likely continuance of water quality;
  - 4. Without a reduction in the number of vehicles being used in the Parish, there is the potential for more air quality exceedance linked to exacerbation of issues around congestion;
  - 5. Without applying specific localised standards there is a higher risk of heritage assets being detrimentally affected;
  - 6. The extent of important habitats and species will continue to be reduced and their condition to deteriorate; and
  - 7. There could be a gradual erosion of key characteristics that are important to the High Weald AONB.

- 1.5.12 To clarify the process in relation to the 'scoping' stage, RDC has already produced a 'Sustainability Appraisal Scoping Report' that is considered applicable to the SEA process of Neighbourhood Plans produced within the District.
- 1.5.13 Particular reference should be made to the 'Sustainability Appraisal Framework' which contains decision-aiding questions to help inform the SEA process. As the Scoping Report states, this framework *'is also considered relevant and applicable to Neighbourhood Plans produced within the District'*. The scope of information to be included in the environmental report should address the SEA objectives set out below. The level of detail should reflect the geographical extent of the NP as far as practicable, drawing on the Council's own Scoping Report referred to above and baseline information already provided and any available from other sources to meet regulatory requirements.
- 1.5.14 In relation to the SEA process for the Burwash Neighbourhood Plan, it is considered that the following objectives from the Sustainability Appraisal Framework should be screened in for SEA purposes:
- 7: Improve accessibility to services and facilities for all ages across the District
  - 9: Improve efficiency in land use and encourage the prudent use of natural resources
  - 10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
  - 11: Reduce emissions of greenhouse gases
  - 12: Minimise the risk of flooding and resulting detriment to people and property
  - 13: Maintain, improve and manage water resources in a sustainable way
  - 14: Conserve and enhance bio-diversity and geo-diversity
  - 15: Protect and enhance the high quality natural and built environment

### **Issues without the Neighbourhood Plan**

- 1.5.15 Without the BNDP, development will be controlled through the development plan formed of the planning documents produced by the District Council and those of relevance from the County Council or statutory agencies.
- 1.5.16 However, if no actions were included or taken at a local level then the following would most likely continue or exacerbate over the time of the Plan:
- i. Risk of flooding
  - ii. Issues in terms of accessing services and facilities, especially in terms of adequate provision
  - iii. Continued higher car usage and worsening of air pollution
  - iv. Further loss of biodiversity
  - v. Erosion of the special contribution the villages and their setting make to the High Weald AONB

## Constructing the framework

- 1.6.0 The Development Plan for Burwash following the making of the Neighbourhood Plan will be formed of the Rother District Plan and the NDP. In terms of creating the framework, the first point has been to consider what has been set out within the Rother Sustainability Appraisal.
- 1.6.1 The Rother framework contains 16 objectives and for the purpose of this exercise, those of most relevance to the Parish have been selected. Though the descriptions of the decision aiding questions and indicators are the same as the Rother DASA, the range of statistics used is more localised to be more specific to the Parish and geographical area concerned. It is important to note that the DASA may be updated but the general ethos should remain the same.
- 1.6.2 The overall framework that has been used for the assessment is set out over the next pages, showing the questions used and the direction of trend shown by the figures.

**Table 1: Constructing the framework**

Objective	Decision-Adding Question	Indicators
<b>SEA topic: Material Assets, Air, Climatic Factors, Biodiversity, Soil</b>		
Improve efficiency in land use and encourage the prudent use of natural resources	Does the option/policy? <ul style="list-style-type: none"> <li>· Use land in sustainable locations that has been previously developed in preference to greenfield sites</li> <li>· Re-use buildings and materials</li> <li>· Protect and enhance the best and most versatile agricultural land</li> <li>· Maximise potential for providing facilities, i.e. from larger sites</li> <li>· Apply suitable density standards to ensure the best use of developable land in appropriate locations</li> <li>· Have potential to layout site to maximise energy efficiency (e.g. solar gain)</li> <li>· Have availability of utility services on site (water, electricity, sewerage, etc)</li> </ul>	
<b>SEA topic: Material Assets, Air, Climatic Factors, Biodiversity, Human Health</b>		
Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Does the option/policy? <ul style="list-style-type: none"> <li>· Improve travel choice</li> <li>· Reduce the need for travel by car / lorry</li> <li>· Reduce the need to travel for commuting</li> <li>· Have access to public transport (buses, train services) and non-car modes to access services.</li> <li>· Have access to pedestrian &amp; cycle routes for localised leisure opportunities</li> <li>· Have highway capacity.</li> <li>· Avoid impact on and from AQMA.</li> <li>· Improve air quality</li> </ul>	<ul style="list-style-type: none"> <li>· Background levels of air pollutants</li> <li>· Number of AQMAs</li> <li>· Commuting patterns in/out District</li> <li>· Mode of travel to work</li> <li>· Licenced vehicles by vehicle type</li> </ul>

	<ul style="list-style-type: none"> <li>· Not worsen or, where practicable, mitigate traffic congestion</li> <li>· Ensure that development is not at risk from land instability</li> </ul>	
<b>SEA Directive Topics: Population, Material Assets, Air, Climate Factors</b>		
Improve accessibility to services and facilities for all ages across the District	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Have good access to shops, services, educational and medical facilities, pubs, community hall, play areas, sports pitches, places of worship, library, nursery, petrol filling station.</li> <li>· Have scope to facilitate the above via on or off-site provision.</li> <li>· Improve accessibility, particularly in the rural areas of the District</li> <li>· Support delivery of quality public transport</li> <li>· Enhance the PRoW and cycle network</li> <li>· Support the timely delivery of infrastructure needs associated with new development</li> <li>· Encourage the provision of services and facilities in accessible locations</li> <li>· Help support the continued viability of services, particularly in rural areas</li> </ul>	<ul style="list-style-type: none"> <li>· Distance to key services</li> <li>· % households within 30 minutes public transport of: <ul style="list-style-type: none"> <li>- GP</li> <li>- Hospital</li> <li>- Primary &amp; secondary school</li> <li>- Employment</li> <li>- Major retail centre</li> </ul> </li> <li>· % completed retail, office &amp; leisure development in centres</li> </ul>
<b>SEA Directive Topics: Landscape, Cultural Heritage, Soils</b>		
Protect and enhance the high quality natural and built environment	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Ensure protection and enhancement of the AONB and respect the key features and characteristics of the High Weald AONB and its setting</li> <li>· Protect, enhance and avoid negative impacts upon sites &amp; features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled ancient monuments, registered battlefields, archeologically sensitive areas (ASAs))</li> <li>· Minimise adverse visual impact on landscape setting of towns and rural settlements</li> <li>· Respect the historical settlement context.</li> <li>· Promote development in character with the area</li> <li>· Seek to ensure that development is in keeping with the landscape character, including National and Local Landscape Character Areas.</li> <li>· Avoid negative impacts on coastal and marine environment including seascapes, protected marine areas and undeveloped coast.</li> </ul>	<ul style="list-style-type: none"> <li>· Number of Conservation Areas</li> <li>· Number of Listed Buildings</li> <li>· Listed Buildings of Grade I and II* at risk</li> <li>· % of Listed Buildings at risk</li> <li>· % of Conservation Areas at risk</li> <li>· Landscape character assessment</li> <li>- % of businesses within the High Weald that are land-based (in comparison to the wider south-east).</li> </ul>

	<ul style="list-style-type: none"> <li>· Protect of gaps and avoid the coalescence of settlements.</li> <li>· Promote development that is in scale and proportionate to host settlement</li> <li>· Ensure building design, arrangement and materials used complement and add to character of area.</li> <li>· Promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment.</li> <li>· Ensure that development is not at risk from land instability</li> </ul>	
<b>SEA Directive topics: Biodiversity, Flora, Fauna</b>		
Conserve and enhance biodiversity and geodiversity	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Protect and enhance locally valued habitats and species</li> <li>· Prevent and, where appropriate, reverse habitat fragmentation</li> <li>· Provide opportunities for provision &amp; enhancement of green space / green infrastructure.</li> <li>· Establish or maintain a network of areas that maintain both the distribution and abundance of threatened species and habitats</li> <li>· Provide green space / green infrastructure which has added value via reducing pressure on international sites.</li> <li>· Avoid harm to Ancient Woodland.</li> <li>· Avoid harm to BAP Habitats.</li> <li>· Avoid harm to Rare &amp; Protected species and their habitats.</li> <li>· Have scope to mitigate and enhance habitats.</li> <li>· Acknowledge and protect important trees, particularly mature specimens.</li> <li>· Acknowledge the actions identified for the Rother, Brede and Tillingham Woods BOA and scope to develop opportunities.</li> <li>· Avoid net loss of biodiversity</li> <li>· Avoid any areas at risk from instability or necessary for mineral supplies</li> <li>· Ensure the location and design of sites does not cause the further fragmentation of habitats and protects and enhances network routes for flora and fauna movement</li> <li>· Support landscaping that enhances native biodiversity</li> <li>· Have a positive nature conservation plan.</li> </ul>	<ul style="list-style-type: none"> <li>· Number &amp; area designated sites</li> <li>· Condition of designated sites</li> <li>· Number and area of Local Sites</li> <li>· Area of ancient semi-natural Woodland.</li> <li>· No further losses of ancient woodland</li> <li>· Area of Biodiversity Action Plan habitat – gains or losses over time</li> <li>· Loss of hedgerows</li> <li>- Number of Tree Preservation Orders (TPOs) in place</li> </ul>



<b>SEA Directive Topics: Climatic Factors, Material Assets, Water, Human Health</b>		
Minimise the risk of flooding and resulting detriment to people and property	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Reduce the number of properties at risk of flooding in the Parish</li> <li>· Avoid locations within flood zones, including EA Flood zones, EA defined areas of surface water risk and Local Surface Water Management Plans/SFRA identified issues of localised flooding.</li> <li>· Ensure that appropriate flood risk protection measures are in place to protect well-being.</li> <li>· Avoid exacerbating flood risk off-site by increasing run-off</li> <li>· Provide scope for, and promotion /adoption of SuDS.</li> </ul>	<ul style="list-style-type: none"> <li>· Properties at risk from flooding</li> <li>· Planning permissions granted contrary to EA advice on flood defence grounds</li> <li>Number of applications approved within area of surface water flooding</li> </ul>
<b>SEA Directive Topics: Water, Human Health, Material Assets, Climatic Factors</b>		
Maintain, improve and manage water resources in a sustainable way	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Protect &amp; improve water quality (groundwater and surface water)</li> <li>· Require the use of water efficiency measures</li> <li>· Minimise the risk of pollution to water sources</li> <li>· Avoid locations within groundwater source protection zones/aquifer.</li> <li>· Ensure new development has sufficient sewerage and waste water treatment capacity to avoid harm to water quality</li> <li>· Implement SuDS where appropriate to avoid run-off of polluted water to water courses or aquifers</li> <li>· Ensure any SuDS includes scope to enhance and enrich habitats and amenity value</li> </ul>	<ul style="list-style-type: none"> <li>· Water consumption per household</li> <li>· Quality of river water</li> <li>· Rivers of High or Good chemical and biological water quality (passing Water Framework Directive criteria).</li> </ul>
<b>SEA Directive Topics: Climatic Factors, Material Assets</b>		
Reduce emissions of Greenhouse gases	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Reduce emissions through reduced travel, energy consumption</li> <li>· Promote renewable energy generation</li> <li>· Promote community involvement, understanding &amp; action on climate change</li> <li>· Help reduce greenhouse gas emissions through reducing car travel.</li> <li>· Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to provide alternatives to car travel</li> <li>· Promote reduced energy use in new development (waste management and reduce energy demand from non-renewable resources).</li> </ul>	<ul style="list-style-type: none"> <li>· Emissions of greenhouse gases</li> <li>· Consumption of gas and electricity</li> <li>Number of applications and discharge of conditions granted for renewable energy</li> </ul>

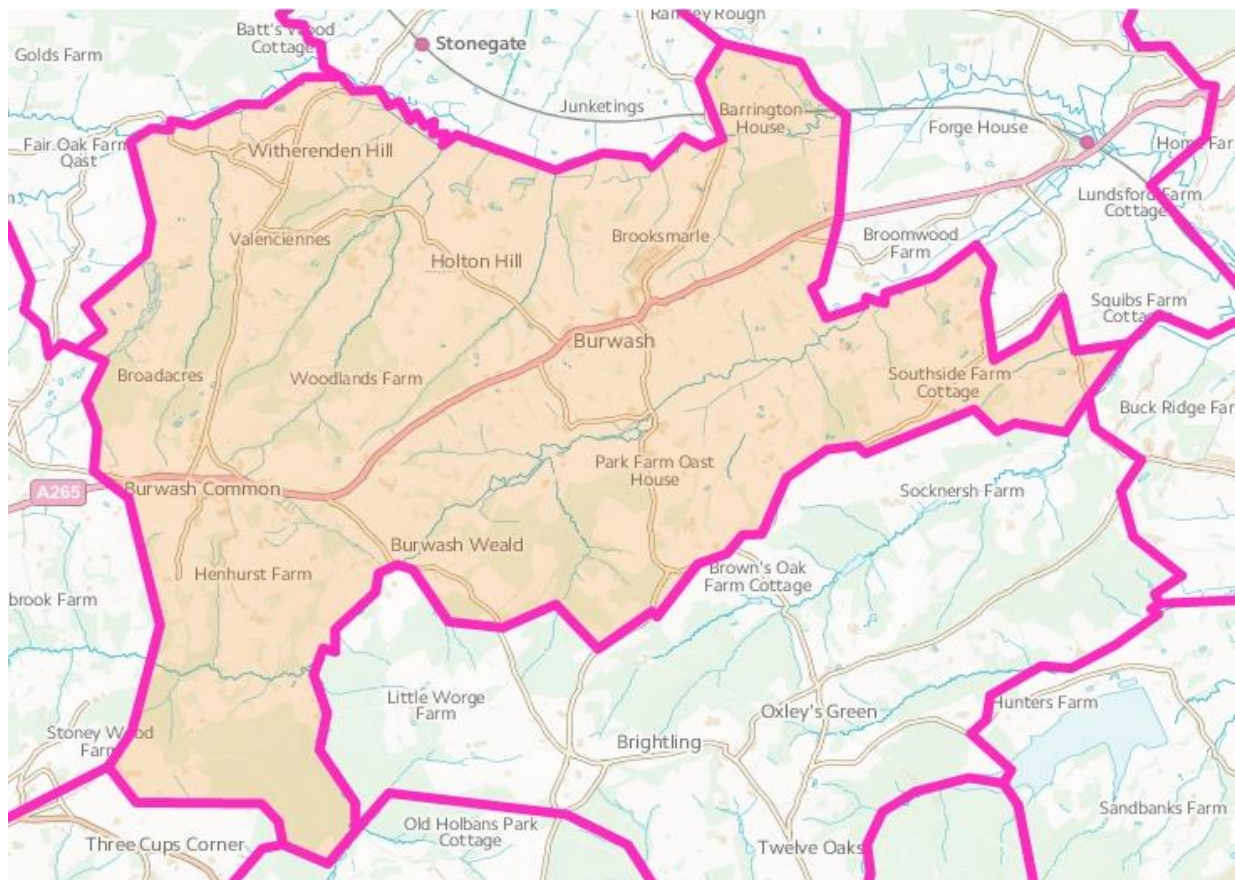
	<ul style="list-style-type: none"> <li>· Have potential for energy generation from renewable resources, including micro-generation as part of the energy requirements of new development</li> <li>· Have potential to maximise passive solar gain</li> <li>· Net Loss / Gain of Trees</li> </ul>	
Above factors may interact in a combined way and may increase cumulative effects either positively or negatively.		
Potential to mitigate negative effects and enhance positive effects		
Actions or change that could reduce or remove effect		
Derived from combination of above		

## SECTION 2

### Assessing the objectives of the BNDP

2.1.0 The area for which the plan will relate was designated by Rother District under resolution in June 2016. This is shown in the figure below and so the geographical scope applicable for the assessment.

**Figure 4:** Designated neighbourhood area map



- 2.1.1 The BNDP is intended to cover the period 2019-2028 and sets out the following vision that is supported by objectives.

***‘Our vision is for Burwash Parish to be a friendly, welcoming community of three villages.***

***We will enhance and protect our rich area of outstanding natural beauty and heritage whilst being sympathetic to appropriate development which meets the needs of our community.***

***To promote and support our existing and new businesses and encourage tourism, we will seek the appropriate infrastructure to ensure a sustainable future for Burwash.’***

#### **Environment**

- 2.1.2 The Environment group looked at the historic environment of Burwash Parish by researching the Parish landscape has remained unscathed for many hundreds of years. This is reflected in its current natural and built environment and historic settlements. The environment group looked at its general history, archaeology and landmarks. They also studied the natural landscape, environment and biodiversity. The following objectives reflect the importance of protecting, preserving and where possible enhancing the special features of the natural and historic environment of the Parish.

1. To conserve and protect our distinctive landscape with natural features such as hedges, ditches, verges, trees, wildflower meadows and ancient ghyll woodlands, including the two nationally important Sites of Special Scientific Interest (SSSI) at Willingford Wildflower Meadow and Dallington Forest.
2. To conserve and protect the Parish setting including views into and out of the historic built and landscape setting of the AONB.
3. To conserve and enhance the ecosystem and biodiversity of the Parish.
4. To improve the safety and quality of footpaths and bridleways and increase access around the Parish through this ‘green’ network.
5. To protect and enhance the open and community green spaces such as Swan Meadow, Burwash Common Playing Fields, Down Meadow and Hornbeam.
6. To support and encourage land stewardship schemes which protect nature, landscapes and the environment.
7. To protect the dark skies by minimising light pollution.
8. To protect and conserve the environment and minimise air pollution.
9. To ensure that designated heritage assets in the parish and their settings are preserved and enhanced for their historic significance and their importance to local distinctiveness, character and sense of place.
10. To ensure that landscaping associated with any new development fits within the local natural setting.

### **Infrastructure, including Leisure, Economy & Tourism**

2.1.3 The Infrastructure, Leisure, Tourism and Economy sub group carried out significant research into all the aspects of infrastructure within the Burwash parish. Out of this research was generated an Infrastructure Assessment report document, in addition to a Traffic Survey and Business Survey. These documents can be found in the Appendices to this draft Plan. The Infrastructure Assessment highlights potential areas of infrastructure improvement, strengthening and future proofing which are recorded in a list of potential development projects. The following objectives set out the important priorities.

1. To promote appropriate speed limits to ensure that local roads are safe for pedestrians and residents who live close to the road, and to facilitate free-flowing vehicle movement.
2. To maintain and seek to improve the bus services through the villages.
3. To preserve the footways and pavements, and ensure they are suitable and safe for pedestrians. Where possible these areas should assist those with mobility issues.
4. To encourage more sustainable means of travel, including cycling and walking.
5. To provide appropriate car parking space to meet the needs of residents, support the viability of local shops and businesses, and to promote tourism.
6. To ensure that all financial contributions received by the Parish Council from new developments are used on projects and initiatives that meet the identified needs of the community.
7. To promote and encourage small scale and appropriate tourism through active marketing initiatives.
8. To help sustain the local economy and to help local business networking, including the development of a local business directory, in order to sustain the local economy.
9. To identify opportunities for new business development and premises to provide further employment within the Parish whilst safeguarding existing employment for the community.
10. To seek improvements in the communications infrastructure, including the provision of superfast broadband, whilst ensuring that the siting and appearance of any required equipment has minimal impact on the visual amenity, character and appearance of the local area.
11. To encourage the provision of a range of appropriate activities which promote the Parish as a destination for visitors. These activities include events, specific walking trails, footpaths and bridleways. To produce promotional material to advertise tourist attractions in local, regional and national forums.

### **Housing**

2.1.4 The Housing sub-group carried out research across all aspects of housing need and supply involving a housing needs survey, character appraisal, re-evaluation of land assessments and led the Call for Sites process. These documents are included within the appendices.

1. To plan for and support the delivery of suitable new housing which meets the current and future needs of the local community.
2. To ensure that new housing development is designed and built to a high quality, respecting the existing character of the three villages in the Parish.
3. To provide an appropriate mix of housing to meet local needs for sale and rent including level access accommodation for the elderly or disabled and housing which is affordable to local households.
4. To maintain and enhance the wooded and rural character of the villages by encouraging the integration of soft landscaping in new developments and, where appropriate, screening from the AONB.
5. To protect and enhance listed buildings and other heritage assets.
6. To conserve and enhance the historic environment in relation to buildings, landscapes, and places that enhance our heritage settings.



### 2.1.5 Consultation and Communication

1. To prioritise and support open communication and consultation between residents, local businesses and organisations, the Parish, District and County Councils.
2. To build on the consultation and community communication processes adopted for the NDP and to ensure these are enshrined in future plans of the Parish Council.

2.1.6 Table 2 demonstrates that there is predominately a positive relationship between the objectives and no negative correlations, which confirms that the Plan has been positively prepared and addresses the matters scoped, into the assessment.

2.1.7 In assessing the impacts of the objectives of the plan, the following symbols will be used in Table 2

- + Positive impact
- Negative impact
- = No/negligible impact
- ? Uncertain impact

**Table 2: BNDP Objectives against assessment framework**

Objective (see preceding page for full NDP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
<b>Environment</b>								
1.To conserve and protect our distinctive landscape with natural features	+	+	+	+	+	+	+	=
2. To conserve and protect the setting and views into an out of the AONB historic built and landscape setting	+	+	+	+	=	?	+	+
3.To conserve and enhance the ecosystem and biodiversity	+	+	+	+	+	+	+	+
4.To improve the safety and quality of footpaths and bridleways	+	+	+	+	=	?	=	=
5. To protect and enhance our open and community green spaces	+	+	+	+	=	?	=	=
6.To support and encourage land stewardship schemes to protect the environment	+	+	+	+	+	+	+	+
7.To protect our dark skies by minimising light pollution	+	+	+	+	+	+	+	+
8.To protect and conserve the environment to minimise air pollution	+	+	+	+	+	+	+	+
9.To ensure that designated historic heritage assets and settings are preserved and enhanced	+	+	+	+	+	=	+	+
10.To ensure that any landscaping fits within the existing natural environment	+	+	=	=	+	+	+	+

Objective (see preceding page for full NDP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
<b>Infrastructure, including Leisure, Economy &amp; Tourism</b>								
1. To promote appropriate speed limits to ensure that our roads are suitable and safe and facilitate free-flowing vehicle movement	+	+	=	=	+	+	+	+
2.To maintain and seek to improve the bus services through the villages	+	+	+	+	+	?	+	+
3.To preserve the footways and pavements, and ensure they are suitable and safe for pedestrians	+	+	+	+	?	?	+	+
4.To encourage more sustainable means of travel, including cycling and walking	+	+	+	+	+	?	+	+
5.To provide appropriate car parking space and support viability of shops and promote tourism	+	+	+	+	+	+	+	+
6.To ensure that all financial contributions are used on projects and initiatives that meet the identified needs	+	+	=	=	+	+	+	+
7.To promote and encourage small scale and appropriate tourism	+	+	=	=	+	+	+	+
8.To help sustain the local economy and to help local business networking, including the	+	+	=	=	+	+	+	+
9.To identify opportunities for business development and premises to provide employment	+	+	=	=	+	?	+	+
10.To seek continuous improvements in the provision of free Wi-Fi and communications infrastructure	+	+	=	=	+	?	+	+
11.To encourage the provision of a wide range of appropriate activities which promote Burwash as a destination	+	+	=	=	+	?	+	+
<b>Housing</b>								
1.To plan for and support the delivery of suitable new housing for current and future needs	+	+	=	=	+	+	+	+
2.To ensure that new housing and development is designed and built to a high quality	+	+	=	=	+	+	+	+
3.To provide an appropriate mix of housing including level access accommodation for the elderly or disabled and affordable housing	+	+	?	?	+	+	+	+
4.To maintain and enhance the wooded and rural character of the villages	+	+	+	+	+	+	+	+
5.To protect and enhance listed buildings and other heritage assets.	+	+	+	+	+	+	+	+
6.To conserve and enhance the historic environment in relation to buildings, landscapes, and places of local cultural value.	+	+	+	+	+	+	+	+

Objective (see preceding page for full NDP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
<b>Consultation and Communication</b>								
1. To prioritise and support open communication and consultation between residents, local businesses and organisations, the Parish, District and County Councils	+	+	+	+	+	+	+	+
2. To build on the consultation and community communication processes adopted for the NDP and to ensure these are enshrined in future plans of the Parish Council	+	+	+	+	+	+	+	+

## SECTION 3

### Assessment of the BNDP policies

3.1.0 In assessing the impacts of the plan and its policies, the following symbols will be used

- + Positive impact
- Negative impact
- = No/negligible impact
- ? Uncertain impact

**Table 3: Assessment of the BNDP policies**

Objective (see preceding page for full NDP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
<b>General Policies</b>								
GP01 Development within the Area of Outstanding Natural Beauty (AONB)	+	+	+	+	+	+	+	+
GP02 Views to and from the AONB	+	+	=	=	+	+	+	+
GP03 Development boundaries	+	+	?	?	+	?	+	+
GP04 Heritage	+	+	+	+	+	+	+	+
GP05 Design Standards	+	+	+	+	+	+	+	+
GP06 Existing Open Spaces	+	?	+	+	+	+	+	+
GP07 New Open Spaces	+	?	+	+	+	+	+	+
GP08 Sustainable development	+	+	+	+	+	+	+	+
GP09 Resident consultation	+	=	+	+	+	+	+	=
<b>Housing</b>								
HO01 Housing tenure and mix	+	+	?	?	?	=	=	+
HO02 Local connections	+	+	?	?	?	=	=	+
HO03 Rural Exception sites	+	+	?	?	?	=	=	+
<b>Environment</b>								
EN01 Natural Environment Protection	+	+	+	+	+	+	+	+
EN02 Landscape Protection	+	+	+	+	+	+	+	+
EN03 Green Infrastructure: Footpaths and bridleways	+	+	+	+	+	+	+	+
EN04 Land management	+	?	+	+	?	+	+	+
EN05 Dark Skies	=	=	?	?	=	+	+	+
EN06 Air Pollution	+	+	+	+	+	=	+	+
EN07 Historic landscape environment	+	+	+	+	+	=	+	+
EN08 Integration of landscaping	+	+	+	+	+	+	+	+

Objective (see preceding page for full NDP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
<b>Infrastructure: Leisure, Economy &amp; Tourism</b>								
<b>IN01</b> Parking	+	+	?	?	+	+	+	+
<b>IN02</b> Pedestrian safety	+	+	+	+	+	+	+	+
<b>IN03</b> Supporting Businesses	+	+	?	?	+	+	+	+
<b>IN04</b> Retention of existing business premises	+	+	+	+	=	+	+	+
<b>IN05</b> Integrated Transport	+	+	+	+	+	=	+	+
<b>IN06</b> Provision of Telecommunications	+	+	+	+	+	=	+	+

3.1.1 The effects of the plan and its policies were assessed in respect of the topics identified in the screening, with the reasonable alternative of having no policy in place. 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. There are circumstances where it is uncertain of the effects but due to the balance of mainly positive effects, the cumulative is likely to be positive.



## Summary of the likely effects of the preferred plan

**Table 4: Summary table of the effects of the plan**

SEA Topic	Effects over time	Can the effect be measured?	Comment
7. Improve accessibility to services and facilities for all ages across the District	Positive	Yes- Census AMR CIL monitoring	The Plan provides opportunities for accessibility as far as constraints will allow
9: Improve efficiency in land use and encourage the prudent use of natural resources	Neutral	AMR	The Plan promotes efficient use of land as far as constraints will allow
10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Minor positive	Yes-Census data Travel Plan monitoring Air quality data CIL Data	The Plan provides opportunities to reduce reliance on car and promote other travel options
11: Reduce emissions of greenhouse gases	Minor positive	RDC data	Landscape, design and access policies support reduction in carbon emission
12: Minimise the risk of flooding and resulting detriment to people and	Positive	Flood events and surface water flooding Planning application and SUDS provision	The use of SUDS and design to reduce consumption will help meet this objectives
13: Maintain, improve and manage water resources in a sustainable way	Minor Positive	SUDS provision and environmental agency data Water consumption data	The use of SUDS and design to reduce consumption will help meet this objectives
14: Conserve and enhance bio-diversity and geo-diversity	Positive	Natural England	The ecology led nature of the plan will protect existing habitat and seek to deliver positive gains in all parts of development.
15: Protect and enhance the high quality natural and built environment	Positive	Landscape assessments	The policies will protect landscape value of parish and ensure development protects the identified character of the Parish

## SECTION 4

### Conclusion

- 4.1.0 The Burwash Neighbourhood Development Plan was initially exploring the allocation of 52 units as allocated by Rother District Council Core Strategy 2014 and as such, it was determined by RDC that an SEA would be required. As the Plan has developed, it supports this requirement but does not seek to allocate the sites for residential development. It will however through its location in the AONB, nature and subject still have an impact on the environment and this is assessed through the SEA.
- 4.1.1 It is not the purpose of the SEA to decide the alternative to be chosen for the Plan or programme. This is the role of the decision-maker who needs to make choices on the Plan or programme to be adopted. The SEA provides information on the relative environmental performance of alternatives, which makes the decision-making process more transparent.
- 4.1.2 The combined effect of the policies in the Plan will mainly relate to the wider landscape and heritage, and will result in efficient use of land and natural resources.
- 4.1.3 The Infrastructure: Leisure, Economy & Tourism policies of the Plan will have the greatest effect on heritage assets and the High Weald AONB. They will provide additional protection to assets/businesses that have been identified as important to the community and the existing villages. In the majority of instances, direct impacts are not expected but there will be indirect impacts, although this does not lessen the effect. The greatest impacts tend to be largely focused on accessibility and actions that may cause a difference in forms of travel. However, the benefits to the community on retaining existing business outweigh this impact on a sustainability value. The combined impact of the infrastructure policies will have a positive effect on provision of services, increasing accessibility and other specific parts of the environment.
- 4.1.4 Although the overall impacts on the environment are largely positive, there will be no worsening of existing issues connected with the environment and for a significant number will result in positive impacts to the environment from the adoption and implementation of all the policies contained within the plan.
- 4.1.5 Without the BNDP, there would be no specific control over the impacts therefore the Plan has a positive impact generally. The contents of the BNDP ensures that those aspects of specific relevance to the villages are recognised and addressed as well as helping to contain impacts to a smaller spatial area.
- 4.1.6 SEA guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the plan. Where practical this report identifies the likely impacts each policy has on achieving the framework set out. It therefore concludes that the policies of the BNDP will have a positive impact on the environment.

### **Next stage**

- 4.1.7 The SEA will be updated following the Pre-submission consultation to reflect any changes which may be necessary to address comments made at this consultation stage.
- 4.1.8 The final stage will be the post adoption statement that will be issued when the Plan is made. This will summarise the process and how impacts to the environment have been taken into account and will be produced by Rother District Council.
- 4.1.9 The plan will be monitored by the Parish and the District having regard to the SEA indicators set out in the District council's Annual Monitoring Plan (AMR).

## Glossary

<b><i>AMR</i></b>	Annual Monitoring Review
<b><i>Biodiversity</i></b>	The living component of the natural world, encompassing all plant & animal species.
<b><i>Biomass</i></b>	Biological material from living, or recently living organisms, useful as an environmentally friendly fuel
<b><i>Community Right to Build Order</i></b>	Gives local people the power to deliver the development that their local community wants
<b><i>Designated heritage asset</i></b>	A valued component of the historic environment
<b><i>Environmental Impact Assessment</i></b>	As assessment of the possible positive or negative impacts that a proposed project might have on the environment, also includes social and economic considerations.
<b><i>Flood zone</i></b>	Flood zones divide the floodplain into 3 areas which represent different levels of flood risk. Flood zone 1 is the lowest risk; flood zone 3 is the highest risk. See the Environment Agency website for more details.
<b><i>Habitat</i></b>	Place in which species or a community of species live, with characteristic plants and animals
<b><i>Historic Environment</i></b>	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, landscape & flora.
<b><i>Historic Environment Record</i></b>	Provides access to resources relating to the historic environment for public benefit and use. Available through your local authority or from the Heritage Gateway website.
<b><i>Habitats Regulation Assessment</i></b>	An assessment of the likely significant effects of a plan or project on a European wildlife site. Part of EU law.
<b><i>Local Green Space Designation</i></b>	Protects green spaces of particular importance to local communities
<b><i>Local Nature Reserve</i></b>	Places with wildlife or geological features that are of special interest to a local area
<b><i>Local Plan</i></b>	Development plan for the area, setting out strategic development policies and allocating sites for development, prepared by the local authority
<b><i>Local Wildlife Site</i></b>	An area of special importance to local nature conservation

<b><i>Neighbourhood Development Plan</i></b>	A document outlining general development policies and allocating sites for the development of land in a neighbourhood.
<b><i>Neighbourhood Development Order</i></b>	Gives planning permission for specific developments or types of development the community wants to see in the neighbourhood
<b><i>Registered Park and Garden</i></b>	Site designated to be of national importance whose preservation much be considered when determining planning applications for development on or affecting the site.
<b><i>Scheduled Monument</i></b>	Scheduled on a list of nationally important archeological sites & monuments. English Heritage takes the lead in identifying sites in England which should be placed on the schedule by the Secretary of State for Culture, Media and Sport There are nearly 20,000 scheduled sites with legal protection under this process.
<b><i>Strategic Environmental Assessment</i></b>	A system of incorporating environmental considerations into policies, plans & strategies. Part of EU law.
<b><i>Sustainable Drainage Systems</i></b>	A system designed to drain surface water in a more sustainable fashion, helps to improve water quality, enhance the environment, and reduce flood risk.
<b><i>World Heritage Site</i></b>	Area designated as important to heritage under relevant national legislation. The list of Heritage sites for England can be found on the English Heritage Website

## Abbreviations

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ASA	Archaeologically Sensitive Area
BOA	Biodiversity Opportunity Area
DASA	Development and Site Allocations
EA	Environment Agency
HRA	Habitat Regulations Assessment
PROW	Public Right of Way
RDC	Rother District Council
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SUDs	Sustainable Drainage Systems
TPOs	Tree Preservation Order(s)



## Appendix 1: Screening determination

Your ref: [ ]  
Our ref: 6.3a BuNP  
Please ask David Marlow  
for:  
Direct dial no: 01424 787835  
Date: 19th October 2018



Donna Moles Consultancy  
[moles.consultancy@gmail.com](mailto:moles.consultancy@gmail.com)  
By email

Dr Anthony Leonard  
Executive Director  
Town Hall  
Bexhill-on-Sea  
East Sussex TN39 3JX

Dear Donna,

### SEA Screening for the Burwash Neighbourhood Plan

Further to your request for an SEA screening opinion I have now received the comments of the Statutory Environmental Bodies (SEB's) which are as stated below :

#### Natural England

*Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.*

#### **Screening Request: Strategic Environmental Assessment**

*From the documents submitted our advisor was under the impression that the developments within the Burwash neighbourhood plan had already been assessed as part of the overarching Rother development and site allocations (DaSA).*

*If this is not the case then because the allocations are within the High Weald AONB then an SEA would be required if the allocations could lead to significant environmental effects.*

#### **Neighbourhood Plan**

*Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:*

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

*We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.*

*We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan.*

Page 1 of 2



*It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected. Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.*

*Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.*

### Historic England

*Thank you for the screening consultation for Burwash. I note that Donna has indicated three sites that are being considered for delivering the 52 residential units that the plan aims to deliver. Is there a map available showing where these sites are, or any other sites that have been considered but rejected? It isn't clear from her descriptions whether any of these contain, are near to, or could potentially affect the settings of any heritage assets (designated or otherwise). The environmental report they have done is an impressive document. One of the first I have seen that includes review of the Historic Environment Record without prompting.*

### Environment Agency

*Thank you for sending over the documents for the draft Burwash NP. Whilst we do not routinely comment at the screening stage, I have had a look at the documents and constraints we consider the following matters would need to be considered. Flood risk, Water Framework Directive (surface and groundwater quality, water quality), Fisheries and Biodiversity and Contaminated land issues (looking at the potential risk to groundwater).*

*We would welcome an opportunity to comment on the scoping stage.*

### **Conclusion**

In the opinion of the Local Planning Authority, an SEA should be undertaken for the Burwash Neighbourhood Plan (BuNP). I have set out the reasoning below in relation to the criteria for determining the likely significance of effects, as contained in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

1. The BuNP 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. As regards the characteristics of the area covered by the BuNP (as set out in Schedule 1(2) of the regulations), I note particularly that:
  - a) the area is wholly within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty;
  - b) The historic core of Burwash is a Conservation Area, sitting astride a principal High Weald ridge;



- c) Aside from the Conservation Area designation, there is a rich historic legacy in many Listed Buildings, many of which fall within an Archaeological Notification Area.

Also, to clarify the process in relation to the 'scoping' stage, RDC has already produced a 'Sustainability Appraisal Scoping Report' that is considered applicable to the SEA process of Neighbourhood Plans produced within the District. It can be found on our web-site here: <http://www.rother.gov.uk/index.cfm?articleid=5008>

Particular reference should be made to the 'Sustainability Appraisal Framework' (Task A4) which contains decision-aiding questions to help inform the SEA process. As the Scoping Report states, this framework *'is also considered relevant and applicable to Neighbourhood Plans produced within the District'*. The scope of information to be included in the environmental report should address the SEA objectives set out below. The level of detail should reflect the geographical extent of the NP as far as practicable, drawing on the Council's own Scoping Report referred to above and baseline information already provided and any available from other sources to meet regulatory requirements.

In relation to the SEA process for the Burwash Neighbourhood Plan, it is considered that the following objectives from the Sustainability Appraisal Framework should be screened in for SEA purposes:

- 7: Improve accessibility to services and facilities for all ages across the District
- 9: Improve efficiency in land use and encourage the prudent use of natural resources
- 10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
- 11: Reduce emissions of greenhouse gases
- 12: Minimise the risk of flooding and resulting detriment to people and property
- 13: Maintain, improve and manage water resources in a sustainable way
- 14: Conserve and enhance bio-diversity and geo-diversity
- 15: Protect and enhance the high quality natural and built environment

In addition, whilst these objectives are likely to be most relevant to this particular Neighbourhood Plan in terms of potential significant environmental effects, you may wish to also consider the other SA/SEA objectives in the Framework for the purposes of assessing the overall sustainability of proposed policies.

If there are any queries we would be happy to advise further and please accept our apologies in the delay in getting this response to you.

Yours sincerely,



David Marlow  
Planning Policy Manager |



## Appendix 2: Relevant Plans & Programmes

Title	Date
<b>International</b>	
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 COM (2002) 581 final: Proposal for a Directive concerning the quality of bathing water	2002
EU Water Framework Directive (2000/60/EC)	2000
EU Air Quality Directive - Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	2008
<b>National</b>	
National 'Planning Practice Guidance' (PPG)	2018
National Planning Policy Framework	2018
Department of Health 'White Paper - Healthy Lives, Healthy People'	2010
The Conservation of Habitats and Species Regulations 2010 (Chapter 8 covers Land Use Plans)	2010
Town and Country Planning Act 1990	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
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
DfT 'Delivering a Sustainable Transport System'	2008
Wildlife and Countryside Act 1981 (as amended)	1981
Biodiversity: UK Action Plan	
DEFRA Securing the future: delivering UK sustainable development strategy	2005
UK Climate Change Programme	2006
Countryside and Rights of Way Act (CROW)	2000
Making space for water Taking forward a new Government strategy for flood and coastal erosion risk management in England	2005
Safeguarding our soils: A Strategy for England Defra	2009
The Flood and Water Management Act 2010 HMSO	2010

Department for Transport Guidance on Accessibility Planning in Local Transport Plans	2004
Department for Transport Delivering a Sustainable Transport System	2008
Department for Transport Active Travel Strategy	2010
DEFRA Noise Policy Statement for England	2010
Energy Act	2008
DECC UK Renewable Energy Strategy	2009
CLG & DfT 'Manual for Streets 1 & 2'	2007
Environmental Protection Act	1990
Ministry of State for Environment and Agri-Environment 'Nottingham Declaration on Climate Change'	2000
Conservation (Natural Habitats &c) Regulations	2010
Natural Environment and Rural Communities Act	2006
DEFRA Natural Environment White Paper Defra	2011
Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Working Together for Clean Air	2011
CLG 'Code for Sustainable Homes': Setting the Sustainability Standards for New Homes and accompanying Technical Guidance - November 2010	2008 & 2010
<b>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
Southern Water 'Water Resource Management Plan 2015-2040'	2014
South East Water 'Water Resource Management Plan 2015-2040'	2014
South East River Basin Management Plan and Actions	
NHS East Sussex Downs & Weald 'Investing in Life'	2009
East Sussex Downs & Weald PCT, Hastings & Rother PCT 'Reducing Health Inequalities in East Sussex'	2010
Sussex Biodiversity Opportunity Areas	2009
Environment Agency Catchment Flood Management Plan: Rother and Romney	2013
ESCC 'Strategic Open Space Study'	2011
East Sussex 'Green Infrastructure Study'	2014
East Sussex Environment Strategy Group 'East Sussex Environment Strategy'	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
East Sussex Landscape Character Assessment	2010
<b>Local/District</b>	
Rother District Core Strategy	2011
Rother District Core Strategy 'Equalities Impact Assessment'	2011
Neighbouring Neighbourhood Plans	
Rother Community Plan	2014
Rother Economic Regeneration Strategy	
Rother Cultural and Leisure Strategy	
Rother District Council Housing Strategy	