

Crowhurst Neighbourhood Plan Monitoring and Review Group responses to examiner questions (dated 28th Jan 2025)

1. Please confirm the timetable for the new Local Plan has not changed from that set out in the Local Development Scheme (adoption 2026 - 2027), and also the projected date of the Reg19 consultation on it.

This should be answered by Rother as LPA

2. Policy CE3 Biodiversity in the CNDP Review requires a Biodiversity Net Gain (BNG) of at least 20%. This is double what the NPPF is requiring, and I cannot see evidence supporting this local increased requirement. As I understand the LPA policy situation, there is reference in the Climate Strategy to an aim of 20% BNG, but the strategy states it will happen only in the new Local Plan is allowed to make this policy. So far I cannot see a reference to this specific increased requirement in the emerging new Local Plan. Can you please explain the background to this 20% requirement, and the evidence and policy you see as supporting it.

a) We have based this on proposed policy GTC8 in the draft Local Plan:

" All qualifying development proposals must deliver at least a 20% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Defra's Statutory Biodiversity Metric..." https://rdcpublic.blob.core.windows.net/website-uploads/2024/04/New-Local-Plan_Reg-18_version_Final.pdf

Part of the explanatory text also states (3.47) "The health of our society and economy is directly linked to the health of the natural environment. Therefore, the severe indicative decline in biodiversity over recent decades demands a strong and effective response."

b) The environment is considered to be very important in Crowhurst. There is a very strong Environmental Group (set up after the original NP showed how important the Environment was to residents) who are enhancing biodiversity and helping to mitigate the effects of the Climate and Ecological Emergency that was declared by the Parish Council in 2019. Amongst other things, this has involved planting new community orchards, hedges and trees and maintaining wildlife verges and meadow. It seems reasonable that new development should tie into this work and also increase biodiversity by a meaningful amount of which 20% is really a minimum.

c) There are red listed and protected species in the Parish (Biodiversity Audit – this is generally updated annually [Crowhurst Biodiversity](#)). It is vitally important that these are supported and a higher BNG will help with this – particularly with wildlife corridors.

d) Improved biodiversity also assists with other actions supported by the NP such as improved health and wellbeing of residents and improved regulation of the air, water, soil and climate. It should also assist in reducing the decline of wildlife.

e) Because of constraints around public transport in the Parish (limited to the train once or twice per hour and relatively expensive if going to locally and the on-demand Flexibus), new housing will bring more cars. Therefore extra BNG needed to offset this.

f) While there is also the Parish Council led Warmer Crowhurst group looking at ways to reduce carbon footprint and improve heating and energy efficiency in the Parish, the housing stock (old with

majority of EPCs at D or worse) and heating types (Crowhurst is off-gas so most heating is either oil or night storage electric) are such that it will take a while to improve this. Higher BNG will again help offset the emissions caused by this.

3. Policy CE5 Blue Infrastructure criteria 1 is not clear to me at present. Does it refer to the sensitive flood zones 2 and 3 only? The requirement to monitor pollution does not state what should happen if pollution is found to occur, and appears to me to be straying into a monitoring role that is the remit of other authorities and not a land-use issue. Comments welcome, and you may wish to consider the reference to 'pollution' in criteria 7 of Policy CB1. At present it is too vague to be useful, and it is understood that County Council guidance needs to be complied with.

Criteria about development within flood zones is for zones 2 and 3.

Criteria about development near watercourses apply to anywhere in the Parish. The primary idea about monitoring pollution is that many developments strip vegetation allowing soil to be washed into streams which adversely affects the biodiversity in them. This needs to be avoided. If a developer caused pollution, they would be expected to resolve it. The environment group is currently setting up a monitoring regime as part of the South East Rivers Trust project. This will cover watercourses into and out of the Parish and will also look at potential agricultural run-off. The relevant authorities will be notified of any pollution found.

Adjacent areas (Battle and Combe Haven) are or plan to set up monitoring of their water courses (some of which pass through Crowhurst)

4. Policy CH2 Land South of Forewood Rise: The (very useful) schedule of changes to the Review Plan states that the map drawn up by the Landscape Architects has been amended - but I can't see any amendments to this map?

Relatively minor changes. Title changed from Site A to CH2 to reflect policy name. Last bullet point in landscape strategy changed to "New development to reflect rural village and farmstead characteristics through use of ~~vernacular~~ contemporary, quality architecture, detailing, layout and scale, avoiding suburbanisation."

5. Appendix 3 of the CNDP Review makes reference to the Biodiversity British Standard 42020. I believe this should now be updated to BS8683, but I would appreciate being advised on this.

Biodiversity British Standard 42020: 2013 - Code of practice for planning and development

BS 8683:2021. Process for designing and implementing Biodiversity Net Gain

These standards are different although probably both should be mentioned. BS42020 is how people should behave with respect to conservation and biodiversity and BS8683 is how to manage the BNG calculations.