

SEDLESCOMBE NEIGHBOURHOOD PLAN 2016-2028

DRAFT STRATEGIC ENVIRONMENTAL ASSESSMENT



Published by Sedlescombe Parish Council under EU Directive 2001/42 on Strategic Environmental Assessment and the Environmental Assessment of Plans & Programmes Regulations 2004 to accompany the publication of the Sedlescombe Submission Neighbourhood Plan

July 2016

NON-TECHNICAL SUMMARY

1. The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Pre Submission version of the Neighbourhood Development Plan for Sedlescombe Parish (“the Neighbourhood Plan”) in accordance with EU Directive 2001/42 on strategic environmental assessment (“the SEA”) and the Environmental Assessment of Plans & Programmes Regulations 2010 (“the EA Regulations”).
2. The Neighbourhood Plan has been prepared by Sedlescombe Parish Council (“the Parish Council”) as the Qualifying Body under the NP Regulations. It covers the whole of the parish area and was designated as a Neighbourhood Area by Rother District Council (“the District Council”) on 1 July 2013.
3. The Neighbourhood Plan has been published for consultation by the Parish Council under the Neighbourhood Planning (General) Regulations 2012 (“the NP Regulations”). The District Council, as the local planning authority, issued its formal screening opinion requiring an SEA 28 November 2013. This concluded that “in the opinion of the Local Planning Authority, the Sedlescombe Neighbourhood Development Plan is likely to have significant effects on the environment and, hence, that a SEA should be undertaken.”
4. A previous version of the Neighbourhood Plan was submitted for examination in July 2014 but was withdrawn in November 2015. The examination report of January 2015 had recommended that the Plan proceed to referendum, but only with changes to the policies that the Parish Council considered unacceptable because they did not reflect the wishes of the community. Rather than leave the decision on how the village of Sedlescombe should grow in the next decade to the District Council, the Parish Council decided to prepare a new version with the local community. This decision was made in January 2016 and the new Pre-Submission Plan is the next step in the process.
5. The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Sedlescombe in the plan period from 2014 to 2028. Together with the policies of the Rother development plan - that is the Rother Local Plan Core Strategy (“the Core Strategy”) and the ‘saved’ policies of the 2006 Rother District Local Plan (“the RDLP”) - and of the National Planning Policy Framework (NPPF), the Neighbourhood Plan policies will be used by the District Council in determining planning applications once the Plan is approved in due course. The High Weald Area of Outstanding Natural Beauty (AONB) Management Plan is also an important shaper of development policy.
6. The Vision of the Neighbourhood Plan is:
“To make Sedlescombe a vibrant place that values its past but looks to the future where people are proud to live and work and be part of a caring community.

To ensure the character and identity of the village is maintained and enhanced whilst allowing growth and encouraging a sense of community through well planned housing appropriate to the needs of the community.

To ensure the natural beauty and key characteristics of this part of the High Weald Area of Outstanding Natural Beauty are conserved and enhanced.”
7. The Neighbourhood Plan has also been informed by the provisions of the Core Strategy,

which was adopted in September 2014. The Neighbourhood Plan is obliged to be in general conformity with the strategic policies of the development plan and to contribute to the achievement of sustainable development. It must also reflect national planning guidance (of the NPPF).

8. More locally, the only other significant plan or programme, of which the Neighbourhood Plan has had to take account, is the High Weald Area of Outstanding Natural Beauty Management Plan. The Management Plan was adopted in March 2014 to cover the period 2014 – 2019.

9. The area is wholly within the AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty. There are many key features of the AONB within the Parish. There is a swathe of land along the course of the River Brede and its tributaries within Flood Zones 2 and 3, including the southern fringes of the village. The Brede Valley is also a Site of Nature Conservation Importance, as is the Powdermill Reservoir, Brede High Woods & Hurst Wood Complex in the north-east of the Parish. There is a significant coverage of Ancient Woodland across the Parish.

10. There are a range of Biodiversity Action Plan Habitats, notably different types of woodland (which overlaps the Ancient Woodland). There is a Groundwater Source Protection Zone bordering the village to the south-east. The historic core of the village is a Conservation Area, with many Listed Buildings, as well as being an Archaeologically Sensitive Area.

11. There are no pressing environmental problems to which the Neighbourhood Plan is seeking to respond. Like other rural parishes, Sedlescombe faces challenges in respect of addressing broader social and economic issues, notably in relation to meeting the housing and job needs of the local community within a highly environmentally constrained area.

12. However, the community has expressed concerns that there are too few jobs in the local area and that, wherever possible, the Neighbourhood Plan should try to use the value of housing development to obtain other environmental, social and/or economic benefits, rather than simply see new housing as an end in itself.

13. The SEA objectives of the Neighbourhood Plan are derived from the Sustainability Appraisal of the RDLPR. They comprise those environmental objectives of greatest relevance to the Neighbourhood Plan and that have measures that are meaningful to assess at this small scale.

14. The reader is reminded that the scale of development provided for in the Neighbourhood Plan is very small in relation to the existing village size and its spatial strategy ensures that there is no material cumulative impact of any allocation policy. It is likely that approximately 60 homes will be delivered on four small sites on the edge of the village and at three small sites in its environs. Crucially, as this scale of development on the edge of the village accords with the spatial strategy of Policy RA1 of the Core Strategy, its Sustainability Appraisal has already ensured that there will be no significant environmental effects in those respects. This leaves the SEA report to use the objectives to assess the environmental effects of the proposed site allocations in comparison to two other sites on the edge of the village that were submitted for consideration but have not been selected.

15. This analysis suggests that there is an overall neutral relationship between the two sets of objectives, with an occasional positive but no negative relationships. The positive relationships are primarily focused on protecting the natural environment and heritage of the Parish, which is unsurprising for a local community within an historic and AONB location. There are also positive correlations in respect of promoting the use of brownfield land and the benefits of increasing local employment opportunities.

16. All the policies have sought to protect and enhance the surrounding natural assets of the village and to avoid areas of flood risk and biodiversity interest. The locational decisions have been driven by using the allocation of housing sites not just to meet the requirements of the Core Strategy but also to achieve very specific business and community facility outcomes. Where necessary, the policies have ensured that key development principles are secured at the outset, leaving other policies of the development plan to ensure subsequent planning applications will provide the detail to assess impact at a finer grain than possible in this assessment.

17. In more general terms, the Neighbourhood Plan provides for between 36 and 38 new homes over the plan period within or attached to the village settlement boundary, in addition to windfall schemes. This number of homes represents a small addition to the existing housing stock to the extent that no material impacts on transport, air quality or water quality for example can be measured or compared. In which case, the assessment indicates there are no significant environmental effects of the Plan. Those minor environmental effects of the Neighbourhood Plan will be addressed as identified above.

1. Introduction

1.1 The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Pre-Submission version of the New Neighbourhood Development Plan for Sedlescombe Parish (“the Neighbourhood Plan”) in accordance with EU Directive 2001/42 on strategic environmental assessment (“the SEA”) and the Environmental Assessment of Plans & Programmes Regulations 2010 (“the EA Regulations”).

1.2 The Neighbourhood Plan is being prepared by Sedlescombe Parish Council (“the Parish Council”) as the Qualifying Body under the NP Regulations. It covers the whole of the parish area and was designated as a Neighbourhood Area by Rother District Council (“the District Council”) on 1 July 2013.

1.3 A previous version of the Neighbourhood Plan was submitted for examination in July 2014 but was withdrawn in November 2015. The examination report of January 2015 had recommended that the Plan proceed to referendum, but only with changes to the policies that the Parish Council considered unacceptable because they did not reflect the wishes of the community. Rather than leave the decision on how the village of Sedlescombe should grow in the next decade to the District Council, the Parish Council decided to prepare a new version with the local community. This decision was made in January 2016 and the new Pre-Submission Plan is the next step in the process. All references to the Neighbourhood Plan in this report therefore relate to the new version, unless otherwise stated.

1.3 The Neighbourhood Plan has been published for formal consultation by the Parish Council under the Neighbourhood Planning (General) Regulations 2012 (“the NP Regulations”). The District Council, as the local planning authority, issued its formal screening opinion requiring an SEA 28 November 2013. This concluded that “in the opinion of the Local Planning Authority, the Sedlescombe Neighbourhood Development Plan is likely to have significant effects on the environment and, hence, that a SEA should be undertaken.

1.4 A scoping letter was consulted on with the statutory authorities for a five week period (under Regulation 12 of the EA Regulations). The responses received on the scope have been taken into account in the preparation of this SEA report, as have the comments made on the SEA report that accompanied the previous version of the Neighbourhood Plan.

2. Background to Strategic Environmental Assessment

2.1 A Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impacts of a plan. The requirement for an SEA is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans and Programmes Regulations 2004” as follows:

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.

2.3 The report responds to each of the SEA requirements in turn, beginning with a short description of the Neighbourhood Plan, identifying the key environmental features of the parish and then assessing the impact of the strategic objectives and policies of the Neighbourhood Plan on those features, using a number of SEA objectives and measures.

3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Sedlescombe in the plan period from 2014 to 2028. Together with the policies of the Rother development plan - that is the Rother Local Plan Core Strategy ("the Core Strategy") and the 'saved' policies of the 2006 Rother District Local Plan ("the RDLP") - and of the National Planning Policy Framework (NPPF), the Neighbourhood Plan policies will be used by the District Council in determining planning applications once the Plan is approved in due course.

3.2 The Vision of the Neighbourhood Plan is:

"To make Sedlescombe a vibrant place that values its past but looks to the future where people are proud to live and work and be part of a caring community.

To ensure the character and identity of the village is maintained and enhanced whilst allowing growth and encouraging a sense of community through well planned housing appropriate to the needs of the community.

To ensure the natural beauty and key characteristics of this part of the High Weald Area of Outstanding Natural Beauty are conserved and enhanced.”

3.3 In pursuit of this Vision, the Neighbourhood Plan contains a number of strategic objectives, each with specific indicators against which the successful implementation of the Plan will be measured:

1. *helps to ensure the long-term security of key stakeholders in the Parish;*
2. *promotes new employment in the Parish;*
3. *either renews or expands commercial or light industrial space in the Parish;*
4. *re-uses existing brownfield sites in preference to greenfield sites;*
5. *provides new homes in sustainable and acceptable locations in and around the village;*
6. *enables the improvement of community facilities and enhances the existing sense of community within the Parish;*
7. *conserves designated areas of national and local landscape, archaeological, geological, ecological or historical importance, including the Sedlescombe Conservation Area;*
8. *conserves the landscape and scenic beauty of our part of the Area of Outstanding Natural Beauty, including the Brede Valley;*
9. *avoids development on areas of land in elevated positions prominent in the landscape which can be viewed from the Brede valley;*
10. *protects the open countryside for the benefit of residents and visitors as well as all significant green infrastructure and associated landscape features including trees, woodland, ponds, streams and wetlands;*
11. *preserves green gaps and hedgerows wherever possible;*
12. *does not exacerbate traffic and parking problems.*

3.4 The Neighbourhood Plan proposes a small number of policies on housing, economic development and green spaces. These policies are each assessed in section 8 of the SEA below.

3.5 The Neighbourhood Plan has also been informed by the provisions of the Core Strategy, which was adopted in September 2014. The Neighbourhood Plan is obliged to be in general conformity with the strategic policies of the development plan and to contribute to the achievement of sustainable development. It must also reflect national planning guidance (of the NPPF).

3.6 The Core Strategy contains a range of strategic and development management policies. Those of particular significance are:

- OSS3: Use and Review of Development Boundaries
- OSS4: Location of Development
- RA1: Rural Areas – guiding development in villages and indicating that the Neighbourhood Plan should allocate at least 35 new homes in the plan period
- RA3: Development in the Countryside – including supporting suitable employment and tourism opportunities
- EC3: Existing Employment Sites – allowing for intensifying and redeveloping for economic value existing employment sites

3.7 More locally, the only other significant plan or programme, of which the Neighbourhood Plan has had to take account, is the High Weald Area of Outstanding Natural Beauty Management Plan. The Management Plan was adopted in March 2014 to cover the period 2014 – 2019.

3.8 The Management Plan has a specific role to play in relation to the planning system. As a statutory document, local planning authorities must take the AONB Management Plan into account when formulating their development plans (including the Local Plan and any neighbourhood plans) and in the assessment of planning applications. The long established ‘Silkin’30 test for major development in National Parks and AONB’s forms part of national guidance to local authorities. Because of the serious impact major development may have on these areas the test requires that all such applications be subject to rigorous examination and planning permission refused except in exceptional circumstances and where it can be demonstrated they are in the public interest. The Test suggests consideration of such applications should include assessment of:

- the need for the development and impact on local economy;
- the cost of, and scope for developing elsewhere;
- the detrimental effects on the landscape and any moderation.

3.9 The plan and its supporting information can assist in the application of these tests. In terms of decision taking and determining planning applications the Management Plan is a ‘material consideration’ and has been tested through the appeal system. The plan can thus be very influential in the planning process and also assist LPAs in fulfilling their duty under section 85 of the CRoW Act to have regard to the designation when deciding planning matters.

3.10 The fundamental and largely immutable character is the essence of the natural beauty of the AONB and the AONB Management Plan is structured around the five key components of this character:

- **Geology, landform, water systems and climate:** deeply incised, ridged and faulted landform of clays and sandstone. The ridges tend east-west, and from them spring numerous gill streams that form the headwaters of rivers. Wide river valleys dominate the eastern part of the AONB. The landform and water systems are subject to, and influence, a local variant of the British sub-oceanic climate.
- **Settlement:** dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries.
- **Routeways:** ancient routeways (now roads, tracks and paths) in the form of ridge-top roads and a dense system of radiating droveways. These routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks.
- **Woodland:** the great extent of ancient woods, gills, and shaws in small holdings, the value of which is inextricably linked to long-term management.
- **Field and heath:** small, irregularly shaped and productive fields often bounded by (and forming a mosaic with) hedgerows and small woodlands, and typically used for livestock grazing; small holdings; and a non-dominant agriculture; within which can be found distinctive zones of heaths and inner river valleys.

3.11 In which case, the vision and objectives outlined above are regarded as being closely matched to the objectives and policies of the Core Strategy and to the provisions of the NPPF and of the High Weald AONB Management Plan.

4. The relevant aspects of the current state of the environment

4.1 The Neighbourhood Plan will set a framework for future development over the remaining plan period to 2028 across Sedlescombe Parish, especially by the allocation of sites.

4.2 The Neighbourhood Plan will form part of the 'development plan' and thereby exert a direct and substantial influence over development proposals coming forward in the period. It has a key role in integrating social, economic and environmental considerations in meeting its obligation to contribute to the achievement of sustainable development.

4.3 The area is wholly within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty. There are many key features of the AONB within the Parish.

4.4 There is a swathe of land along the course of the River Brede and its tributaries within Flood Zone 2, including the southern fringes of the village. The Brede Valley, is also a Site of Nature Conservation Importance, as is the Powdermill Reservoir, Brede High Woods & Hurst Wood Complex in the north-east of the Parish. There is a significant coverage of Ancient Woodland across the Parish.

4.5 There are a range of Biodiversity Action Plan Habitats, notably different types of woodland (which overlaps the Ancient Woodland). There is a Groundwater Source Protection Zone bordering the village to the south-east.

4.6 The historic core of the village is a Conservation Area, with many Listed Buildings, as well as being an Archaeologically Sensitive Area. There are also many non-designated heritage assets within the village and elsewhere in the parish.

5. The environmental characteristics of areas likely to be significantly affected

5.1 Subject to the location of the development, the probability of effects is in some respects high (eg AONB), while in some cases, where environmental issues bear upon the village and its immediate environs, it could be moderate/high and in other respects is likely to be low, having regard to the relatively limited scale required.

5.2 The duration of any impacts will be long-lived by virtue of the "life" of new building. There is the potential for the cumulative effects to be more significant than from individual developments, again subject to the location of development.

5.3 Trans-boundary effects may arise, but are expected to be minimal. Risks to Human health are negligible, while relevant agencies will have the ability to advise in respect of specific proposals.

5.4 The amount of land directly affected by likely development will be a relatively low proportion of the area of the Parish (1,264 hectares). A number of the environmental qualities are vulnerable to new development, to varying degrees. The AONB is not only a national designation but is especially sensitive to new development, hence, the effects could be significant subject to location.

6. Any existing environmental problems that are relevant to the Neighbourhood Plan

6.1 There are no pressing environmental problems to which the Neighbourhood Plan is seeking to respond. Like other rural parishes, Sedlescombe faces challenges in respect of addressing broader social and economic issues, notably in relation to meeting the housing and job needs of the local community within a highly environmentally constrained area.

6.2 However, the community has expressed concerns that there are too few jobs in the local area and that, wherever possible, the Neighbourhood Plan should try to use the value of housing development to obtain other environmental, social and/or economic benefits, rather than simply see new housing as an end in itself.

6.3 The choices made in the Neighbourhood Plan therefore specifically reflect the importance of the Pestalozzi Centre as a valued employer and of the Church as a community asset of wider value than its religious purpose. The Sawmills also offers the opportunity to create new rural jobs and to improve tourism facilities in the Parish.

6.4 More generally, the new homes planned for will contribute to meeting local housing needs.

7. The environmental protection objectives that are relevant to the Neighbourhood Plan and the way those objectives and any environmental considerations have been taken into account during its preparation

7.1 The SEA objectives of the Neighbourhood Plan are set out in Table A below. They are informed by the Sustainability Appraisal of the Core Strategy but only those environmental objectives of greatest relevance to the Neighbourhood Plan have been selected.

SPNP SEA Objective	SPNP SEA Measures
1. Improve efficiency in land use and encourage the prudent use of natural resources	<ul style="list-style-type: none"> ● Will the policies encourage new homes on brownfield land? ● Will the policies focus new development in and on the edge of the main village?
2. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	<ul style="list-style-type: none"> ● Will the policies enable trips to village services to be made by walking or cycling rather than by private car? ● Will the policies encourage new jobs to reduce the dependence on out-commuting for work? ● Will the policies help avoid increasing road congestion within the village?
3. Minimise the risk of flooding and resulting detriment to people and property	<ul style="list-style-type: none"> ● Will the policies avoid development on land in Flood Zone 1? ● Will the policies ensure any surface water flood risk is mitigated?
4. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	<ul style="list-style-type: none"> ● Will the policies avoid development that will harm designated or non-designated natural assets? ● Will the policies enable biodiversity gain?
5. Protect and enhance the high quality natural and built environment	<ul style="list-style-type: none"> ● Will the policies ensure that any likely significant effects on the AONB landscape are avoided or satisfactorily mitigated? ● Will the policies ensure that there will be no harmful effects on a designated heritage asset or its setting?

Table A: Neighbourhood Plan SEA Objectives & Measures

7.2 Following the scoping of the original SEA, it was considered that two of the proposed SEA objectives (i.e. to reduce emissions of greenhouse gases and to maintain, improve and manage water resources in a sustainable way) were better suited to the assessment in Local Plans of major development proposal options; they could not form a meaningful assessment of the Neighbourhood Plan policies with the very much smaller scale of development it proposes. In both cases, the data was not available to enable assessment and the objective would not have been able to distinguish between policy choices in any event.

7.3 The Parish Council has also been mindful of the Planning Practice Guidance (ID 11-030), which makes it clear that an SEA accompanying a neighbourhood plan “should focus on the environmental impacts which are likely to be significant ... (that) is considered to be

appropriate for the content and level of detail in the neighbourhood plan". In addition, examinations of other neighbourhood plans have now accepted that the task of undertaking SEA is different to that of assessing the policies of other forms of development plan. Furthermore, all of the additional objectives sought by the District Council are matters that are generic to any development proposal, irrespective of its location (e.g. sustainable construction), and will in any event be dealt with at the planning application stage in the normal way. For this reason, the scope of the new Neighbourhood Plan suggests there is no reason to amend this view.

7.4 In addition, there was concern that the scoping report contained only the objectives and not any more specific measures. To aid the assessment, and to make the objectives more specific to the Neighbourhood Plan, a small number of measures have been identified. The measures have been re-worded since the previous SEA report to provide a more meaningful means of assessing the policies. They are intended to enable a comparison between the relative merits of each policy and any reasonable alternative option. In due course, the Parish Council and District Council will monitor the planning information collected and reported by the District Council.

7.5 The reader is reminded that the scale of development provided for in the Neighbourhood Plan is very small in relation to the existing village size and its spatial strategy ensures that there is no material cumulative impact of any allocation policy. It is likely that approximately 60 homes will be delivered on four small sites on the edge of the village and at three small sites in its environs. Crucially, as the scale of development on the edge of the village accords with the spatial strategy of Policy RA1 of the Core Strategy (between 36 and 38 homes versus the target of 35 homes), the Core Strategy Sustainability Appraisal has already ensured that there will be no significant environmental effects in those respects. This leaves the SEA report to use the objectives to assess the environmental effects of the proposed site allocations in comparison to two other sites on the edge of the village that were submitted for consideration but have not been selected.

7.6 The other three proposed site allocations lie a short distance from the edge of the village and are not justified in relation to Policy RA1. Rather, they are being proposed to use new housing as a means to another social and/or economic policy end. In these cases, the SEA assessments uses its objectives to compare each policy with the alternative of not having such a policy.

7.7 It is noted that the Examiner of the original Neighbourhood Plan did not consider its SEA report failed to meet the basic conditions. However, he expressed some concerns that the report was insufficiently robust in making its arguments to support the spatial strategy proposed in that version of the Plan. Although much of this concern has been addressed in the new Neighbourhood Plan, which has adopted a different spatial strategy to delivering new homes, more care has been taken in this report to ensure all the relevant significant environmental effects have been tested in a proportionate way.

8. The likely significant effects on the environment

8.1 The likely significant effects of the strategic objectives and policies of the Neighbourhood Plan on the environment are assessed in turn below. In each case, the assessment uses the following notation: + positive, 0 neutral and – negative.

8.2 In most cases, it is acknowledged the data is not collected or reported at a Neighbourhood Plan scale to enable an accurate assessment. In addition, the scale of development proposed in the Plan is too small in comparison with the scale of existing development in the parish, making the identification of cause-and-effect relationships between inputs and outputs very uncertain.

8.3 For that reason the assessment seeks to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

Assessing the impact of the Neighbourhood Plan Strategic Objectives

8.4 In Table B below the twelve strategic objectives of the Neighbourhood Plan are assessed against its five SEA objectives.

SPNP SEA Objectives	SPNP Objectives											
	1. security	2. employment	3. business	4. brownfield	5. housing	6. community	7. designated	8. AONB	9. Visual impact	10. countryside	11. green gaps	12. traffic
1. Land Use Efficiency	0	0	0	+	0	0	0	+	+	+	0	0
2. Congestion and Pollution	0	+	+	0	0	0	0	0	0	0	0	+
3. Flood Risk	0	0	0	0	0	0	0	0	0	0	0	0
4. Biodiversity	0	0	0	0	0	0	+	0	0	+	0	0
5. Natural and Built Environment	0	0	0	0	0	0	+	+	+	+	+	0

Table B: Assessment of Neighbourhood Plan Strategic Objectives

8.5 This analysis suggests that there is an overall neutral relationship between the two sets of objectives, with an occasional positive but no negative relationships. The positive relationships are primary focused on protecting the natural environment and heritage of the Parish, which is unsurprising for a local community within an historic and AONB location. There are also positive correlations in respect of promoting the use of brownfield land and the benefits of increasing local employment opportunities.

Assessing the impact of the Neighbourhood Plan policies

8.6 The assessment considers each policy in turn using the SEA objectives. In some cases, the assessment also considers the option of having no policy. In respect of the proposed housing site allocation policies – 2, 4, 7, 8, 9 and 10 - that will contribute to meeting the requirements of Policy RA1 of the Core Strategy, the assessment compares their assessments with those of two rejected housing sites in paras 8.38 – 8.43. The assessment should therefore be read in conjunction with the Pre Submission Neighbourhood Plan document and its Proposals Map and further details can be found in the separate Site Assessments report in the Evidence Base.

Policy 1 – Spatial Plan of the Parish

Neighbourhood Plan SEA Objective	SPNP Policy	No Policy
1. Land Use Efficiency	+	0
2. Congestion and Pollution	+	0
3. Flood Risk	0	0
4. Biodiversity	0	0
5. Natural and Built Environment	+	0

8.7 This policy directs future development in the parish within the settlement of Sedlescombe, unless provision is made by other policies in the Neighbourhood Plan. In doing so, the policy proposes some minor amendments to the Sedlescombe Development Boundary as defined on the Proposals Map of the RDLP to accommodate four small sites on the edge of the settlement. This scale of development accords with the requirements of Policy RA1 of the Core Strategy, the Sustainability Appraisal of which assessed that policy as having no significant harmful environmental effects.

8.8 The goal of the Neighbourhood Plan has therefore been to select sites within and on the edge of the village, also in accordance with Policy RA1, that are sustainable locations for housing development, informed by the SEA objectives. Policy 1 is therefore the outcome of those site allocations.

8.9 The alternative of having no policy is neutral as a future revision of the Rother development plan would likely make such a change in due course. In the meantime, the current Proposals Map will continue to be used by the District Council to implement Core Strategy policy OSS3.

Policy 2 – Sunningdale, Land off Gregory Walk

Neighbourhood Plan SEA Objective	SPNP Policy
1. Land Use Efficiency	+
2. Congestion and Pollution	0
3. Flood Risk	0
4. Biodiversity	0
5. Natural and Built Environment	0

8.10 This policy allocates land for housing development on a small site (currently partially occupied by a residential building) on the south western edge of the village.

8.11 The policy has some positive environmental effects in respect of making better use of existing residential land, albeit not land that meets the technical definition of ‘brownfield’ land. Part of the site falls within the existing settlement boundary, which requires only a minor amendment to accommodate a larger scheme. The site lies within a reasonable walking distance of the shops and services on The Green and so is assessed as neutral in respect of its congestion/pollution effects.

8.12 The site had the potential to have negative flood risk and biodiversity effects. However, the Environment Agency has redrawn the boundary of the River Brede flood risk zone to exclude the site, which is nestled between existing development to the north and south east. The policy requires (in its part 6) that a housing scheme implements an appropriate restoration of the river, as proposed by the Agency as a mitigation measure. It also requires

(in its parts 4 and 5) that a scheme retains the existing boundary hedges and can demonstrate that it will avoid any habitat damage. In which case, the assessment is that the policy will have a neutral effect in these regards.

8.13 More generally, the intensification of development on the site will not result in a scheme of a scale that will have any material impact on the AONB or on the village Conservation Area or its setting.

Policy 3 – Land at Pestalozzi International Village

Neighbourhood Plan SEA Objective	SPNP Policy	No Policy
1. Land Use Efficiency	+	0
2. Congestion and Pollution	-	0
3. Flood Risk	0	0
4. Biodiversity	0	0
5. Natural and Built Environment	0	0

8.14 This policy supports redevelopment of brownfield land that is part of the existing cluster of buildings of the Pestalozzi International Village to the south-east of the village.

8.15 The policy avoids a harmful effect on the surrounding AONB by confining development to within the cluster of existing buildings on the site and requiring (in its parts 3 and 6) mitigation landscape measures to successfully manage this matter. The allocation is for a small housing scheme but the site is arguably too far from the village centre to encourage walking trips. There will therefore be a minor negative effect, even with the policy provisions requiring (in its part 4) that Ladybird Lane is improved to accommodate any traffic mitigation measures.

8.16 As the policy is not intended to contribute to the village housing target of Policy RA1 of the Core Strategy, and is an exception to Policy 1 of the Neighbourhood Plan, it is necessary to compare its assessment with the no policy' option. The policy will have an economic benefit in supporting the competitive operations of an important rural employer. This option may have negative economic consequences if the facility cannot continue to operate from this location.

Policy 4 – Land North of Village Hall

Neighbourhood Plan SEA Objective	SPNP Policy
1. Land Use Efficiency	0
2. Congestion and Pollution	0
3. Flood Risk	0
4. Biodiversity	0/-
5. Natural and Built Environment	0/-

8.17 This site adjoins the northern edge of the village. The larger space, of which this site is a part, is sensitive to development on its slope with the potential to harm the AONB setting to the village from this direction. In addition, there is some biodiversity interest in the fields and in the hedgerows to Church Hill. The policy therefore confines a housing scheme to the lower part of the site closest to the village hall to avoid any harmful effects on the AONB. It also requires (in parts 3, 4 and 5) the effects of achieving a new road access to the site on the existing hedgerow to Church Hill, the outcome of which ought to be a neutral effect on biodiversity, especially as the remainder of the site may deliver a net biodiversity gain to connect with the Local Nature Reserve adjoining the village hall. However, it is acknowledged that there may be some residual negative effects relating specifically to the means of access (but not to the developable area). It is unfortunate that the ideal means of access using the existing village hall access is not feasible, as this would have avoided any such potential.

8.18 The site is not as close to the village centre as others but it does lie within 400m of the centre and there is a pavement. It is also immediately adjacent to the village hall, which is a very well used community facility. Overall, therefore the policy is assessed as neutral in congestion/pollution terms.

Policy 5 – Land at Sedlescombe Sawmills

Neighbourhood Plan SEA Objective	SPNP Policy	No Policy
1. Land Use Efficiency	+	-
2. Congestion and Pollution	-	0
3. Flood Risk	0	0
4. Biodiversity	0	0
5. Natural and Built Environment	0	-

8.19 This policy allocates brownfield employment land and semi-derelict premises for a mixed use development scheme comprising new employment, housing (6-8 properties) and tourism uses. It is intended to encourage the beneficial reuse of this site.

8.20 The policy will have a positive effect by promoting the redevelopment of derelict industrial buildings in the AONB on land that has no biodiversity or flood risk issues. Any impact on biodiversity may be mitigated by the application of other development plan policies to proposals. The site is not proximate to any heritage asset.

8.21 The site is not well located to the village so would not normally be well suited to housing development, hence it is assessed as having a negative congestion/pollution effect. However, the housing scheme will be small and serves a specific economic development cross-subsidy purpose. The negative effect is therefore marginal given the scale of the scheme. The policy will have an important economic benefit in encouraging economic and tourism development in a rural location that is suited to both.

8.22 As the policy is not intended to contribute to the village housing target of Policy RA1 of the Core Strategy, and is an exception to Policy 1 of the Neighbourhood Plan, it is necessary to compare its assessment with the no policy' option. The policy will have an economic benefit in retaining an employment use and in enabling a new tourism use. This option may have negative economic consequences if these economic benefits are not provided for by this policy and are left to a planning application being judged on other development plan policies.

Policy 6 – Land Adjacent St. John the Baptist Parish Church

Neighbourhood Plan SEA Objective	SPNP Policy	No Policy
1. Land Use Efficiency	0	0
2. Congestion and Pollution	-	0
3. Flood Risk	0	0
4. Biodiversity	0	0
5. Natural and Built Environment	-	0

8.23 This policy seeks to achieve two complementary outcomes: securing a number of long term community benefits – most especially the Parish Church which is the parish’s oldest building - and delivering affordable homes for local people. It will allow for the church to become significantly easier and safer to access for parishioners both currently and in the long term. Its primary benefits are therefore social rather than environmental.

8.24 The policy avoids some negative environmental effects with the exception of its effect on the setting to the listed church building and the fact that it is some distance beyond the village boundary, requiring car journeys for most users. In this case, the site is large enough to enable a scheme to be designed to minimize its heritage effects through the careful layout, orientation, massing and materials of new buildings. However, the very principle of development will change the open setting of the church and this will have a negative effect.

8.25 Although not brownfield, the land has no current use or purpose and is not close to any biodiversity or flood risk areas. Any impact on biodiversity may be mitigated by the application of other development plan policies to proposals. The policy encourages the use of the land to deliver a series of specific environmental and social outcomes. These will reduce traffic congestion (on a difficult road bend) caused by visitors to the church and will enable the church to invest in repairing, maintaining and using the Grade II* listed church for social as well as religious purposes.

8.26 As the policy is not intended to contribute to the village housing target of Policy RA1 of the Core Strategy, and is an exception to Policy 1 of the Neighbourhood Plan, it is necessary to compare its assessment with the ‘no policy’ option. The policy is expressly intended as an enabling scheme to reinvest in the heritage asset and to finance its wider community use. These are not matters that are assessed within the scope of this SEA but their value will be addressed in the separate Basic Conditions Statement in due course. However, it is noted

that there is local community support for the scheme, and, in the absence of this policy, its positive effects may be lost if a planning application for this type of scheme is judged against other development plan policies. This option will leave unaddressed the existing parking problem and will require the church to find alternative means of financing the repairs to the church. It will also have negative social impact in not realising the opportunities for community use.

Policy 7 – Land at Gate Cottage

Neighbourhood Plan SEA Objective	SPNP Policy
1. Land Use Efficiency	0
2. Congestion and Pollution	0
3. Flood Risk	0
4. Biodiversity	0
5. Natural and Built Environment	0

8.27 This site adjoins the northern edge of the village. The location of the site is such that its development will have little or no visual effect on the AONB. Ideally, the scheme should be planned and delivered along with the adjoining Land at Church Hill Farm site proposed in Policy 8 but this is not essential to delivering a satisfactory scheme. However, the policy requires (in part 1) a housing scheme to retain as much of the existing site boundary hedgerows as possible. The site is close to existing properties and so the policy requires that attention is paid to avoiding harm to their amenities through the orientation of buildings. There is no known specific biodiversity interest on the site. The policy is therefore assessed as neutral in these respects.

8.28 The site is not as close to the village centre as others but it does lie within 400m of the centre and there is a pavement. It is also directly opposite the village hall, which is a very well used community facility. It may also be possible for a scheme to come forward with the Church Hill Farm scheme to share access. Overall, therefore the policy is assessed as neutral in congestion/pollution terms.

Policy 8 – Land at Church Hill Farm

Neighbourhood Plan SEA Objective	SPNP Policy
1. Land Use Efficiency	0
2. Congestion and Pollution	0
3. Flood Risk	0
4. Biodiversity	0
5. Natural and Built Environment	0

8.29 This site adjoins the northern edge of the village. Its location is such that much of the site extends into the AONB with little in the way of a defensible edge. Ideally, the scheme should be planned and delivered along with the adjoining Land at Gate Cottage site proposed in Policy 7 but this is not essential to delivering a satisfactory scheme. The policy confines a development scheme to the lower land that is closest to the Land at Gate Cottage site and it requires (in part 1) new planting to the site boundary and an orientation of buildings that minimises its effects on the AONB countryside beyond. It also requires (in part 2) the scheme layout and landscape buffer on its western boundary to ensure that it will not be possible to extend this scheme any further into the AONB. There is no known specific biodiversity interest on the site. The policy is therefore assessed as neutral in these respects.

8.30 The site is not as close to the village centre as others but it does lie within 400m of the centre and there is a pavement. It is also very close to the village hall, which is a very well used community facility. It may also be possible for a scheme to come forward with the Gate Cottage scheme to share access. Overall, therefore the policy is assessed as neutral in congestion/pollution terms.

Policy 9 – Land at Balcombe Green

Neighbourhood Plan SEA Objective	SPNP Policy
1. Land Use Efficiency	0
2. Congestion and Pollution	0
3. Flood Risk	0
4. Biodiversity	0
5. Natural and Built Environment	0

8.31 The site occupies land that is surrounded on three side by residential development and, as such, its development will not be an incursion in to the AONB, hence its neutral effect in that respect. There is some biodiversity and landscape interest in the current wooded nature of the site but an arboricultural survey has indicated that the value is not so significant to prevent development. The policy requires (in part 1) new planting to the site boundary and an orientation of buildings that minimises its effects on the AONB countryside beyond. It also requires (in part 2) the scheme layout and landscape buffer on its northern boundary to ensure that it will not be possible to extend this scheme any further into the AONB. It is therefore assessed as neutral in terms of its biodiversity and landscape effects.

8.32 The site is close to the village centre, lying within 400m of the centre off an existing road (Orchard Way). The policy is therefore assessed as neutral in congestion/pollution terms.

Policy 10 – Land at Pump House Yard

Neighbourhood Plan SEA Objective	SPNP Policy
1. Land Use Efficiency	+
2. Congestion and Pollution	+
3. Flood Risk	0
4. Biodiversity	0
5. Natural and Built Environment	0

8.33 The site lies within the existing settlement boundary and is in an employment use. Its redevelopment will have some positive effects in making use of brownfield land and, through the car parking policy provision, in helping address the current traffic problems caused by school parking in peak hours. The site also lies in the Conservation Area but is assessed as neutral, as the policy requires the design of the scheme to sustain the character of the Area. It could be argued that a scheme of this type may have a positive effect on the Area by replacing an employment yard with new buildings.

8.34 The loss of employment land is not directly assessed using the SEA objectives, nor are the social benefits of providing additional car parking spaces for the school. The separate Basic Conditions Statement will address these matters when it is published alongside the submitted Neighbourhood Plan in due course. For this report, it is noted that there will be a minor negative effect of the loss of a very small parcel of employment land, but that there will be a greater social benefit in addressing the school parking problem. In any event, the employment land is not well located for that use, as it lies in close proximity to a number of residential properties with limited road access.

Policy 11 - Local Green Spaces

Neighbourhood Plan SEA Objective	SPNP Policy	No Policy
1. Land Use Efficiency	0	0
2. Congestion and Pollution	0	0
3. Flood Risk	0	0
4. Biodiversity	0	0
5. Natural and Built Environment	+	0

8.35 This policy designates two locations in the parish as Local Green Spaces in accordance with the criteria of paragraph 77 of the NPPF. In doing so, it seeks to protect both sites from development for the plan period and beyond.

8.36 The policy is neutral on four of the assessment objectives. In seeking to prevent harmful greenfield development on the edge of the village, the policy will protect the AONB and historic identity of Sedlescombe and, in the case of Red Barn Field, protect from the loss of biodiversity interest.

8.37 The alternative of not having such a policy is assessed as neutral as it is assumed other development plan policies would ensure that proposals on the sites, which are beyond the settlement boundary of Policy 1, would be rejected.

Alternative Housing Sites

8.38 During the preparation of the Neighbourhood Plan two other sites on the edge of the village were considered for their potential as suitable housing sites: at Street Farm and at Land North of Gorselands. Although neither are considered 'reasonable alternatives', given their planning histories and the need for the Neighbourhood Plan to pass a referendum, for completeness, both have been assessed against the SEA objectives as they adjoin the village boundary and may otherwise be considered as potentially meeting strategic policy.

Neighbourhood Plan SEA Objective	Street Farm	Gorselands
1. Land Use Efficiency	0	0
2. Congestion and Pollution	0	0
3. Flood Risk	0	0
4. Biodiversity	0	0
5. Natural and Built Environment	-	-

8.39 The Street Farm site (referred to as Site SE5 in the 2013 SHLAA) is a highly controversial site with a long history of significant public objection to proposals to develop all or part of the land. For the purpose of this assessment, the site is considered to be the smaller area (ref SE5A) on the eastern half of the larger site and bordering housing on Brede Lane. This has been the subject of a dismissed appeal for a housing scheme in 2015.

8.40 As with most of the preferred sites, the development of the site would have neutral effects in respect of the first four SEA objectives. It is possible that any housing scheme on this side of the village may add to traffic congestion on Brede Lane and in the centre of the village, especially in combination with peak hour out-commuting and school drop off trips. But any such effects may be mitigated through highways works and so the assessment is neutral.

8.41 The main negative effect of development in this specific location is its effects on the AONB landscape. The land is located on a slope down from Brede Lane at the transition from the village to the AONB countryside, with no defensible boundary for some distance to its west or south (and therefore always the risk of an extension of the scheme to cover the whole site in due course). Hence, Policy 11 of the Neighbourhood Plan proposes the whole site is designated a Local Green Space.

8.42 The Land North of Gorselands site was dismissed in the SHLAA for similar landscape effect reasons. Like Street Farm, it has one tenuous edge with existing development in the village but extends well beyond into the surrounding countryside. The rise of the land above the village edge would make development prominent in the landscape.

8.43 In both cases, the sites perform less well than those proposed for allocation in respect

of their effects on the AONB and to defining the rural character of the setting to the village, with arguably the exception of Policy 4 Land North of Village Hall. In that instance, it is possible there may be some residual effects on biodiversity and the AONB landscape as a result of its proposed access. However, unlike these sites, its proposed developable area can be far better contained in the landscape and especially the immediate topography than these two alternatives. As the policies of the Neighbourhood Plan have been able to identify sufficient sites to meet the target of Policy RA1 of the Core Strategy, there is therefore no need for these additional sites to be allocated.

Summary

8.44 All the policies have sought to protect and enhance the surrounding natural assets of the village and to avoid areas of flood risk and biodiversity interest. The locational decisions have been driven by using the allocation of housing sites not just to meet the requirements of the Core Strategy but also to achieve very specific business and community facility outcomes. Where necessary, the policies have ensured that key development principles are secured at the outset, leaving other policies of the development plan to ensure subsequent planning applications will provide the detail to assess impact at a finer grain than possible in this assessment.

8.45 In more general terms, the Neighbourhood Plan provides for at least 36 new homes over the plan period, in addition to windfall schemes. This number of homes represents a small addition to the existing housing stock to the extent that no material impacts on transport, air quality or water quality for example can be measured or compared. In which case, the assessment indicates there are no significant environmental effects of the Plan. Those minor environmental effects of the Neighbourhood Plan will be addressed as identified above.

9. A description of measures envisaged concerning monitoring

9.1 The District Council and Sedlescombe Parish Council will jointly monitor the effectiveness of the implementation of the Neighbourhood Plan using the available data. The District Council's Monitoring Report will provide some data at this level.