



Strategic Environmental Assessment  
(SEA) Report of the Salehurst and  
Robertsbridge Neighbourhood  
Development Plan incorporating a  
Sustainability Appraisal

## **Environmental Report**

**PLAN SUBMISSION : Regulation 15 of the Neighbourhood Planning Regulations 2012**

31<sup>st</sup> October 2017 (revised as requested by the Examiner post hearing)

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## Addendum note

This report is a revised version of that submitted with the Salehurst and Robertsbridge Neighbourhood Development Plan (SRNDP) in December 2016. The SEA has been updated as part of further work requested by the NDP Examiner during the Examination period to be more explicit on the assessment, clearly comparing the alternatives including the preferred approach and how these were assessed against the baseline environmental characteristics of the area. The revisions will further clearly identify the significant positive and negative effects of each alternative.

To this end Section 6 has been modified to ensure consistency in the scoring of all the sites and for completeness includes a Sustainability Appraisal of those sites as well as a Sequential test to address comments from the Examiner and other representations made. It outlines the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. Section 7 includes a revised conclusion on the overall social, environmental and economic impact of the different alternatives, including those selected as the preferred approach in the NDP.

**The Examiner has requested that this revised document is further consulted upon for 28 days.**

## NON- TECHNICAL SUMMARY

The purpose of this report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Development Plan Plan in accordance with EU Directive 2001/42 on strategic environmental assessment (“the SEA”) and the Environmental Assessment of Plans & Programmes Regulations 2004 (“the EA Regulations”). This report is a revised version of that submitted with the NDP in December 2016 for examination. The Examiner of the Neighbourhood Plan having requested that this revised report contains more consistent assessment of all sites and the cumulative effects of the NDP.

For this revised version, the scope has been widened to accommodate the Examiners request and to provide further analysis of the sustainability attributes of all the sites assessed. This has been done through the introduction of a Sustainability Appraisal (SA) which seeks to address the wider sustainability objectives when applying the sequential test in line with national guidance with the aim to achieving sustainable development as per the National Planning Policy Framework.

The report seeks to undertake this wider assessment in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct and cumulative effects. In doing so, the SA/SEA must be proportionate and “does not need to be done in any more detail ... than is considered to be appropriate for the content and level of detail in the neighbourhood plan” (National Planning Practice Guidance ID:11-031).

Throughout the development of the NDP a number of modifications have been made to the plan policies to reflect changes made following consultation. However, modifications to the SEA only need to be considered where appropriate and proportionate to the level of change being made to the neighbourhood plan...and a change is likely to be significant if it substantially alters the draft plan and or is likely to give rise to significant environmental effects (ID: 11-42). This revised SA/SEA Report is considered to demonstrate that the NDP, when taken as a whole, will achieve a significant contribution to sustainable development.

The main sustainability issues in the neighbourhood area to which the Neighbourhood Plan responds are managing the effect of recent and future scale of housing development whilst ensuring the delivery of community infrastructure in the right parts of the village to serve current and future needs. The policies of the Plan have not warranted any changes.

## Introduction

1.1 This Environmental Report supports the Salehurst and Robertsbridge Neighbourhood Development Plan (SRNDP) and shows the effects on the environment, in line with the requirements of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC.

### Why is an Environmental Report needed?

1.2 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.

1.3 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 Salehurst and Robertsbridge neighbourhood plan.

1.4 A Screening of the Neighbourhood Plan was submitted to Rother District Council (RDC) on 30<sup>th</sup> April 2016. This was sent to the statutory bodies for consultation and a final response from the District Council received on 15<sup>th</sup> June 2016. This can be seen in Appendix I.

1.5 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>. RDC has advised that it has undertaken a screening and confirms that no Appropriate Assessment is required of the SRNDP. This was confirmed in a letter from Rother District Council on 15<sup>th</sup> September 2016, where they confirmed that they have done an HRA Screening document<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

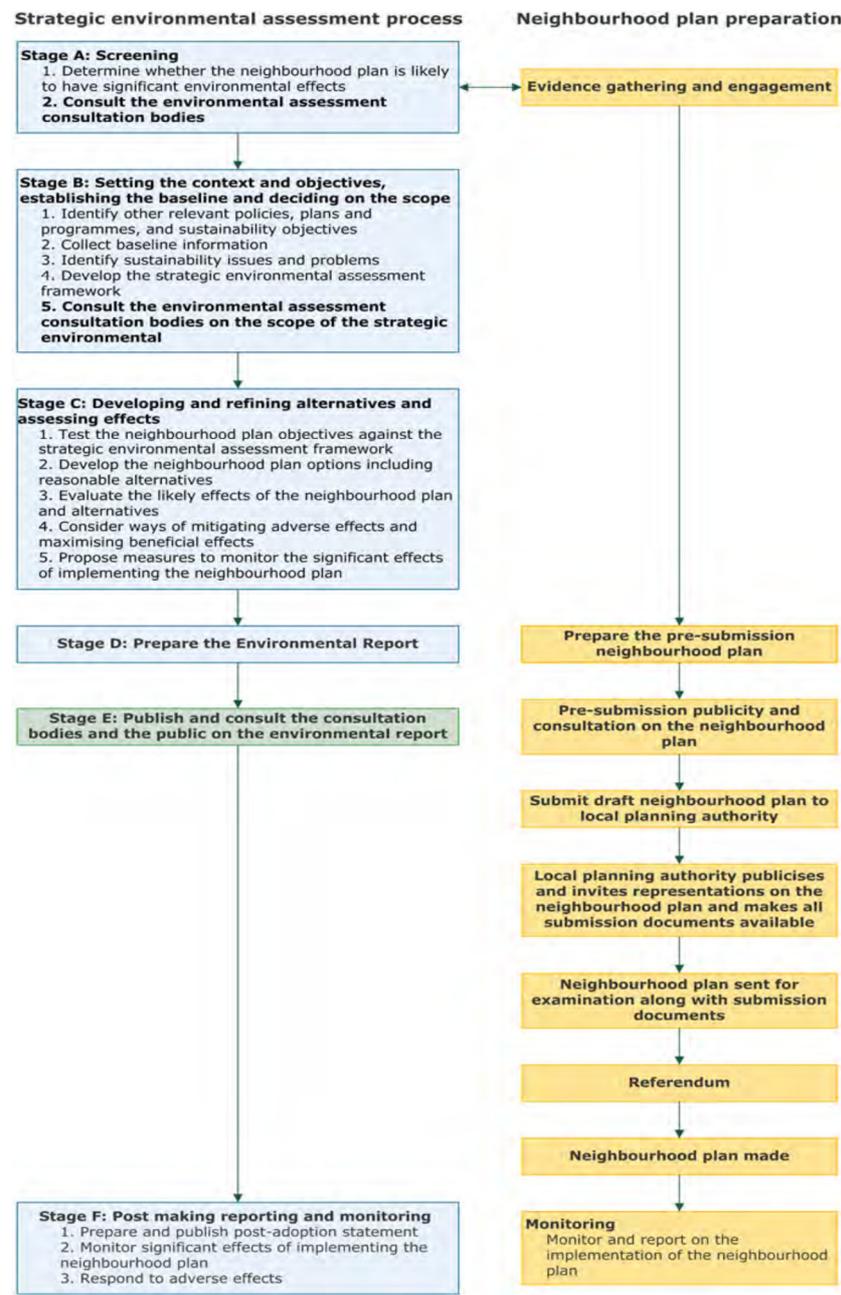
<sup>3</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=15112&p=0>

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

# Methodology

2.1 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 below 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 SRNDP.

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



2.2 The work relating to each of the stages set out in Figure 1 above for the SRNDP is briefly explained here.

### *Screening*

2.3 Though small in scale, as the Neighbourhood Plan will 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*

2.4 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.

2.5 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.

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

### *Environmental Report*

2.7 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. Finally, it requires that a summary of the main content has to be presented in a Non-Technical Summary.

**This is the current stage and this environmental report including the assessments has been done with respect to the Draft of the SRNDP.**

### *Post-Adoption statement*

2.8 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**

2.9 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 SRNDP 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.

2.10 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.

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

## Baseline characteristics and environmental issues

3.1 This section has markers on the left hand side of the first paragraph where the SEA Themes change through this commentary.

3.2 The parish of Salehurst and Robertsbridge is a vibrant and unique place located in the County of East Sussex some 12 miles north of Bexhill and 11 miles north-west of Hastings. The parishes are located approximately central in the overall area of Rother District, with a combined population of 2,728 of which the highest percentage is in the 45-64 age range.

3.3 SEA Theme [Landscape]                      The parish is washed over by the much wider landscape of the High Weald Area of Outstanding Natural Beauty (AONB), which is generally considered to be divided between the Lower Rother Valley and the Upper Rother Valley.

3.4 Like many settlements, the villages developed at a point of convergence of the river with a number of streams; the Darwell stream flows through Robertsbridge dividing the original settlement from the twentieth century developments and the railway to the west. It should be noted that the River Rother was navigable to this point until the mid-14th Century. The surrounding landscape is dominated by the broad valley of the River Rother and its tributaries. It is at this point in the valley that the predominantly wooded area of the Upper Valley gives way to a more open landscape dominated by pasture and arable land.

3.5 The settlement of Robertsbridge is located on a valley side with its northern extremities on the valley floor. This has resulted in a village set against a backdrop of a river landscape, with some of the village having a direct relationship with the tributary that flows into the river.

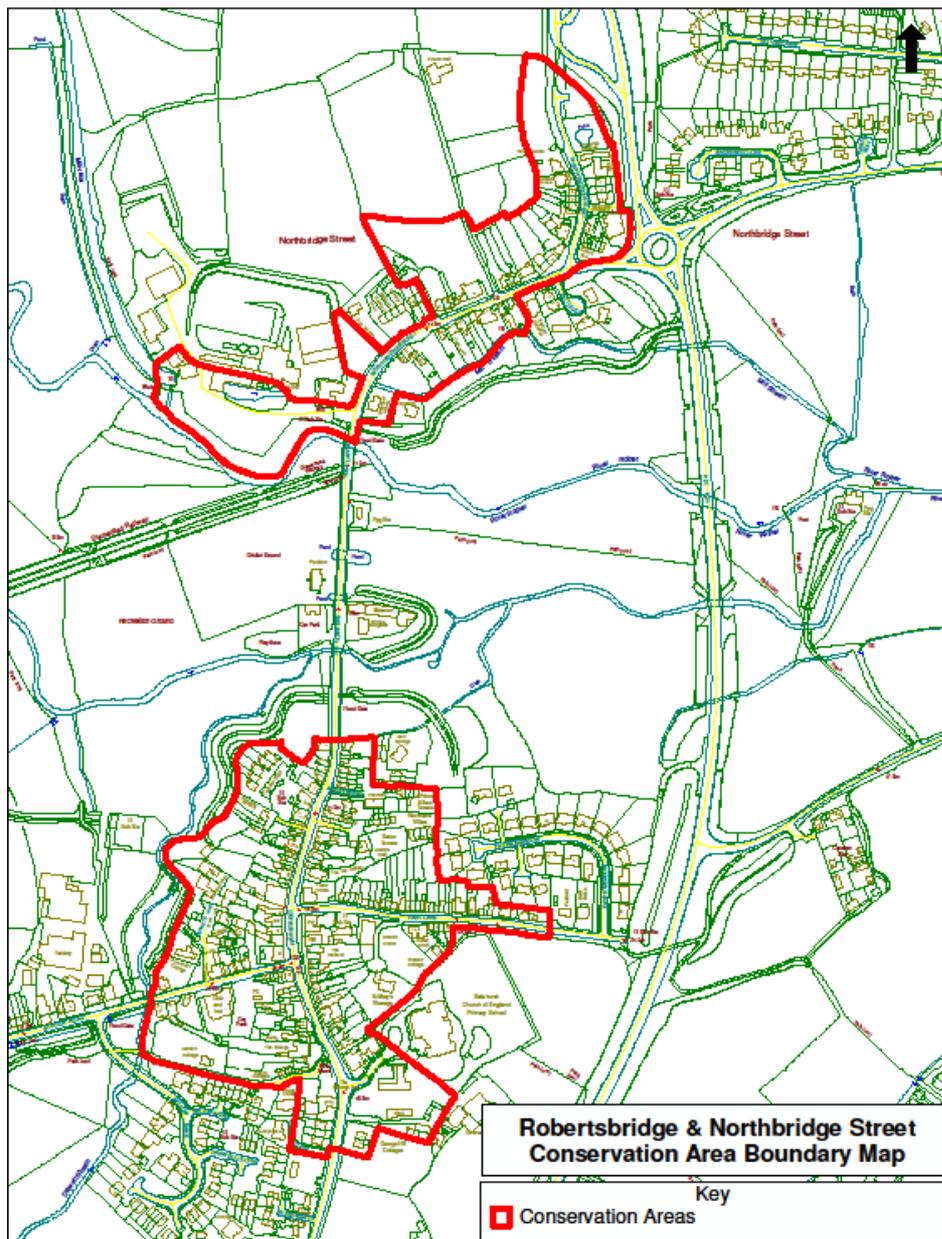
3.6 There are two communities in the Parish and each has their own distinct characters. Robertsbridge, the larger of the two settlements by far, lies to the south west of Salehurst which contains the parish church. This is more of a linear settlement, whereas Salehurst is essentially a nucleated development.

3.7 The village lies on the route of the Hastings to London railway, with a busy Station. A bypass forming part of the A21 trunk road lies to the east of Robertsbridge. This diverts the majority of all the traffic around the village centre and as a consequence protects the Village Centre from excessive congestion/pollution issues. There are two principal routes into and out of the settlement; one of them runs north-south, whilst the other runs more West-east.

3.8 SEA Theme [cultural heritage including architectural and archaeological heritage]                      Overall within the parish as a whole there are 105 designated Listed Buildings.

3.9 In terms of the built characteristics of the villages, Robertsbridge (including Northbridge) is a large historic village. The High Street runs north/south and forms the heart of the village, comprising a mix of commercial and residential properties. Off the High Street runs a staggered crossroads; to the east extends Fair Lane, a historic lane predominantly residential in use, and now a no through road for vehicles. Meanwhile to the west runs Station Road, with a mixture of leisure, commercial and residential uses nearer the village core, becoming more residential in character. A conservation area covers an area covered by the settlement, as it existed by the late 15th Century, plus the more relatively recently developed area around Station Road, with the whole area being some 6.6hectares. The extent of this is shown in figure 2 at the top of the next page.

Figure 2: Conservation Area



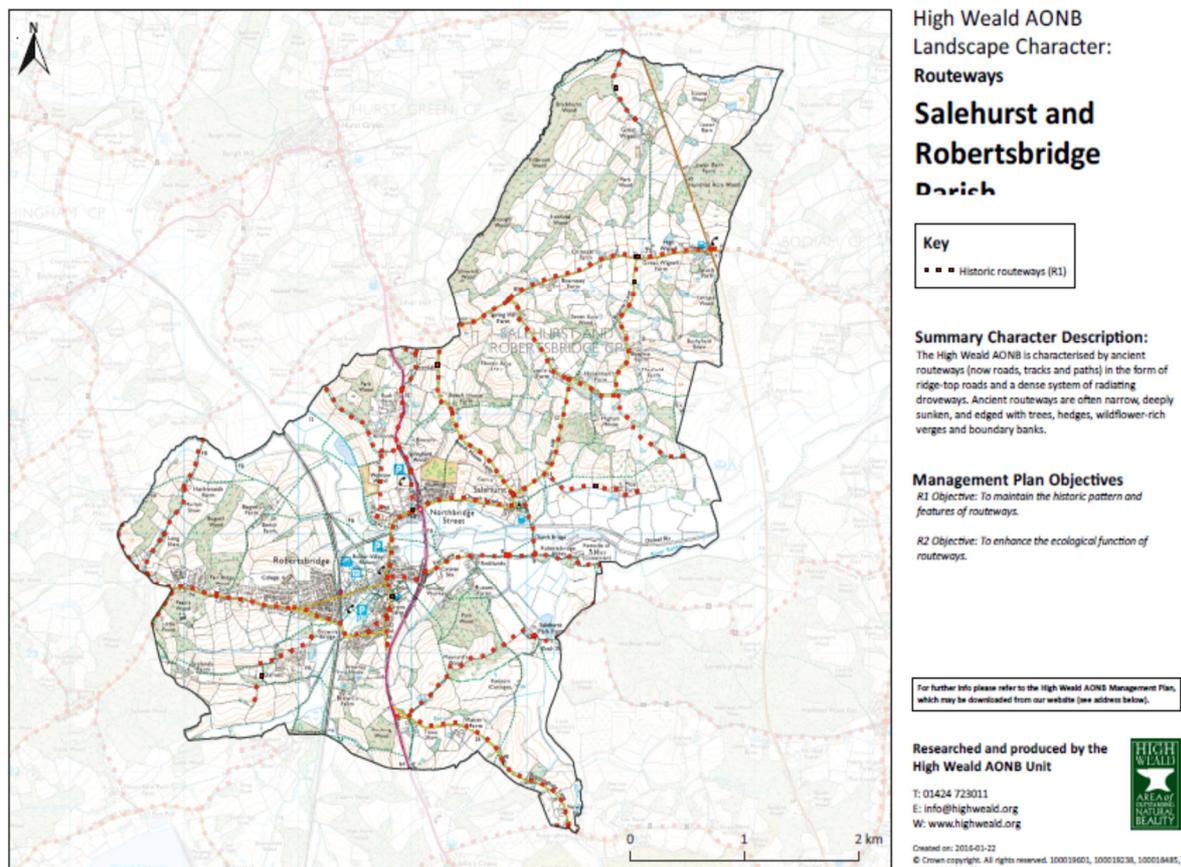
Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office. (Crown Copyright). Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. No further copies may be made. Rother District Council Licence No 100018643 2009.

3.10 Salehurst, on the other hand, is a very small compact settlement with very little development. The main focus of attention is that of the parish church which is surrounded by a handful of attractive properties. Uses include a public house and a farm shop.

3.11 SEA Theme [Landscape]

This low-lying expanse of green fields, pasture and playing fields is a key part of the setting of Robertsbridge village, as well as providing a clear distinction between the settlement and that of Northbridge Street and the Mill site. Much of the built fabric of the settlements is hidden from view until entering them individually. The parish is especially important in terms of retaining much of the key characteristics of the High Weald AONB, with its historic field margins and the extensive routeways that cross it as shown in Figure 3

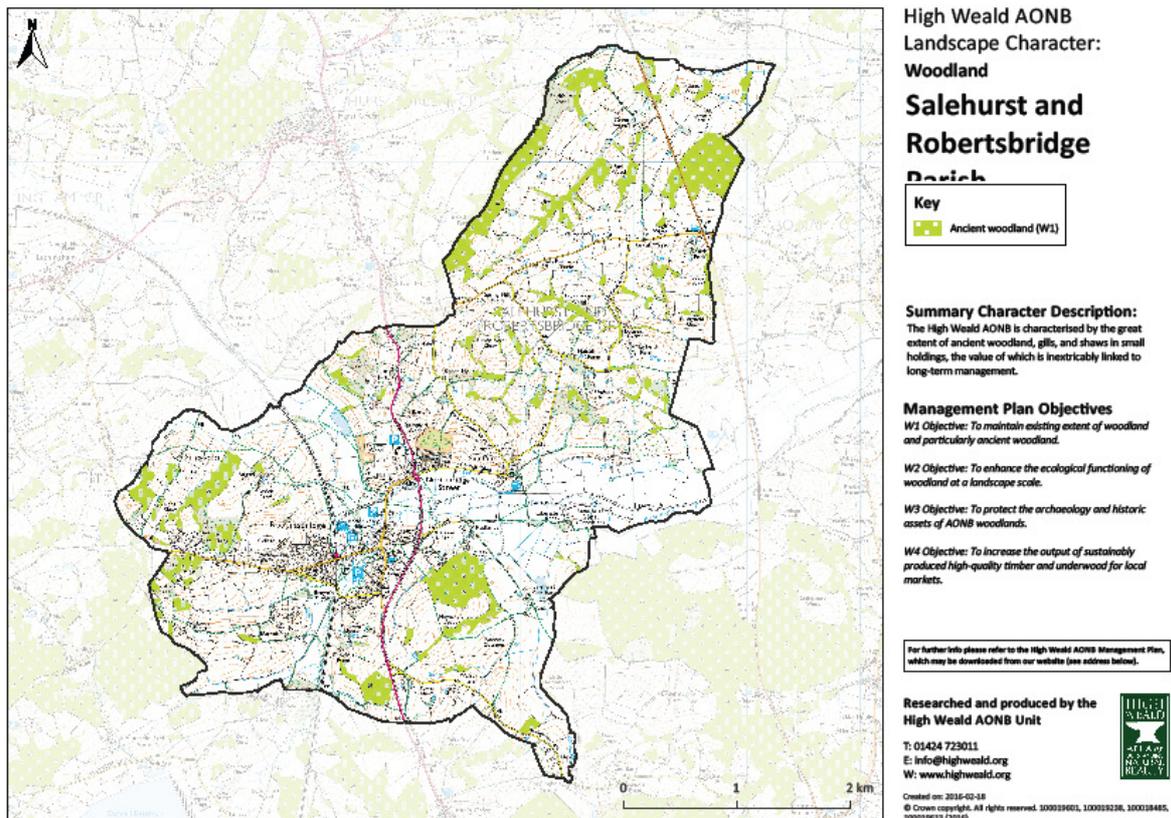
It is also very characteristic of the High Weald AONB landscape that one arrives into the village from south, east, north and west, down significant ridges. Figure 3: High Weald characteristics



3.12 SEA Theme [Flora; Fauna; Biodiversity]

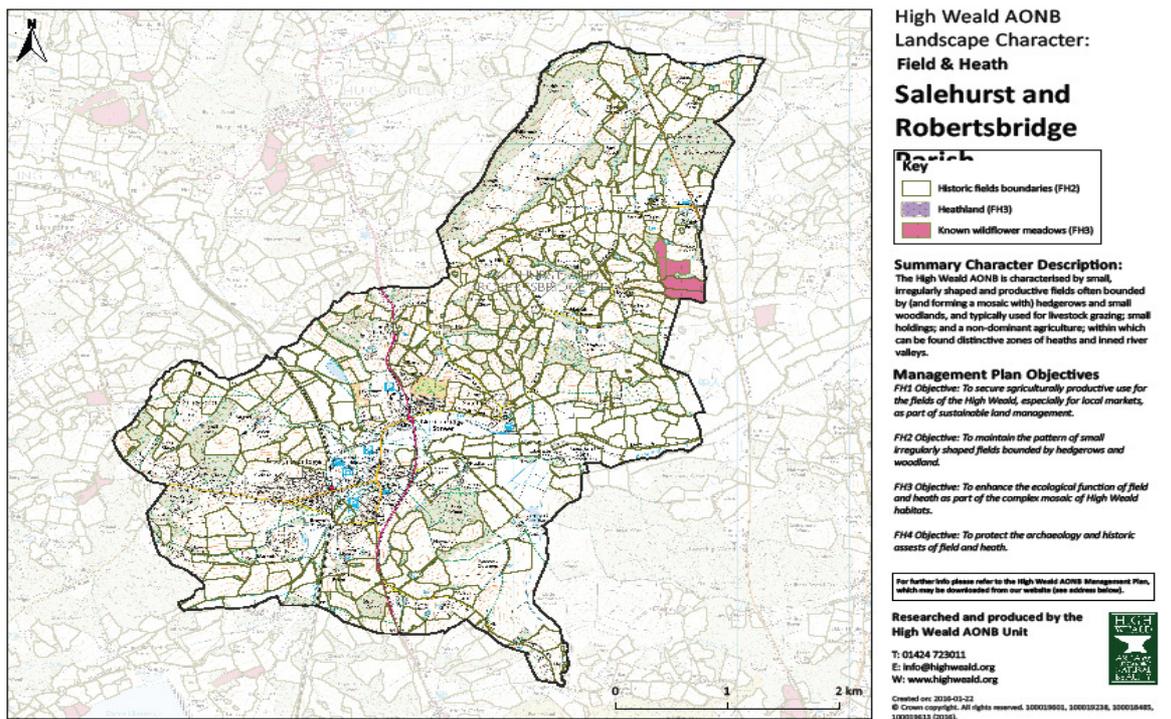
In addition to the characteristics of the High Weald mentioned above, the parish is extensively covered by woodlands and specifically recognised for its unique wildflower meadows. Rother has 16% of the District covered by ancient woodland and a large amount of this is contained in Salehurst and Robertsbridge parish. The extent of the Parish covered by these is outlined on Figure 4.

Figure 4: Map showing extent of woodland in parish



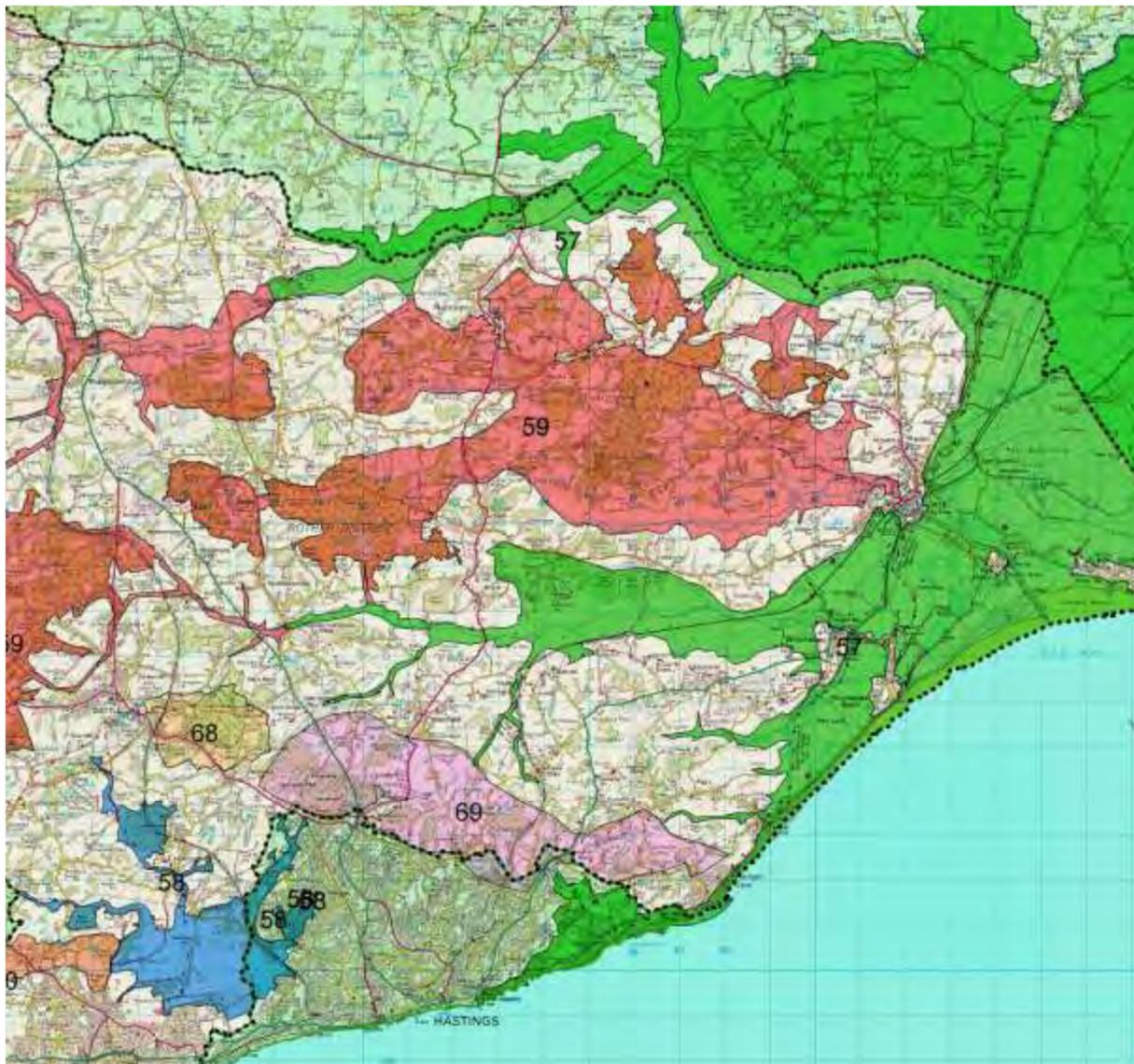
3.13 The exact spread of heath and wildflower meadows prevalent within the parish are shown on Figure 5.

Figure 5: Map showing the extent of heath and wildflower meadows



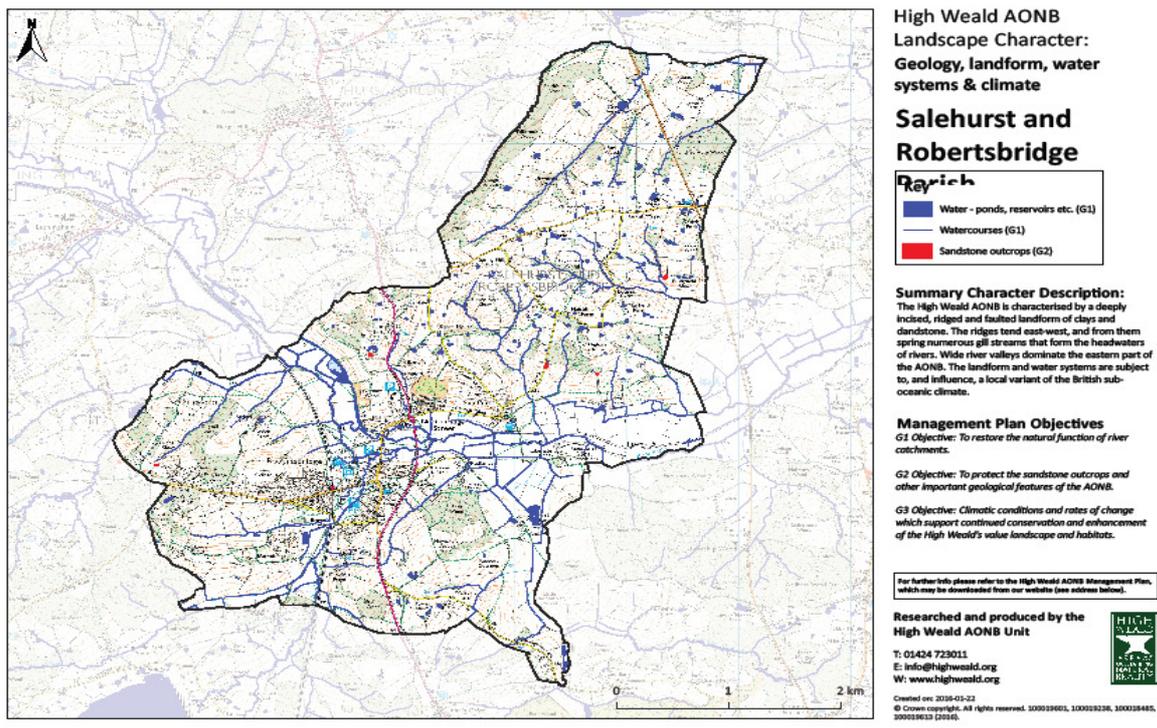
3.14 Extents of all habitats have declined in quality and extent throughout Rother and East Sussex, so it is important the quality of these is retained. No sites in the parish have been recognised or designated for their importance to nature conservation. Those identified generally reflect the most extensive types of habitats in the Parish, although large extents are recognised for their potential to extend, enhance and potentially create new habitats. Areas identified as having the greatest opportunities for these reasons are called Biodiversity Opportunity Areas (BOA) and the Parish is fully covered by the wider Rother, Brede and Tillingham Woods BOA. The context both to the Parish and its connections to the wider position of this BOA is shown on Figure 6 below.

Figure 6: Context of the Rother, Brede and Tillingham Woods BOA (no. 59)



3.15 SEA Theme [Soil; Material Assets] The agricultural land within the Parish as shown on Figure 7 below is generally Grade 3. There is a significant amount of land around the villages that is classed as being other land primarily in non-agricultural use which may lessen the overall amount.

Figure 7: Setting of the overall parish in terms of geology

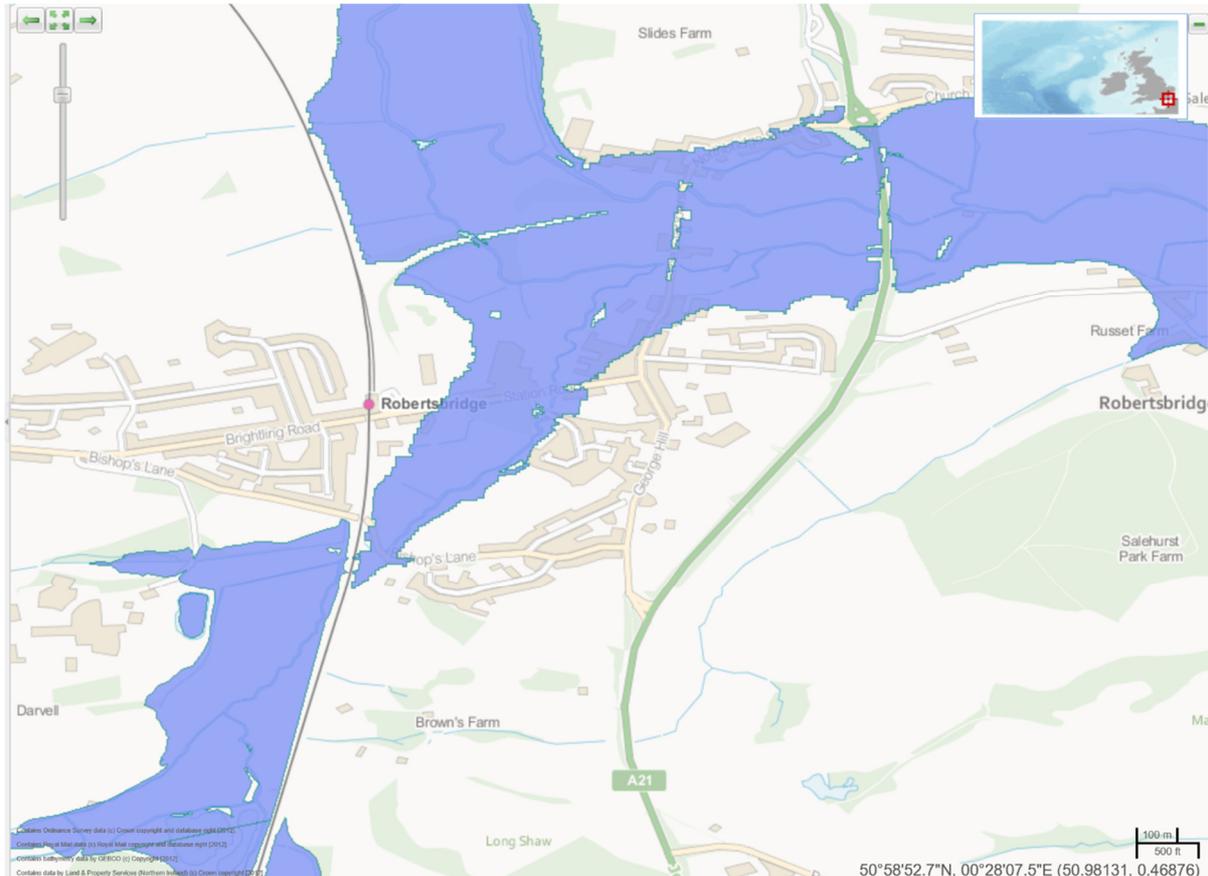


3.16 As mentioned under the setting of the Parish, the topography changes markedly throughout the overall extent of the Parish. In addition, it shows that there are two areas of sandstone within the parish. These do not contribute significantly to the local economy but should be avoided as these are less stable and can be more prone to movement and especially sinkholes in heavy water incidents.

3.17 SEA Theme [Water] Unfortunately the Rother Strategic Flood Risk Assessment identified that there are a number of sources of flooding that get compounded through the Parish. The initial, some may think most obvious, is linked to the position of the Darvell Stream that runs through the middle of the Parish. This is a main river and as a result a broad area to the north of Salehurst and over to the west in the space between the two villages, plus to the south, is within Flood Zone 2 & 3. In the main there is little difference between the extent of either of these. The Rother SFRA 2008 identified this area as being focused over between the villages but the most recent flood maps show that this is actually focused that

affects a large central area of Robertsbridge village. This extent of this is centred on the middle part of the eastern end of Station Road and emanates out to the north east and south west, as can be seen on figure 8 below.

Figure 8: Extent of Flood Zone 3 in the Parish<sup>6</sup>



3.18 The conclusions from the Sequential Test in the Level 1 SFRA and the linked Level 2 (2008) report were that:

*“The Rother District Local Plan, Inset Map No.30, shows the Development Boundary for Robertsbridge, together with a housing allocation at Grove Farm and a mixed use allocation adjacent to Culverwells, both outside of flood Zones 2 and 3.*

*It should be possible to avoid areas at risk to flooding in searching for any required new allocation for development. ...at Robertsbridge any planning application received for the redevelopment of Previously Developed Land or for ‘infill’, within a flood risk area, will require an Exception Test...outside the existing Development Boundary are unlikely to pass the Exception Test.”*

3.19 In addition to this, Robertsbridge has also been identified as an area that has severe drainage issues that come from flooding of both the sewers and highways. The specific area that is identified with the greatest occurrence of severe drainage is focused in the middle of the town. Along with the

<sup>6</sup>[National Flood Map for Planning \(Rivers & Seas\)](#) as accessed on 24/09/16

stream flowing between the villages and therefore being constrained as well, this means that there is an identified Flood Warning Area in Robertsbridge. The Rother Sequential Test mentions there were 88 properties flooded in 2000 and as a result a flood alleviation scheme was constructed at Robertsbridge in 2003/4 that is intended to give protection against extreme flooding of the rivers or their tributaries. The flood alleviation scheme is to be maintained by the Environment Agency and Rother Council are looking to ensure that this is increased so that this becomes responding to incidents, although there has been no official agreement reflected in any published documents to date.

3.20 As well as the combined flood risk that affect the villages as they are served largely by Southern Water, they are also considered to be within an 'Area of Water Stress' meaning that limits on water abstraction can be applied. Severe drainage areas mean there have been impacts on water quality in the past.

3.21 SEA Theme [Air; Human Health]

The context of the road system within and connecting the villages both to each other and the wider District has been covered near the beginning of this section. These relationships become particularly important once the localised information is analysed. As detailed in the Transport profile of the Parish, the Parish has a significantly higher proportion of residents with more than one vehicle per dwelling. It also shows that this tends to correlate with a higher proportion identifying it as their main mode of transport when commuting to work.

3.22 As shown earlier under the setting part of this section, there are a high number of routeways crossing throughout the Parish. These contribute to a specific characteristic of the High Weald AONB, although there are also a number of slim roads that run throughout the villages as well, appropriate solutions to improve flow and capacity on the network becomes more challenging.

## Results from baseline review

3.23 Crucially for the villages going forward the greatest proportion of their populations fall within the 45-64 age group, with an even spread among other age groups. This means that it is especially important in terms of need to support the older population and ensuring that services reflect this. As well as surveys showing that there would be a preference to look for more adaptable housing in the future, this age group tends to prefer shorter distances. This has the potential to have positive impacts both for this aspect and indirectly to others, although may cause a gradual increase in pressure on differing infrastructure. These will need to be carefully considered as the assessment progresses.

3.24 The result from the higher proportion of residents with more than one vehicle per dwelling and the number of slimmer roads mean that it will be especially important to try and cause a change away from private vehicles to other forms of transport going forward. Additionally, the higher proportion of private vehicles can have significant indirect impacts associated with air quality, although this will have to be considered further throughout the assessment.

3.25 The context of the Parish and its connections to the wider position in the Rother, Brede and Tillingham Woods BOA will be important in terms of the assessment going forward.

The special importance of the Parish in terms of the characteristics of the High Weald AONB, with its historic field margins and the extensive routeways must be considered throughout the assessment.

3.26 There is quite a lot of land that is Grade 3 in the Parish, plus around the built areas an amount of land classified as other land and it is important to remember this point throughout the assessment.

3.27 The two areas of sandstone should be taken into account in the assessment, due to its instability.

3.28 It is crucially important to ensure increasing means to maintain and improve water supplies and no deterioration in water quality are considered in the assessment.

3.29 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 SRNDP:

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.

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

3.30 Many issues that affect the way the Parish and villages will form into the future are not directly connected to the physical environment but the social or economic. Largely these tend to be connected to the population and the position of the villages within the wider District.

3.31 Without the SRNDP 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.

3.32 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 SRNDP:

- i. Continued flooding through the central part of the village for services
- ii. Issues in terms 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 village and its setting make to the High Weald AONB

## Constructing the framework

4.1 The development plan for Salehurst and Robertsbridge following the making of the neighbourhood plan will be formed of the Rother District Plan and the SRNDP. In terms of creating the framework, the first point has been to consider that set out within the Rother Sustainability Appraisal. For the Rother site allocations document, a further review and updating of this was carried out and consulted on in January 2016.

4.2 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.

### Difficulties during the assessment

4.3 The main issues with the collection and treatment of information through this process have been pointed out in section 2.1.

4.4 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.

Strategic Environmental Assessment Framework

Objective	Decision-Adding Question	Indicators
<b>SEA topic: Material Assets, Air, Climatic Factors, Biodiversity, Soil</b>		
1	<p>Improve efficiency in land use and encourage the prudent use of natural resources</p> <p>Does the option policy?</p> <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>		
2	<p>Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</p> <p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Improve travel choice · 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. <ul style="list-style-type: none"> <li>· Have access to pedestrian &amp; cycle routes for localised leisure opportunities</li> </ul> </li> <li>· Have highway capacity.</li> <li>· Avoid impact on and from AQMA.</li> <li>· Improve air quality</li> <li>· Not worsen or, where practicable, mitigate traffic congestion</li> <li>· Ensure that development is not at risk from land instability</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>

3	<b>SEA Directive Topics: Population, Material Assets, Air, Climate Factors</b>		
	<p>Improve accessibility to services and facilities for all ages across the District</p>	<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>			
4	<p>Protect and enhance the high quality natural and built environment</p>	<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> </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>· 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> <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. · 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>			
5	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> </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>

		<ul style="list-style-type: none"> <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>	
<b>SEA Directive Topics: Climatic Factors, Material Assets, Water, Human Health</b>			
6	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 · 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>			
7	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> </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>

		<ul style="list-style-type: none"> <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>	
<b>SEA Directive Topics: Climatic Factors, Material Assets</b>			
8	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> <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>	<ul style="list-style-type: none"> <li>· Emissions of greenhouse gases</li> <li>· Consumption of gas and electricity</li> </ul> <p>Number of applications and discharge of conditions granted for renewable energy</p>
<b>SEA Directive Topics: Material Assets</b>			
9	Reduce waste generation and disposal, and achieve the sustainable management of waste	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Help reduce waste and facilitate recycling in construction and operation.</li> <li>· Encourage composting.</li> <li>· Encourage development self-sufficient in waste management.</li> <li>· Support recovery of energy from waste.</li> <li>· Have good proximity to a household waste facility.</li> </ul>	<ul style="list-style-type: none"> <li>· Tonnage &amp; % of recycled household waste</li> <li>· Waste collected per person (kg)</li> <li>· % change in household waste collected per year</li> </ul>

		· Have good proximity to a 'bring' recycling point.	· % household waste composted · % household waste landfilled
<b>Cumulative and Synergistic Effects</b>	Above factors may interact in a synergistic way and may increase cumulative affects either positively or negatively.		
<b>Potential Mitigation</b>	Potential to mitigate negative effects and enhance positive effects		
<b>Recommendations</b>	Actions or change that could reduce or remove effect		
<b>Conclusions</b>	Derived from combination of above		

4.5 As well as establishing the framework, it is necessary to establish a scoring system. The scoring system being used is therefore as follows:

Table 1: Scoring system

Objective	Questions	Statistics	Score
1	2 positive answers	N/A	Red
	3-5 positive answers	N/A	Yellow
	6+ positive answers	N/A	Green
2	1-3 positive answers	Increased out commuting ; or Increased air pollutants or declaration of AQMA.	Red
	4-6 positive answers	No change expected for any	Yellow
	7+ positive answers	Reduction in air pollutants; or Reduction in out commuting Reduction in number of licenced vehicles; or Increase in other modes of travel to work or reduction in vehicle as mode	Green
3	2 positive answers	Increased proportion over 30 mins distance	Red
	3-6 positive answers	No change to proportion in 30 mins	Yellow
	6+ positive answers	Increased proportion less than 30 mins	Green
4	1-3 positive answers	Increased number of listed buildings at risk; or Grade1, Grade II and Grade II* at risk; or Reduction in % of land based businesses in High Weald	Red
	4-6 positive answers	No change	Yellow
	7+ positive answers	Increased number of conservation areas; or Reduction in number of listed buildings at risk; or Reduction in Grade 1 and Grade ii* at risk; or Increased % of land based businesses in High Weald	Green
5	Up to 5 positive answers	Any reduction of type or extent of habitats	Red
	6-10 positive answers	No significant change	Yellow
	11+ positive answers	Any increase or improvement in the type or extent of habitat and species; or Any actions aligned with the opportunities of the BOA	Green
6	1 positive answer	No significant change	Red
	2 positive answers	Located in lower flood risk;	Yellow
	3+ positive answers	Reduction in number of applications approved against EA advice on flood defence grounds; or Reduction in terms of applications and properties at risk from flooding	Green
7	2 positive answers	Increase in water consumption; or Reduction in water quality	Red
	3-5 positive answers	No significant change	Yellow
	6+ positive answers	Reduction in water consumption; and/or Improved water quality	Green
8	1-3 positive answers	Increase in gas and electricity; or Increase in greenhouse gas emissions	Red
	4-6 positive answers	No significant change	Yellow
	7+ positive answers	Reduction in greenhouse gas emissions and gas and electricity consumption; and/ or	Green

		Increase in number of applications discharged for renewable energy	Green
9	1-2 positive answers	Increase in % waste collected per year; or waste per household (kg)	Red
	2-4 positive answers	No significant change	Yellow
	5+ positive answers	Improve access to facilities; Reduced % waste per year and per household (kg)	Green

### **‘Reasonable’ alternatives**

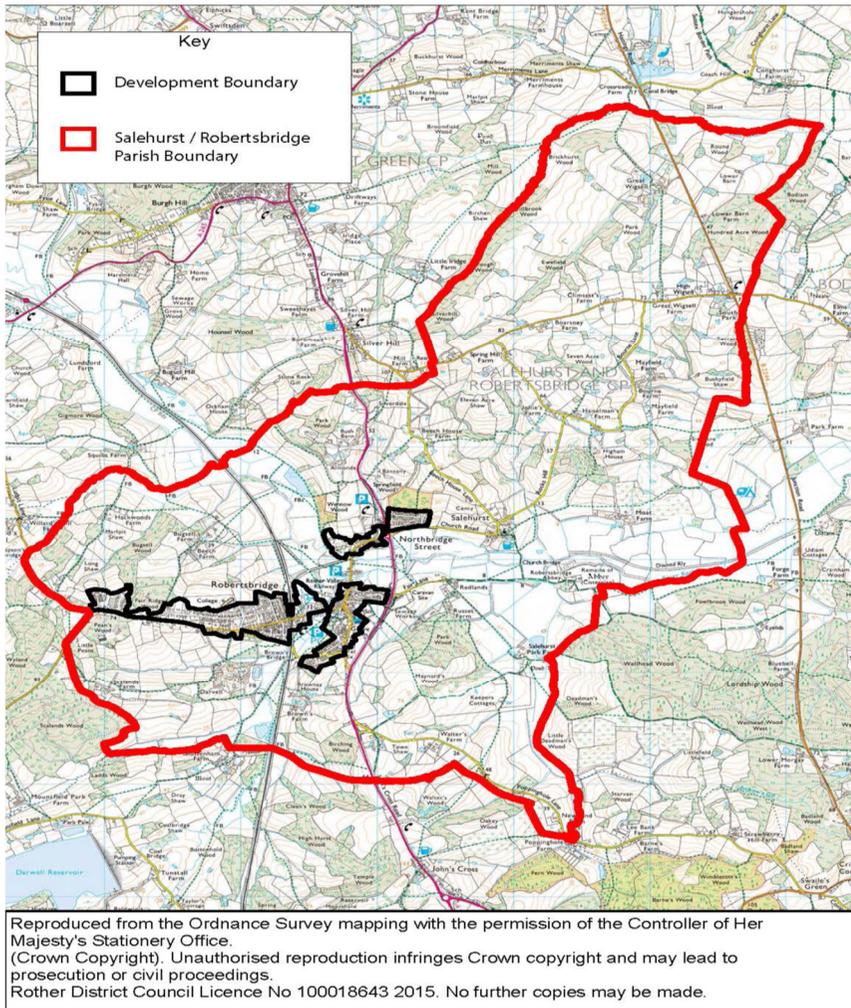
4.6 In terms of the formulation of the plan there was only one main element where alternatives applied. For the majority of the content of the plan there were no ‘reasonable’ alternatives, apart from not having a neighbourhood plan and leaving development of the parish to the development plan and any other of relevance.

4.7 The main area where there were alternatives related to housing. The alternative approach towards the housing number was either not allocating any sites or providing more. If it allocated no sites then it would not meet the basic requirement of being in conformity with a higher tier plan, so not ‘reasonable’. As Table 12 of the Core Strategy outlines this is the amount that is possible to be delivered in the plan period using the SHLAA 2013. It is on the basis of these documents and especially the fact no additional sites were brought forward through the separate Call for Sites process, a higher amount was not considered ‘reasonable’.

4.8 The alternate to the sites that have been allocated within the SRNP would have been the selection of different sites. An assessment of all sites has not been done due to the conclusion at the end of the previous paragraph.

## Assessing the Objectives of the SRNDP

5.1 The area for which the plan will relate was designated by Rother District under resolution CB14/80 on 13<sup>th</sup> April 2015. This is shown in the figure below and so the geographical scope applicable for the assessment. Figure 9: Designated area of Salehurst and Robertsbridge Neighbourhood Development Plan



5.2 The SRNDP is intended to cover a twelve year period and sets out the following vision that is supported by 19 objectives under 6 themes.

*“Salehurst and Robertsbridge will continue to be a thriving safe and friendly parish where people want to live, work and play. We will maintain and enhance our parishes whilst supporting sustainable development that respects our location within an Area of Outstanding Natural Beauty for the benefit of all residents and visitors alike.”*

The objectives of the SRNDP under their themes are:

**1. Economy**

- a) To sustain a thriving village centre with mix use shopping and service provision offering a range of goods and services to the local community and visitors.
- b) To foster a sustainable community that promotes employment creation, across commercial, retail and industrial sites.
- c) To retain the local retail and service provision.

**2. Education**

- a) To improve and extend the local educational facilities in line with future housing developments.
- b) To seek adequate education provision for children of the village of all ages.
- c) To promote informal or social educational facilities for younger people.

**3. Environment**

- a) To protect and enhance local open spaces and access to the countryside.
- b) To plan for climate change and work in harmony with the environment to conserve natural resources.
- c) To encourage development which meets current energy efficiency standards and where possible higher standards to achieve low carbon and/or renewable energy generation.

**4. Housing**

- a) To plan and deliver a range of housing mix, sizes and types that is integrated into the community which reflects both current and future housing needs of the village.
- b) To protect, maintain and enhance the nationally and locally important heritage assets and historic character; by guiding development that is sympathetic with the surroundings.
- c) To promote principles of good design and high quality that encourages local context and rural locality.

## **5. Infrastructure**

- a) To promote cycle networks and non-vehicular connectivity for a sustainable village life.
- b) To reduce the harmful impact of road traffic and parking on the local community.
- c) To seek timely and effective maintenance of existing infrastructure.
- d) To maintain and improve effective flood defences.
- e) To seek improvements for pedestrian safety on the high street.

## **6. Leisure**

- a) To secure the long term future of existing community leisure and cultural facilities for all ages.
- b) To promote the provision of new facilities to address the future needs of the village.

5.3 The following table shows the likely impact that these could have related to the assessment framework. Where there is no relationship the corresponding cube is left blank, where there is a positive relationship between them this is marked with a tick and where there is a conflict between them it is marked with a cross.

Table 2: SRNDP Objectives against assessment framework

Objective	Efficient use of land and natural resources	Reduce road congestion, pollution and improve air quality	Improve accessibility to services and facilities for all ages	Protect and enhance the high quality natural and built environment	Conserve and enhance biodiversity and geodiversity	Minimise the risk of flooding and the detriment to people and properties	Maintain, improve and manage water resources in a sustainable way	Reduce emissions of greenhouse gases	Reduce waste generation, disposal and achieve sustainable waste management
Sustainable village centre with shops and services for residents and visitors	✓	✓	✓		✓		✗	✗	✗
Foster sustainable community that promotes employment creation	✓			✓			✗	✓	✓
Retain local retail and services	✓	✓	✓	✓	✓		✓	✗	
Improve and extend educational facilities in line with future housing	✗	✗	✓		✗		✗		
Seek adequate education provision for village children of all ages									✗
Protect and enhance local open spaces and access to the countryside				✓	✓			✓	
Plan for climate change, working with the environment to conserve natural resources	✓	✓		✓	✓	✓	✓	✓	✓
Encourage developments that meet energy efficiency standards and higher to achieve low carbon and/or renewable energy generation	✓	✓		✓			✓	✓	✓
To deliver a mix of housing that is integrated into the community reflecting both current and future housing need	✓			✓					
Protect, maintain and enhance both nationally and locally important heritage assets	✓		✓	✓					
Promote principles of good design taking account of local character and rural locality	✓		✓	✓			✓	✓	✓
Promote cycle routes and non-vehicular connectivity	✓	✓	✓		✓			✓	
Reduce harmful impact of road traffic and parking on local community		✓	✓		✓			✓	
Seek timely and effective maintenance of existing infrastructure	✓	✓	✓			✓	✓	✓	✓

Maintain and improve effective flood defences	✓			✓	✓	✓	✓		
Seek improvements for pedestrian safety on the high street		✓	✓	✓				✓	
Secure the long term future of leisure and cultural facilities for all ages			✓						
Promote provision of future facilities to address future need	✓		✓	✓		✓			

5.4 As can be seen, although there is a large number of areas where there will be direct relationships, there are generally a large number of areas where there are positive relationships and only a limited number where there is the potential for conflict. These conflicts tend to relate between natural resources and the objectives relating to encouraging growth. Though they are identified at this stage, this does not mean that these should be discounted. Much of this result is due to there being no specific detail and so little to assess specific effects. Identifying the potential for conflict between these simply has to borne in mind throughout.

## Assessing the sites around Salehurst and Robertsbridge

6.1 The first source for potential sites was the Rother District Strategic Housing Land Availability Assessment (SHLAA) 2013, specifically those in and around Salehurst and Robertsbridge. The detail within this and Table 12 of the adopted Core Strategy<sup>7</sup> plus the site assessment document for the SRNDP indicates that there is a capacity of 155 residential units that may be accommodated on these sites throughout the period of the SRNP. Due to their inclusion in these documents all of these are considered to be 'reasonable' alternatives for this aspect of the SRNP. As the numbers for the sites are based on this evidence there was no specific need to consider different amounts by varying other elements (i.e. densities).

6.2 Information relating to the sites was available from a County level and down to local information provided in responses from neighbourhood workshops with residents and site promoters. The following discussion assesses each of the sites individually against the aspects of the framework and then ends with an overall conclusion. Though there were 16 sites that were included in the SHLAA 2013, to be as robust as possible a separate Call for Sites exercise was also carried out by the Neighbourhood Plan Steering Group. The following sites resulted from both these processes:

1. Slides Farm
2. South of Pound Platt
3. Mill site
4. North of Northbridge Street (adj. Mill site)\*
5. Vicarage Land
6. Grove Farm Phase 1
7. Grove Farm Phase 2
8. Robertsbridge Club
9. Market site/ Countrycrafts
10. Bishops Lane
11. Heathfield Gardens (West)
12. Heathfield Gardens (East)
13. Adjacent Culverwells, Station Road

\*This is identified as 3a on the Site Map and within the following section of this document to be consistent with that.

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<sup>7</sup><http://www.rother.gov.uk/corestrategy>

The revised presentation of the site assessment allows more in-depth assessment so that it is as objective as possible which means that there are times when an objective has multiple scoring but the individual comments provide the clarity. This means that some of the scoring may be different to the December version due to providing clarity and acquiring more up to date information on various sites.

## 1. Slides Farm

6.3 This site is located to the north east and is the furthest away from any of the development boundary. Only part of the site is being promoted.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources			The site is some distance from the current development boundary, and is lacking in current connections to utilities and would need a new access Greenfield site, when brownfield is available elsewhere in the village.
Reduce road congestion, pollution and improve air quality			The site would not increase congestion from traffic coming to it from outside the village because it would be accessed directly from the A21. Its distance from the village centre (950m) is the greatest of all considered sites, and so would probably generate increased car traffic to access services within the village, although it is only at a comparable distance from the village as the developments on the eastern side of the A21.

<p>Improve access to services and facilities for all ages</p>	<p>It would be reasonably close to walk to whatever facilities were located on the Mill Site and the Recreation Ground.</p>	<p>The hourly bus service, Monday to Saturday, could alleviate this concern. Bus stops 300 m from entrance to site.</p>	<p>The distance from the centre of the village would make pedestrian traffic unlikely and therefore there would be a greater use of the car. Steep hill up to site from Northbridge Street</p>
<p>Protect and enhance the high quality of the natural and built environment</p>			<p>The location of this site on slightly rising ground would make it visible from a few vantage points within the village. It would extend the built envelope of the village significantly outside the current development boundary and thus into the open countryside. Any permanent development in the High Weald AONB has the capacity to harm and/or intrude into the AONB, so must be well designed to blend in and be appropriately conditioned. Probable loss of some areas of habitat although gardens are increasingly recognised as useful habitats.</p>
<p>Conserve and enhance biodiversity and geodiversity</p>			<p>No publicly available evidence of biodiversity, but any development would reduce possible habitat, and therefore reduce chances for biodiversity to improve.</p>
<p>Minimise the risk of flooding and detriment to people and properties</p>			<p>In Flood Zone 1 for all of the site, so it is to be anticipated that if approved, appropriate conditions to require adequate and effective SuDS installation to be in place to</p>

			prevent any surface water flooding off site. History of off-site flooding
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering.
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it.
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling.	
<b>Overall Conclusion</b>	Careful site layout and design is needed, as well as sustainable drainage solutions to reduce the surface water runoff into the site from the road.		

## 2. South of Pound Platt

6.4 This is a small site abutting the development boundary to the north east.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	The site is immediately adjacent to the current development boundary, close to adopted roads, so extension of utilities to the site should not be a great concern		It is a small site only and would require third party permission to gain access to the adopted highway It is immediately adjacent to the Conservation Area
Reduce road congestion, pollution and improve air quality		Northbridge Street is at its narrowest where the access from the site would emerge, but considering the size of the site, this is not thought to be a significant concern	
Improve access to services and facilities for all ages		The site is approximately 650m from the centre of the village but such a distance does not now deter people from walking to most village facilities, whereas it is much nearer to the Recreation Ground and whatever may be at the Mill Site	
Protect and enhance the high quality of the natural and built environment		The site is relatively small and has been used for domestic and storage purposes, so has little of merit in either the natural or built environment. Small domestic housing and gardens would not make any significant difference to the current situation	Any permanent development in the High Weald AONB has the capacity to harm and/or intrude into the AONB, so must be well designed to blend in and be appropriately conditioned Probable loss of some areas of habitat although gardens are

			increasingly recognised as useful habitats
Conserve and enhance biodiversity and geodiversity			No publicly available evidence of biodiversity, but any development would reduce possible habitat, and therefore reduce chances for biodiversity to improve
Minimise the risk of flooding and detriment to people and properties			This site is located close to the edge of Flood Zone 2 in Flood Zone 1 and the access to the adopted highway would be in Flood Zone 2, which creates a risk History of off-site flooding
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it

Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling. Surface water removal problem general within the village	
<b>Overall Conclusion</b>	Careful site layout and design given its proximity to the Conservation Area, as well as sustainable drainage solutions to reduce the surface water runoff into the site from the road.		

### 3. Mill Site

6.5 The site is located inside and outside the western edge of the Northbridge Street development boundary. The SHLAA had identified it for a commercial use with some residential to enable achieving the viability for the employment use. The site has been vacant for a number of years.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	Partly (80%) inside development boundary Brownfield site abandoned for last 13 years and in need of restoration. Physical eyesore in its present condition Potential to use Mill race for energy generation on site (preliminary investigation		Loss of industrial/commercial site, since majority of site would be for housing. Partly within Conservation Area

	undertaken by Ovesco - alternative energy co-operative based in Lewes – indicates strong potential) Restoration of existing listed building (Oast) and unlisted significant building (Mill building) Existing utilities on site		
Reduce road congestion, pollution and improve air quality	Short, access to A21, steering traffic away from village centre Has bus stops within 100m of entrance to site. Possible creation of foot/cycle path to station/new medical centre, reducing distance to secondary school. Hydro power would reduce overall air pollution	However, many people from Northbridge Street and from the c.80 houses east of the A21 (i.e. beyond the site) often walk to the village centre because of difficulties of parking in the centre of the village. Need for adequate on-site parking for residents and businesses to avoid overspill parking	Site entrance approx 550m from village centre (junction High Street/Station Road) Northbridge Street is narrowed to single carriageway by parked cars and thus through access is sometimes restricted
Improve access to services and facilities for all ages	Has bus stops within 100m of entrance to site. Possible creation of foot/cycle path to station/new medical centre, reducing distance to secondary school. Direct links to AONB through extensive network of public footpaths. Closest site to pocket park, football, cricket pitches, children's playground, adult fitness equipment. Possible donation of freehold of land to Parish Council used as Pocket Park. Flat access to village and services from entrance		Sloping access on site to northern end. Site entrance approx. 550m from village centre (junction High Street/Station Road)

<p>Protect and enhance the high quality of the natural and built environment</p>	<p>Restoration of existing buildings of merit, particularly the Mill building which because of its size and history is considered to be a very significant structure in the village. Removal of concrete surfacing and other derelict structures and eyesores. Creation of dedicated green spaces in flood risk areas, but long term maintenance of such areas needs to be dealt with at planning Improvement of Mill race to facilitate hydro scheme.</p>		<p>Any permanent development in the High Weald AONB has the capacity to harm and/or intrude into the AONB, so must be well designed to blend in and be appropriately conditioned Probable loss of some areas of habitat although gardens are increasingly recognised as useful habitats. Part of the site is in Northbridge Street Conservation Area so care needed with any proposals</p>
<p>Conserve and enhance biodiversity and geodiversity</p>	<p>It is currently brownfield and derelict in the AONB, so development could eliminate pollution to land and improve habitat. Tree management which is needed could form part of development plan; geodiversity should be unaffected by any development.</p>		<p>Any residential or commercial development will change in some ways the biodiversity of a derelict brownfield site.</p>
<p>Minimise the risk of flooding and detriment to people and properties</p>	<p>Majority of the site and existing buildings are in FZ1.</p>	<p>Part of the site is in FZ2 which is acceptable in line with vulnerability table. There is some risk but less than 1:100</p>	<p>Flooding is a serious potential risk with a small area of the site in FZ3 which would be subject to the Exception Test. River Rother has a history of 'flashy' flooding, i.e. a rapid rise but equally rapid decline in flood water. Any proposal would have to satisfy EA and LPA, with Flood Plan and emergency access.</p>

Maintain, improve and manage water resources	Development would have to ensure the flood risk is minimised, so would assist in reducing risk to the site and other adjacent properties		Any development, whether residential or commercial, would increase water consumption, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions	Potential hydro scheme		All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it.
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling. Surface water removal problem general within the village	
<b>Overall Conclusion</b>	Majority of this site is in FZ1 so is suitable for housing allocation. However, part of the site scores negatively for flood risk, but with appropriate mitigation this could be managed. The potential flood depths on the site are quite considerable (in excess of 1m) and mitigation measures are likely to be in the form of raised floor levels (first floor accommodation only) and flood compensation, where necessary and will need safe access in times		

	of flooding. Positive aspects are multiple: restoration of important buildings and heritage assets, removal of dereliction and pollution, provision of commercial premises, potential improvement in access to rail station. Investigation of the potential to incorporate renewable energy.
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### 3a. North of Northbridge Street (adj. Mill site)

6.6 This site is to the north east of site 3, abutting the current development boundary.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources			It is outside the current development boundary by some margin, and because it is landlocked, could only be used for development if access were to be granted by a third party; we are not aware of any such grant being proffered. Greenfield site, when brownfield is available elsewhere in the village. There are no utilities on site
Reduce road congestion, pollution and improve air quality		Public transport (buses) are available on Northbridge Street; however the site is a further 200m from the entrance from Northbridge Street to the Mill Site	As this site could only in practice be developed in conjunction with site 3, the additional number of dwellings built might create an unacceptable burden on a single a point of access.

		However, many people from Northbridge Street and from the c.80 houses east of the A21 walk to the village centre often because of difficulties of parking in the centre of the village.	
Improve access to services and facilities for all ages	Access via the Mill Site would allow use of the future foot/cycle path to station It has close links to the rural footpath network		Access to the site is uphill through the Mill Site
Protect and enhance the high quality of the natural and built environment			Because it is raised from surrounding land, it would create an impact for longer and some shorter distance views into the site and lacks existing tree cover. Any permanent development has the capacity to harm the natural environment, so must be well designed to blend in and be appropriately conditioned Probable loss of some areas of habitat although gardens are increasingly recognised as useful habitats.
Conserve and enhance biodiversity and geodiversity			No publicly available evidence of biodiversity, but any development would reduce possible habitat, and therefore reduce chances for biodiversity to improve
Minimise the risk of flooding and detriment to people and properties		In Flood Zone 1 for all of the site, so it is to be anticipated that if approved, appropriate conditions	

		to require adequate and effective SuDS installation to be in place to prevent any surface water flooding off site	
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it

Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	This site would have a number of detrimental impacts on the environment, with very few positive benefits if at all. Extensive landscaping and careful design would be needed to reduce the visual impact.		

## 5. Vicarage Land

6.7 This site is a small site and is within the development boundary adjoining the Primary School.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	Site within the current development boundary. Central to the village. Part of the site is brownfield. Small infill in the centre of the village; services in Fair Lane adjacent.		Within the Conservation Area, so there needs to be sympathetic design
Reduce road congestion, pollution and improve air quality	Very close to centre of village (100m) for pedestrian traffic Opportunity to improve (slightly) road along Fair Lane		Access is steep, particularly for older people and pram pushers Fair Lane is very narrow and is already congested with parked vehicles

	Potential to improve width of opposite pavement at access to site		
Improve access to services and facilities for all ages	Very close to centre of village and thus to village facilities		Access by foot is steep, particularly for older people
Protect and enhance the high quality of the natural and built environment	Buildings to be demolished (Mission Room and Vicarage) and Mission Room has been neglected for a number of years; Vicarage not in keeping with Conservation Area		Any permanent development has the capacity to harm the natural environment, so must be well designed to blend in and be appropriately conditioned Probable loss of some areas of habitat although gardens are increasingly recognised as useful habitats
Conserve and enhance biodiversity and geodiversity		Small site with buildings and infrastructure on part, so any loss of biodiversity would be small No impact on geodiversity	
Minimise the risk of flooding and detriment to people and properties			Flood Zone 1, so any risk would be off-site flooding and any permission on the site would be expected to incorporate appropriate conditions for SuDS installation. No anecdotal evidence of off-site flooding caused by existing site conditions to Fair Lane but evidence of flooding to rear of properties on High Street which could be addressed by development
Maintain, improve and manage water resources			Any development, whether residential or commercial, would

			increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	Effective SUDs is needed and will need to ensure new buildings do not break skyline to High Street. Work to ensure access creates self-improvement to Fair Lane for traffic and pedestrians. Appropriate dwellings for the site location. These adverse impacts can be appropriately conditioned to enable site to be used for dwellings and a community building.		

## 6. Grove Farm Phase 1

6.8 This site partly was included in a site designated in the Rother Local Plan 2006. Part of the eastern development boundary of Robertsbridge forms the site boundary and Site 7 (Grove Farm phase 2) abuts it to the east. A planning application for this site was received by Rother on 10 July 2017 and is still being considered.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	Site is 70% within the existing development boundary Site is close to the village centre (access to centre 300m); utilities presumed to be in George Hill		Mainly greenfield (wholly greenfield according to NPPF definition of 'agricultural land'. site with medieval field boundaries, when brownfield is available elsewhere in the village Partly within Conservation Area Loss of agricultural land grade 2/3, currently in use. 24" water main crosses the site, reducing useful area to develop; underground electricity cable crosses the site. Archaeological area of interest, not yet properly explored
Reduce road congestion, pollution and improve air quality	Because it is very close to centre of village and certain facilities (primary school, nursery) it would reduce the need to use cars to travel about the village Footpath already on George Hill to access north or south Close to bus stop (150m from site access)		George Hill is highly congested already because of use by parents to the Primary School, Guides and Nursery, and users of the Youth Centre; and by commuters who park there to avoid parking charges at the rail station Development would reduce current on-street parking places on George Hill

			<p>Location of site will put pressure on junction with A21 at George Hill which is a source of accidents</p> <p>The above problems were identified in Rother's SHLAA</p> <p>Would entail the creation of a new vehicular entrance additional to the already existing eight such entrances all within a distance of 250m, plus a further one already granted planning permission</p>
<p>Improve access to services and facilities for all ages</p>	<p>Close to centre of village and thus to Primary School, Nursery and Youth Centre. Close to bus stops</p> <p>Possibility of creation of employment opportunities with conversion of listed barn</p> <p>Children's leisure activities (play area or possible BMX or skateboard area) could be provided on site but long term maintenance of such areas needs to be dealt with at planning</p>		<p>Steep incline from bottom of George Hill</p>
<p>Protect and enhance the high quality of the natural and built environment</p>	<p>Repair/restoration of listed barn would enhance built features of site</p>		<p>Development would destroy the medieval field structure identified by the High Weald AONB Unit</p> <p>Development without proper investigation/preservation would harm the archaeological features of the site, already identified by ESCC</p> <p>Would cause loss of noted approach to the village in the</p>

			<p>Conservation Area appraisal para 3.2 considered to be “striking”. The site being at the entrance to the village contributes to the rural nature of the village.</p> <p>Current application does not provide for 30 m tree belt immediately adjacent to the site’s eastern boundary, as indicated by Policy VL7 of the 2006 Local Plan ‘to provide screening on the higher land between the housing and the Robertsbridge bypass’</p> <p>Any permanent development in the High Weald AONB has the capacity to harm and/or intrude into the AONB, so must be well designed to blend in and be appropriately conditioned.</p> <p>Probable loss of some areas of habitat although gardens are increasingly recognised as useful habitats</p>
<p>Conserve and enhance biodiversity and geodiversity</p>		<p>No twelve month survey or flora and fauna so far produced with planning application, so difficult to say what may be lost by development, although recorded bat route across the site might be affected by development</p>	<p>No publicly available evidence of biodiversity, but any development would reduce possible habitat, and therefore reduce chances for biodiversity to improve</p>

Minimise the risk of flooding and detriment to people and properties		In Flood Zone 1, but current problem with surface water flowing from site at various points in rainy conditions suggest extreme care needs to be taken for any development to ensure that current problems are not exacerbated	
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will	

		minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	The cumulative effects, especially if the Site 7 were built are significant in terms of extra traffic generated on to road infrastructure, internally and externally. Given there is a planning application current, archaeology and ecology will need further investigation as will capacity of SUDs to cope with surface water flooding. Development on this site would have a significant impact on the feel of the countryside into the village. Due to landscape impact, it would cause loss of perception of Robertsbridge as a rural village because of loss of 'green finger' into the heart of the village, direct to medieval and 18 <sup>th</sup> century buildings		

## 7. Grove Farm Phase 2

6.9 This site is a larger site sitting between site 6 and the A 21 Robertsbridge By-pass. The 2006 Local Plan indicated a children's play area and tree belt should be on the edge of this site, abutting Site 6.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources			Greenfield site, when brownfield is available elsewhere in the village It would be dependent upon access through Grove Farm 1, and the current application does not indicate adequate access to be provided Services would have to be extended on to the site 24" water main and underground electricity cable cross the site Loss of agricultural land, grade 2/3, currently in use

Reduce road congestion, pollution and improve air quality	It is close to centre of village, although not as close as Grove Farm 1, but would reduce the need to travel by car to such facilities as Primary School and Nursery Footpath already on George Hill to access north or south Close to bus stop (200m from site access)		George Hill is highly congested already because of use by parents to the Primary School, Guides and Nursery, and users of the Youth Centre; and by commuters who park there to avoid parking charges at the rail station Users would gravitate southwards to access the A21, and that junction has a poor accident record
Improve access to services and facilities for all ages	Close to centre of village, particularly Primary School, Nursery and Youth Centre Close to bus stops		Steep incline from bottom of George Hill and through Grove Farm 1
Protect and enhance the high quality of the natural and built environment	When planners previously looked at site, they suggested strengthening of the tree belt next to the A21		Any development would be on rising ground and so visual impact would be seen from shorter and long distance view points. Any permanent development has the capacity to harm the natural environment, so would have to be well designed and appropriately conditioned. Loss of areas of habitat, although gardens are increasingly recognised as useful habitats
Conserve and enhance biodiversity and geodiversity			No publicly available evidence of biodiversity on site, but any development would reduce possible habitat and therefore chances for biodiversity to improve

Minimise the risk of flooding and detriment to people and properties		In Flood Zone 1, but current problem with surface water flowing from site at various points in rainy conditions suggest extreme care needs to be taken for any development to ensure that current problems are not exacerbated	
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will	

		minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	This site should not be put forward for development. It was originally proposed by a developer who had an option over the site in 2016. The owners indicated at the Public Hearing on 28 September 2017 that they no longer wished to put this site forward. Due to landscape impact, it would cause loss of perception of Robertsbridge as a rural village because of loss of 'green finger' into the heart of the village, direct to medieval and 18 <sup>th</sup> century buildings		

## 8. Robertsbridge Club

6.10 This is the smallest site suggested at the call for sites and is located centrally in the village close to the junction of Station Road and High Street. During the course of the preparation of the NP, the owners indicated they no longer wished their site to be included as a possible development site.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	The site is a brownfield site It is within the current development boundary It is small but is the most centrally located of all the sites which were examined. There are existing connections to utilities on site The Club's proposals would include a new, more sustainable home for the existing club, using a smaller footprint		

Reduce road congestion, pollution and improve air quality	The small site of itself would not generate much traffic from people living there. It is centrally located so lessens the need for vehicles to be used to access other places within the village		
Improve access to services and facilities for all ages	Its central location means relatively easy access for any village facility by foot. The rebuilding of club facilities should prove an enhancement to the village		
Protect and enhance the high quality of the natural and built environment	This is a brownfield site and any improvement in the natural environment would come from any small cottage gardens provided The existing club building is a mainly 100 year old wooden structure of no merit or architectural significance		
Conserve and enhance biodiversity and geodiversity		This is a small brownfield site so little opportunity to enhance biodiversity	
Minimise the risk of flooding and detriment to people and properties			In Flood Zone 3, so both the EA and LPA would have to be entirely satisfied with designs to ensure safety of all residents in the event of flooding
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but

			such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	This site would not have any effects on the environment although it is significantly constrained by being within flood zone 3.		

## 9. Countrycrafts/Market Site

6.11 This site is one of the smallest and is situated in the middle of the settlement boundary approximately central. It is just across the road from others being considered on the eastern side of the parish. **This site now has planning permission so is not assessed any further.**

## 10. Bishops Lane

6.12 The site is outside the development boundary although it abuts existing housing on Bishops Lane

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	Immediately adjacent to similar residential development and also adjacent to the current development boundary	22% of site in Flood Zone 3 but no proposed development there except diverted public footpath	Greenfield site, when brownfield is available elsewhere in the village Its development would reduce the extent of the proposed listed series of green spaces – a green corridor through the centre of the village, visible from several places
Reduce road congestion, pollution and improve air quality	It is close to centre of village on foot, using the footpath to Willowbank. Access to the site would avoid congestion in the centre of the village		Bishop's Lane is a narrow, ancient trackway originally fringed with emphatic tree linings, which carry a clear impression of rurality and they would be harmed by development. Access from the west is extremely poor and dangerous with two blind 90° bends very close to the site

			<p>Access to Bishops Lane from west off Brightling Road is a very difficult hairpin (access to secondary school)</p> <p>Access from George Hill is along Heathfield Gardens, a road with antiquated high sleeping policemen. Rother's SHLAA said potentially accessible but 'only following extensive highways works including an extension to the 30 mph zone to contain the vehicular access and appropriate road widening works to provide footway connection.....</p> <p>Appropriateness of road widening and works at this point would impact on the area's rural character and tranquillity on a road defined by High Weald AONB as a historic routeway.'</p> <p>Location of site will put pressure on junction with A21 at George Hill which is a source of accidents</p>
<p>Improve access to services and facilities for all ages</p>	<p>Possible new footpath close to Darvell Stream to be provided  Close to most services if you use the footpath, not the road  Closest of all sites to station and surgery, via footpath</p>		<p>Access road is dangerous from east, no footpath after junction with Heathfield Gardens  Access road is dangerous from west, with double blind bends  Furthest site from bus stops, but still only 250m</p>

<p>Protect and enhance the high quality of the natural and built environment</p>	<p>Approx 35%of the site would be left undeveloped, as water meadows but long term maintenance of such areas needs to be dealt with at planning Proposed community orchard at entrance to site but long term maintenance of such areas needs to be dealt with at planning</p>		<p>Development would cover the most visible part of one of the nominated green spaces in the NP Any permanent development in the High Weald AONB has the capacity to harm and/or intrude into the AONB, so must be well designed to blend in and be appropriately conditioned Probable loss of some areas of habitat although gardens are increasingly recognised as useful habitats. There would be erosion of open valley through the village as well as visual exposure from public footpaths. Access would urbanise existing lane which is a historic route.</p>
<p>Conserve and enhance biodiversity and geodiversity</p>			<p>No publicly available evidence of biodiversity but any development, even over only half of the site, would reduce possible habitat, and therefore reduce chances for biodiversity to improve</p>
<p>Minimise the risk of flooding and detriment to people and properties</p>		<p>78 % of site is in Flood Zone 1, so would not be affected by fluvial flooding; it is to be anticipated that if approved, appropriate conditions to require adequate and effective SuDS installation to be in place to prevent any surface water flooding</p>	
<p>Maintain, improve and manage water resources</p>			<p>Any development, whether residential or commercial, would</p>

			increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering
Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	Though in general there are a lot of negative scores for this site it is neutral for flood risk. Investigation of the potential to incorporate a community orchard is an option. Development would impact on the built and natural environment.		

## 11. Heathfield Gardens West

6.13 This is a site located immediately outside the southern development boundary of the village and adjoins site 12.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	Least visual impact along with Heathfield Gardens East, from other viewpoints in the village of any of the selected sites Outside the current development boundary, but immediately adjacent to similar residential developments When put with Heathfield Gardens East, the two create a deliverable development site		Greenfield site when brownfield available elsewhere Furthest selected site from the centre of the village (600m)
Reduce road congestion, pollution and improve air quality	Traffic coming to this site from outside the village would probably have the least impact on the village and therefore not add to congestion, particularly on George Hill Close to bus stops (150m)		Any new development will create additional traffic, whether car-borne or vehicles serving the new dwellings, which would add to congestion. Location of site will put pressure on junction with A21 at George Hill which is a source of accidents
Improve access to services and facilities for all ages	Possible footpath across through to Heathfield Gardens increases choice of pedestrian routes to		Furthest selected site from centre of village and most facilities

	places such as secondary school, station and surgery Close to bus stops; close to Farm Shop		At the top of a steep hill (George Hill) which may discourage walking within the village
Protect and enhance the high quality of the natural and built environment	Probably the most hidden of all selected sites in terms of visual intrusion because of surrounding topography Rother's SHLAA indicates 'high quality development in strong landscape setting would enhance AONB character of area.		Any permanent development has the capacity to harm the natural environment, so must be well designed to blend in and be appropriately conditioned Possible loss of some areas of habitat including mature trees although gardens are increasingly recognised as useful habitats
Conserve and enhance biodiversity and geodiversity			No publicly available evidence of biodiversity, but any development would reduce possible habitat, and therefore reduce chances for biodiversity to improve
Minimise the risk of flooding and detriment to people and properties		In Flood Zone 1 for all of the site, so it is to be anticipated that if approved, appropriate conditions to require adequate and effective SuDS installation to be in place to prevent any surface water flooding off site	
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering

Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	This site has a low visual impact with other issues but could be mitigated. No specific mitigation but investigation of sustainable drainage necessary, so is being proposed by the NDP		

## 12. Heathfield Gardens East

6.14 This is a site located immediately outside the southern development boundary of the village and adjoins site 11 and George Hill.

Objective	Commentary (Positive)	Commentary (Neutral)	Commentary (Negative)
Efficient use of land and natural resources	Least visual impact , along Heathfield Gardens West ,from other viewpoints in the village of any of the selected sites When put with Heathfield Gardens West, the two create a coherent single access sensible development site with sufficient capacity to ensure affordable housing to be built. Outside the current development boundary, but immediately adjacent to similar residential developments		550 m from the centre of the village. Greenfield site (although had a temporary industrial use 25+ years ago as a compound for the Robertsbridge by-pass) when brownfield available elsewhere
Reduce road congestion, pollution and improve air quality	Traffic coming to this site from outside the village would probably have the least impact on the village and therefore not add to congestion, particularly on George Hill Close to bus stops (50m)		Any new development will create additional traffic, whether car-borne or vehicles serving the new dwellings, which would add to congestion. Location of site will put pressure on junction with A21 at George Hill which is a source of accidents
Improve access to services and facilities for all ages	Possible footpath across through to Heathfield Gardens increases choice of pedestrian routes to places such as secondary school, station and surgery		Second furthest selected site from centre of village and most facilities At the top of a steep hill (George Hill) which may discourage walking within the village

	Close to bus stops; close to Farm Shop		
Protect and enhance the high quality of the natural and built environment	Probably the most hidden of all selected sites in terms of visual intrusion because of surrounding topography Rother's SHLAA indicates 'high quality development in strong landscape setting would enhance AONB character of area.		Any permanent development has the capacity to harm the natural environment, so must be well designed to blend in and be appropriately conditioned Possible loss of some areas of habitat including mature trees although gardens are increasingly recognised as useful habitats
Conserve and enhance biodiversity and geodiversity			No publicly available evidence of biodiversity, but any development would reduce possible habitat, and therefore reduce chances for biodiversity to improve
Minimise the risk of flooding and detriment to people and properties		In Flood Zone 1 for all of the site, so it is to be anticipated that if approved, appropriate conditions to require adequate and effective SuDS installation to be in place to prevent any surface water flooding off site	
Maintain, improve and manage water resources			Any development, whether residential or commercial, would increase water consumption from the site compared to existing, but such could be mitigated by installation of water saving devices during the build, with grey water recycling and water metering

Reduce greenhouse gas emissions			All new build developments have the opportunity to introduce solar panels or other energy generating equipment which produce less greenhouse gas and all have the opportunity to install insulation above any statutory guidelines to decrease the production of greenhouse gases; the NP seeks to encourage this activity, it cannot compel it
Reduce waste generation, disposal and achieve sustainable waste management		Inevitable consequence of any development, whether residential or commercial, that there will be some generation of waste; planning conditions and local services provided by RDC will minimise impact of such, encourage minimisation of waste, and encourage recycling Surface water removal problem general within the village	
<b>Overall Conclusion</b>	This site has a low visual impact and other issues but could be mitigated. No specific mitigation but investigation of sustainable drainage necessary, so is being proposed by the NDP		

### 13. Adjacent Culverwells, Station Road

6.15 This site is situated adjacent to the existing garage and north of the allotments. Similar to Grove Farm this site has been allocated since the 2006 Rother Local Plan. Approval was granted in June 2015 for 17 homes and 13,000sqft of office space on this site and it incorporated aspects that dealt with the main points that have been identified as mitigation above.

## Sustainability Appraisal

6.16 For this revised version, the scope has been widened to accommodate the Examiners request and to provide further analysis of the sustainability attributes of all the sites assessed. This has been done through the introduction of a Sustainability Appraisal (SA) which seeks to address the wider sustainability objectives when applying the sequential test in line with national guidance with the aim to achieving sustainable development as per the National Planning Policy Framework. An SA extends the concept of SEA as a process through which to assess the environmental as well as social and economic impact and it's likely contribution to the delivery of sustainable development overall. The SA fully incorporates the requirements of the SEA Directive.

6.17 The point of the SA is not to fill in the matrix, but to ensure that the proposal or alternative is as environmentally beneficial or sustainable as possible. The table is only a tool for doing this. The actual assessment of effects uses appropriate qualitative and quantitative tools and is supported by evidence. The matrix presents a format for summarising the assessment findings, accompanied by an explanation of the key findings and the assumptions underpinning these, including links to baseline information where this is possible. 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 qualifying body must demonstrate how its plan or order will contribute to achieving sustainable development. A sustainability appraisal may be a useful approach for doing this.

6.18 The Sustainability Appraisal is designed to test the Plan and is a means of identifying and mitigating any potential adverse effects that the Plan might otherwise have. In doing so it ensures that the proposals in the plan are the most appropriate given the reasonable alternatives. The SA process helps test the Plan through the use and application of evidence and therefore helps with developing options. Within the context of the Sequential Test the SA helps balance the alternatives for providing development based on a holistic consideration of the wider sustainability benefits which may outweigh those posed by flooding. In this regard, the Sustainability Appraisal below has been used as a tool to assess the sites and to determine which merit further consideration within the Exception Test. The 12 SA objectives were informed by a review of the SEA, the NDP, RDC sustainability objectives along with the Planning Practice Guidance. The NDP site options and alternatives were appraised against the 12 SA objectives contained within the sustainability appraisal framework, with an assessment made concerning the predicted social, economic and environmental effects of the options. The options were assessed according to the criteria and is set out in **Table 3**.

## Detailed Sustainability Appraisal (SA) Matrices for the Sites

### Colour coding key

1	++	The option or policy is likely to have a <b>significant positive</b> effect on the SA objective(s).
2	++/-	The option or policy is likely to have a mixture of <b>significant positive</b> and <b>minor negative</b> effects on the SA objective(s).
3	+	The option or policy is likely to have a <b>positive</b> effect on the SA objective(s).
4	0	The option or policy is likely to have a <b>negligible</b> or no effect on the SA objective(s).
5	-	The option or policy is likely to have a <b>negative</b> effect on the SA objective(s).
6	--/0	The option or policy is likely to have a <b>significant negative</b> and <b>negligible</b> or no effect on the SA objective(s).
7	--/+	The option or policy is likely to have a mixture of <b>significant negative</b> and <b>minor positive</b> effects on the SA objective(s).
8	--	The option or policy is likely to have a <b>significant negative</b> effect on the SA objective(s).
9	?	It is <b>uncertain</b> what effect the option or policy will have on the SA objective(s), due to a lack of data.
10	+/- or ++/--	The option or policy is likely to have an equal mixture of <b>both minor or both significant positive and negative</b> effects on the SA objective(s).

**Table 3: SA assessment**

SA objectives	SA SCORE										
	Slides Farm	South of Pound Platt	Mill site	North of North bridge Street	Vicarage Land	Grove farm phase 1	Grove farm phase 2	Roberts bridge club	Bishops lane	Heath-field gardens west	Heath-field gardens east
1.Achieve successful and inclusive communities.	-	+	+	+	+	+	+	+	+	+	+
2.Improve the health and wellbeing of the village	0	0	0	0	0	0	0	0	0	0	0
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes	0	0	0	0	0	0	0	0	0	0	0
4.To achieve sustainable levels of economic growth/prosperity and promote town centre vitality/viability	+	+	++	+	++	++/-	+	++	+	+	+

5. To reduce the effect of traffic on the environment.	-	-	-	-	-	-	-	-	-	-	-	-
6. To maintain and enhance the cultural heritage and assets of the village	0	0	++	0	+/- or ++/--	+/- or ++/--	0	+	0	0	0	0
7. To maintain and enhance the quality of landscapes, townscapes and the historic environment.	--	0	+/- or ++/--	--	+/- or ++/--	--/+	--	0	--/+	-	-	-
8. To reduce contributions to climate change	-	-	+/- or ++/--	-	-	-	-	-	-	-	-	-
9. To reduce the risk of flooding	+	+	+	+	+	+	+	+	+	+	+	+
10. To maintain and improve the quality of the land and soil	-	-	++	-	+			0	-	-	-	-

11. To improve air quality	-	-	-	-	-	-	-	-	-	-	-
12. To promote sustainable design and construction	+	+	+	+	+	+	+	+	+	+	+

**Summary of SA findings** (only the key significant social and economic impacts are listed)

**Slides Farm**

**Social impacts:** By use of a permissive path, the site can be directly linked to the footpath network around the village

**Mill site**

**Social impacts:** Development of this site would be an opportunity to remove an eyesore of dereliction and create a community housing development which is supported by the village. It could be a possible creation of a café in the restored Mill building to create a community hub . The donation of Pocket Park extension to Parish Council would be a great asset to the community. Hydro project would be run by a Community Interest Company. Subject to viability, there is aspiration for the creation of affordable homes.

**Economic impacts:** There is an opportunity for re-creation of employment on site as well as possibly a café on site. There is potential for a hydro project on site.

**North of Northbridge Street**

**Social impacts:** The proximity to the Mill Site would enable the local footpath network to be accessed as well as the possible new path to the station

**Vicarage Land**

**Social impacts:** Potential for provision of sheltered housing, because of proximity to centre of village, despite short steep access  
Potential for provision of a more suitable, sustainable smaller community space and place of worship in the centre of the village. Any development of dwellings may have an effect on the amenities of existing properties unless carefully designed.

**Economic impacts:** Modern community facility can be used for commercial purposes as well as community/worship activities

**Grove Farm 1**

**Social impacts:** Potential BMX track or other play facility. Possible full allocation of affordable dwellings.

**Economic impacts:** there is potential for the listed barn and buildings to provide employment.

**Grove Farm 2**

**Social impacts:** there is an opportunity for full allocation of affordable dwellings

**Robertsbridge Club**

**Social impacts:** New provision of improved and sustainable (including sound insulation) social facilities at the Club would be a benefit

Possible use of housing for older people, since located in the centre of the village

**Economic impacts:** The club is a small employer, usually of local people, so this would be able to continue.

**Bishops Lane**

**Social impacts:** Provision of community orchard and new stream-side footpath, beneficial to the community, although unclear who would be responsible for community orchard. Possible full allocation of affordable dwellings

**Heathfield Gardens West**

**Social impacts:** Possible full allocation of affordable dwellings

**Heathfield Gardens East**

**Social impacts:** Possible full allocation of affordable dwellings

## Sequential Approach

6.19 This Sequential Test has been prepared to assess the flood risk of all sites within the Parish that have been considered for potential development in the Neighbourhood Plan.

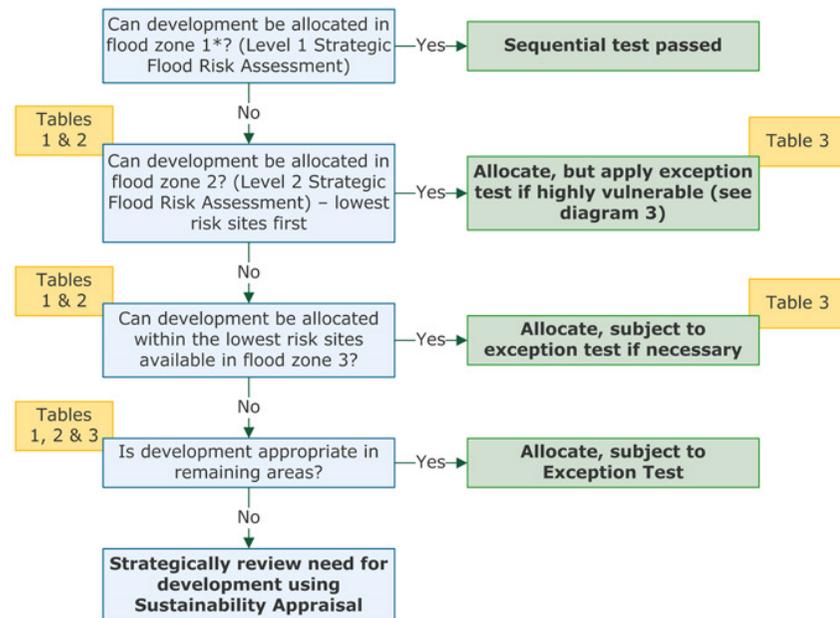
6.20 Neighbourhood Plans have been prepared to enable Towns and Parishes to plan how their communities will change and develop in the future. In addition to strategic sites identified in the Rother District Plan (and subject to a separate flood risk assessment) the Neighbourhood Plan Area has been allocated a level of additional homes which need to be brought forward through their NDP. In preparing Local Plans the Council are required to undertake a flood risk test. A sequential approach is used to steer new development to areas at the lowest risk of flooding.

6.21 The District Plan sets the framework for Neighbourhood Plans and has identified a housing requirement of 155 new homes for the plan period up to 2028 that are to be delivered through this Neighbourhood Plan. As the sites allocated in the Neighbourhood Plan are not assessed under the District Local Plan Sequential Test, this report addresses this. The Strategic Flood Risk Assessment identified areas of the District is at high risk of fluvial (river) flooding. The risk of river flooding of an area is categorised by the probability of flooding occurring in that area in any given year and these categories are summarised in **Table 4**.

6.22 The sequential test draws upon information gathered and detailed within the District Council’s Strategic Flood Risk Assessment (SFRA) as well as the site assessment by the NDP. The tests follow the steps outlined in the National Planning Policy Framework and accompanying technical guidance, and follows examples of best practice as highlighted by the Environment Agency.

6.23 The National Planning Policy Framework (paragraph 100) requires Plans such as the District Plan and Neighbourhood Plans to “apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by applying the **Sequential Test**, and, if necessary, applying the **Exception Test**”.

The overall process, as set out within the Planning Practice Guidance (PPG), is shown in Figure 10 below.



\* Other sources of flooding also need to be considered

### Figure 10: Application of the Sequential Test in local plan preparation

6.24 The NPPG states that “the flood zones as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the [Sequential] Test.”

Flood Zone	Risk of Fluvial Flooding
1	Low probability – land assessed as having a less than 1 in 1,000 annual probability of flooding (<0.1%)
2	Medium probability – land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of flooding (1% - 0.1%)
3a	High probability – land assessed as having a 1 in 100 or greater annual probability of flooding (>1%)
3b	This zone comprises land where water has to flow or be stored in times of flood.

**Table 4: Summary of fluvial Flood Risk Zones**

6.25 Technical Guidance to the National Planning Policy Framework classifies types of development into five categories of flood risk vulnerability; essential infrastructure, highly vulnerable, more vulnerable, less vulnerable and water-compatible development. **Appendix III** lists the types of development that are classified under each flood risk vulnerability classification. It is important to note that residential is ‘more vulnerable’ and commercial uses are ‘less vulnerable’.

### Sequential approach within a site

6.26 For the purposes of assessing the sites and considering the information above, within each flood zone, new development should be directed first to sites at the lowest probability of flooding and the flood vulnerability of the intended use matched to the flood risk of the site, i.e. higher vulnerability uses should be located on parts of the site at lowest probability of flooding. The Sequential Test is the process to ensure that this happens.

6.27 Within a site, a sequential approach to the location of development should be followed so that the flood vulnerability of the intended use matches the flood risk within the site, i.e. higher vulnerability uses should be located on parts of the site at lowest probability of flooding.

6.28 The Sequential and Exception Test are national planning policy requirements. These tests are not intended to prevent all development on sites liable to flooding; accepting that some form of development may have to be located here. The Exception Test is only appropriate when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary for wider sustainable development reasons. Table 4 shows which type of development can be appropriately located in each flood zone, and where the Exception Test is required.

Flood risk vulnerability classification	Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	✓	Exception test required	✓	✓
Zone 3a	Exception test required	✓	X	Exception test required	✓
Zone 3b functional floodplain	Exception test required	✓	X	X	X

Key: ✓ Development is appropriate.  
 X Development should not be permitted.

**Table 4: Flood risk Vulnerability and flood zone compatibility**

**6.29 Analysis of proposed development areas (this includes all the sites except the 2 with planning permission)**

The table below shows the analysis of the proposed development areas identified in the Neighbourhood Plan, as:

- Locations identified through the Neighbourhood Plan
- The existing fluvial flood risk characteristics of these locations (basis of the Test)
- Other sources of flood risk which will require a sequential approach to development
- Any existing flood defences
- The existing land use(s) of each area
- The proposed use(s) of each area
- The flood risk vulnerability classification for each proposed use.

Location	Size (ha)	Flood risk zone/s (area of site within flood zone)	Other sources of flood risk	Existing Flood Defences	Existing Uses	Proposed Development	Can the proposed development be located in the net developable area?
Slides Farm	1.3	1 – all	surface water flooding off site (SWFOS)	none	agricultural	housing	yes
South of Pound Platt	0.2	2 – all	SWFOS	2003 defences	garages vacant land	housing	yes
Mill Site	4.4	1 –50% 2 –13% 3 -37%	SWFOS	2003 defences	ex-industrial	housing, part commercial, part green space	yes but some flood mitigation needed
North of Northbridge Str	2.5	1 – all	SWFOS	none	agricultural	housing	yes
Vicarage site	0.4	1 – all	SWFOS	none	church building	Housing, part church	yes
Grove Farm Phase 1	1.3	1 – all	SWFOS	none	agricultural	housing, part commercial	yes
Grove Farm Phase 2	3.0	1 –all	SWFOS	none	agricultural	housing	yes
Robertsbridge Club	0.3	3 – all		2003 defences	social club	housing, part club premises	yes but some flood mitigation needed
Bishops Lane	3.1	3 -20% 1 -80%	SWFOS	none	vacant agricultural	housing, part green space	yes
Heathfield Gardens (West)	0.7	1 – all	SWFOS	none	vacant agricultural	housing	yes
Heathfield Gardens (East)	0.7	1 – all	SWFOS	none	vacant agricultural	housing	yes

## The Sequential Test

6.30 Potential development sites assessed through the Site Assessment document are in different flood zones as shown below.

<b>1. Are the proposed development areas in Flood Zone 1 – Low probability of flood risk?</b>	
	<b>Development areas wholly within Flood Zone 1:</b>
	100% of Heathfield Gardens is in FZ 1 and 100% of the vicarage site is in FZ 1
	<b>Development areas partly within Flood Zone 1:</b>
	50% of the Mill Site is in FZ 1 which is where the bulk of the development is proposed
<b>2. Are the proposed development areas in Flood Zone 2? – Medium probability of flood risk?</b>	
	<b>Development areas wholly within Flood Zone 2:</b>
	None
	<b>Development areas partly within Flood Zone 2:</b>
	13% of the Mill Site is in FZ 2
<b>3. Are the proposed development areas in Flood Zone 3? – High probability of flood risk?</b>	
	<b>Development areas wholly within Flood Zone 3:</b>
	None
	<b>Development areas partly within Flood Zone 3:</b>
	37% of the Mill Site is in FZ 3 (most of which would not be built on)

## The sequential approach to development

<b>4. What are the allocations outside flood zone 1</b>
The Mill site is being allocated and 50% of the site is outside FZ1
<b>a) Identify alternative sites that were considered and explain why they were dismissed</b>
The alternative sites considered have been assessed are in section 6 of this document.
<b>b) explain why the allocations cannot be directed to Flood Zone 1 elsewhere in the neighbourhood area</b>
The Mill site is allocated based on the results of the SEA/SA which looks at the environmental, social and economic impact of the site. The allocation of this site has many benefits including restoration of important buildings and heritage assets, removal of dereliction and pollution, provision of commercial premises, potential improvement in access to rail station. The majority of the site is in FZ1 which also sites the existing buildings and majority of the proposed development. It is assumed that Part 1 of the Exception test would be passed for the portion of the Mill Site which is outside Flood zone 1

because of the wider sustainability benefits to the community that outweigh flood risk and demonstrate those sustainability aspects, as shown in the Sustainability Assessment of all the sites. Where sites are wholly or partly located in areas where there are other sources of flooding, a site-specific flood risk assessment will be required at planning application stage. For the Mill Site application, a sequential approach to development within the site, Part 2 of the Exception test and the use of Sustainable Drainage Systems will be necessary to avoid and mitigate any impact. Part 2 of the Exception Test requires the development to be safe, and this will need to be demonstrated in a Flood Risk Assessment.

The benefits of developing this site are very much in-keeping with the NPPF and indeed the ethos of Neighbourhood Planning which is based on the SEA/SA outweighs the presumption against locating what is classed as “more vulnerable” developments in Flood Zone 2 and 3. Whilst flood mitigation measures can address the flood issues, the only thing which can address a disused historic building is re-development.

## Assessment of the SRNDP policies

7.1 This section has been split to reflect the six policy areas. For each of these it will begin by setting out the alternatives being assessed; assess the individual policies and then conclude on the combination of all the policies under that policy area.

**This was initially assessed as part of the SEA process but updated as part of the post Reg.14 consultation comments received so supersedes the section in the SEA.**

### Economy

7.2 The main alternatives for this policy area are:

- a) No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
- b) The policy either as worded or amended.

#### Policy EC1: Retail in the village centre and outskirts

7.3 Spatially the name of the policy and its wording makes it very clear as to the area that this relates to. The justification also makes the intent of the policy clear, which is about maintaining employment and ensuring the longer term of the businesses of the village.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is nothing assigned to Robertsbridge in terms of retail, although it is identified as a key rural centre, so it would be difficult to assess the likely impact on the environment	This policy will make a positive contribution towards this objective by ensuring developments are focused inside or close to the development boundary and so will use existing infrastructure and buildings
2	CS Policies TR 2 and 3 encourage non car use and the minimisation of travel	The application of the policy will mean that there would be a reduction in the need for travel by car
3	This would simply continue the existing situation and not spread access wider through the village	This directs more retail use to the centre and its edges so increasing the amount accessible to a greater spread of residents
4	No impact from the current Rother Core Strategy	Through directing these uses towards the centre this will help protect the natural environment and gives protection to heritage assets through the need to take account of the Conservation Area
5	No impact from the current Rother Core Strategy	The policy of the neighbourhood plan is not expected to significantly affect the environment

6	In this situation a general policy relating to flooding would apply as there is no retail related one.	The neighbourhood plan policy would not have a direct impact on this aspect
7	In this situation there is likely to be a positive effect on this aspect in line with national standards. Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The neighbourhood plan policy will not be expected to affect this aspect of the environment
8	No impact from the current Rother Core Strategy	This policy may through causing a reduction in the need to travel, mean there will be a positive effect in terms of reducing greenhouse gases
9	In this situation it would be expected that this would be assessed and conditioned as necessary	The policy would not be expected to have a significant impact on this aspect as it will use existing infrastructure

Policy EC2: Facilities to support and encourage home working through ultra-fast telecommunication provision

7.4 This policy is not constrained to one particular area but would apply to any development within the Parish area.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	Though this is identified as an issue there is no policy relating to it and so it would not be expected there would be any effect on the environment	The acknowledgement of the policy to the High Weald AONB and the Conservation Areas in the parish, will make a slight contribution towards this and so will use existing infrastructure and buildings.
2	There would be a slight positive impact through use of the relevant policy from the Rother Core Strategy (EC 1 and TRB 2 and 3)	The neighbourhood plan policy would reduce the need for some residents to travel outside of the village to work
3	No impact from the current Rother Core Strategy	It would not be expected that this policy would have a direct impact on this aspect
4	No impact from the current Rother Core Strategy	The acknowledgement of the policy to the High Weald AONB and the Conservation Areas in the parish, will mean there will be positive effects on this aspect
5	The Local Plan includes a policy encouraging the investment in ICT connections, (EC 1) although the exact impact is difficult to assess	It would not be expected that this policy would have a direct impact on this aspect
6	CS flood policies would apply in this situation that should help to improve the environment	This policy would have no direct impact to the environment

7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The neighbourhood plan policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	The policy itself will not have a direct impact but a positive indirect effect if more people travel by other means, although working at home may increase the amount of energy used per household
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	The policy would not have a direct impact although there is a small potential there may be increased waste per household

### Policy EC3: Employment retention

7.5 Though this policy is not focused on one area it is clearly spatial in being focused on existing business sites.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There would be a positive impact in the majority of cases as most sites are within the built area and already have utilities. CS Policy EC 3 supports also	The neighbourhood plan policy would have a positive effect on the use of land and buildings
2	There would be the potential for positive effects on the environment through reduced amounts of commuting via car to work Policies TR 2 and 3 would apply	There would be the potential for less need to commute to work as a result of the retention of employment within the village by the policy
3	The relevant policy in the local plan is robust and so will have a positive impact in terms of local access (CS Policy EC 3)	The policy will mean that there will be a positive effect on the built environment by focusing on retention.
4	No impact from the current Rother Core Strategy	The acknowledgement of the High Weald AONB and the Conservation Areas in the parish, will mean there will be positive effects on this aspect
5	Through a combination of policies there will be positive effects on heritage assets and to a possibly lesser extent the natural environment	The inherent protection that this policy provides means that the minimum effect will be neutral to the environment
6	Strong flood policies would apply in this situation that should help to improve the environment (CS Policy EN 7)	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met	The policy will not be expected to have an impact on this aspect

	relating to water supply and waste water	
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

#### Policy EC4: Assets of Community Value (Community Right to Bid)

7.6 Though spread throughout Robertsbridge and Salehurst this policy is focused on the properties listed and so specific.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There would be the potential loss of sites that are valuable to the community	As these sites are within the development boundary this will have a significantly positive impact on the built environment
2	No impact from the current Rother Core Strategy	It would not be expected that this policy will have a direct impact
3	No impact from the current Rother Core Strategy	Though the policy is not expected to have a great impact on this element, the retention of public assets in the community should preserve accessibility
4	A relevant policy would be applied to any application to protect the built heritage ( CS Policy EN 2)	The policy would not be expected to have a particular impact on this element of the natural environment but will be positive on the historic environment
5	No impact from the current Rother Core Strategy	This policy would have no direct impact to the natural environment
6	Strong flood policies would apply in this situation that should help to improve the environment	This policy would have no direct impact on this aspect
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

#### Policy EC5: Tourism

7.7 Though this policy is expected to apply across the Parish in the justification it does mention the key characteristics and features that will be covered by this policy.

	Alternatives
--	--------------

SEA Objective	a) No policy	b) Policy
1	CS Policy EC 6 encourages new tourism activities	NP Policy EC 5 would encourage better use of land for tourism
2	EC 6 does not attempt to control car travel. However policies TR 2 and 3 would have a positive impact	Policy EC 5 encourages 'access by sustainable transport'
3	EC 6 does not attempt to control car travel, but policies TR 2 and 3 would benefit	The policy is not expected to have a great impact on this element.
4	EC 6 does not deal with this specific issue	The policy EC 5 in limbs 1, 2 and 4 aspire to this objective
5	No impact from the current Rother Core Strategy	EC 5 limb 4 aspires to this objective
6	Strong flood policies would apply in this situation that should help to improve the environment	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

### Policy EC6: Rural businesses

7.8 This policy is intended to cover the whole extent outside of the built area defined later in this Neighbourhood Plan.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	CS Policy EC 4 encourages re-use for business purposes in rural areas	This will have a significantly positive impact on the environment
2	Policies TR 2 and 3 would apply	It would not be expected that this policy will have a direct impact
3	Policies TR 2 and 3 would apply	The policy is not expected to have a great impact on this element
4	No impact from the current Rother Core Strategy	The policy would not be expected to have a particular impact on this element of the environment but will be positive on the built environment

5	CS Policy EC 4 encourages re-use for business purposes in rural areas. No impact on natural environment	Policy EC 6 encourages the re-use of buildings
6	Strong flood policies would apply in this situation that should help to improve the environment	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

### EC7: Encouraging employment

7.9 There is no specifically defined area that this policy relates to but throughout the whole parish.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	CS Policy EC 4 encourages re-use of buildings	This will have a significant positive impact on the environment since Policy EC 7 requires that any proposal has a minimised impact on the landscape
2	Policies TR 2 and 3 would apply	Policy EC 7 refers specifically for the need to 'promote sustainable transport'
3	Policies TR 2 and 3 would apply	Policy EC 7 refers specifically for the need not to 'cause or exacerbate any traffic problems'
4	No impact from the current Rother Core Strategy	Policy EC 7 refers specifically for the need for any development 'to blend well within the character of its neighbours...and minimise the impact...on the wider character of the AONB landscape'
5	No impact from the current Rother Core Strategy	Policy EC 7 refers specifically for the need for any development 'to blend well within the character of its neighbours...and minimise the impact...on the wider character of the AONB landscape'
6	Strong flood policies would apply in this situation that should help to improve the environment	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect

8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.10 Overall the combined impact of the seven policies that are included under the Economy policy area will be greatest on heritage assets and the High Weald AONB. They will provide additional protection to assets that have been identified as important to the community and the existing villages. Though in many instances direct impacts are not expected but indirect impacts these are no less important. Largely these tend to focus most on accessibility and actions that may cause a difference in forms of travel.

7.11 Though not having a set of policies and leaving it to the Rother Local Plan would not result in too many detrimental impacts to the environment, the comparison of having the neighbourhood plan policies mean there are additional protections and consequently improve the beneficial effects on the environment of the Parish.

## Education

7.12 The alternative for this section is the same as the previous one, being:

- a) No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
- b) The policy either as worded or amended.

### Policy ED1: Education Provision

7.13 The policy is applicable across the main built up areas relating specifically to the three educational facilities in these. The justification is the fact that all are either full or near capacity and so any significant development will put pressure on them. The Robertsbridge Children's Services is the priority with the Robertsbridge Community College next, although it is recognised that during the lifetime of the NP, these priorities may change.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	Considering all the sites that are the focus of this policy are located in the built area any extensions would therefore represent a good effect to the environment and use of resources

2	Policy TR 2 applies	The position of the schools involved are focused close together, in a distance of 15minutes and so can encourage travelling by non-car means, so reduce pollutant levels. The policy is aimed at ensuring there is educational capacity for all within the village up to age 16 and so out traffic should be reduced
3	Nothing in the Local Plan directs with regard to any locations for schools	The policy is aimed at ensuring there is educational capacity for all within the village up to age 16 and so access to such facilities is easy
4	No impact from the current Rother Core Strategy	As all of the sites are within the built areas of the village it will help to preserve the value of the landscape, prevent coalescence and habitats
5	No impact from the current Rother Core Strategy	This policy would have no direct impact to this aspect of the environment
6	No impact from the current Rother Core Strategy because of location of the facilities	This policy would have no direct impact to this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

## Policy ED2: Sports Facilities at the Schools

7.14 This policy does not direct to a specific area but does make mention of existing school sites.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	Policy CO3 of the local plan though not allocating specific sites gives clear direction of the areas to which it is relevant so there would be a positive effect on the environment	Considering all the sites that are the focus of this policy are located in the built area any extensions would therefore represent a good effect to the environment and use of resources
2	Policy CO3 of the local plan though not allocating specific sites gives clear direction of the areas to which it is relevant so there would be a positive effect on the environment	The position of the schools involved are focused close together, in a distance of 15 minutes and so can encourage travelling by non-car means, so reduce pollutant levels
3	Policy CO3 of the local plan though not allocating specific sites gives clear	Any new facilities would be accessed in exactly the same way as the current

	direction of the areas to which it is relevant so there would be a positive effect on the environment	education establishments are so should cause no problems.
4	No impact from the current Rother Core Strategy	As any development would be on existing built sites there should be no further impact to either natural or built environment
5	No impact from the current Rother Core Strategy	This policy would not be expected to affect this aspect of the environment
6	No impact from the current Rother Core Strategy because of location of the facilities	This policy would have no direct impact to this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The intended uses would in general be suitable i and as such have only minimal impact on the environment
8	No impact from the current Rother Core Strategy	This policy would have no direct impact to this aspect of the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.15 Overall the combination of these policies means that there would be an efficient use of land and natural resources.

## Environment

7.16 The main alternatives for this policy area are:

- a) No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
- b) The policy either as worded or amended.

7.17 However with respect to policy EN2, there was also the alternative of other locations to be considered or locations included to be excluded.

### 7.18 Policy EN1: Parks and Open Space

It is difficult to be accurate about the exact area that this policy is intended to apply as there does not seem to be the corresponding inset map. However on the basis of the wording of the policy the following assessment is made.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	The intended protection of this policy and its uses means that this would be expected to have a positive effect on the environment

2	There is no direct policy in the Local Plan	Due to the position of the existing sites they are within easy walking distance meaning there will be expected to be an improvement to the environment through no need to use cars to access them
3	Nothing in the Local Plan directs to any locations to do with playing fields but policy CO3 sets out the criteria for extensions of existing sites	Policy EN 1 will retain access to current facilities in the village and make access easy for any new facilities
4	No impact from the current Rother Core Strategy	No real impact on this aspect from policy
5	No impact from the current Rother Core Strategy	It is to be expected that any new facilities created under this policy would fully respect the environment
6	The flood policies of the plan would apply	Some of the sites have been impacted by floods in the past and are not defended. The policy will not assist this
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.19 There are a number of aspects that this policy will not affect and so there would be no difference to the environment but there are a number where the policy as written would have number of positive impacts on the environment.

#### Policy EN2: Local Green Space Designation

7.20 This policy is intended to designate a number of sites as Local Green Spaces and to be supported by a map.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. However CS Policy EN 5 specifically encourages the development of green infrastructure and where	Sites are spread both inside and close to the development boundary so would not be expected to significantly benefit the environment and are appropriate uses of land in their current state.

	possible linking areas of natural green space.	
2	There is no direct policy in the Plan	The position of these sites means that non-vehicular means can be used to access them and so there potential for reduced pollutants
3	The local plan does not allocate any new open spaces	The allocation of additional areas of natural green space provides added protection and the spread in locations will mean more are available within a shorter travel time, so less impact on the environment
4	CS Policy EN 5 encourages green spaces	The protection for sites outside the development boundary will be positive on the natural environment and retention of key characteristics of the High Weald, as well as to the setting of the conservation areas.
5	Policy EN 5 encourages green spaces and bio and geodiversity in particular	The number and spread of sites will mean that there will importantly be no loss or fragmentation of routes used by species as well as allowing for enhancements potentially in the future
6	The flood policies of the plan would apply as applicable to the preferred sites	Though this policy will not be explicit in terms of reducing flood risk it could well have a positive indirect effect
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have a significant impact on this aspect of the environment
8	No impact from the current Rother Core Strategy	It is not anticipated that this aspect would be significantly affected
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.22 Overall this policy would be expected to have a significant positive impact on the environment with respect to a clear majority of aspects. Largely this is through the added protection that it provides to biodiversity, habitat and species along with not hindering necessary infrastructure and having a number of positive indirect impacts.

Policy EN3: Countryside Protection and the Parish's place within the High Weald Area of Outstanding Natural Beauty

7.23 This policy would seem to apply to all land outside the development boundary and its driver would seem to be preservation of characteristics of the High Weald AONB and space between the village.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	The only designation through the local plan is the High Weald Area of Outstanding Natural Beauty and the actions of the Management Plan, meaning a positive impact to the use of land (CS Policy EN 1)	This policy recognises the environmental designation and so aims to prevent inappropriate development in and around the parish, so has a positive effect on the environment in terms of land use and natural resources
2	Combinations of policies would relate to this and so there would be a positive effect on the environment (EN 1 and 5)	This policy would affect this aspect as it wishes to respect the settlement pattern of the parish
3	Combinations of policies would relate to this and so there would be a positive effect on the environment (EN 1 and 5)	This policy would not affect this aspect and so there would be no significant effect on the environment directly although it would mean that there would still be good access to the open countryside and green infrastructure
4	Applicable policies would be from differing parts of the Local Plan (EN 1 and 5)	This detailed policy will protect the inherent characteristics of the natural environment
5	Through a combination of policies there will be positive effects on the natural environment (EN 1 and 5)	This policy will have a positive effect through giving protection preventing fragmentation of habitats and movement of species
6	The flood policies of the plan would apply	This policy calls for the restoration of the natural function of the local rivers and watercourses inter alia to prevent flooding
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No impact from the current Rother Core Strategy	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled if at all through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.24 Though this policy will not affect a number of aspects it will make a positive impact on those aspects connected with biodiversity, landscape and the use of land and natural resources.

#### Policy EN4: Conservation of Natural Resources

7.25 This policy is intended to r preserve other landscape characteristics and general setting of the area around the development areas of the parish.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	This would be covered through a combination of policies in the local plan ( CS OSS 4, EN 2 and 3)	This policy would be expected to ensure continued appropriate use of land resources
2	This would be covered through a combination of policies in the local plan ( CS OSS 4, EN 2 and 3)	This policy though not directly relating to reducing non-vehicular means of transport would have a positive effect on the environment through the retention of trees and other vegetation
3	No specific policy in the Local Plan	This policy will provide additional protection to natural features and the extension and expansion of green infrastructure throughout the parish, so positively impacting the environment
4	Policy EN5 of the local plan would mean there would be a positive impact on the environment – and OSS 4, EN 2 and 3	The aims and intentions of this policy will mean additional protection for the natural environment of the parish as well as the wider landscape and so there will be a positive effect on the environment
5	Policy EN5 of the local plan would mean there would be a positive impact on the environment – and OSS 4, EN 2 and 3	The aims and intentions of this policy will mean additional protection for the natural environment of the parish as well as the wider landscape and so there will be a positive effect on the environment
6	The flood policies of the plan would apply	Though there will not be a direct impact on this aspect there would be positive indirect impacts through the retention of features that may reduce the impact of flooding
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	There will be a positive effect on this aspect through the retention and protection of water features that are important in the wider landscape
8	No impact from the current Rother Core Strategy	The policy would not be expected to affect this aspect
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

#### Policy EN5: Renewable Energy and Energy Efficiency

7.26 This is not intended to be specific to one area abut applicable to the whole Parish and its intention is to reduce energy consumption through design and be adaptable to climate change.

SEA Objective	Alternatives	
	a) No policy	b) Policy

1	Policy SRM 1 of the Rother Local Plan specifies many ways to mitigate the effects of climate change Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water, so would have a positive effect on the use of natural resources	As this policy is intended to be applied to all development in the parish there will be a positive effect on the environment and the use of natural resources
2	All the transport policies of the local plan would apply and so there would be a positive effect on the environment as there are strands in all encouraging modes other than the car (TR 2 and 3)	This policy would be expected to have a positive effect on the environment through encouraging activities that reduce the production of pollutants
3	A combination of policies from the local plan would apply and so there would be an improvement over the existing situation (TR 2 and 3)	The policy will not directly affect this aspect although it might discourage the supplies of fuel oil as a heating source and reduce traffic
4	Applicable policies would be from differing parts of the Local Plan	As this is expected to be applied across the parish it is not expected that there would be direct impacts but indirect effects to the environment through lower pollution
5	Through a combination of policies there will be positive effects on the natural environment	As this is expected to be applied across the parish it is not expected that there would be direct impacts but indirect effects to the environment through lower pollution
6	The flood policies of the plan would be applicable and so as a minimum there would be no worsening of the existing situation	As this policy includes the need to take account of climate change there should be a positive effect on the environment through a reduction in the number of properties at risk from flooding
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	As this policy includes the need to take account of climate change there would be a positive effect on the environment through reduced water consumption
8	Policy SRM 1 should generate a positive impact on greenhouse gases	Due to the overall intention of the policy there would be a significant positive effect on the environment through a reduction of greenhouse gases plus adaptations to climate change
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	This policy would have a positive effect on the environment through emphasising reductions both in terms of energy and water, as well as waste generally

7.27 This policy would be expected to have a significant positive effect against the majority of aspects largely connected with the reduction in greenhouse gas emissions plus the need to have taken account and integrated, as necessary, adaptation measures into design.

## Policy EN6: Historic Environment

7.28 This policy is intended to be applicable to designated heritage assets and their settings. In broad terms this means focused along High Street, Fair Lane, Northbridge Street and Salehurst'; although with some also in George Hill and some neighbouring streets to all of them.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	The spatial strategy of the local plan would apply and so ensure that there is as a minimum no deterioration to the existing heritage assets and features	This policy should be positive so far as retaining historic uses of buildings
2	Policies TR 2 and 3 would apply	This policy would not be expected to affect this aspect or have an impact on the environment
3	A combination of policies, apply in terms of the historic environment and especially heritage assets, so there will be a positive effect on the environment	The policy is not expected to have a great impact on this element
4	Applicable policies especially EN 2, would be from differing parts of the Local Plan	As all of the sites are within the built areas of the village it will help to preserve the value of the landscape, prevent coalescence and most importantly preserve the value of heritage assets within the built landscape.
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have a direct impact to preserve settings of historic built environment
6	The flood policies of the plan would apply	This policy would have no direct impact to this part of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	Policy SRN 1 is relevant here	It is not anticipated that this policy would have a significant effect on this aspect of the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on this aspect

7.29 The main aspect that this policy will affect is the historic built landscape and

## Policy EN7: Listed Buildings and Buildings or Structures of Character

7.30 This policy is focused spatially within the two Conservation Areas and specific to heritage assets.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	It would be a good effect to the environment and use of resources
2	There is no direct policy in the Plan although as such there would be no significant effect	This policy would not be expected to affect this aspect or have an impact on the environment.
3	Local Plan policy EN2 and the environment section so there will be a positive impact	This policy is not expected to impact on this aspect of the environment
4	Applicable policies would be from differing parts of the Local Plan	This will have a positive impact on the built environment
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the natural environment
6	The flood policies of the plan would apply as applicable	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies in this situation	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.31 The main positive impacts to the environment from this thematic section of the SRNP would be in terms of efficient use of natural resources, the landscape and heritage settings as well as potential for reduction in air pollutants.

## Housing

7.32 The main conclusion of the sites' assessment is that a wide number of sites had neutral impacts on the environment. Individual assessment resulted in half of these being suitable, however there were 3 sites that were assessed as having detrimental impacts on the environment

and 4 that were assessed as having positive impacts on the environment and some others were neutral. The three that were expected to have negative effects were Slides Farm, North of Northbridge Street (adj. the Mill) and Adjacent Culverwells. The four that were assessed as having positive impacts were Vicarage Lane, Bishops Lane, Heathfield Gardens West and the Mill Site.

7.33 In a similar fashion to the other policy areas the alternative being dealt with in this policy assessment is:

- a) No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
- b) The policy either as worded or amended.

**Policy HO1: Spatial Plan**

7.34 This sets out the focus and approach to development both within the development boundary and also outside of it.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is a current development boundary which is now out of date	This policy allows for development outside the BUAB, this meets requirements of other policies both within the neighbourhood plan and Rother's Local Plan
2	A range of policies from the Local Plan apply so there will be a positive impact particularly TR 2 and 3	It is expected that this policy would have a significant effect on the environment by containing development as close to existing development as possible
3	Applicable policies would be from differing parts of the Local Plan, particularly TR 2 and 3	There will be a positive effect on this aspect
4	Applicable policies would be from differing parts of the Local Plan	It is anticipated that this policy would have a significant effect on the environment by containing development as close to existing development as possible
5	Through a combination of policies there will be positive effects on the natural environment	This policy should have a direct impact by containing development as close to existing development as possible
6	The flood policies of the plan would apply	There will be no worsening to the impact on the environment.
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant policy in the Local Plan	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

**Policy HO2: Housing requirement**

7.35 As set out in under the reasonable alternatives discussed in the previous part on Assessing Sites around Salehurst and Robertsbridge from page 27-42, on the basis of the content of the Rother Local Plan and the SHLAA 2013, as stated in the policy it was only felt appropriate to consider how to deliver the 155 dwellings identified.

Alternatives	
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SEA Objective	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations, simply amounts that could be expected over the plan period. As such it is not possible to accurately predict the exact impact on the environment	The policy is clear about allocated sites and also sets out that windfall sites will only be supported inside the development boundary and that others will be considered if the allocated sites do not come forward. As such the policy makes an efficient use of land and natural resources and so a positive impact on the environment
2	A combination of policies from the local plan would apply so that there will be positive impacts on the environment associated with the encouragement in the transport section to other non-car uses ( TR 2 and 3)	The specific mention in the policy of ensuring local infrastructure and explicitly including car parking and congestion means there would be a positive effect on the environment as a result
3	A combination of policies from the local plan would apply so that there will be positive impacts on the environment associated with the encouragement in the transport section to other non-car uses (TR 2 and 3)	The inclusion in the policy of requirements for infrastructure should result in reduced travel distances and so a positive effect on the environment
4	Applicable policies would be from differing parts of the Local Plan	As the focus of the policy is on sites within and close to the edge of the development boundary it will limit incursion into the neighbouring countryside and so have a positive effect on this aspect of the environment
5	Through a combination of policies there will be positive effects on the natural environment	There will be a slight impact on biodiversity although it is not possible at this level to distinguish the exact degree, however the focus within the existing settlement areas would mean this would most likely be neutral
6	The flood policies of the plan would apply	As the policy specifically picks out flood prevention in the policy there will be a positive impact through reducing the number of properties in FZ3 and residents at risk from flooding
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	Though there will be additional capacity required in the networks there is no hindrance to this, there will be a neutral effect on the environment
8	No relevant policy in the Local Plan	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

### Policy HO3: Site allocations

7.36 This does as suggested in the name and allocates sites inside and immediately adjacent of the development boundary to deliver the required housing over the period of the plan. Predominantly this means a greater amount sited in the north east of the existing boundary. However, the three sites that have been included are in line with the outcome from the assessment in the previous section.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	As the focus of this policy is on sites within and close to the development boundary, there will be limited impact on the environment through limiting incursion into the wider countryside
2	Various policies in the local plan relate to this aspect and so there will be a positive impact (TR 2 and 3)	The extension of new footpaths and cycleways will have a positive effect through reducing the distance to goods and service's
3	Policies TR 2 and 3 would apply	The reference to extending footpath and cycleways means there will be a positive impact on the environment as a result of assisting non-car modes of transport
4	Applicable policies would be from differing parts of the Local Plan	The allocation of sites inside and at the edges of the development boundary means that there will be limited impact on the landscape setting and their position means they avoid impacting on any heritage assets
5	Through a combination of policies there will be positive effects on the natural environment	There will be positive effects on the environment resulting from the need for open green space and carefully landscaping being required
6	The flood policies of the plan would apply	The site allocated will need to demonstrate that they can have limited impact on flooding

7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	Though there will be additional capacity required in the networks there is no hindrance to this, so a positive effect on the environment
8	No relevant policy in the Local Plan	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.37 Through sites being allocated in and close to the development boundary there will be positive effects on the environment through less incursion into the countryside and the wider AONB and heritage assets. Additional to this the requirement for specific aspects like landscaping and green space will also encourage biodiversity, along with the extension of footpaths and cycleways to help a switch in travel choice. This last aspect is also in line with the aims of the Rother, Brede and Tillingham Woods BOA as well as a key characteristic of the High Weald AONB.

#### Policy HO4: Development of residential gardens

7.38 The focus of this policy is as it is named on residential back gardens.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no policy directly relevant to development of back gardens and so it can only be assumed that the effect to the environment would be the same as windfall development.	As this policy is about controlling development in back gardens and these are often the edge of the existing development area, it will help to ensure an efficient use of land and resources, as well as a number of other positive effects on the environment such as the setting of heritage assets and the wider landscape
2	No relevant policies in Local Plan	The policy is not expected to have a great impact on this element
3	No relevant policies in Local Plan	The policy is expected to have only a limited effect,
4	Applicable policies would be from differing parts of the Local Plan	As all of the sites are within or adjacent to the built areas of the village it will help to preserve the value of the landscape, prevent coalescence and preserve habitats
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have a positive direct impact on this aspect of the environment
6	The flood policies of the plan would apply as applicable to the preferred sites	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect

8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

### Policy HO5: Housing Mix

7.39 This policy has no spatial aspect as it is expected to be applied to all development within the Parish.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	Policy LHN 1 directs in rural areas a mix of housing types	The focus of this policy is across the whole Parish and so will have a positive impact on this aspect of the environment
2	Policies TR 2 and 3 would apply	The policy will not affect this aspect of the environment
3	Policies TR 2 and 3 would apply	The policy is not expected to have a great impact on this element
4	Applicable policies would be from differing parts of the Local Plan so would be positive	The fact that the policy specifically mentions single level dwellings will have the impact of reducing any impact within the countryside and towards the wider landscape setting
5	Through a combination of policies there will be positive effects on the natural environment	It is difficult to assess the exact impact that this would have on the environment considering this will affect the whole parish
6	The flood policies of the plan would apply	This policy will have little impact on this aspect
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.40 This policy will have little impact on all the elements of the framework, although those it will affect will be positive.

### Policy HO6: Lower cost, shared or social (affordable) Housing

This policy will be expected to apply to the whole Parish but would not be expected to have a significant spatial impact.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	Policy LHN 1 exercises controls on affordable dwellings	The focus of this policy is across the whole Parish and so will not have a direct impact on this aspect of the environment
2	Policies TR 2 and 3 would apply	The policy will not affect this aspect of the environment
3	Policies TR 2 and 3 would apply	By ensuring that housing is located and provided for the local community it shall reduce the distance to services and facilities so will have a positive impact
4	Applicable policies would be from differing parts of the Local Plan	The policy will not affect this aspect of the environment
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	This policy will have no impact to this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	The policy will not affect this aspect of the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.41 The nature of the policy means that it will have little impact across the elements of the framework.

#### Policy HO7: Design

7.42 There is no spatial aspect to this as it would be expected to apply across the whole Parish. By its nature this policy will have positive impacts both to the natural and built environments.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	Policies OSS 4 and EN3 direct towards good quality design	This will not have a direct impact but should indirectly have a positive impact on this aspect
2	No relevant policies to this issue	This will have a positive effect on this aspect of the environment

3	No relevant policies to this issue	The policy is not expected to have a great impact on this element but will be positive
4	Applicable policies would be from differing parts of the Local Plan	This policy will have a positive effect to this aspect by protecting and ensuring the retention of the character and setting of the parish, especially with regard the AONB
5	Through a combination of policies there will be positive effects on the natural environment	This policy should have a positive impact through the inclusion of biodiversity being mentioned within the policy
6	The flood policies of the plan would apply as applicable to the preferred sites	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	The policy will have a positive impact on the environment through the inclusion of renewable energy technologies within the wording of the policy
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.43 The majority of the aspects of the environment affected by this policy is through the inclusion of specific mention within the policy wording. It will contribute towards both landscape setting and renewable technologies.

#### Policy HO8: Sustainability

7.44 This policy will most directly affect the area around the river due to its specific mention of hydroelectricity, although also the parish more widely.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	The criteria in this policy are designed to promote efficient land use
2	No relevant policies to this issue	This is not likely to have a direct impact although may have indirect positive impacts
3	No relevant policies to this issue	This is not likely to have a direct impact although may have indirect positive impacts
4	Applicable policies would be from differing parts of the Local Plan	This is not likely to have a direct impact although may have indirect positive impacts

5	Through a combination of policies there will be positive effects on the natural environment	This is not likely to have a direct impact although may have indirect positive impacts
6	The flood policies of the plan would apply as applicable to the preferred sites	This policy would have no direct impact to this aspect of the environment and it would not be expected that it will have any negative effects regard this aspect
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have a positive impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.45 Overall there will be positive effects from this policy.

#### Policy HO9: Conservation Areas

7.46 The spatial extent of this policy will be within the existing settlement areas that generally correlate to the area of the Conservation Area.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	This policy will make a positive contribution to the efficient use of land being focused in the built area
2	No relevant policies to this issue	Though the policy is not expected to have a great impact on this element, it will have an indirect positive impact from being within the built area
3	No relevant policies to this issue	Though the policy is not expected to have a great impact on this element, it will have an indirect positive impact from being within the built area
4	Applicable policies would be from differing parts of the Local Plan	The policy will have the greatest impact on this aspect of the built environment through preserving the setting, landscape and heritage assets
5	Through a combination of policies there will be positive effects on the natural environment	The policy will have no direct impact on this aspect of the natural environment but will be positive for the built environment
6	The flood policies of the plan would apply	This policy would have no direct impact to the environment

7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.47 The main aspect affected by this policy is that of the landscape setting and protecting heritage assets.

Overall the combination of the policies within this section of the SRNP will have mainly positive impacts to the environment. They will be with respect to the wider landscape and heritage assets, as well as reducing flood risk and a good use of land and natural resources.

## Infrastructure

7.48 In the same as the previous sections the two alternatives for this section of the neighbourhood plan policies assessment were:

- a) No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
- b) The policy either as worded or amended.

### Policy IN1: Parking Provision

7.49 This policy is about parking provision and spatially its main extent will be within the settlement and development boundaries supported with the new areas for growth identified in the previous part of the SRNP plan

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	Considering all the sites that are the focus of this policy are located in the built area any extensions would therefore represent a good effect to the environment and use of resources
2	Policies TR 2, 3 and 4 would apply	The policy is expected to reduce parking on streets and hence congestion and thus, it will have a positive impact
3	Policies TR 2 3 and 4 would apply	The policy is expected to reduce parking on streets and hence congestion and thus, it will have a positive impact
4	Applicable policies would be from differing parts of the Local Plan	The policy will not affect this aspect of the environment

5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	This policy would have no direct impact to this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.50 Overall the policy will not have a significant impact on the environment being contained within the settlement and development boundaries.

#### Policy IN2: Loss of Parking

7.51 This policy aims to ensure that there is no loss to existing parking space on the streets of the existing settlement and development boundary.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	This will positively affect this aspect with it being focused within the existing settlement and development boundaries
2	Policy TR 4 would apply	The policy is expected to contribute to easing road congestion
3	Policy TR 4 would apply	The policy is expected to have an effect, by reducing congestion
4	Applicable policies would be from differing parts of the Local Plan	Though not direct there will be a positive indirect aspect through ensuring the protection of the countryside and landscape setting
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	As the focus is in the existing built areas the majority will be in the lower flood risk areas, although a number of higher risk areas are within these
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect

8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.52 Overall this policy would only have limited positive effects on the environment.

### Policy IN3: Maintain and improve existing infrastructure

7.53 The overall aims of this policy are to help improve existing infrastructure.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over this subject. As such it is not possible to accurately predict the exact impact on the environment	The conditions in this policy should ensure efficient use of land – see the criteria outlined
2	Policies TR 2 and 3 would apply	The policy is not expected to have a great impact on this element but limb 3 requires no significant impact on the road network
3	Policies TR 2 and 3 would apply	The policy is not expected to have any great effect.
4	Applicable policies would be from differing parts of the Local Plan	The policy requires that the local environment and landscape is taken into account (limb 2) and so there would be a positive effect
5	Through a combination of policies there will be positive effects on the natural environment	The policy requires that the local environment and landscape is taken into account (limb 2) and so there would be a positive effect
6	The flood policies of the plan would apply	Though there would be no effect on this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect but must have no detrimental effect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.54 This policy will not have a significant impact on the environment directly but will have positive indirect impacts .

Policy IN4: Non car provision/public transport provision

7.55 This policy aims to ensure that there are safe and improved routes through the village, especially for those who are older or have mobility issues. Spatially there is no direct focus.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over this subject except for cycle routes in Policy TR 2. As such it is not possible to accurately predict the exact impact on the environment	The policy will encourage efficient use of land
2	Policies TR 2 and 3 would apply	As the focus of this policy is improvement of various cycle and walking routes this should have a positive impact on this aspect of the environment
3	Policies TR 2 and 3 would apply	This aspect will be positively affected through making services and facilities more accessible to all parts of the community
4	Applicable policies would be from differing parts of the Local Plan	The increased number of routes will tie in with the historic routeways characteristic of the High Weald AONB
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would be applicable and so as a minimum there would be no worsening of the existing situation	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water in the water environment	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.56 Overall this policy will have a positive effect on the limited elements that it would affect.

Policy IN5: Pedestrian safety

7.57 This policy is intended to provide safe routeways from new developments for all residents. Spatially though it will be focused within the built area and the growth areas identified it will more widely affect the Parish as a whole.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is in Policy TR 3 a desire to encourage pedestrians and prioritise their needs	There is no land specifically affected by this policy but as it is largely in the settlement and development boundaries it will positively affect this aspect of the environment
2	Policies TR 2 and 3 would apply	As the focus of this policy is on walking routes it will positively affect this aspect of the environment through encouraging and making easier travel by other means
3	Policies TR 2 and 3 would apply	This policy will have a positive effect on this aspect of the environment as it encourages increased access to services and facilities for all
4	Applicable policies would be from differing parts of the Local Plan	As all of the sites are within the built areas of the village it will help to preserve the value of the landscape
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	This policy would have no direct impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.58 Overall this policy has focused impact on several aspects of the environment.

#### Policy IN6: Communications Infrastructure

7.59 This policy is focused on communication infrastructure and therefore does not have a spatial focus.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations for such infrastructure. As such it is not possible to accurately predict the exact impact on the environment	This policy is all about improving the efficiency of the use of land for development

2	No specific policy in Local Plan	Better IT infrastructure will reduce the need to travel and so benefit this criteria
3	No specific policy in Local Plan	There will be no direct impact but a positive indirect one through allowing an increased number of people to access services and facilities through increased provision
4	Applicable policies would be from differing parts of the Local Plan	There will be a neutral impact on this aspect of the environment
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply as applicable to the preferred sites	This policy would have no direct impact to this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.50 There will only be limited focus on the environment resulting from this policy.

#### Policy IN7: Developer contributions

7.51 This policy is about the provision of facilities and infrastructure that is required in a timely fashion. This would tend to focus on the existing settlement and development boundaries but especially when applied to windfall sites might have a wider impact on the environment.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over this need As such it is not possible to accurately predict the exact impact on the environment	As this will indirectly be focused within the settlement and development areas initially and then identified schemes and locations there will be an efficient use of land
2	Policies TR 2 and 3 would apply	There would be expected to be a positive impact as the policy allows for other infrastructure elements to be delivered where identified, which may result in reducing congestion
3	Policies TR 2 and 3 would apply	The policy may have an indirect positive impact if as a result of developer contributions, access is improved
4	Applicable policies would be from differing parts of the Local Plan	It is at present unknown what these developer contributions may be used for

		but they may have a direct impact on this aspect of the environment
5	Through a combination of policies there will be positive effects on the natural environment	It is at present unknown what these developer contributions may be used for but they may have a direct impact on this aspect of the environment
6	The flood policies of the plan would apply	There will be a positive impact on this aspect as there is scope for identified schemes to be funded off site
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	If there are any required schemes, then these could be funded using this so scope for a positive impact to the environment
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	There may be potential for offsite requirements to be funded through this route, so there could be a positive effect

7.52 The impact to the environment may be positive across a wider area than just the immediate settlement and development areas dependent on its use.

#### Policy IN8: Flood Risk

7.53 This policy deals with ensuring that flood mitigation schemes and actions are implemented. Spatially this would therefore tend to be focused in the space between the settlements where the greatest flood risk is.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	Policy EN 7 covers flood risk and sets out detailed criteria for any development in a flood risk area	Because there are flood risks in the parish, this policy ensures sensible and efficient use of land
2	There is no direct policy in the Plan	This aspect of the environment would not be affected
3	There is no specific policy in the Local Plan	The policy is not expected to have a great impact on this element
4	Applicable policies would be from differing parts of the Local Plan	This aspect of the environment is not expected to be significantly affected
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	This policy would have a positive impact to the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met	The policy will not be expected to have an impact on this aspect

	relating to water supply and waste water	
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.54 This policy would only be expected to have a limited impact on the environment.

7.55 Overall this infrastructure section would cumulatively have a positive impact across the framework, even though there will impacts from each policy individually.

## Leisure

7.56 Again the two alternatives for these policies are:

- a) No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
- b) The policy either as worded or amended.

### Policy LE1: Community leisure/cultural facilities

7.57 This policy is focused on leisure and cultural facilities, especially those providing multiple uses. Spatially this tends to be focused within the existing built areas.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	As this will be focused within the built areas as this where facilities are there will be a positive impact on this aspect of the environment
2	Policies TR 2 and 3 would apply	This will not directly affect this aspect of the environment but may enable leisure pursuits to be undertaken within the village rather than elsewhere.
3	Policies TR 2 and 3 would apply	There will be a positive impact on this aspect as this will make increased local provision and therefore accessibility.
4	Applicable policies would be from differing parts of the Local Plan	As all of the sites are within the built areas of the village it will help to preserve the value of the landscape
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	This policy would have no direct impact to the environment

7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste waters on the water environment	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.58 There will only be a focused impact to the environment from this policy.

#### Policy LE2: Loss of leisure/cultural facilities

7.59 This policy is aimed at preserving the existing facilities and sets out requirements that must be met for this to be acceptable.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	This will not directly affect this aspect of the environment
2	Policies TR 2 and 3 would apply	Retention of such facilities in the village will lessen the need to travel out of the village
3	Policies TR 2 and 3 would apply	This policy will have a positive impact through ensure there is no worsening of the existing provision and therefore accessibility
4	Applicable policies would be from differing parts of the Local Plan	This will not directly affect this aspect of the environment
5	Through a combination of policies there will be positive effects on the natural environment	This policy would have no direct impact to the environment
6	The flood policies of the plan would apply	This policy would have no direct impact to this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	The policy will not be expected to have an impact on this aspect
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

7.60 The policy will only have a focused positive effect.

### Policy LE3: New facilities

7.61 This policy is focused on new community facilities, although there is no focused spatial element to the policy.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	This aspect of the environment is not expected to be affected as the policy stipulates that there should not be significant harmful impacts on the environment
2	A range of policies from the Local Plan apply so there will be a positive impact	Provision for various routes and alternate modes of transport mean there will be a positive indirect impact on the environment. It requires that there should not be an unacceptable impact on the local road network
3	A combination of policies from the local plan would apply so that there will be positive impacts on the environment	The focus of this policy will have a positive impact through provision of additional services
4	Applicable policies would be from differing parts of the Local Plan	There will not be a direct impact but a positive indirect impact through the requirement to take account of local environment
5	Through a combination of policies there will be positive effects on the natural environment	The inclusion in the policy of the local environment means there will be a positive effect to this aspect of the environment
6	The flood policies of the plan would apply	The inclusion for addressing surface water flooding means there will be a positive impact on this aspect of the environment
7	Policy SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and waste water	There will be no direct impact on this aspect of the environment
8	No relevant Local Plan policies	It is not anticipated that this policy would have a significant effect on the environment
9	This would be controlled through the East Sussex Waste and Minerals Plan policies being applied	It is not anticipated that this policy would have a significant effect on the environment

## Assessment conclusion of the overall SRNDP

8.1 The Salehurst and Robertsbridge Neighbourhood Development Plan will through its nature and subject have an impact on the environment. In terms of the actual allocations the majority of policies are focused in the existing settlements and the development boundaries. However, the allocations for sites will focus development in the lowest risk areas of flood risk and where part of a location is within the higher one it is expected that mitigation can be achieved.

8.2 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 have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives, and can make the decision-making process more transparent.

8.3 When assessed against the considerations in the SEA and SA, The Mill site, Heathfield Gardens and Vicarage Land outweigh the other sites assessed and have therefore been allocated in the NDP. It needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based only on these factors in order to select an option. Factors such as public opinion, deliverability, wider benefit to the community and conformity with national policy have also be taken into account when selecting options for the plan. To this end the Mill Site has been allocated although a section of the site is in FZ3, as such needs to pass the Exception test.

8.4 The Exception Test is only appropriate when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary for wider sustainable development reasons.

8.5 It is assumed that Part 1 of the Exception test would be passed for the portion of the Mill Site which is outside Flood zone 1 because of the wider sustainability benefits to the community that outweigh flood risk and in order to fully demonstrate those sustainability aspects, a Sustainability Assessment has been undertaken of all the sites. Where sites are wholly or partly located in areas where there are other sources of flooding, a site-specific flood risk assessment will be required at planning application stage. For the Mill Site application, a sequential approach to development within the site, Part 2 of the Exception test and the use of Sustainable Drainage Systems will be necessary to avoid and mitigate any impact. Part 2 of the Exception Test requires the development to be safe, and this will need to be demonstrated in a Flood Risk Assessment.

8.6 In terms of positive impacts on the environment this would mainly result from Vicarage Land, Bishops Lane, Heathfield Gardens West and the Mill Site. A large number of the sites have mainly neutral impacts to the environment, with just one or two aspects scoring differently. All sites generally score the same across a few areas of the framework, especially in terms of water resources. Overall

it is a similar situation regarding waste management and renewable energy and reduction of greenhouse gases.

8.7 The Economy policies at the beginning of the SRNDP will have the greatest effect on heritage assets and the High Weald AONB. They will provide additional protection to assets 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.

8.8 Overall, the combination of the policies in the education section of the SRNDP will result in an efficient use of land and natural resources. Although in the majority of cases, it would not be expected that the impact on biodiversity could not be mitigated.

8.9 The combined effect of the policies in the Housing section of the SRNDP will mainly relate to the wider landscape and heritage assets, as well as reducing flood risk and a good use of land and natural resources.

8.10 Finally, 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 such as reducing flood risk.

8.11 Although the overall impacts on the environment are largely mixed as a minimum, there will be no worsening of existing issues connected with the environment and for a significant number (ie. it is neutral in some aspects) will result in positive impacts to the environment from the adoption and implementation of all the policies contained within the plan.

8.12 Without the SRNDP, there would be no specific control over the impacts therefore the Plan has a positive impact generally. The contents of the SRNDP ensures that those aspects of specific relevance to the parish are recognised and addressed as well as helping to contain impacts to a smaller spatial area.

8.13 SEA guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the plan. Where practical this report identifies the likely negative and positive impacts each policy has on achieving sustainability objectives based on the framework set out. It demonstrates that the policies of the SRNDP will positively contribute towards delivering the social, economic and environmental objectives set out in the SA framework.

## **Next stage**

8.14 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.

## Glossary

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
SRNDP	Salehurst and Robertsbridge Neighbourhood Development Plan
SUDs	Sustainable Drainage Systems
TPOs	Tree Preservation Order(s)

## **Appendix I: Screening determination**

Your ref: [  
Our ref: Robertsbridge and Salehurst  
Please ask for: Norman Kwan  
Direct dial no: n/a  
Date: 15<sup>th</sup> June 2016



Karen Ripley  
Robertsbridge and Salehurst Parish Council |

Dr Anthony Leonard  
Executive Director of Business Operations

Town Hall  
Bexhill-on-Sea  
East Sussex TN39 3JX

Dear Karen,

### **SEA Screening Opinion For Robertsbridge and Salehurst Neighbourhood Plan**

Thank you for your request for an SEA screening opinion, together with supporting information documents.

Rother District Council (as the responsible authority) must determine whether the plan is likely to have significant environmental effects.

RDC has consulted with the statutory environmental bodies (SEBs) – Natural England, the Environment Agency and Historic England as part of this process and passed them the Parish Council's submitted material. The EA have responded to state that they "*no longer comment on screening opinions*". At the time of writing, Natural England have not yet responded. Historic England are of the view that SEA is required and their response is attached.

In the light of this, as well as our own interpretation of The Environmental Assessment of Plans and Programmes Regulations 2004, I would advise as follows on the need for a Strategic Environmental Assessment: In the opinion of the Local Planning Authority, the Robertsbridge and Salehurst Neighbourhood Plan (RSNP) is likely to have significant effects on the environment and, hence, that a SEA should be undertaken. 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 above Regulations:

1. The RSNP will form part of the 'development plan' and thereby exert a direct and substantial influence over development proposals coming forward in the period
2. The RSNP has a key role in integrating social, economic and environmental considerations in meeting its obligation to contribute to the achievement of sustainable development
3. The RSNP needs to consider a number of nationally or locally important environmental factors, notably:



- 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) There are many key features of the AONB within the Parish, including historic field boundaries, historic routeways, etc .
- c) There are significant heritage constraints, including two conservation areas, significant numbers of listed buildings, unlisted buildings of architectural interest, and archaeological notification areas. There are potential direct impacts where sites contain, or lie within these assets, as well as indirect impacts through development in the setting of assets.
- d) There are swathes of land along the course of the Rivers Rother and Darwell and their tributaries, including central areas of the village and sites under consideration for development, are within Flood Zones 2 and 3.
- e) The Rother and Darwell Valleys are also identified within the 'Rother, Brede and Tillingham Woods Biodiversity Opportunity Area' which overlaps with sites under consideration for development. BAP Priority Habitats include ponds, watercourses and floodplain grazing marsh. There are numerous records of protected, BAP and rare species.

It should be noted that RDC has already produced an 'SA Scoping Report for the Development and Site Allocations DPD' available [here](#). On page 29-32 of the link there is a 'Framework', which as the Scoping Report states, *'is also considered relevant and applicable to Neighbourhood Plans produced within the District'*.

I trust this information is useful.

Kind Regards,



**Norman Kwan BA (Hons), MA, DiP TP, MRTPI**  
Principal Planning Officer - Strategy and Planning,  
Rother District Council,  
Town Hall,  
Bexhill on Sea,  
East Sussex,  
TN39 3JX  
|



## **Appendix II: 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)	2012
National Planning Policy Framework	Mar 2012
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	
Robertsbridge Conservation Area Appraisal	2009
Rother District Council Local Plan Background Evidence Studies. Various including: Rother Open Space, Sport and Recreation Study, Green Infrastructure Study, Landscape Assessments, Strategic Flood	

Risk Assessment, Low Carbon & Renewable Energy Potential Study, Housing Studies & Papers, Transport Studies & Papers, Economic & Commercial Studies & Papers, Infrastructure Delivery Plan and Spatial Area Studies	
Parish Action Plan	

### Appendix III

<b>Essential infrastructure</b>	<ul style="list-style-type: none"> <li>- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.</li> <li>- Wind turbines.</li> </ul>
<b>Highly vulnerable</b>	<ul style="list-style-type: none"> <li>- Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</li> <li>- Emergency dispersal points.</li> <li>- Basement dwellings.</li> <li>- Caravans, mobile homes and park homes intended for permanent residential use<sup>3</sup>.</li> <li>- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”).</li> </ul>
<b>More vulnerable</b>	<ul style="list-style-type: none"> <li>- Hospitals.</li> <li>- Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.</li> <li>- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>- Non–residential uses for health services, nurseries and educational establishments.</li> <li>- Landfill and sites used for waste management facilities for hazardous waste.</li> <li>- Sites used for holiday or short-let caravans and camping, <i>subject to a specific warning and evacuation plan.</i></li> </ul>

<p><b>Less vulnerable</b></p>	<ul style="list-style-type: none"> <li>- Police, ambulance and fire stations which are not required to be operational during flooding.</li> <li>- Buildings used for shops, financial, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in “more vulnerable”, and assembly and leisure.</li> <li>- Land and buildings used for agriculture and forestry.</li> <li>- Waste treatment (except landfill and hazardous waste facilities).</li> <li>- Minerals working and processing (except for sand and gravel working).</li> <li>- Water treatment works which do not need to remain operational during times of flood.</li> <li>- Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).</li> </ul>
<p><b>Water-compatible development</b></p>	<ul style="list-style-type: none"> <li>- Flood control infrastructure.</li> <li>- Water transmission infrastructure and pumping stations.</li> <li>- Sewage transmission infrastructure and pumping stations.</li> <li>- Sand and gravel working.</li> <li>- Docks, marinas and wharves.</li> <li>- Navigation facilities.</li> <li>- Ministry of Defence defence installations.</li> <li>- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>- Water-based recreation (excluding sleeping accommodation).</li> <li>- Lifeguard and coastguard stations.</li> <li>- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, <i>subject to a specific warning and evacuation plan.</i></li> </ul>