



# Strategic Environmental Assessment (SEA) Report of the Salehurst and Robertsbridge Neighbourhood Development Plan

## **Environmental Report**

September 2016

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## 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>. Due to the position of the Parish, beyond the usual distance of 10km from a European site, it would not be expected that anything proposed in the SRNDP will have an impact on site integrity. As such, 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

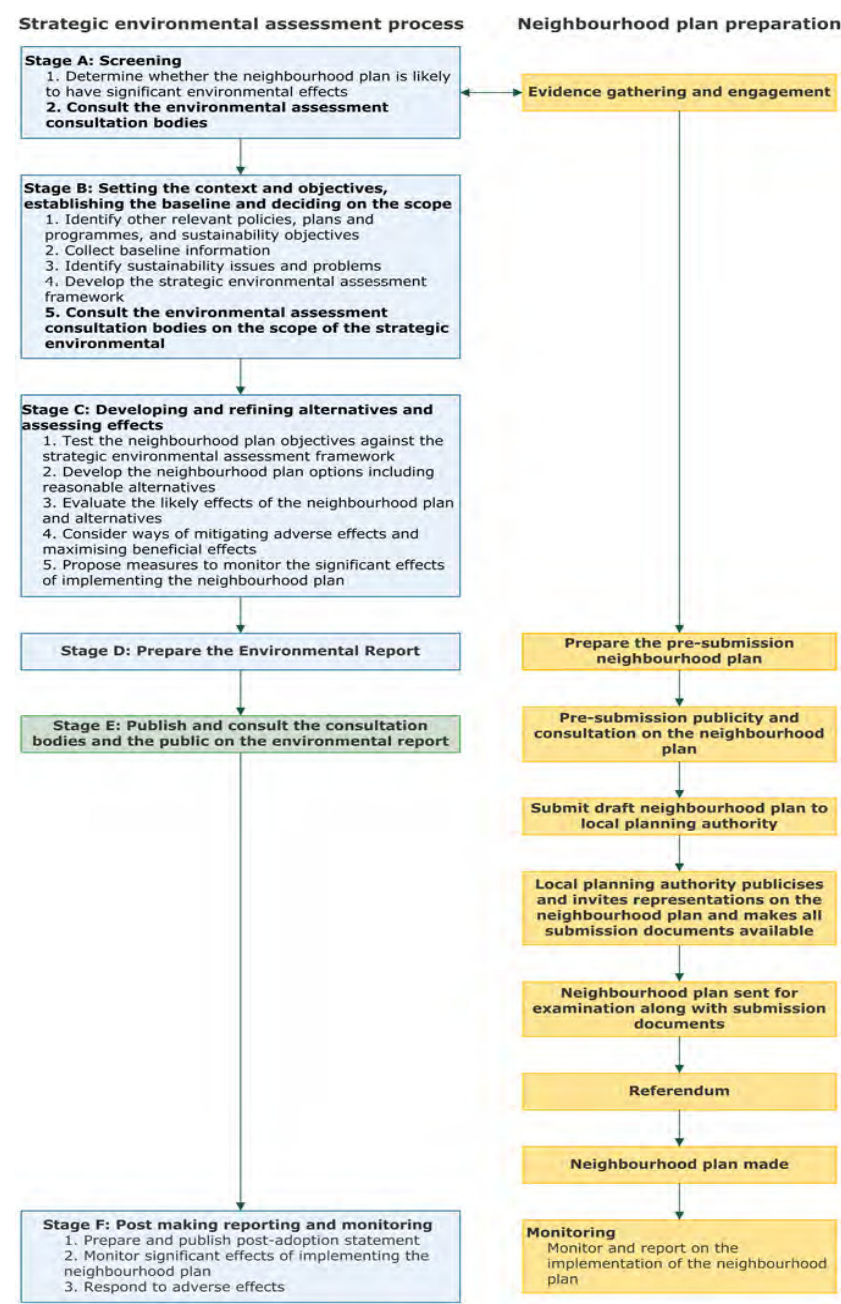
<sup>3</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=15112&p=0>

<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.
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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.

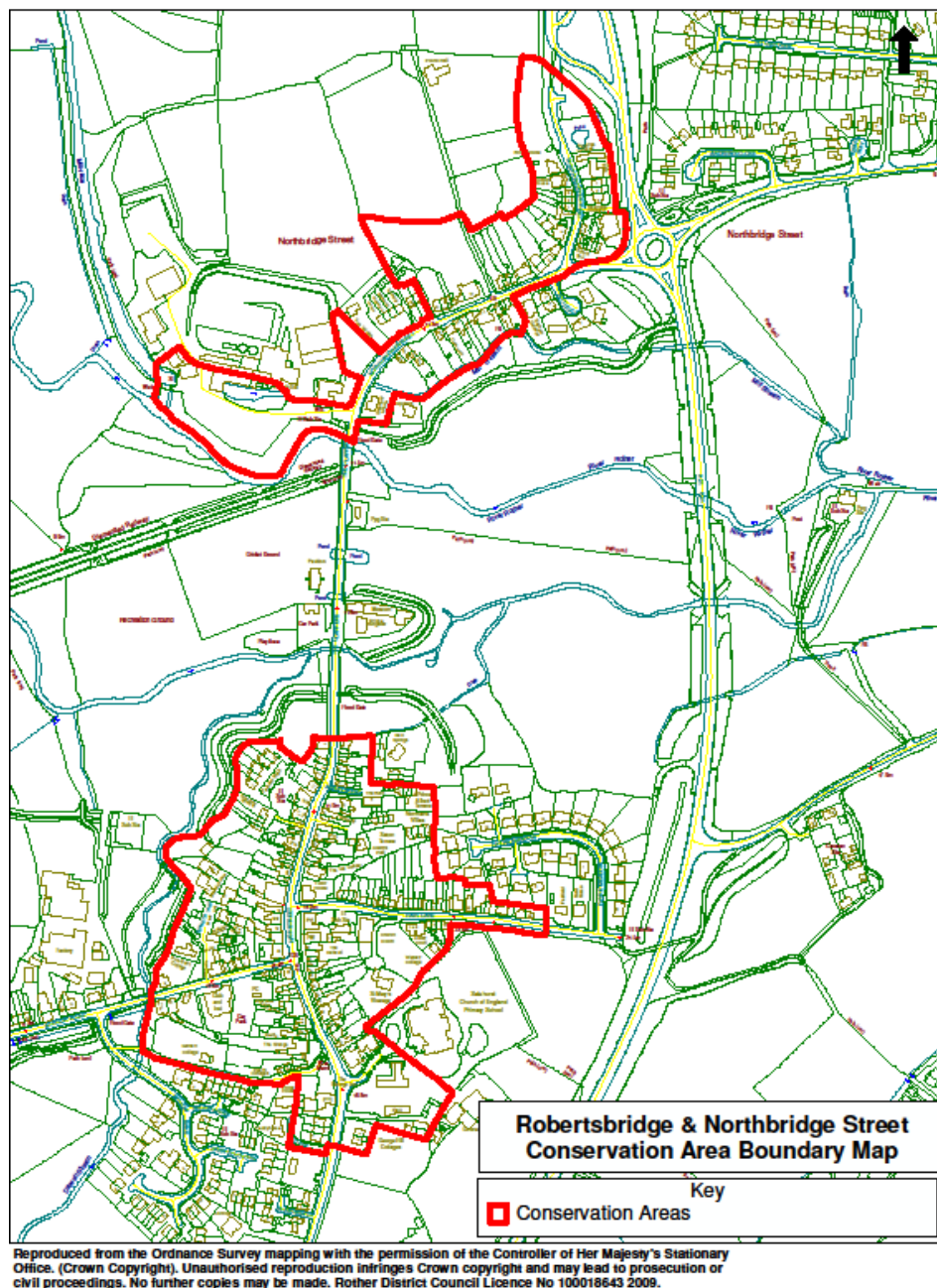
3.7 The village lies on the route of the Hastings to London railway, with a busy Station. A bypass forming part of the A21 trunk road lies to the east of Robertsbridge. This diverts the majority of all the traffic around the village centre and as a consequence protects the Village Centre from excessive 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.
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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 6.6 hectares. The extent of this is shown in figure 2 at the top of the next page.

Figure 2: Conservation Area





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.

Figure 3: High Weald characteristics

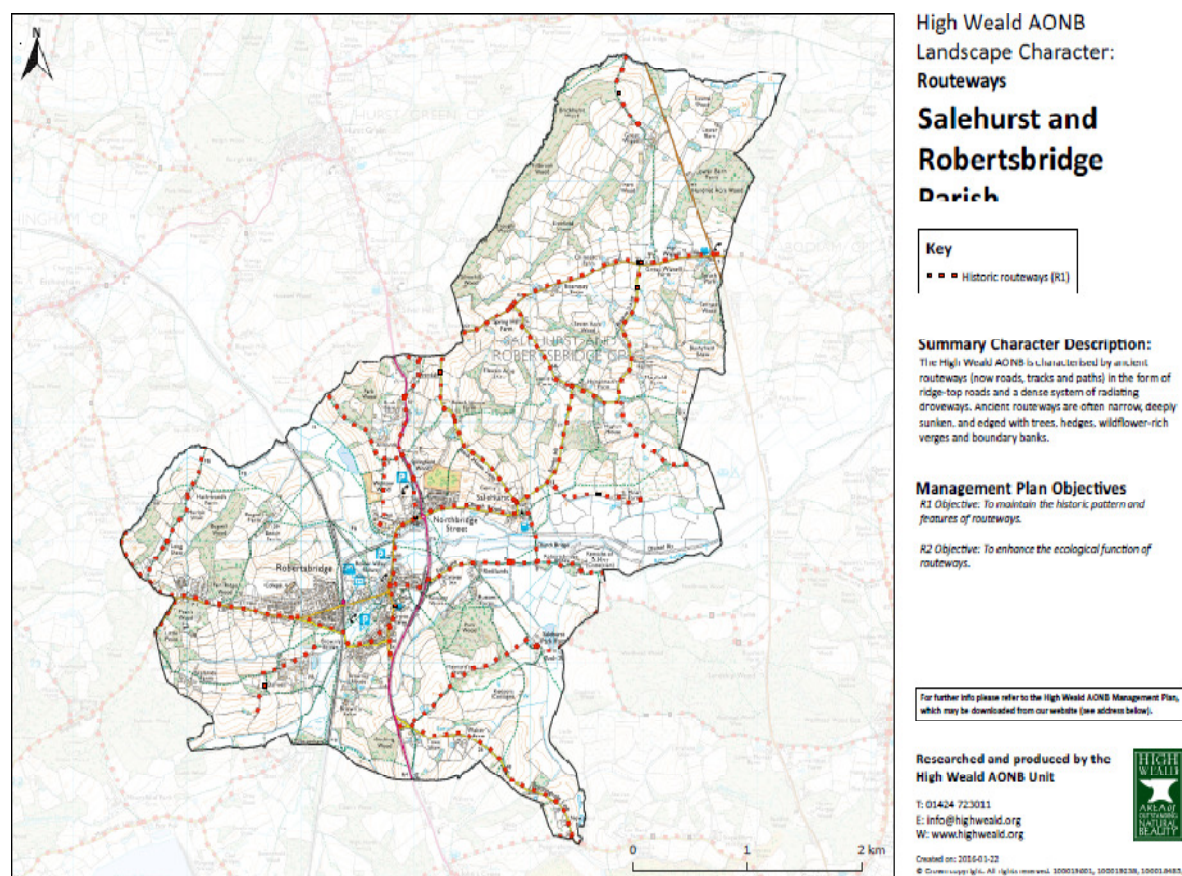
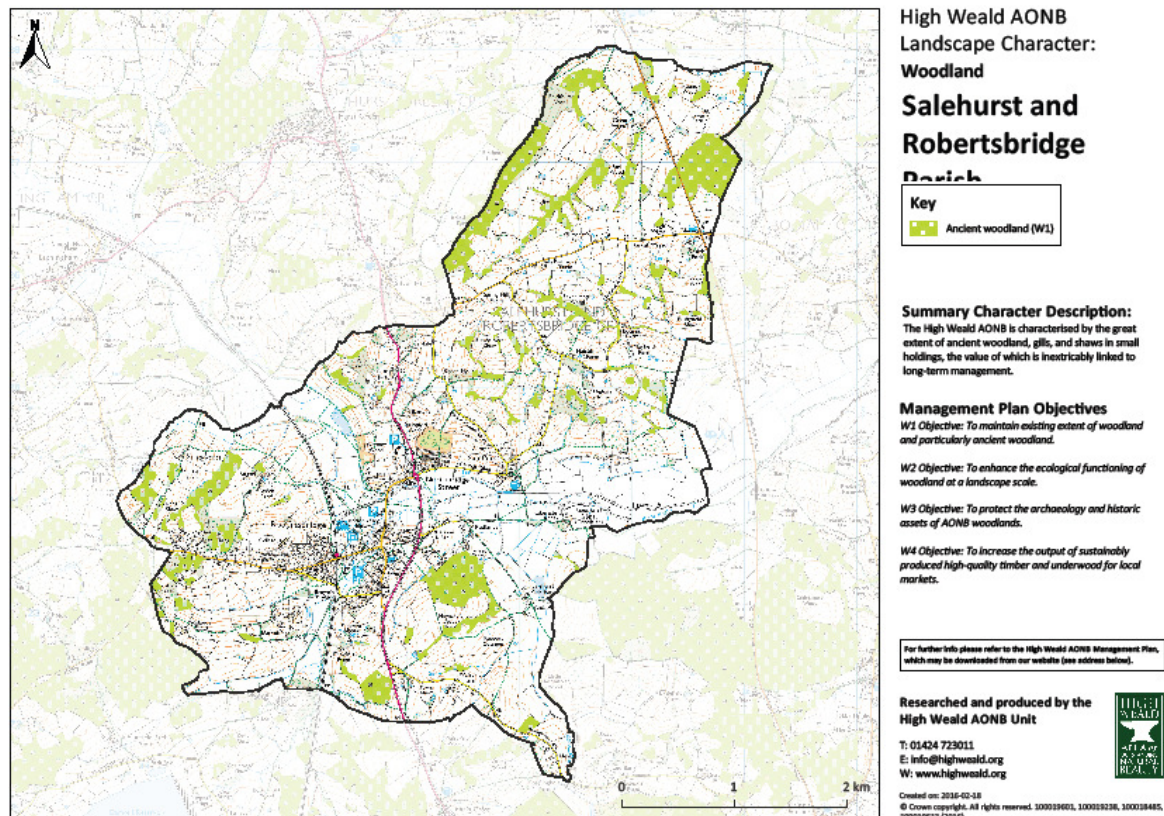


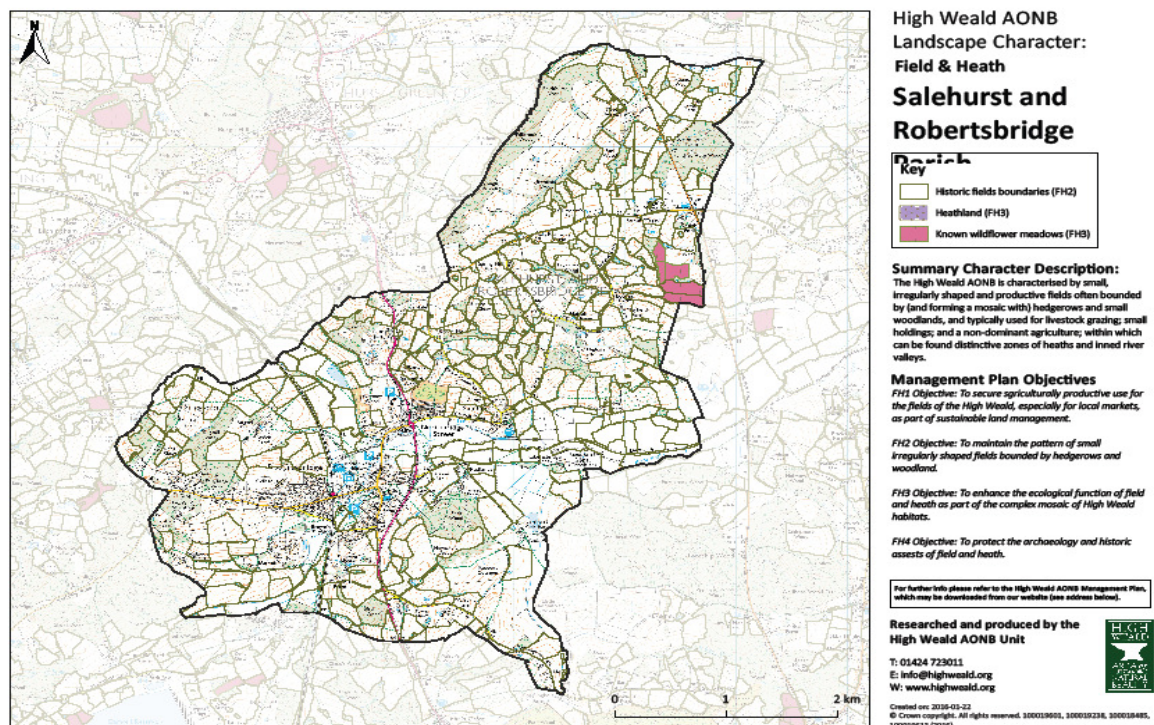


Figure 4: Map showing extent of woodland in parish



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

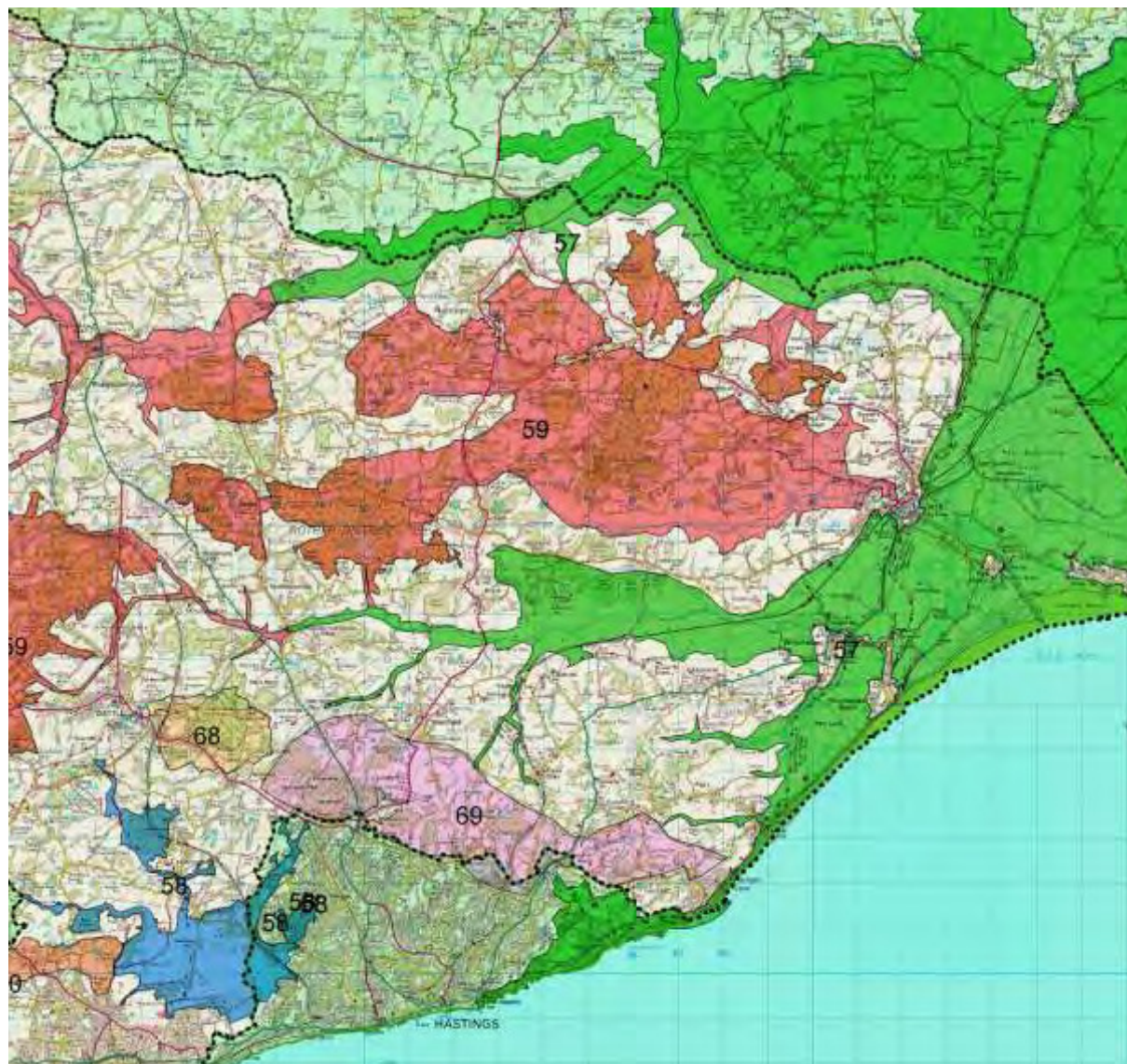
Figure 5: Map showing the extent of heath and wildflower meadows





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.

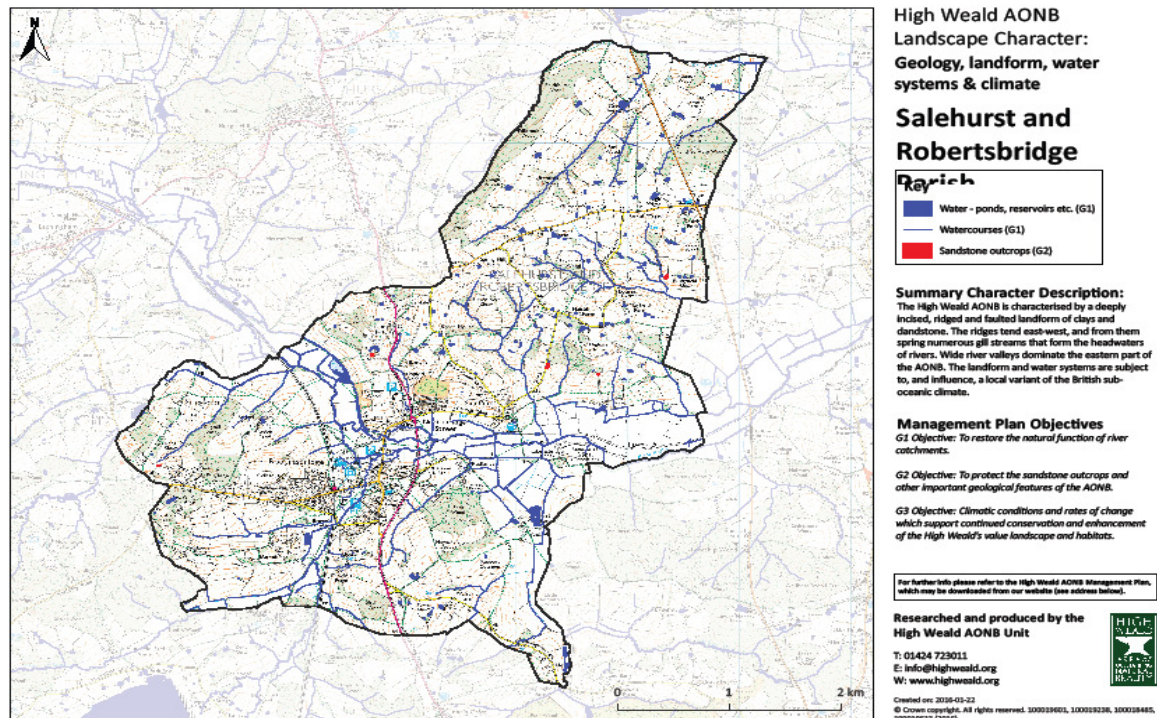
Figure 6: Context of the Rother, Brede and Tillingham Woods BOA (no. 59)



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.

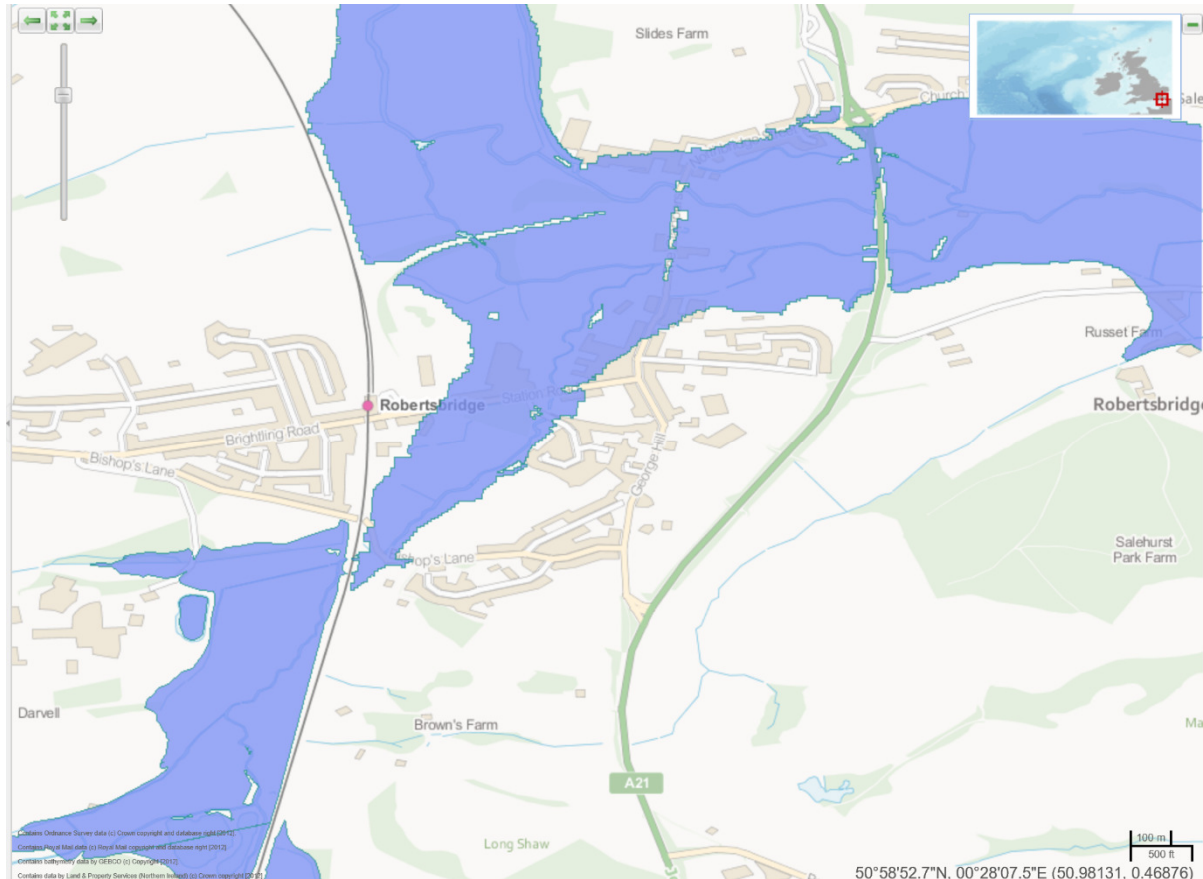
3.17 SEA Theme [Water]

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

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

with the greatest occurrence of severe drainage is focused in the middle of the town. Along with the 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.
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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	Improve efficiency in land use and encourage the prudent use of natural resources	<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	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	<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.</li> <li>· Have access to pedestrian &amp; cycle routes for localised leisure opportunities</li> <li>· Have highway capacity.</li> <li>· Avoid impact on and from AQMA.</li> <li>· Improve air quality</li> <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>		
	Improve accessibility to services and facilities for all ages across the District	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Have good access to shops, services, educational and medical facilities, pubs, community hall, play areas, sports pitches, places of worship, library, nursery, petrol filling station.</li> <li>· Have scope to facilitate the above via on or off-site provision.</li> <li>· Improve accessibility, particularly in the rural areas of the District</li> <li>· Support delivery of quality public transport</li> <li>· Enhance the PRoW and cycle network</li> <li>· Support the timely delivery of infrastructure needs associated with new development</li> <li>· Encourage the provision of services and facilities in accessible locations</li> <li>· Help support the continued viability of services, particularly in rural areas</li> </ul>	<ul style="list-style-type: none"> <li>· Distance to key services</li> <li>· % households within 30 minutes public transport of: <ul style="list-style-type: none"> <li>- GP</li> <li>- Hospital</li> <li>- Primary &amp; secondary school</li> <li>- Employment</li> <li>- Major retail centre</li> </ul> </li> <li>· % completed retail, office &amp; leisure development in centres</li> </ul>
<b>SEA Directive Topics: Landscape, Cultural Heritage, Soils</b>			
4	Protect and enhance the high quality natural and built environment	<p>Does the option/policy?</p> <ul style="list-style-type: none"> <li>· Ensure protection and enhancement of the AONB and respect the key features and characteristics of the High Weald AONB and its setting</li> <li>· Protect, enhance and avoid negative impacts upon sites &amp; features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled ancient monuments, registered battlefields, archeologically sensitive areas (ASAs))</li> <li>· Minimise adverse visual impact on landscape setting of towns and rural settlements</li> <li>· Respect the historical settlement context.</li> <li>· Promote development in character with the area</li> <li>· Seek to ensure that development is in keeping with the landscape character, including National and Local Landscape Character Areas.</li> </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>· 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.</li> <li>· Promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment.</li> <li>· Ensure that development is not at risk from land instability</li> </ul>	
<b>SEA Directive topics: Biodiversity, Flora, Fauna</b>			
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> <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</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>

		mineral supplies · 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 · Support landscaping that enhances native biodiversity · Have a positive nature conservation plan.	
<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	Does the option/policy? · Reduce the number of properties at risk of flooding in the Parish · 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. · Ensure that appropriate flood risk protection measures are in place to protect well-being. · Avoid exacerbating flood risk off-site by increasing run-off · Provide scope for, and promotion /adoption of SuDS.	· Properties at risk from flooding · Planning permissions granted contrary to EA advice on flood defence grounds Number of applications approved within area of surface water flooding
<b>SEA Directive Topics: Water, Human Health, Material Assets, Climatic Factors</b>			
7	Maintain, improve and manage water resources in a sustainable way	Does the option/policy? · Protect & improve water quality (groundwater and surface water) · Require the use of water efficiency measures · Minimise the risk of pollution to water sources · Avoid locations within groundwater source protection zones/aquifer. · Ensure new development has sufficient sewerage and waste water treatment capacity to avoid harm to water quality · Implement SuDs where appropriate to avoid run-off of polluted water to water courses or aquifers · Ensure any SuDS includes scope to enhance and enrich habitats and amenity value	· Water consumption per household · Quality of river water · Rivers of High or Good chemical and biological water quality (passing Water Framework Directive criteria).
<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> <li>· Have good proximity to a 'bring' recycling point.</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> <li>· % household waste composted</li> <li>· % household waste landfilled</li> </ul>
<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	
	3-5 positive answers	N/A	
	6+ positive answers	N/A	
2	1-3 positive answers	Increased out commuting ; or Increased air pollutants or declaration of AQMA.	
	4-6 positive answers	No change expected for any	
	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	
3	2 positive answers	Increased proportion over 30 mins distance	
	3-6 positive answers	No change to proportion in 30 mins	
	6+ positive answers	Increased proportion less than 30 mins	
4	1-3 positive answers	Increased number of listed buildings at risk; or Grade 1, Grade II and Grade II* at risk; or Reduction in % of land based businesses in High Weald	
	4-6 positive answers	No change	
	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	
5	Up to 5 positive answers	Any reduction of type or extent of habitats	
	6-10 positive answers	No significant change	
	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	
6	1 positive answer	No significant change	
	2 positive answers	Located in lower flood risk;	
	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	
7	2 positive answers	Increase in water consumption; or Reduction in water quality	
	3-5 positive answers	No significant change	
	6+ positive answers	Reduction in water consumption; and/or Improved water quality	
8	1-3 positive answers	Increase in gas and electricity; or Increase in greenhouse gas emissions	
	4-6 positive answers	No significant change	
	7+ positive answers	Reduction in greenhouse gas emissions and gas and electricity consumption; and/ or Increase in number of applications discharged for	



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

### **‘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.

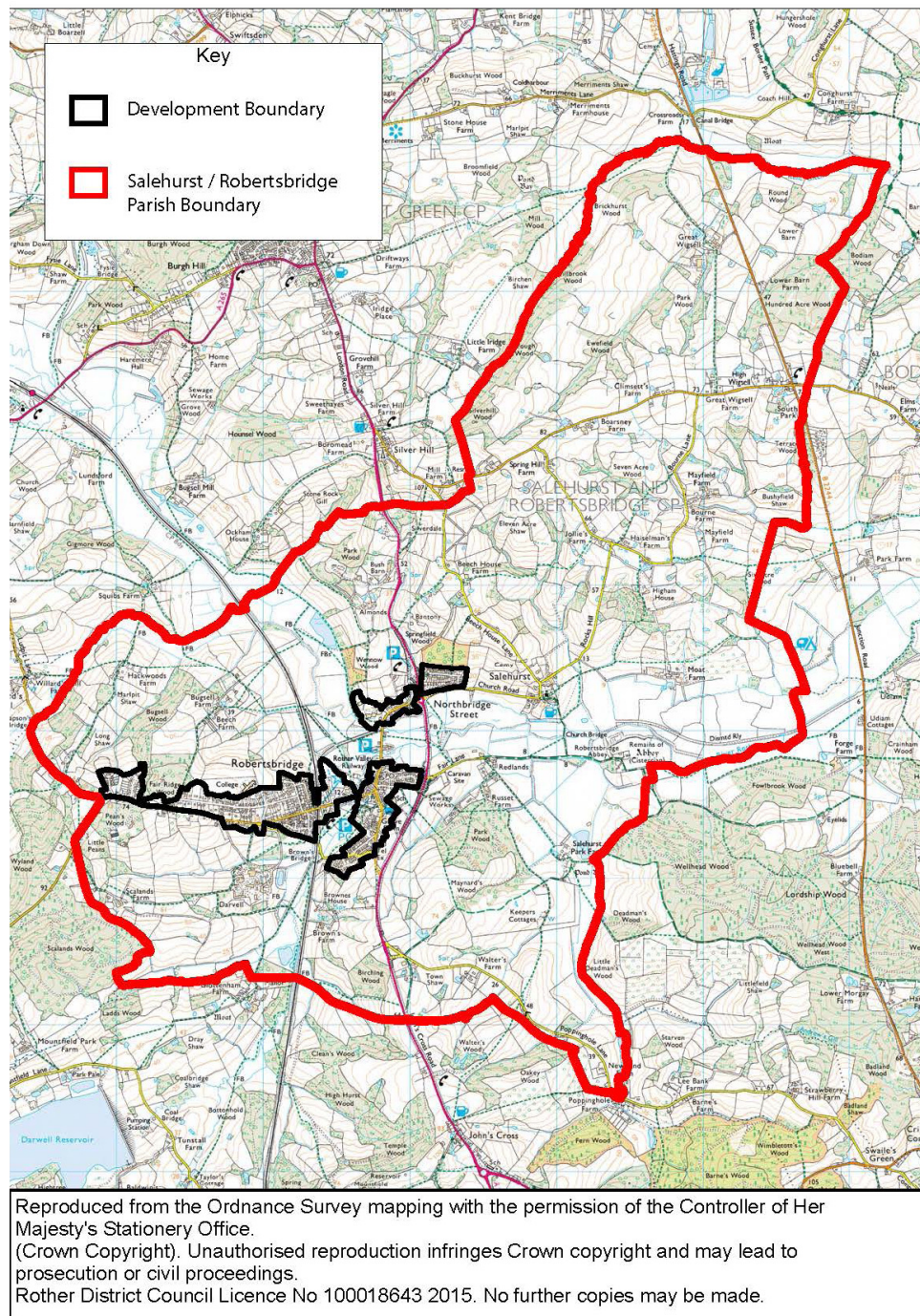
4.7 The main area where there were alternatives related to housing. The alternative approach towards the housing number was either not allocating any sites or providing more. If it allocated no sites then it would not meet the basic requirement of being in conformity with a higher tier plan, so not ‘reasonable’. 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 village where people want to live, work and play. We will maintain and enhance our village 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>



## 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
Efficient use of land and natural resources	The site is well away from the development boundary so is not considered to be an efficient use of land and as a result does not have existing connections to infrastructure
Reduce road congestion, pollution and improve air quality	There would be an increase in vehicles due to the distance from the village centre with services and facilities, as well as there not being bus services in the vicinity
Improve access to services and facilities for all ages	The distance from the existing village means that there will be a greater distance to access services and facilities plus the low number of properties and residents in this part of the villages means that this would not be a suitable location to site any new facilities
Protect and enhance the high quality of the natural and built environment	The fact that there is a distance between the existing built area and this site means that development at this location would be significant within the wider landscape and currently contributes towards both the setting of the settlements and the open field system important to the High Weald. Though there are no heritage assets that affect the site, it sits just to the north of the Conservation Area
Conserve and enhance biodiversity and geodiversity	This area though not ancient woodland is heavily wooded and so there would be a significant impact in terms of the loss of habitat and a key area for species movement. Its position also means that it is important to enhance the opportunities identified for the Rother, Brede and Tillingham BOA of which there is no indication
Minimise the risk of flooding and detriment to people and properties	The national maps show that this site is within Flood Zone 1 and so the lowest risk from flooding, although this part of the parish has high incidence of flooding from surface water
Maintain, improve and manage water resources	The site is not near a source protection area and there would be a reduction of consumption due to national building regulations and Southern Water's meter programme. It is unknown as to whether there is sufficient capacity in the existing sewer network in this area
Reduce greenhouse gas emissions	As this is likely to increase car use there would not expect to be a positive impact on this aspect
Reduce waste generation, disposal and achieve sustainable waste management	Though on site recycling facilities will be expected the location further from the settlement or development boundary means it would not be expected to significantly reduce waste production
<b>Cumulative/Synergistic Effects</b>	The only cumulative impacts will be in combination with the Rother Core Strategy and this has been taken into account within the discussion above
<b>Mitigation</b>	Careful site layout and design with lower height development on the north and eastern boundaries is needed as well as new or extension of off-site bus services, as well as sustainable drainage solutions to reduce the surface water runoff into the site from the

	road
<b>Recommendation</b>	This site should not be allocated for housing. It may be suitable for other purposes
<b>Overall Conclusion</b>	The position of the site means that there would be expected to be a number of negative impacts on the environment. Even for the neutral elements there are constraints that need to be addressed

## 2. South of Pound Platt

6.4 This site is a small site that is located inside the development boundary but abutting it in the north east. Currently this is open land behind some existing gardens.

Objective	Commentary
Efficient use of land and natural resources	As this site is against the development boundary it will be an efficient use of land and due to neighbouring existing properties there would not be expected to be significant issues in terms of extending utility networks and so natural resources
Reduce road congestion, pollution and improve air quality	Access is an issue at this site so this is more likely to contribute towards congestion and so more likelihood of a negative effect on the environment.
Improve access to services and facilities for all ages	Due to the relative distance from the village centre and its limited size this would not significantly address access issues in this part of the villages.
Protect and enhance the high quality of the natural and built environment	Due to its limited size and position just beyond the development boundary this would only have a limited impact and so beneficial with regards landscape and setting of heritage assets
Conserve and enhance biodiversity and geodiversity	This site has thick firm boundaries defined by high trees and for this reason makes good provision for various native species, as well as clearly creating a visual separation between the built area and the wider landscape. Development located here would cause negative impacts to a number of the questions for this aspect of the framework
Minimise the risk of flooding and detriment to people and properties	The site is fully in the lowest risk flood zone although the edge of the higher flood zone 2 associated with the highway creeps towards the eastern boundary of the site. As development here would have to address this it will have a positive impact to this aspect of the environment
Maintain, improve and manage water resources	There are no source protection zones around the Parish and Southern Water's metering programme plus stricter building standards, it will not be expected this aspect will be significantly affected
Reduce greenhouse gas emissions	The small size of the site means that it would not be expected more than on site elements can be included although being just behind existing built development it could be easier for expansion in future of any community schemes plus access to existing bus services along Northbridge Street
Reduce waste generation, disposal and achieve	Though all development is expected to provide recycling facilities on site the small scale of this site means that nothing additional to

sustainable waste management	this would be expected to contribute to this aspect
<b>Cumulative/Synergistic Effects</b>	The only cumulative impacts will be in combination with the Rother Core Strategy and this has been taken into account within the discussion above
<b>Mitigation</b>	Careful layout and design will be needed along with retention of the mature trees on the boundaries plus the need for improvements to immediate footpaths and possibly off site public transport
<b>Recommendation</b>	If the site was to be allocated mitigation along the lines above should be incorporated
<b>Overall Conclusion</b>	The small scale of this site means that in general it will have neutral impact on the environment. In terms of effective use of land and resources and flooding are positively affected although these are balanced by the fact that there will be negative effects on the natural environment and biodiversity.

### 3. Mill Site

6.5 This site is located in the southwestern corner of the area covered by the development boundary defined around Northbridge and extends further to the west that falls outside of the boundary. The SHLAA had identified it for a commercial use but with some residential to enable achieving the viability for the employment use. The site has been vacant for a number of years.

Objective	Commentary
Efficient use of land and natural resources	This is both within and outside the development boundary with a previous use that vacated a number of years ago. This means that it already has existing service and infrastructure provision. Therefore there would be expected to be positive effects resulting against 3 of the questions as a minimum and so reflected in this score.
Reduce road congestion, pollution and improve air quality	The site has an existing maintained road and has had an element of limited parking. It is within a 5 mins distance of services by other modes of transport (buses; walking), it also has a number of roads in the vicinity and there is the potential that additional routes could be invested in. Due to the close proximity to non-vehicular means of travel this has potential to lead to a change in commuting to work figures, although there are no air quality issues in the Parish. The combination of positively answering 6 questions and reducing movement by vehicles means that this results in a positive score.
Improve access to services and facilities for all ages	As access to retail, leisure and education facilities are within 10 mins and there is only 5 mins to travel by means other than vehicle there will be positive effects. The fact that the site is already served by utilities will also mean there will be positive effects. A significant constraint to the site is the need for a new medical facility, although the promoters are glad to incorporate this so there will be a positive effect especially when taken together.
Protect and enhance the high	The fact that though the site has part within the development



quality of the natural and built environment	boundary there is a greater amount outside of this. This means there will be a detrimental impact regarding the landscape and so the natural environment. There will be a positive impact on the built environment through reusing a building in the conservation area. However, there is part of the Listed Oasthouse on the western boundary of the site and here is another that is near the boundary along Northbridge. Significantly due to the 2 listed buildings and the impact regarding landscape character, this can only score a neutral score.
Conserve and enhance biodiversity and geodiversity	As part of this site is in the built area there would be less of an impact on the natural environment. The western area closest to the river would be ideal for creating wetland habitat in line with the actions for the BOA and ensuring no net loss in biodiversity as well as the Biodiversity Action Plan. Additionally it has been suggested that a hedgerow or tree line could be incorporated to separate the employment and housing uses, so towards the either new trees or characteristics of the High Weald
Minimise the risk of flooding and detriment to people and properties	Although the Rother Sequential test identifies this in the higher risk area, the National flood maps <sup>8</sup> show that this only applies to the western portion of the site. However various mitigation measures could be incorporated, including provision of swales around the access along with other Sustainable Drainage solutions plus siting the employment closer to this area rather than the housing.
Maintain, improve and manage water resources	The integration of new wetland would have positive effects on the last two of the questions as well as national building regulations on water and Southern Water's programme of inserting water meters will mean there will be no increase in water consumption. There will be no impact on water as the site is outside any source protection zones
Reduce greenhouse gas emissions	The intention for the greater part to be employment will increase the likelihood of reduced travel, especially by car, although on its own this will create a positive score. Its size may also allow for greater incorporation of a standalone scheme from renewable sources
Reduce waste generation, disposal and achieve sustainable waste management	Though in the main this would be through aspects such as design its countryside location may provide scope for some element of aspects such as allotments to be incorporated, although as this is not certain the score is tempered
<b>Cumulative/Synergistic Effects</b>	The cumulative impacts would occur with the neighbouring site that are largely around incursion into the countryside and infrastructure provision.
<b>Mitigation</b>	Investigation of the potential to deliver a wetland area on the western part of the site and if any capability to incorporate renewable energy, plus a hedgerow or tree separation between uses.
<b>Recommendation</b>	The aspects above should be considered and elements

<sup>8</sup><https://flood-warning-information.service.gov.uk/long-term-flood-risk/risk?address=100060099883> accessed on 3<sup>rd</sup> August 2016

	incorporated if it were to be included as an allocation.
<b>Overall Conclusion</b>	The site scores negatively in terms of flood risk but partially connected with this is the potential for positive effects on biodiversity, geodiversity and particularly in terms of reducing road congestion that equally means no deterioration in air quality. As well as these points there would be positive effects through the increased access to facilities for all and in terms of water. The other elements although having some positive aspects are also balanced by possible negative effects or uncertainties as well

### 3a. North of Northbridge Street (adj. Mill site)

6.6 This site is to the north and east of the first site but is outside of the settlement boundary but abutting it. It is included as part of a much wider area within the SHLAA 2013, specifically including the area intended for employment in the southern part. It is also abutted on its western boundary by the Mill site.

Objective	Commentary
Efficient use of land and natural resources	As this is outside the development boundary it would not be an efficient use of land and would not have utilities available.
Reduce road congestion, pollution and improve air quality	Its position beyond the development boundary means that this is not going to reduce travel by car, particularly due to the distance of the middle of the site from the existing roads. Though a number of bus services go along Northbridge Street there are none elsewhere, so existing services would have to be significantly extended
Improve access to services and facilities for all ages	There is a significant distance between the middle of this site and the existing village centre and so there would be a greater distance to services and facilities, especially the schools or church. There is no certainty there would be any new facilities provided.
Protect and enhance the high quality of the natural and built environment	The site has a number of trees and hedgerows on its boundaries that are important in terms of creating a separation from the existing built form within the wider landscape, plus touching the edge of a woodland on the northern boundary. Though there are no heritage assets on the site it will abut and affect the setting of the Conservation Area.
Conserve and enhance biodiversity and geodiversity	There is a woodland that touches the corner of the northern boundary so development would hinder potential movement of species, although it remains away from any unstable land
Minimise the risk of flooding and detriment to people and properties	The site is entirely within Flood Zone 1 and so the lowest flood risk on the National Flood Map and due to its distance from the existing roads is not at risk from surface water flooding currently
Maintain, improve and manage water resources	National building regulations and Southern Water's metering programme means that consumption will lower, although there would be no improvement to address flooding on the nearest highway during extreme events, so tempering this score
Reduce greenhouse gas	The housing would be required to have an energy strategy and to

emissions	meet new building regulation standards meaning there should be reduced energy demand, although there is no guarantee over provision from any new sources and its position into the countryside and with an existing woodland nearby would mean this is likely to be harder without impacting on the environment
Reduce waste generation, disposal and achieve sustainable waste management	Recycling facilities will be provided as part of any permission although it would not be expected that it would significantly affect the overall amount of waste recycled
<b>Cumulative/Synergistic Effects</b>	The main cumulative impacts occur with the neighbouring site and are centred around both landscape setting and provision of infrastructure. In particular there may be the potential to address more of these when considered more widely together.
<b>Mitigation</b>	Extensive landscaping along with new and extension of existing bus routes plus careful design to reduce impacts on the Conservation Area and stand alone renewable energy scheme.
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation.
<b>Overall Conclusion</b>	This site would have a number of detrimental impacts on the environment, with only a few having more limited effects but there are no positive effects from this site.

#### 4. Vicarage Land

6.7 This site is the smallest site and though within the development boundary abuts the open countryside with other sites 5&6 the other side of the primary school between it and the main road.

Objective	Commentary
Efficient use of land and natural resources	This site is within the settlement and development boundary and so an efficient use of land and natural resources, as well as meaning that it can more easily tap into existing utility networks
Reduce road congestion, pollution and improve air quality	The position of the site means that there is good access to other services of travel, so encouraging alternate forms of travel will be easy and so reduce pollutants and the number of those exposed
Improve access to services and facilities for all ages	The position of the site within the settlement area means that there is 10 minutes or less walking to be able to access services and facilities, so have a significant positive impact on this aspect
Protect and enhance the high quality of the natural and built environment	The location in the settlement area means that there will not be an impacts on the environment and that any development must take account of the Conservation Area designation and so impacts on heritage assets
Conserve and enhance biodiversity and geodiversity	The site is not known to have any protected species and there are no heritage assets directly on or near the site. Being within the Conservation Area any design will have to appreciate and take this into account
Minimise the risk of flooding and detriment to people and properties	The site is fully within the lowest risk from flooding and so there will be a positive impact through less properties being at risk from flooding and well away from any unstable land
Maintain, improve and manage water resources	There is no source protection zone around the village and the stricter standards through building regulations and Southern

	<b>Water's metering programme</b>
Reduce greenhouse gas emissions	The small scale of the site means that there is unlikely to be any significant contribution towards energy from renewable sources, although its central position does mean it can encourage reduction to greenhouse gases through travel by other means
Reduce waste generation, disposal and achieve sustainable waste management	It would only be expected that there will be the required on site recycling and existing services can easily be extended although it would not be expected there would be any other significant contribution
<b>Cumulative/Synergistic Effects</b>	The only cumulative impacts will be in combination with the Rother Core Strategy and this has been taken into account within the discussion above.
<b>Mitigation</b>	No explicit mitigation required.
<b>Recommendation</b>	Some slight wording changes could help ensure maximum benefits.
<b>Overall Conclusion</b>	This site significantly will have positive contributions towards half of the assessment framework and the remainder will be neutral so there will be no worsening to the environment at all.

## 5. Grove Farm Phase 1

6.8 This site is part of a one that has been brought forward from the designation in the original Rother Local Plan of 2006. Part of the eastern development boundary of Robertsbridge forms the site boundary and it is abutted on the eastern side by the associated Phase 2. An application was received by Rother District Council on 17<sup>th</sup> June and is still being considered.

<b>Objective</b>	<b>Commentary</b>
Efficient use of land and natural resources	This sits just within the development boundary and so is an efficient use of land, although unfortunately it is not currently served with utilities it should not be difficult for connections to be made.
Reduce road congestion, pollution and improve air quality	Though on a main road, properties can be set back so that there is no detrimental effects especially with thicker glazing on the windows. There is sufficient capacity and access would be on and off George Hill. The location will also encourage use of other modes of transport, such as buses and walking or cycling
Improve access to services and facilities for all ages	The location will mean that existing bus services will be in close proximity and all services and facilities of the village are within 30 minutes
Protect and enhance the high quality of the natural and built environment	The County Landscape assessment gives this area a moderate landscape capacity. There are no heritage assets apart from the conservation area. This site does not have a significant impact in terms of characteristics key to the High Weald or any special habitats or protected species. Significantly historic remains may be present across the site and so investigation would be required, although this does not alter the scoring.
Conserve and enhance biodiversity and geodiversity	There are no protected species on this site but there is a very firm boundary of trees that appears to contain the settlement in longer views but retains space inside to the built area. This means

	further building could be contained and not affect views, however it also abuts the Conservation Area and so may detrimentally affect this
Minimise the risk of flooding and detriment to people and properties	The National Flood Maps show that the site is within Flood Zone 1 and so has the lowest risk from flooding. There is some surface water flooding from the highways along the closest roads.
Maintain, improve and manage water resources	The site is not near a source protection area and there would be a reduction of consumption due to national building regulations and Southern Water's meter programme
Reduce greenhouse gas emissions	On its own the site would not be able to contribute towards renewable energy but if combined with the neighbouring site this may become more viable. However the location means that it could contribute towards more cycling and walking routes for recreation, especially due to its proximity to two existing routeways.
Reduce waste generation, disposal and achieve sustainable waste management	The development would be required to provide recycling facilities but would not be expected to make any further contribution
<b>Cumulative/Synergistic Effects</b>	The main cumulative impacts are with the neighbouring Phase 2 site, which may help in terms of addressing and delivering both more infrastructure plus mitigatory actions.
<b>Mitigation</b>	Ground investigations will be needed to ascertain the exact value of the possible historic remains and on its own there may be question marks over the potential expansion or provision of services or facilities. Sustainable Drainage solutions would also be required around the highway.
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation.
<b>Overall Conclusion</b>	This site is not expected to have significant impacts on the environment but at the same time will not have significant positive impacts. The only strongly positive impact would be in terms of flood risk and archaeology.

## 6. Grove Farm Phase 2

6.9 This site is a longer site that sits between the main road and the development boundary abutting the Phase 1 site. The Local Plan included an indicative location of a children's play area immediately against the settlement boundary with a tree belt around this.

Objective	Commentary
Efficient use of land and natural resources	This site is beyond the existing settlement or development boundary and so this would not be an efficient use of land and meaning that extensions to infrastructure networks will be harder
Reduce road congestion, pollution and improve air quality	Though there are bus services that run along George Hill and the eastern boundary runs behind the primary school meaning there may be a slight switch to other means of travel. However this will be tempered by the fact that there will be a greater number of vehicles that will affect capacity on the network and possible

	worsening of air quality
Improve access to services and facilities for all ages	The relationship of the site behind the existing built area will partially help to reduce distance to services and facilities as well as the depth of the site meaning that there may be potential for inclusion of enhancements to them, especially open space
Protect and enhance the high quality of the natural and built environment	The position of the site means that there will be an expansion into the countryside, although this is contained by the main road. Importantly though archaeological remains were found on the north eastern corner of the site and so this will have to be respected and may mean that there may be others across the site
Conserve and enhance biodiversity and geodiversity	There are no protected species on the site and there is no added biodiversity value and so no detrimental impact would be expected in this regard although there is some more porous land on the centre of the western boundary with the school
Minimise the risk of flooding and detriment to people and properties	The site is fully within the lowest risk flood zone and may be able to include sustainable drainage solutions within any design and so potentially deal with more limited issues connected with the porous land on the western side
Maintain, improve and manage water resources	Southern Water's metering programme and stricter building standards mean that water demand should be reduced
Reduce greenhouse gas emissions	On its own the site would not be able to contribute towards renewable energy but if combined with the neighbouring site this may become more viable. However the location means that it could contribute towards more cycling and walking routes for recreation, especially due to its proximity to two existing routeways.
Reduce waste generation, disposal and achieve sustainable waste management	In addition to the expected on site recycling facilities the open nature to the main road along with the archeological importance of the north eastern corner of the site would make it suitable for additional allotment to be provided
<b>Cumulative/Synergistic Effects</b>	The cumulative come with the neighbouring Phase 1 site in terms of addressing and delivering infrastructure plus mitigation when combined.
<b>Mitigation</b>	It will be especially important for an archaeological study to be done beforehand and also a Phase 1 Habitat survey to ensure that no protected species have become present on the site, as well as incorporation of new routeways that connect to the existing ones of the High Weald.
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation
<b>Overall Conclusion</b>	In general the site would not make a significant impact on the environment but will have positive effects on water resources and possible waste management.

## 7. Robertsbridge Club

6.10 This site is another small site that is located centrally in the south eastern built up area towards the junction of station road and the high street. Not all of the current site will be needed to continue these services into the future.

Objective	Commentary
Efficient use of land and natural resources	Being centrally located in the development boundary and settlement this would make an extremely efficient use of land plus ensure that continued use of the associated building. There are existing utilities on the site
Reduce road congestion, pollution and improve air quality	The moderate size of the site and its position means that travel by means other than the car can easily be achieved making a significant impact to improving air quality. There will be enough capacity on the existing network as well, meaning no additional works are necessary
Improve access to services and facilities for all ages	The central position of the site and the longer term viability of the club will be positive although the size of the site would not help provision of new facilities. The position means that there is ease for non-vehicular travel but little potential to significantly increase these.
Protect and enhance the high quality of the natural and built environment	The location means that there would not be any detrimental impact on the landscape or natural environment but there would not be significant improvements either. It is sited in the conservation area and so would have to be in keeping with its locality but this will be helped by its smaller size.
Conserve and enhance biodiversity and geodiversity	Though the location of the site means it would not have significant impacts on the environment if green elements are included then it may be possible to provide some routes for the movement of species
Minimise the risk of flooding and detriment to people and properties	On the national map the site is in flood zone 3 associated with the river and so would not be suitable for residential development
Maintain, improve and manage water resources	The site is not near a source protection area and there would be a reduction of consumption due to national building regulations and Southern Water's meter programme.
Reduce greenhouse gas emissions	Due to the small size of this site it is expected that any contribution that this make against this would be through design rather than any larger on site provision from renewable energy
Reduce waste generation, disposal and achieve sustainable waste management	The small scale of this site means that no more than the commitments required by the Rother Plan will make a contribution and so there will be no significant impact on this aspect of the environment
Cumulative/Synergistic Effects	The only cumulative impacts will be in combination with the Rother Core Strategy and this has been taken into account within the discussion above.
Mitigation	It would be necessary for a significant level of sustainable



	drainage and flood alleviation elements to be incorporated.
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation.
<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 and so not appropriate for locating housing.

## 8. 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 has a lapsed planning permission and so has been long accepted for housing. Recent discussions indicate that a new scheme for 7 units is anticipated.

<b>Objective</b>	<b>Commentary</b>
Efficient use of land and natural resources	Due to its position within the development boundary and central to the built area means that it will reuse buildings and maintain the amount of agricultural land plus already have utilities and other infrastructure connected.
Reduce road congestion, pollution and improve air quality	There is no Air Quality Management Area in the village at present but this would result in a small increase of population in proximity to an area where there is potential for higher levels of pollutants and it would not significantly affect either rights of way or public transport services, although is close to existing routes. In addition there is already a maintained access
Improve access to services and facilities for all ages	The site is on a main route of the village and so has a high level of accessibility, especially as its proximity to the school and village store
Protect and enhance the high quality of the natural and built environment	Due to the position of the site within the development boundary it will have positive effects by reducing any use of land outside the boundary and will mean that it fits in the host community. This area has no heritage assets nearby and so no detriment to the environment
Conserve and enhance biodiversity and geodiversity	The position in the built area means that there will be positive effects to the protection of the landscape and agricultural land as avoiding any areas of land instability, although there is not going to be any opportunity to increase or improve biodiversity
Minimise the risk of flooding and detriment to people and properties	This site is fully in Flood Zone 1, although it is still in an area of poorly draining soil and has a medium risk from surface water flooding, that is mainly along the highway. Robertsbridge is specifically recognised as a hot spot for highway flooding and it could contribute towards addressing this
Maintain, improve and manage water resources	The site is not within a source protection zone. National building regulation standards and Southern Water's meter roll out will mean there will be a reduction in terms of consumption. The position and size of the site mean that are already close connections to the networks, although without more detail an accurate assessment of whether there may be positive impacts off site is unknown



Reduce greenhouse gas emissions	Apart from through design it would not be expected that this would significantly affect this aspect
Reduce waste generation, disposal and achieve sustainable waste management	The position and size of the site means that there is already utilities, although this would not trigger any new works
<b>Cumulative/Synergistic Effects</b>	The only cumulative impacts will be in combination with the Rother Core Strategy and this has been taken into account within the discussion above.
<b>Mitigation</b>	None required
<b>Recommendation</b>	No specific one
<b>Overall Conclusion</b>	Overall this will not have a significant impact on the environment as although there is potential to have positive impacts there is insufficient evidence currently to be able to score any aspects apart from accessibility as having so.

## 9. Bishops Lane

6.12 This site is outside the development boundary but abuts it around the southern built up area.

<b>Objective</b>	<b>Commentary</b>
Efficient use of land and natural resources	The site though abutting the settlement and development boundary is to the north of it and so not an efficient use of land
Reduce road congestion, pollution and improve air quality	The position of the site means that it could help to provide new capacity within a main route, although extensions to bus services both on and off the site would be required, so positively affect the environment
Improve access to services and facilities for all ages	Access to services and facilities will not be directly affected although by enhancing aspects such as bus services and locating people closer to the central location of the services will positively impact this aspect
Protect and enhance the high quality of the natural and built environment	The position of the site means that development will reduce the open space between the existing built area. There will be no impact on any of the historic environment though as it is not located near the Conservation Areas or any listed buildings
Conserve and enhance biodiversity and geodiversity	the lack of any important species or habitats means that there will be less impact although development will mean that there will be a reduction in space for species movement
Minimise the risk of flooding and detriment to people and properties	The site is fully within the lowest risk from flooding although the higher flood zone 2 is located close to the northern boundary and so if sustainable drainage solutions are incorporated in the design could reduce or prevent this and so positively affect this aspect of the environment
Maintain, improve and manage water resources	There will be expected to be no significant impact on this aspect of the environment due to the stricter building standards and Southern Water's metering programme
Reduce greenhouse gas emissions	The greater scale of the site may make greater allowance in terms of possible incorporation of energy from renewable sources although this is unknown at this stage and so preventing a positive scoring
Reduce waste generation,	The size of the site and its location on the edge of the village

disposal and achieve sustainable waste management	means that open space or potential allotments could be incorporated but it is unknown without detailed design as to whether this will happen and so the score is tempered
<b>Cumulative/Synergistic Effects</b>	The only cumulative impacts will be in combination with the Rother Core Strategy and this has been taken into account within the discussion above
<b>Mitigation</b>	Investigation of the potential to incorporate allotments or a renewable energy scheme
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation
<b>Overall Conclusion</b>	Though in general there are a lot of neutral scores for this site it would positively reduce flood risk and air pollution

## 10. Heathfield Gardens West

6.13 This is a decent sized site that is located in the south eastern corner abutting the development boundary and its eastern boundary is a separate area that has also been submitted. This proposal specifically includes an area assigned for landscaping.

<b>Objective</b>	<b>Commentary</b>
Efficient use of land and natural resources	This is outside the development boundary and so there would be a negative effect in terms of efficient use of land and
Reduce road congestion, pollution and improve air quality	There is sufficient capacity on the highway for a moderate amount and its position means that there will be good access to public transport routes, plus potentially trigger extension to provisions or routes
Improve access to services and facilities for all ages	The position on the extreme southern end of the existing built area means that there will be a slightly greater physical distance to be covered but there is a good access to both pedestrian and leisure routes as well as the main highway network, so services and facilities are still within 30 minutes walking distance
Protect and enhance the high quality of the natural and built environment	This is an area that has only a moderate landscape capacity but has a couple of important High Weald routeways in close proximity that add value, although good design would be expected to enhance these characteristics. Through the inclusion of the landscape area this will prevent significant urban spread.
Conserve and enhance biodiversity and geodiversity	The inclusion of a specific area for landscaping will make a positive impact on the environment and link with and enhance the characteristics of both the High Weald AONB and also the Rother, Brede and Tillingham BOA, as well as being away from any land that may be unstable
Minimise the risk of flooding and detriment to people and properties	The site is located entirely within flood zone 1 and so has the lowest risk of flooding from any source.
Maintain, improve and manage water resources	The site is not near a source protection area and there would be a reduction of consumption due to national building regulations and Southern Water's meter programme
Reduce greenhouse gas emissions	On its own the site would not be able to contribute towards renewable energy but if combined with the neighbouring site this may become more viable. However, the location means that it

	could contribute towards more cycling and walking routes for recreation, especially due to its proximity to two existing routeways.
Reduce waste generation, disposal and achieve sustainable waste management	Though the site would be required to provide recycling facilities it is unknown as to whether other facilities such as allotments may be provided
<b>Cumulative/Synergistic Effects</b>	The main cumulative impacts come when combined together with the neighbouring site to the east and affect addressing and delivering certain aspects, such as waste management.
<b>Mitigation</b>	No specific aspect required but investigation of incorporation of recycling and renewable energy schemes
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation
<b>Overall Conclusion</b>	Though this would not be within the definition of being an efficient use of land it will have positive effects in terms of accessibility, the natural environment and the reduced risk of flooding. A reduction would also be expected of water consumption and protecting the water environment, plus potential for a reduction to greenhouse gases, although on its own the site would not be able to contribute anything towards renewable energy.

## 11. Heathfield Gardens East

6.14 This site is outside the development boundary but abuts it in the south east with the eastern boundary almost following the main road. It is also abutted on the western boundary by site 10.

<b>Objective</b>	<b>Commentary</b>
Efficient use of land and natural resources	This site is outside of the development boundary with the northern boundary abutting the southern edge, so it is not an efficient use of land plus it is in close proximity to existing utility networks. Additionally is potential to maximise the provision of facilities when combined with the neighbouring site. It would not reuse buildings and not accurate assessment can be made on the exact contribution it would make towards providing facilities.
Reduce road congestion, pollution and improve air quality	There is no existing Air Quality Management Area but housing in this location would increase the proximity of residents to the main A21, which is the most likely to go above set limits. There would be good access to existing bus services, as well as having a historic routeway that runs along the site boundary. Though existing proposals for an access onto George Hill are not supported by the Highway authority the owner has stated they would be willing to work with the neighbouring site.
Improve access to services and facilities for all ages	There would be opportunities to connect or extend the existing routeways and rights of way, as well as the majority of facilities being within 20-25 minutes walk, plus there may be potential to extend existing bus services.
Protect and enhance the high quality of the natural and built environment	The site sits to the south of the existing built form and extends almost fully across to fill the existing buffer space with the main A21. This means that it is relatively contained within the wider

	landscape, meaning it has a moderate landscape capacity. Though there are no heritage assets on the site, some medieval pottery and trenches were found when the bypass was constructed. It will prevent coalescence with other settlements and is avoids areas of land instability
Conserve and enhance biodiversity and geodiversity	There are no specific BAP habitats on the site and the closest is the ancient woodland that is significantly to the south. There are no protected species that are known to use the site although nature management is important to the promoter along with any joint actions to help retain the key characteristics of the High Weald
Minimise the risk of flooding and detriment to people and properties	The site is fully within Flood Zone 1 so with the lowest risk, although there is a very limited patch in the south that is affected by surface water flooding
Maintain, improve and manage water resources	The site is not near a source protection area and there would be a reduction of consumption due to national building regulations and Southern Water's meter programme
Reduce greenhouse gas emissions	On its own the site would not be able to contribute towards renewable energy but if combined with the neighbouring site this may become more viable. However the location means that it could contribute towards more cycling and walking routes for recreation, especially due to its proximity to two existing routeways.
Reduce waste generation, disposal and achieve sustainable waste management	Any development would be required to provide recycling facilities. Existing services could be more easily extended if agreement for connection through neighbouring site to Heathfield Gardens and if allotments were incorporated on the northern boundary south of the intended Local Green Space may result in greater recycling and less waste, although it is unknown whether this is intended, so the score is tempered
<b>Cumulative/Synergistic Effects</b>	The main cumulative impacts come when combined together with the neighbouring site to the west and affect addressing and delivering certain aspects, such as waste management.
<b>Mitigation</b>	It will be important for significant consideration of partnership working with the neighbouring site, especially in terms of access and other facilities such as enhancing routeways, biodiversity and potential waste management and renewable energy.
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation.
<b>Overall Conclusion</b>	This site would not be predicted to have a significant impact on the environment and in fact has the greatest potential for positive effects regarding the natural and built environment as well from the risk of flooding. There is always the potential with more detail that some of the current ambers could change, although currently there is insufficient to be absolutely conclusive.

## 12. 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.

Objective	Commentary
Efficient use of land and natural resources	The site though abutting the settlement area is just to the north of the development boundary and so in the countryside, meaning it would not be an efficient use of land or natural resources. However the provision of utilities and infrastructure should not be a problem as these already serve the neighbouring site
Reduce road congestion, pollution and improve air quality	There is a significant distance to the middle of the site and there is no access, plus no existing PROWs nearby and so this site would not encourage travel by alternate means
Improve access to services and facilities for all ages	The position of the site means that from the edge of the site there will potentially be around 10-15 minutes to services and facilities, although the significant distance from the middle of the site means that there is unlikely to be a significant shift in travel modes, so not affecting this part of the environment
Protect and enhance the high quality of the natural and built environment	This will be result of incursion into the countryside affecting the context of the settlements and there is a significant boundary of mature trees that are particularly important in terms of providing an immediate haven to wildlife. Furthermore this site abuts the Conservation Area and so this will have to be taken into account in any design
Conserve and enhance biodiversity and geodiversity	Though the site does not have aspects of the Brede, Rother and Tillingham Woods BOA, it has clearly defined mature trees on the boundaries and there are a large number of mature trees across the northern part of the site, so there will be a detrimental impact to this aspect
Minimise the risk of flooding and detriment to people and properties	The site though mainly in the lowest risk flood zone is covered by the higher flood zone 2 along the eastern boundary and into the eastern part of the site, therefore scoring negatively
Maintain, improve and manage water resources	Water demand will be reduced through meeting stringent building regulation standards and Southern Water's metering programme, although no other direct elements. However unique to this site more measures are likely to be needed to prevent any deterioration in water quality if the mature boundary treatment is removed.
Reduce greenhouse gas emissions	The shorter distance from the south of the site may allow for travel by a proportion of new residents but in the main the distance to the centre of the site mean that there is expected to be more car movements
Reduce waste generation, disposal and achieve sustainable waste management	Being a larger site as well as on site recycling there may be potential for either energy generation through renewables or allocation of land as allotments
<b>Cumulative/Synergistic Effects</b>	The only cumulative impacts will be in combination with the Rother Core Strategy plus and this has been taken into account within the discussion above

<b>Mitigation</b>	It will be important for specific landscaping and careful design and layout to be incorporated as well as access and non-vehicular routes, plus off site extension of existing bus services plus investigation of renewable energy and waste management measures.
<b>Recommendation</b>	The aspects above should be considered and elements incorporated if it were to be included as an allocation.
<b>Overall Conclusion</b>	This site would have the greatest negative impacts to the environment.

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. As a result this would not be considered to be significantly negative and would change to being neutral heading towards positive but always tempered by exact implementation.

### Overall conclusion on sites

6.16 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.

6.17 Significantly a large number of the sites have mainly neutral impacts to the environment, with just one or two aspects scoring differently. The three sites that are expected to have the greatest detrimental impacts to the environment are Slides Farm, North of Northbridge Street (adj. the Mill) and Adjacent Culverwells, The negative score for Adjacent Culverwells changes to neutral through the integration of the mitigation recommended.

In terms of positive impacts on the environment this would mainly result from Vicarage Land, Bishops Lane, Heathfield Gardens West and the Mill Site. Others that have more limited positive impacts on the environment are the two phases of Grove Farm and possibly Countrycrafts/Market Site.

6.18 Six of the sites, as can be seen by their names are individual parts of two larger development opportunities. These have been considered and discussed within the matrices above in terms of them as sites, although consideration has been given of what could be achieved if combined with the associated site as well.

6.19 As a general rule this shows that especially individually only half of the wider definitions actually have positive impacts on the environment. The outcome of this is that the Mill site is suitable and has positive impacts due to its location but that the associated North of Northbridge Street (adj the Mill) has a number of detrimental impacts on the environment. In terms of the Grove Farm Phases these generally score the same and have a neutral impact, especially with mitigation. For the last Heathfield Gardens, the western part has significantly greater positive impacts than the associated eastern part.



6.20 The conclusions have been made on the basis of a strategic level consideration with no knowledge of any designs which is what would be expected of a neighbourhood plan.

## 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.

### 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	In this situation there is nothing assigned to Robertsbridge in terms of retail, although it is identified as a key 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 existing infrastructure and use of buildings
2	This alternative would not have a positive effect as it would simply be likely to continue the existing situation	The application of the policy will mean that there would be a reduction in the need for travel by car but by other less polluting means, although it would not contribute towards any mitigation schemes
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	The lack of direction means that there is no protection either to heritage assets or the natural environment	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	In terms of the local plan this would be applying a policy related to the natural environment rather than a retail one, although it is not anticipated there would be significant effects as a result	The policy of the neighbourhood plan is not expected to significantly affect the environment

6	In this situation a 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	The neighbourhood plan policy will not be expected to affect this aspect of the environment
8	As this would not provide direction it would not alter the existing situation	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-fasttelecommunication 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
2	There would be a slight positive impact through use of the relevant policy from the Rother local plan	The neighbourhood plan policy would not be expected to have a significant impact on this aspect
3	In this situation accessibility is expected to be in a sequential approach from the centre outwards and so it would have a positive effect to the environment	It would not be expected that this policy would have a direct impact on this aspect
4	A relevant policy would be applied to any application but this would not be expected to significantly change the existing situation	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 installation of broadband in rural areas, although the exact impact is difficult to assess	The inherent protection that this policy provides regarding the AONB means that the minimum will be neutral effects to the environment
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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The neighbourhood plan policy will not be expected to have an impact on this aspect
8	Due to the high requirements of this	The policy itself will not have an impact but a

	policy there would be a positive effect on the environment in this situation	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 slim 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 business sites.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There would still be a positive impact in the majority of cases as many sites are within the built area and already have utilities	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	There would not be a direct impact but the potential for less need to commute to work as a result of the retention by the policy
3	The relevant policy in the local plan is robust and so will have a positive impact in terms of access and	The policy will mean that there will be a positive effect on the built environment by focusing on retention. Additionally this will mean there will be less need to commute by car to work
4	A relevant policy would be applied to any application but this would not be expected to significantly change the existing situation	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	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 regarding the AONB means that the minimum will be neutral effects to the environment
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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

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

7.6 Though spread slightly throughout the two main villages this policy is focused on the properties listed and so specific in nature.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	In this situation 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 environment
2	There would be the potential for positive effects on the environment through reduced amounts of commuting via car to work	It would not be expected that this policy will have a direct impact but potentially a positive effect indirectly through increased travel by other means due to being retained
3	The relevant policy in the local plan is robust and so will have a positive impact in terms of access	Though the policy is not expected to have a great impact on this element,
4	A relevant policy would be applied to any application but this would not be expected to significantly change the existing situation	The policy would not be expected to have a particular impact on this element of the environment but will be positive on the historic environment
5	Through a combination of policies there will be positive effects on heritage assets and to a possibly lesser extent the natural environment	This policy would have no direct impact to the environment
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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

#### 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.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	In this situation there would be the	As this policy would be expected to apply

	potential loss of sites that are valuable to the community	across the Parish it is not possible for an exact assessment to be made, but it would be expected that this is likely to neutral due to the constraints of the policy especially in terms of being in character with the
2	There would be the potential for positive effects on the environment through reduced amounts of commuting via car to work	It would not be expected that this policy will have a direct impact but potentially a positive effect indirectly through increased travel by other means due to being retained
3	The relevant policy in the local plan is robust and so will have a positive impact in terms of access	Though the policy is not expected to have a great impact on this element,
4	A relevant policy would be applied to any application but this would not be expected to significantly change the existing situation	The policy would not be expected to have a particular impact on this element of the environment but will be positive on the historic environment
5	Through a combination of policies there will be positive effects on heritage assets and to a possibly lesser extent the natural environment	This policy would have no direct impact to the environment
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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

#### Policy EC6: Rural businesses

7.8 This policy is intended to cover the whole extent outside of the built area defined later in the neighbourhood plan.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	In this situation 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 environment
2	There would be the potential for positive effects on the environment through reduced amounts of commuting via car to work	It would not be expected that this policy will have a direct impact but potentially a positive effect indirectly through increased travel by other means due to being retained
3	The relevant policy in the local plan is	Though the policy is not expected to have a



	robust and so will have a positive impact in terms of access	great impact on this element,
4	A relevant policy would be applied to any application but this would not be expected to significantly change the existing situation	The policy would not be expected to have a particular impact on this element of the environment but will be positive on the historic environment
5	Through a combination of policies there will be positive effects on heritage assets and to a possibly lesser extent the natural environment	This policy would have no direct impact to the environment
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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

#### 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	In this situation 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 environment
2	There would be the potential for positive effects on the environment through reduced amounts of commuting via car to work	It would not be expected that this policy will have a direct impact but potentially a positive effect indirectly through increased travel by other means due to being retained
3	The relevant policy in the local plan is robust and so will have a positive impact in terms of access	Though the policy is not expected to have a great impact on this element,
4	A relevant policy would be applied to any application but this would not be expected to significantly change the existing situation	The policy would not be expected to have a particular impact on this element of the environment but will be positive on the historic environment
5	Through a combination of policies there will be positive effects on heritage assets and to a possibly lesser extent the natural environment	This policy would have no direct impact to the environment
6	Strong flood policies would apply in this	This policy would have no direct impact to

	situation that should help to improve the environment	the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.10 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 Although not having a set of policies and leaving it to the Rother Local Plan would not result in 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.

SEA Objective	Alternatives	
	a) No policy	b) Policy
1	There is no direction in the policies of the local plan over explicit locations. As	Considering all the sites that are the focus of this policy are located in the built area any

	such it is not possible to accurately predict the exact impact on the environment	extensions would therefore represent a good effect to the environment and use of resources
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	The position of the schools involved are focused close together, in a distance of 15minutes and so can encourage travelling by other means, so reduce pollutant levels
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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	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	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 three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

### 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 15minutes and so can encourage travelling by other means, so reduce pollutant levels
3	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	The exact impact is difficult to assess without exact sites but it is likely that any new facilities would be expected to result in no lessening of access and potential

	effect on the environment	improvement
4	Applicable policies would be from differing parts of the Local Plan	As the policy does not specify sites it is difficult to accurately assess the potential impact but the related use means that impacts would be expected to be low. The same reasoning means that the impacts on heritage assets would also be expected to be low.
5	Through a combination of policies there will be positive effects on the natural environment	This policy would not be expected to affect the environment
6	The flood policies of the plan would apply as applicable to the three existing sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The intended uses would in general be suitable in all areas except immediately around the river or streams and as such only minimal impact on the environment
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	Exact assessment is not possible and could only be done at an application level but it is expected that the larger schemes could have a positive impact
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. However in the majority of cases it is not possible to give an exact assessment without site details and as such the conclusions are largely based either on parish information or the spread of the existing sites.

## 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 alternate of other locations to be considered.

### 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	Alternatives
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Objective	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 Plan although there is a strand within another regarding education. As such there would be no significant effect	Due to the position of the existing sites they are within easy walking distance and less intensive meaning there will be expected to be an improvement to the environment through reduced pollutants
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	Though the policy is not expected to have a great impact on this element, any increase in provision in the parish will increase alternate uses to the car and so reduce pollutants
4	Applicable policies would be from differing parts of the Local Plan	The intended use means it will preserve the value of the landscape, as well as preventing coalescence of settlements plus being sensitive to heritage assets, so positive effects
5	Through a combination of policies there will be positive effects on the natural environment	At this level of planning it would be expected that there would be positive effects to the environment, although this may need to be revised at planning application stage with more detailed information
6	The flood policies of the plan would apply as applicable to the three sites	The use covered by this policy is compatible with this objective and so a positive effect
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.19 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. In particular this would be with regard to the use of land and natural resources plus biodiversity and reduction in risk from flooding.

#### Policy EN2: Local Green Space Designation

7.20 This policy is intended to designate a number of sites as Local Green Space and to be supported by a map. They are split into three categories and also additional information put in the justification part of this policy.

7.21 Under Part A of the policy it lists 8 sites for designation due either to their current status or their ownership, with the majority of these being existing open spaces. Part B then lists a further 8 sites that they also wish to be designated and finally Part C includes 3 sites that correlated to some of the sites that were being considered for housing. Having initially reviewed these, as mentioned the first set tend to be existing open spaces, justification is provided with the second set and the third although the last appears limited.

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	Sites are spread both inside and close to the development boundary so would not be expected to significantly affect the environment
2	There is no direct policy in the Plan although there is a strand within others. As such there would be no significant effect	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	Applicable policies would be from differing parts of the Local Plan	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. Importantly the designation of the specific area with archaeological remains of Grove Farm will make the most significant contribution towards the historic environment
5	Through a combination of policies there will be positive effects on the natural environment	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 sites	Though this policy will not be explicit in terms of reducing flood risk it could well have a positive indirect effect
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	Though the policy will not be expected to have an significant impact on the environment, it importantly would not hinder delivery of necessary infrastructure due to the wording of the policy
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	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
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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

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 villages.

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	This policy recognises the environmental designation and so aims to prevent inappropriate development in and around the villages, 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	This policy would not affect this aspect and so there would be no significant effect on the environment
3	Combinations of policies would relate to this and so there would be a positive effect on the environment	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	This policy will protect the inherent characteristics of the natural environment preventing coalescence and protecting the setting of the conservation area and designated heritage assets
5	Through a combination of policies there will be positive effects on the natural environment	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 as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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
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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 relate to on site actions but the aim is around preservation of the landscape characteristics and general setting of the area outside 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	This policy would not be expected to have a significant effect in terms of this aspect
2	This would be covered through a combination of policies in the local plan	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	Policy EN5 of the local plan would mean there would be a positive impact on the environment	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	Applicable policies would be from differing parts of the Local Plan	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	Through a combination of policies there will be positive effects on the natural environment	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 as applicable to the three sites	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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	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	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	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
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#### Policy EN5: Renewable Energy and Energy Efficiency

7.26 This is not intended to be specific to one part but 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 SRM2 of the Rother Local Plan specifically applies criteria to be met relating to water supply and wastewater, 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	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	The policy will not directly affect this aspect
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
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
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 would be a positive effect on the environment through a reduction in the number of properties at risk from flooding
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	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	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	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	This policy would have a positive effect on

	East Sussex Waste and Minerals Plan policies being applied	the environment through emphasising reductions both in terms of energy and water, as well as waste specifically
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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 Station Road; Northbridge Street and Silverhill 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 will not directly affect this aspect and so there would be no impact on the environment
2	There are no policies in the plan directly relating to reduction in air pollutants but change to non-vehicular travel is emphasised through all the transport section	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	Though 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	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 crucially to all forms of heritage assets
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 three sites	This policy would have no direct impact to this part of the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	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 landscape and especially the important characteristics of the High Weald AONB that are recognised in the baseline characteristics and other documents of relevance to the Parish.

#### 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	Considering all the sites that are the focus of this policy are located in the built area any extensions would be a good effect to the environment and use of resources
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	The position of the majority of village services are within in a distance of 15/25minutes travel time and so can encourage travelling by means other than the motorcar, so reducing pollutant levels
3	Nothing in the Local Plan directs to any locations to do with schools	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	As this is focused within the built areas and must take account of critical characteristics recognised for their contribution towards the setting of the overall settlements, so have a significant effect 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 three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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 accessibility and potential for reduction in air pollutants.

## Housing

7.32 The assessment of the sites individually has been carried out within the preceding part Assessing Sites around Salehurst and Robertsbridge. A brief summary of the main conclusion was that though a wide number had neutral impacts on the environment there were six of the sites that constituted individual parts of 3 development opportunities. Individual assessment resulted in half of each being more suitable than the associated one. Finally 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. 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 Land, 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 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 prioritises land within the defined built area but allows for development outside this that 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 especially those within the transport section	The position of the schools in and around the settlements are focused close together, in a distance of 15 minutes and so can encourage travelling by other means, so reduce pollutant levels so having a positive effect on this aspect of the environment
3	Nothing in the Local Plan directs to any	The direction towards the development areas



	locations to do with schools	means that there will be a positive effect on this aspect as it will mean a reduced distance to services and so can increase travel by other means
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, prevent coalescence and habitats, although there may be potential for negative impacts on heritage assets
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 three sites	The direction towards the built area means that there will be no worsening and potential improvement on this aspect of the environment as it will mean that it is within the area at lowest risk from flooding
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

### Policy HO2: Housing requirement

7.35 As set out under the reasonable alternatives discussed in the previous part on Assessing Sites around Salehurst and Robertsbridge, 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.

SEA Objective	Alternatives	
	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	The specific mention in the policy of ensuring

	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	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	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 applicable to the three sites	As the policy specifically picks out flood prevention in the policy there will be a positive impact through reducing the number of properties and residents at risk from flooding
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	Though there will be additional capacity required in the networks there is no hindrance to this, so a positive effect on the environment
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

### Policy HO3: Site allocations

7.36 This does as suggested in the name and allocates sites 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	As the focus of this policy is on sites within

	the local plan over explicit locations. As such it is not possible to accurately predict the exact impact on the environment	and close to the development boundary, there will be a positive effect 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	The extension of new footpaths and cycleways will have a positive effect through reducing the distance to goods and service's
3	The local plan does not include any allocations for services and so reduce the travel distance	The reference to extending footpath and cycleways means there will be a positive impact on the environment as a result of the different mode 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 as applicable to the three sites	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
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	Though there will be additional capacity required in the networks there is no hindrance to this, so a positive effect on the environment
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.37 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 so 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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect expected directly to the environment	
3	Nothing in the Local Plan directs to any locations to do with schools	The policy is not expected to have a great impact on this element, although may help to ensure there is no significant increase on infrastructure
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, prevent coalescence and habitats
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 three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

### 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	There is no direction in the policies of the local plan over explicit locations. As such it is not possible to accurately	The focus of this policy is across the whole Parish and so will not have a direct impact on this aspect of the environment

	predict the exact impact on the environment	
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	The policy will not affect this aspect of the environment
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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	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 as applicable to the three sites	This policy will have little impact on this aspect as it mentions nothing
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.40 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 (Non-Market) 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	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 focus of this policy is across the whole Parish and so will not have a direct impact on this aspect of the environment
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	The policy will not affect this aspect of the environment

3	Nothing in the Local Plan directs to any locations to do with schools	By ensuring that housing is located and provided for the local community it shall reduce the distance to services and facilities
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 as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	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	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 have a direct impact but should indirectly have a positive impact on this aspect
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This will not have a positive effect on this aspect of the environment
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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 policy will have a positive effect to this aspect by protecting and ensuring the retention of the character and setting of the villages, 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 three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment in this situation	The policy will have a positive impact on the environment through the inclusion of renewable 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	This policy will not affect land and so not affect this aspect of the environment
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This aspect is not likely to be affected by this policy
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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 is not likely to have a direct impact although may have indirect impacts
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 three sites	This policy would have no direct impact to the environment and it would not be expected that it will have any negative effects regard this aspect
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the	It is not anticipated that this policy would

	local plan policy there would be a positive effect on the environment in this situation	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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This aspect will not be affected by this policy
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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	The policy will have the greatest impact on this aspect of the 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 environment
6	The flood policies of the plan would apply as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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



7.47 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 a mix of impacts to the environment. A number of these 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 SRNDP.

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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	The policy will not have a significant effect on this aspect of the environment
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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	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 as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a	It is not anticipated that this policy would have a significant effect on the environment

	positive effect on the environment in this situation	
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.

7.51

#### 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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	The policy will not directly affect this aspect of the environment
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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	Though not direct there will be a positive indirect aspect through ensuring the protection of the countryside and landscape setting, though this is tempered by the fact that it could affect the Conservation Area and possible setting of heritage assets
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 three sites	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	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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
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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 aim of this policy is 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 explicit locations. As such it is not possible to accurately predict the exact impact on the environment	This aspect of the environment will not be affected
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	Though the policy will not be directly affected it will be indirectly through encouraging a reduction of more road movement than the capacity can take
3	Nothing in the Local Plan directs to any locations to do with schools	The impacts will be indirect rather than direct
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 and so there would be a positive effect
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 three sites	Though there would be no effect on this aspect of the environment it will not be made worse as the local environment is included within the policy
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect but must have no detrimental effect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

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

#### 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 explicit locations. As such it is not possible to accurately predict the exact impact on the environment	The policy will not affect this aspect of the environment
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	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	Nothing in the Local Plan directs to any locations to do with schools	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 apply as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.56 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 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	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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	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	Nothing in the Local Plan directs to any locations to do with schools	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, prevent coalescence and habitats
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 three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.58 Overall this policy has focused impact on three 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. As such it is not possible to accurately predict the exact impact on the environment	This aspect of the environment will not be affected
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This aspect of the environment will not be affected
3	Nothing in the Local Plan directs to any locations to do with schools	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 positive impact on this aspect of the environment as connections to the historic routeways of the 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 apply as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.50 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 will 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 explicit locations. 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 a positive impact on this aspect of the environment
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	There would be expected to be a positive impact as the policy allows for other infrastructure elements to be delivered where identified
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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	There would not be expected to be a direct 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 three sites	There will be a positive impact on this aspect as there is scope for identified schemes to be funded off site
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	If there are any required schemes, then these could be funded using this so scope for a positive impact to the environment
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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	There may be potential for offsite requirements to be funded through this route, so there will 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 villages where the greatest flood risk is.

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	Due to the location of the highest flood risk this would not be expected to affect this aspect of the environment
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This aspect of the environment would not be affected
3	Nothing in the Local Plan directs to any locations to do with schools	Though 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 as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.54 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 only be limited 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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This will not directly affect this aspect of the environment
3	Nothing in the Local Plan directs to any locations to do with schools	There will be a positive impact on this aspect as this will make increased 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, prevent coalescence and habitats indirectly
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 three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	This would result in increased demand on water demand, so this would be negative
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.58 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	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	This will not directly affect this aspect of the environment
3	Nothing in the Local Plan directs to any locations to do with schools	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 as applicable to the three sites	This policy would have no direct impact to the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	The policy will not be expected to have an impact on this aspect
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

7.60 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
2	There is no direct policy in the Plan although there is a strand within another regarding education. As such there would be no significant effect	Provision for various routes and alternate modes of transport mean there will be a positive indirect impact on the environment
3	Nothing in the Local Plan directs to any locations to do with schools	The focus of this policy will have a positive impact through provision of additional services being allowed
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 as applicable to the three sites	The inclusion for addressing surface water flooding means there will be a positive impact on this aspect of the environment
7	There would be a positive effect on this as there is a specific policy in the Local Plan to control impacts on the water environment	There will be no direct impact on this aspect of the environment
8	Due to the high requirements of the local plan policy there would be a positive effect on the environment 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

## Assessment 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 identified by the Rother Core Strategy. 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 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.

8.3 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.

8.4 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.

8.5 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.

8.6 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.

8.7 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.

### Next stage

8.8 The final stage will be the post adoption statement that will be issued when the plan is made. This will summarise the process and how impacts to the environment have been taken into account.

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

## **Appendix I: Screening determination**

Your ref:  
Our ref:  
Please ask for:  
Direct dial no:  
Date:

Robertsbridge and Salehurst  
Norman Kwan  
n/a  
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	