

## **EAST SUSSEX COUNTY COUNCIL ADVICE RELATING TO THE REVISED ENVIRONMENTAL REPORT (STRATEGIC ENVIRONMENTAL ASSESSMENT REPORT) FOR SALEHURST AND ROBERTSBRIDGE NEIGHBOURHOOD PLAN –NOVEMBER 2017**

Thank you for the opportunity to comment on the Strategic Environmental Assessment (SEA) Report (revised version) of the Salehurst and Robertsbridge Neighbourhood Plan. The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference.

### **Ecology comments on the SEA:**

#### **Criteria used for Neighbourhood Plan**

##### **Objective 4:**

We would suggest adding in "protect, enhance and avoid negative impacts on sites designated for their nature conservation or geological interest (although this may sit better under objective 5).

##### **Objective 5:**

- Instead of BAP habitats [and species], the SEA should refer to Habitats and Species of Principal Importance as listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act). The S41 lists are drawn from the BAP and includes all BAP habitats and species. Therefore recommend change "avoid harm to BAP habitats" to "avoid harm to habitats or species listed as of principal importance under Section 41 of the NERC Act".
- "have scope to mitigate and enhance habitats" is a bit vague. All developments should seek to achieve a net gain in biodiversity.
- Whilst the objective to provide and enhance green space/green infrastructure is welcomed, it must be recognised that it is not always appropriate for all green spaces/GI to be multi-functional. In some cases, increased access can be detrimental to biodiversity.
- The term "threatened species and habitats" has a very specific meaning, therefore its use in this way limits the species and habitats it could apply to. Recommend the criterion is changed to "establish and/or maintain a network of areas that maintains the distribution and abundance of biodiversity".

##### **Indicators:**

- There are no indicators for species. Recommend maintenance of size and distribution of local population.
- The condition of designation sites is not always known (particularly the case for Local Wildlife Sites/Sites of Nature Conservation Importance).
- Either amend above or add indicator as follows: area/% of designated sites, ancient woodland and/or Section 41 habitats in positive conservation management.

- Ancient Semi-natural Woodland and Plantations on Ancient Woodland Sites are of equal value in government policy and national guidance. The indicator should therefore be area of ancient woodland and buffer around it.

### Objectives

3a) Rather than “protect and enhance local open spaces...”, recommend “protect and enhance biodiversity and...”

### Site Assessments

- Without maps/grid references, it is not possible to comment on the site assessments.
- Any development should be informed by an Ecological Impact Assessment in line with BS42020:2013 and CIEEM Technical Guidance.
- It is noted that for the Grove Farm site, it is stated that there is no publicly available evidence of biodiversity on site. A lack of records from a site is not necessarily indicative of a lack of biodiversity interest and may simply reflect a lack of recording effort.

### Landscape comments:

- Page 18 SEA Topics – Landscape, Cultural Heritage and soils:
  - 4. Suggested added objective bullet: Avoid intrusive visual impacts in the AONB countryside.  
Under the indicators column add words in italics: Landscape character *and visual* assessment.
- Suggested addition on Page 27 paragraph 5.2 Objective 4 c) New housing development should have regard to the High Weald AONB Design Guide (to be published in March 2018)
- Mill site – no comments
- Grove Farm: Suggested addition to positive commentary: *Grove Farm has some capacity for development as there is scope to redefine the built up village edge in this location. A green corridor should be retained between A21 and the village edge. This higher part of the area is more visible from distant views and should be kept open.*

### Historic Environment

- The Historic Environment baseline is very minimal and the Historic Environment Record does not appear to have been consulted. There are incorrect references to Archaeologically Sensitive Areas rather than Archaeological Notification Areas (N.B. these are correctly referred to in the Inspector’s letter).
- The archaeological interest of both Salehurst and Robertsbridge is not summarised effectively in terms of the archaeological potential (prehistoric to

modern) of both settlements, the evolution of both settlements in respect of each other and the historical and archaeological interest of designated and undesignated historic buildings.

- SEA Object 4 needs to include Archaeological Notification Areas as a minimum. Ideally I think there should be a reference to non-designated heritage assets and archaeological interest below-ground, within historic buildings and structures and for the historic landscape of routeways and field systems which contribute to the setting of both settlements.
- The references to historical and archaeological interest for both the Mill Site and Grove Farm Phase 2 are non-existent or negligible. With regard to archaeological matters both sites are presently being considered through the planning system.

### **Other comments**

#### **Objectives of the NP:**

- Objective 3c) on page 26 should either be deleted or clarified, as it implies that the energy efficiency standards set out in the Building Regulations are voluntary. If they want to set higher standards then they need to make the additional standard explicit so that the objective is clear and, ultimately, enforceable through planning.

#### **Mill site:**

- It would be useful to have a little more commentary on the potential 'hydro' scheme that's mentioned a couple of times, including some indication of potential location & size, to get some sense as to the likelihood that it might come forward.
- There's no mention of items that NPPF indicates should be standard (e.g. installation of electric vehicle charging points, for residents and visitors), which would tie back to the SEA framework objective to improve air quality (page17).
- There is no comment about requiring building standards above the current Building Regs (e.g. for carbon reduction and off-set), to tie back to the SEA framework objective to reduce greenhouse gas emissions (page 21).
- There seems to be a contradiction between objectives under 5. (page 27) and the statement that more parking is needed for residents and businesses in or near the centre of the village.