

Your ref: |  
Our ref: 6.3a ENDP  
Please ask David Marlow  
for:  
Direct dial no: 01424 787635  
Date: 8 May 2018



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by email |

**Dr Anthony Leonard**  
**Executive Director of Business**  
**Operations**

Town Hall  
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Dear Donna

### **SEA Screening for the Etchingham Neighbourhood Plan**

Further to your request for an SEA screening opinion, together with supporting information and my letter of 12 March 2018 I have now received the comments of the Statutory Environmental Bodies (SEB's) which are as stated below :

#### Natural England

##### SEA screening request

In terms of national and international habitats, as no specific sites have yet been allocated as part of the NDP, at this stage there are not likely to be significant effects, in the context of the location and sensitivities of designated habitats and landscapes within the parish. However, if your authority decide that SEA is required, framework objectives 14 and 15 within the Sustainability Appraisal Scoping Report attached to this consultation, would apply in terms of potential environmental impact.

However, it is noted from the screening request that between 20 and 30 houses are likely to be allocated within the parish. If any of these are allocated as sites within the NDP as it progresses, the need for SEA will need to be re-assessed.

##### Etchingham NDP Vision and Objectives

- 'Farming, Environment and Countryside' – section 3 should be amended to refer to 'ecosystems' and incorporate the 'maintenance and enhancement of connectivity' (not just the 'provision of movement corridors for wildlife').
- 'Housing and Development' – section 4 includes a reference to '...any adjacent AONB'. This could be read to imply that parts of the parish are not designated as AONB, therefore, as the whole parish is so designated, it is recommended that this be amended (such as '...where appropriate, screening to address potential impact on the AONB.')

##### Advisory Notes

As the entire parish is within the High Weald Area of Outstanding Natural Beauty (AONB) designated landscape, any related policy that comes forward in the NDP should include a reference to compliance with the High Weald AONB management plan.



### Historic England

In light of the Environmental Assessment of Plans and Programmes Regulations 2004, and based upon the information provided at this time, our view is that a SEA is not required in this instance. It is unlikely that there will be significant effects on the historic environment of heritage assets as result of the proposals in the plan.

We note, however, that one site identified for potential housing development on the SHLAA map extract, viz. ET17a, is close to the Old Rectory, a Grade II listed building. If the Council assesses that there is likely to be a significant effect on this heritage asset as a result of development taking place on this site, that has not previously been subject SEA at a higher plan level, you may determine that inclusion in the current SEA report is required as a precaution. In that case, assessment against Objective 15 in the Development and Sites Allocations DPD Sustainability Appraisal Scoping Report (June 2016) would be appropriate

### Environment Agency

Due to the location of Etchingham the following matters would need to be considered. Flood risk, Water Framework Directive (surface and groundwater quality, water quality), Fisheries and Biodiversity and Contaminated land issues (looking at the potential risk to groundwater).

As previously advised , Wealden District Council (WDC) has submitted objections to both the Ticehurst and Crowhurst regulation 14 Draft Neighbourhood Plans, in terms of the lack of HRA Screening. Further discussions are being undertaken with Natural England in relation to this matter and as to the need or otherwise for an HRA screening. We anticipate that a screening will be required and subject to Natural England's comment this is likely to be undertaken by RDC.

The government's Planning Practice Guidance states that a Neighbourhood Plan may require an SEA where a neighbourhood plan allocates sites for development, or the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan.

In the opinion of the Local Planning Authority, an SEA should be undertaken for the Etchingham Neighbourhood Plan (ENP). 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 Environmental Assessment of Plans and Programmes Regulations 2004.

1. The ENP will allocate sites and form part of the 'development plan' and thereby exert a direct and substantial influence over development proposals coming forward in the period.
2. As regards the characteristics of the area covered by the ENP (as set out in Schedule 1(2) of the regulations), I note particularly that:
  - 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) land within Etchingham village and it's environs are affected by or adjacent to Ancient Woodland, certain BAP habitats, different key components of the AONB, Listed Buildings, Archaeological Notification Areas, a groundwater protection area and extensive areas liable to flooding.



Also, to clarify the process in relation to the 'scoping' stage, RDC has already produced a 'Sustainability Appraisal Scoping Report' that is considered applicable to the SEA process of Neighbourhood Plans produced within the District. It can be found on our web-site here: <http://www.rother.gov.uk/index.cfm?articleid=5006>

Particular reference should be made to the 'Sustainability Appraisal Framework' (Task A4) which contains decision-aiding questions to help inform the SEA process. As the Scoping Report states, this framework *'is also considered relevant and applicable to Neighbourhood Plans produced within the District'*. The scope of information to be included in the environmental report should address the SEA objectives set out below. The level of detail should reflect the geographical extent of the NP as far as practicable, drawing on the Council's own Scoping Report referred to above and baseline information already provided and any available from other sources to meet regulatory requirements.

In relation to the SEA process for the Etchingham Neighbourhood Plan, it is considered that the following objectives from the Sustainability Appraisal Framework should be screened in for SEA purposes:

- 7: Improve accessibility to services and facilities for all ages across the District
- 9: Improve efficiency in land use and encourage the prudent use of natural resources
- 10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
- 11: Reduce emissions of greenhouse gases
- 12: Minimise the risk of flooding and resulting detriment to people and property
- 13: Maintain, improve and manage water resources in a sustainable way
- 14: Conserve and enhance bio-diversity and geo-diversity
- 15: Protect and enhance the high quality natural and built environment

In addition, whilst these objectives are likely to be most relevant to this particular Neighbourhood Plan in terms of potential significant environmental effects, you may wish to also consider the other SA/SEA objectives in the Framework for the purposes of assessing the overall sustainability of proposed policies.

If there are any queries we would be happy to advise further and please accept our apologies in the delay in getting this response to you.

Yours sincerely,



David Marlow  
Planning Policy Manager |

