

Submission Crowhurst Neighbourhood Plan Representations - In policy order

Respondent Details			Agent Details		Part of Neighbourhood Plan		Comment Full	Participate in oral exam	Notify when NP made
Reference	Respondent Name	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Item	Support/ Object			
CRO/R16/2019/1	Spencer Jefferies	National Grid	Hannah Lorna Bevins	Wood E&I Solutions UK Ltd	Whole Plan		<p>Assets in your area: National Grid has identified the following high voltage overhead powerline as falling within the Neighbourhood area boundary: 4ZJ Route - 400kV two circuit route from Ninfield substation in Rother to Dungeness in Shepway. From the consultation information provided, the above overhead powerline does not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure</p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact plantprotection@cadentgas.com</p> <p>Electricity distribution Information regarding the distribution network can be found at: www.energynetworks.org.uk</p>		
CRO/R16/2019/2	Konstantinos Gallios	SGN			Whole Plan		<p>Network Overview</p> <p>There is no SGN infrastructure supplying Crowhurst area at the moment, so the developments mentioned in the plan will have no impact in any way at SGN's network.</p>		
CRO/R16/2019/3	David Marlow	Rother District Council			Whole Plan	Support	Please see pages 1 & 2 of the representation here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31407		
For representations on Policy CS1 - Development Boundaries, please see CRO/R16/2019/18									
CRO/R16/2019/4	David Marlow	Rother District Council			Policy CE1(2) - Landscape Character of Crowhurst & Policy CF2 (3) Open Spaces and Recreation	Object	Please see pages 2-4 of the representation here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31407		
CRO/R16/2019/5	Mr Steven West	E.G. West & Sons			Policy CE1(2) - Landscape Character of Crowhurst & Policy CF2 - Open Spaces and Recreation Paragraph 4.3.2.5 of Community Facilities, Open Space and Recreation	Object	<p>Referring to identified Open and Natural Space allocation ONS7 [see Map 3 of Appendix 1] and policies CE1 and CF2, as we are the landowners of this parcel we would like this removed from the Open and Natural Space policy. We feel that the policy could be restrictive to the business we run, as a small part of the area is a wood yard and another small part of the area is used to store organic fertilizer / manure. Another part of the policy also suggests, as it's written, that it could be used for recreational use - it is our farmland part of which we use to produce crops - not a playground. It is also unclear that if in the future we wanted to erect an agricultural barn or a farm holiday let whether this would impact on the ability to do this.</p> <p>Referring to identified Open and Natural Space allocation ONS6, I am not the landowner but I am confused why this is included as some of this area was planted with conifers some years ago with my presumption that they would be harvested for their wood in the future. Not sure that this goes with this policy.</p> <p>I have had some talks with the people making the plan and they say that ONS7 is only subject to policy CE1. This needs to be made clear on each Open and Natural Space area as I'm told different policies refer to each area.</p> <p>4.3.2.5: In regards to this policy/paragraph although I am not the farmer who farms the land but I feel that putting a raised hard surface across the fields could impair the ability to farm the land i.e. ploughing the fields and any fences erected could be restrictive to the movement of the animals from one parcel to another. It also raises questions over insurance if someone was hurt – as to who is liable.</p> <p>It would also concern me most about what precedents it could raise with other footpaths. Something I would not want to see on my land with infield paths.</p> <p>On the flipside I do understand the need to improve the walking route to the recreation ground from the school which could be achieved along the side of the road if there was a willingness to do so from other land owners on the west side of the road. In some places it may need to be on the east side.</p>	No	Yes

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CRO/R16/2019/6	Claire Tester	High Weald AONB Partnership			Policy CE2 - The High Weald Area of Outstanding Natural Beauty (AONB)	Support	I support the wording of this policy which will help ensure that development conserves and enhances the AONB as required by Section 85 of the Countryside and Rights of Way Act and paragraph 172 of the NPPF.	Yes	Yes
CRO/R16/2019/7	Amy Croombs	Natural England			Policy CE2 - The High Weald Area of Outstanding Natural Beauty (AONB)	Support	Natural England supports the inclusion of a policy which aims to conserve and enhance the natural beauty of the High Weald AONB. All developments should have regard for the High Weald AONB Management Plan with reference to the AONB's key characteristics.		
CRO/R16/2019/8	David Marlow	Rother District Council			Policy CE2 - The High Weald Area of Outstanding Natural Beauty (AONB)	Support	The landscape importance of the High Weald AONB within the parish is clearly reflected in NP policy CE2 (also cross-referenced in policies CS1, CE1(1)) and the High Weald AONB boundary is identified on CNP Maps 1, 8 and 9. RDC welcomes the recognition of the landscape importance of the High Weald AONB within the CNP planning policies.		
CRO/R16/2019/9	Chris Flavin	East Sussex County Council			Policy CE3 – Biodiversity		Para 4.2.5.1 (the Policy justification section for Policy CE3 - Biodiversity) refers to NPPF paragraph 118. This should actually be paragraph 170 of the NPPF (the new version of the NPPF dated July 2018) .	No	Yes
CRO/R16/2019/10	David Marlow	Rother District Council			Policy CE3 – Biodiversity	Object	In relation to policy CE3 Biodiversity the requirements of part 2(i) relating to 'Any new development' and the footnote relating to the completion of the CNDP Environment Planning Application checklist exceed what is possible under NPPF policy and the statutory requirements of the National and Local List of Planning Application Requirements for Rother District Council November 2018. Therefore, it is considered that, as drafted, the requirement would be disproportionate for some development. It is suggested that Policy CE3 2(i) should be prefixed with <i>Where appropriate</i> , to read: " <u>Where appropriate</u> , new development is expected to be supported by an initial ecological appraisal in line with Rother DC policy and, if required, by further ecological surveys, having regard to the site context or type of development;" Similarly the final paragraph of the policy should be similarly prefixed by <u>Where appropriate</u> , completion of the CNDP Environment Planning..... as this could not be applied to all development.		
CRO/R16/2019/11	Mr Steven West	E.G. West & Sons			Policy CE4 - Natural Features	Object	4.2.6.1: In regard to this policy/paragraph hedgerows are already protected by the national hedgerow policy and the rules should not be changed.		
CRO/R16/2019/12	Sophie Page	Environment Agency			Groundwater and Contaminated Land (Comments on Policy CE5)	Support	The geology in this area is predominately the Wadhurst Clay which is designated as Unproductive, and the Ashdown Beds which are a Secondary A aquifer. There is an area which is designated as a source protection zone 3 to the west of the village and therefore groundwater is particularly sensitive in this area and should be protected from contamination. We support Policy CE5 which says SuDS will be used where appropriate and that the design shall include measures to prevent pollution. We would direct developers to the Ciria SuDS manual C753, which has industry best practice. It provides information and guidance on risk assessment and the likely level of treatment: http://www.susdrain.org/		

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CRO/R16/2019/13	Sophie Page	Environment Agency			Biodiversity (Comments on Policies CE3, CE4 & CE5)	Support	<p>CE3 – Biodiversity: We strongly support the inclusion of this policy which protects and aims to enhance biodiversity. We feel there are a few minor points that could strengthen this in order to further protect the local biodiversity, rural character of the area and links to the wider environment.</p> <p>Paragraph 1. We recommend adding in Priority Species and Ancient Woodland to the list of those where development will not be permitted if it has an adverse ecological affect. Although Ancient Woodland is covered in Policy CE4, the current wording seems to say that loss of this habitat might be tolerated if there was overriding need. This does not seem to fit with Rother’s Policy EN17 which says that ‘particular regard will be paid to the protection of this habitat’.</p> <p>Paragraph 2, Point iii. ‘Existing wildlife corridors should be conserved and retained...’ We would recommend the wording to be changed to read ‘retained, buffered, enhanced, restored and strengthened’.</p> <p>There is no mention of Biodiversity Opportunity Areas (BOAs). Part of the Combe Haven and Marline BOA no. 58 lies within the Crowhurst boundary. Two of its aims are to identify opportunities associated with development and floodplain restoration and re-connection, and we would like to see these represented in policy. Climate change is mentioned in Policy CE5 Blue Infrastructure but not in Biodiversity. We would welcome some consideration given to predicted climate change and preventing the isolation of significant populations.</p> <p>CE4 – Natural Features: We would like to strengthen the wording for Ancient Woodland to follow Rother’s Policy EN17. We would like to see rivers and streams specifically mentioned here in the introduction. During discussions and providing responses to the Bexhill Link Road and subsequent development it was extremely hard to persuade developers of the unique value headwaters have particularly ghyll streams and that the loss of a small stretch of ephemeral stream is of no consequence.</p> <p>CE5 – Blue Infrastructure: We are pleased to see the inclusion of a blue policy and are very supportive of the paragraph in CE3, 2:vi linking SuDS and wildlife opportunities. Blue infrastructure provides a great opportunity to link a variety of habitats and maintain ecological corridors. We would welcome the inclusion of floodplain restoration and re-connection (as above) to be included to cover any potential sites where development may be permitted in flood zones or areas contiguous to them. Point 1 may be a suitable place to include this.</p>		
CRO/R16/2019/14	Sophie Page	Environment Agency			Flood Risk (Comments on Policies CE3, CE4 & CE5)		<p>We are happy to find the inclusion of Natural Flood Management (NFM) and working with natural processes to reduce flood risk in sections 5 through to 8. We would welcome the inclusion of these in the neighbourhood plan policies.</p> <p>CE5 Blue infrastructure (pages 47-48): The last paragraph reads “Encouragement will be given to development which secures an improvement in flood risk terms which will reduce pressures on the catchment downstream.” We would encourage that this be expanded to include contributions to upstream NFM works to help reduce flood risk to the village. This would be in line with paragraph 157 of the NPPF; (c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques);</p> <p>We would recommend the same (contributions to NFM) for the policies CE3 Biodiversity and CE4 Natural features.</p>		
For representations on Policy CF2 - Open Space and Recreation, please see CRO/R16/2019/4 & CRO/R16/2019/5									

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							No	Yes
CRO/R16/2019/15	Charlotte Mayall	Southern Water			Policy CF3 - Local Green Space	Object		
						<p>Southern Water understands Crowhurst Parish Council's desire to protect the rural character of the village by designating Local Green Spaces (LGS). However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.</p> <p>Paragraph 101 of the National Planning Policy Framework (NPPF, 2018) establishes that policies for managing development within LGS should be consistent with those for Green Belts, whilst Paragraphs 143-144 establish that inappropriate development in the Green Belt 'should not be approved except in very special circumstances', in which the potential harm of a development proposal is clearly outweighed by other considerations.</p> <p>Southern Water considers that should the need arise, special circumstances would exist in relation to the provision of essential wastewater infrastructure, as it would be required to serve new and existing customers or meet stricter environmental standards. The provision of such infrastructure is essential for sustainable development. It is likely that there would be limited options with regard to location, as any new infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'.</p> <p>Proposed amendment:</p> <p>The submitted Neighbourhood Plan does not reflect the NPPF and could act as a barrier to achieving sustainable development as outlined above. The following proposed policy provision would address this and enable the basic conditions necessary for a Neighbourhood Plan to be met: Protect areas identified as Local Green Space on CNDP 4 by only supporting development in very special circumstances, such as for essential utility infrastructure where it can be demonstrated there are no suitable alternative sites available, or development which meets an identified need related to the current usage of the area, remain of a similar scale and bulk as existing facilities and is supported by the local community.</p>		
CRO/R16/2019/16	Amy Croombs	Natural England			Policy CF3: Local Green Space	Support		
						<p>Natural England supports the inclusion of a policy on Local Green Space.</p> <p>It is noted that Policy CF3 aims to protect existing local green spaces. Natural England advises that this policy should in addition, seek opportunities to "protect and enhance" areas identified as Local Green Space, both in terms of onsite provision and connectivity to the wider green infrastructure network.</p> <p>Local green spaces should provide opportunities for both wildlife and people.</p>		
CRO/R16/2019/17	Amy Croombs	Natural England			Policies CH1, 2 & 3 - Housing			
						<p>In line with Policy CE3, Natural England advise that biodiversity net gain should be sought for all allocations. Net gain can be in the form of, on site, or off site enhancements.</p> <p>As detailed in Policy CE3 and CE5, Natural England supports the inclusion of SuDS which should provide benefits for people, landscape and wildlife.</p> <p>It should be noted that the allocated housing is within the High Weald AONB, as such these allocations should have regard for the High Weald AONB Management Plan. All allocations within the AONB have potential to negatively impact upon the nationally designated landscape. Natural England advises that the allocations must protect and enhance the character of the AONB, in accordance with Rother's Local Plan Policies, the High Weald AONB Management Plan, National Character Areas, Local Character Areas and Policy CE2 of your Neighbourhood Plan.</p> <p>We also advise that any advice provided by the High Weald AONB Unit is given full consideration. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the High Weald AONB Management Plan, will be a valuable contribution to the planning decision.</p> <p>It is noted that on fig. 4.4, there is reference to Fore Wood Nature Reserve. It should be made clear that this is also Fore Wood SSSI, a nationally designated landscape, as described in policy CE2.</p> <p>It is pleasing to see that Natural England's comments on the Crowhurst Neighbourhood Plan Reg.14, dated 16th February 2018, in relation to Policy CH1/2/3 have been taken on board, in the Strategic Environmental Assessment (SEA).</p>		

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CRO/R16/2019/18	David Marlow	Rother District Council			Policies CH1, 2 & 3, - Housing, together with Policy CS1 - Development Boundaries	Support	<p>In terms of the housing allocations, small sites well related to the existing village and with marginal impact on the landscape of High Weald AONB have been selected. The three sites will allow Crowhurst parish to meet and exceed its housing requirement of 20 dwellings as set out in the RDC Core Strategy adopted on 29 September 2014. The proposed allocations provide for a total of 30 residential units.</p> <p>RDC supports the scale and location of housing allocations in policies CH1, CH2 and CH3, for the reasons set out above, together with the revised development boundary (as reflected in policy CS1) in protecting the setting of the village.</p>		
CRO/R16/2019/19	Elizabeth Cleaver	Highways England			Policies CH1, 2 & 3 - Housing		<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>Having reviewed the submission Crowhurst Neighbourhood Plan, we note that the Rother District Council Local Plan Core Strategy and Development and Site Allocations (DASA) documents identify that between 2011-2028, Crowhurst should deliver 20 dwellings. The Submission Crowhurst Neighbourhood plan identifies three sites with a total provision of 30 dwellings as follows:</p> <ul style="list-style-type: none"> • Policy CH1 - Land at Station Road/Forewood Lane – 12 dwellings; • Policy CH2 - Land south of Forewood Rise – 12 dwellings; and • Policy CH3 - Land adjacent to Station Car Park – 6 dwellings. <p>Accordingly, Highways England does not offer any comments on the Submission Crowhurst Neighbourhood Plan. However, if further sites are identified, Highways England requests that it is kept informed for consideration of whether there would be a cumulative impact on the Strategic Road Network.</p>		
CRO/R16/2019/20	Mr Robin Young				Policy CH1 - Land at Station Road and Forewood Lane	Object	<p>Agree with principles of plan to conserve and enhance natural and built environment and to minimise impact of flooding but suggest that building houses at site CH1 will exacerbate flooding when there is heavy rain, despite use of SUDS.</p> <p>Also (para 4.3.6) if houses to be built at CH1 then planting of natural vegetation buffers on north and south west side is vital to conserve rural aspect of village and will also help with flood mitigation.</p>	Yes	Yes
CRO/R16/2019/21	Dr David Kinloch				Policy CH1 - Land at Station Road and Forewood Lane	Object	<p>Proposed Site CH1, and map CH1: The development site is too close to the church and historic centre of the village (see 4.3.4 regarding heritage buildings), and should be moved northwards into the previously proposed site to adjoin the existing housing. The development can then be screened from the village centre with mature trees in order to maintain the ambience of the village centre.</p>	No	Yes
CRO/R16/2019/22	Mr Simon Kinloch				Policy CH1 - Land at Station Road and Forewood Lane	Object	<p>The location of CH1 (at junction of Station Road and Forewood Lane, page 64). Given this is in some ways the centre of the village, with the church, school, manor house, medieval ruins and the village hall all nearby, and is arguably one of the most attractive locations along the main road through the village, I feel that, despite the best efforts of any potential housing developers the rural village feel and visual attractiveness will inevitably be diminished, not enhanced, with the building of housing on this location.</p> <p>My suggestion would be instead to build those houses in the area marked as 'Retain as Open Countryside' on Fig. 4.2. This would mean the development wouldn't be 'floating' by itself on that side of the Station Road, as in CH1, and instead be near pre-existing houses. They would still have all the benefits of the central location, with easy access to the school, station etc, just with a reduced visual impact on the surroundings. Another benefit of this location would be reduced noise pollution from the main road. Parking could be on-site so hopefully there wouldn't be any parking issues on Station Road, and the increased traffic impact would be minimal as the entrance would be only be a short distance up the road. All the other suggested features (landscape buffer provisions, tearing down the burned-out building etc) could also still be implemented to soften the effect of the buildings further.</p>	Yes	Yes
CRO/R16/2019/23	Nicola Diepering				Policy CH1 - Land at Station Road and Forewood Lane	Object	<p>CH1: I am concerned that the proposed housing development at site CH1 will seriously affect the beauty and rural, bucolic look of the centre of the village, and will be too close to the ancient heritage sites (manor house, church, farm, etc). The site should be "moved" back northwards to the previously proposed site, adjacent to the existing housing, where it could be shielded from the view of the historic village centre by landscaping. There would be little effect on the High Weald AONB, or existing farming activities.</p>	No	Yes

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CRO/R16/2019/24	Elizabeth Hone				Policy CH1 - Land at Station Road and Forewood Lane	Object	Please see representation here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31408		
CRO/R16/2019/25	Elizabeth Hone				Policy CH3 - Land adjacent to the station car park	Object	<p>1. This seems an ideal site in many ways, if the buildings are sensitively designed and handled – starter homes for commuters?</p> <p>2. However, the inevitable increased access up the poorly maintained Station Road is not ideal.</p> <p>Station Road itself has an appalling road surface – in spite of periodic surface patching, the tarmacadam becomes gradually pockmarked with irregularly shaped ruts. Water continues to flow down several parts, but also appears to well up from what I understand to be likely underground springs which may be partially or largely instrumental in lifting the road surface.</p> <p>I don't know where heavy building equipment would go to access the site, and am very unhappy about the idea of them barging past all the parked cars – leaving a not over wide space for them.</p> <p>3. I imagine that contracts will state the need to allow access to residents and station users.</p> <p>4. Also there is the problem - as yet to be sorted - of the parking for residents of such a development.</p>		
CRO/R16/2019/26	Elizabeth Hone				CC2(5) - Infrastructure (Landscaped parking area)	Object	<p>I am neither entirely happy, nor entirely convinced, that this is a solution to our school and village hall (and sometimes church) parking problems.</p> <p>1. Environment – View For a start, it will inevitably impede the view of what is perhaps the most beautiful landscape in Crowhurst village per se.</p> <p>2. Footpath that skirts the road Secondly, I am very concerned about safety of walkers, e.g. adults with children on their way to and from the school, as they presumably will have to walk behind the entrance and exit from the car park (very carefully thought out, I will concede) an already narrow road on a bend skirting the present footpath.</p> <p>3. Presumably the visibility splay is adequate – but it still leaves me concerned, having walked and driven along this curvy road for many years. I'm not completely convinced it's going to take the danger out of school parking.</p> <p>4. Presumably the proposed footway link to the existing path will be, as the director of the Rother Footpath assured me, in addition rather than instead of an archaic footpath leading between the church and the ruins of the old Manor House (dating certainly from 1927, but also mentioned in the 1800's).</p> <p>5. I am not sure that the parking will be used/occasionally clogged by walkers rather than the villagers?? For whom is it intended?</p>		
CRO/R16/2019/27	Simon Kinloch				Policy CC2(5) - Infrastructure (Landscaped parking area)	Object	<p>The proposed car park, Fig 4.6. For similar reasons as above, building a car park next to a view overlooking the Grade 1 listed church and the valley with the 1066 walk going through it would again diminish the feel and visual appeal of the village.</p> <p>I appreciate the need of a better parking solution for this part of the village, therefore a proposal would be perhaps at the opposite side of the road, nearer the current parking at the village hall next to the school's playing courts. With suitable landscape buffering provisions in place and the planting of native hedgerow, the impact could be minimised to the school. Given there aren't that many houses in the immediate area, it would be utilised predominately at the beginning and end of the school day, and for church services which are usually on a Sunday. The entrance could either be via the current village hall parking entrance (perhaps widened), or in the low-quality foliage/hedgerow just next to it.</p>	Yes	Yes
CRO/R16/2019/28	Nicola Diepering				Policy CC2(5) - Infrastructure (Landscaped parking area)	Object	<p>Map 6: The proposed car park will significantly spoil the view across the field, and church. It should be relocated across the road, and adjacent to the existing fenced school play area, and serve the same purpose without spoiling the rural views across the valley.</p>	No	Yes