

CROWHURST NEIGHBOURHOOD PLAN 2018 - 2028

CONSULTATION STATEMENT

1.0 INTRODUCTION

1.1 This consultation statement supports the Submission Neighbourhood Plan in accordance with the Neighbourhood Planning (General) Regulations 2012 Section 15(2). Part 5 of the Regulations sets out that a Consultation Statement should:

- (a) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted;
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

1.2 In accordance with section 15 of the Neighbourhood Planning (General) Regulations, this statement has been prepared by the Crowhurst Neighbourhood Plan Steering Group on the behalf of Crowhurst Parish council to accompany its submission to Rother District Council of the submission version of the Crowhurst neighbourhood development Plan (CNDP). The preparation of the Crowhurst Neighbourhood Development Plan has involved local residents and other organisations with an interest in the parish in the preparatory stages for the Neighbourhood Plan. This Statement sets out details of events and consultations. It lists the activities in which the local community has been involved and the ongoing work of volunteers. The aim of the consultations in Crowhurst has been to ensure that there is as widespread as possible awareness and understanding of the rationale and content of the Neighbourhood Plan and to encourage community engagement to influence and shape the Plan. This Statement demonstrates that there has been extensive community engagement which has informed the community of the progress and evolved the content of the Crowhurst Neighbourhood Plan from the start to submission of the Plan to the Local Authority.

2.0 THE PLAN PREPARATION PROCESS

2.1 Crowhurst Parish Council took the decision to produce a Neighbourhood Plan at its meeting on 5th October 2015 after a working party had looked at the pros and cons. Formal designation of the Parish of Crowhurst as a Neighbourhood Plan area was completed in December 2015. The Plan preparation process has been led by Crowhurst Parish Council, with decisions delegated to its Neighbourhood Plan Steering Group, which consisted of 4 Parish Councillors and, initially, seven residents. The Group has acted as a key means of compiling the evidence base, engaging with the local community and testing the suitability and acceptability of its emerging policies and proposals. The structure of the Neighbourhood Plan Group can be seen in Fig 1

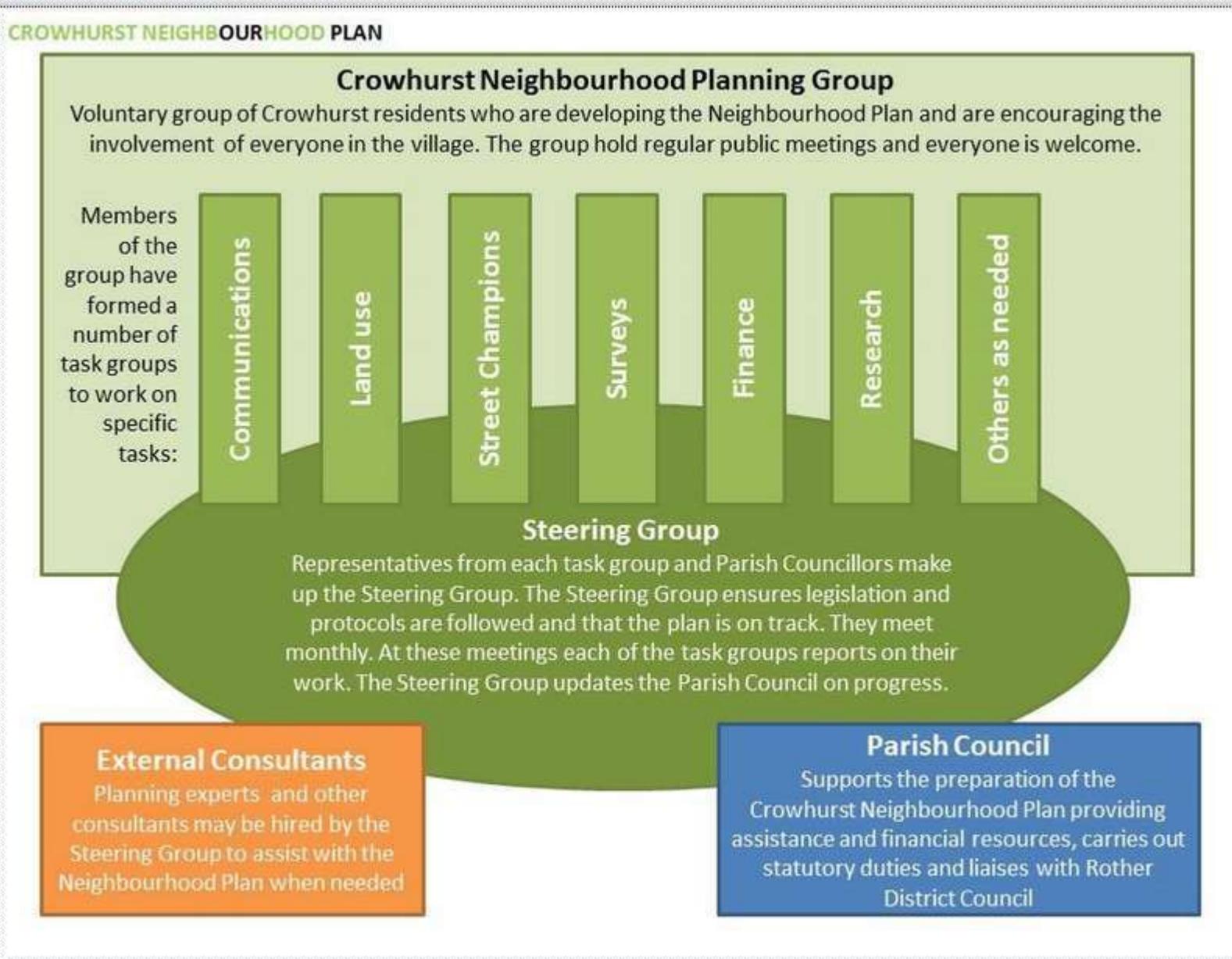


Figure 1 – Crowhurst Neighbourhood Plan Structure

2.2 An engagement strategy was created to guide the Neighbourhood Plan Steering Group in involving as much of the community as possible throughout all consultation stages of Plan development so that the Plan was informed by the views of local people and other stakeholders from the start of the Neighbourhood Planning process. The aims of the strategy were to ensure:

1. the right information
2. to the right people
3. in the right medium
4. at the right time

The full Communication and Engagement Strategy can be seen on the policies page of the CNP website:

<http://www.crowhurstneighbourhoodplan.org/policies>

2.3 Initial meetings took place to find out what the residents thought were the important issues. The various task groups were set up to look at different parts of the plan. The next major stages of the plan were:

- Call for Sites
- Assessment of sites to shortlist
- More detailed assessment of shortlisted sites to get to the proposed site list
- Regulation 14 consultation
- Amendment of draft plan based on comments

Feedback, exhibitions and surveys took place, as listed in Fig 2, in Section 3.3, throughout the process to ensure residents were kept informed and had their say on what went into the plan. All information (minutes of meetings, survey results etc) were available on the Crowhurst Neighbourhood Plan website.

2.3 A Neighbourhood Plan Forum was set up by other Parishes within Rother District to enable discussion between Parishes carrying out a Neighbourhood Plan. This was also attended by various Rother District Council officials and was a useful way of exchanging information.

3.0 Community Engagement

- 3.1 The Parish Council published a Parish Plan in 2014 which had been the subject of extensive public participation and consultation. This provided a good understanding of the issues facing the Parish. A copy of the Parish Plan can be found on the Parish Council website under Planning and Reporting <http://www.crowhurstpc.co.uk/7282>
- 3.2 Many meetings were held with residents, along with 2 Parish wide surveys and other events in order to try and engage with as many residents as possible. An underlying aim of the NP process has been that it should be formed out of the resident’s ideas and how they wish to see Crowhurst develop in the future.
- 3.3 In addition to the events mentioned in Figure 2, monthly steering group meetings were held which were open to the public. An email distribution list (from people attending events and surveys) was used to advertise events and distribute agendas and minutes. Agendas and minutes were also available on the NP website. Hardcopy minutes were also available to those who asked and on the village notice board. The minutes would also be approved at the Parish Council meeting. Posters for events/meetings were also put up in various locations around the village. For particularly important events, banners were also put up in the village and flyers delivered to every household. Events were frequently run alongside other village events to try and reach as many people as possible. A blog was put on the website as another way of communicating, although this was rarely used. The monthly Crowhurst News magazine was very supportive in the amount of space allocated to publish NP minutes, updates and adverts for events.

Date	Event	
June 2015	Parish Council Working party set up to look into Neighbourhood Planning	
July 2015	Mtg with Sedlescombe about NP	Notes on PC website
Oct 2015	PC mtg resolved to go ahead with NP	Minutes on PC website
Nov 2015	Village meeting	Advertised via posters. Mtg explained more about NP process and benefits to village. Presentation given by J.Vine-Hall, Chair of Sedlescombe NP and PC.
Dec 2015	Village meeting	Advertised via posters. Mtg started the process of organising structure of NP Group, matters of interest to residents and a list of skills that could be useful.
Dec 2015	Crowhurst Parish designated as a NP area	
Jan 2016	Village meeting	Further work on setting up structure of NP group and task groups to cover different aspects of plan.
Jan 2016	Mtg with Rother NP Liaison officer	
Feb 2016	Mtg with Salehurst and Robertsbridge NP	Advice given on how Roberstsbridge and Saleshurst have been carrying out their NP

		process so far.
Feb 2016	Village meeting	Terms of Reference discussed and start made on a Vision for the NP
Mar - Jun 2016	Crowhurst Neighbourhood Plan Group (CNPG) meeting	Monthly meetings and discussion with residents to update progress of NP
April 2016	Flyer to all houses in Parish	Flyer delivered to all houses explaining about the NP
April 2016	1 st steering group meeting	Monthly meetings held from this point on
July 2016	Strawberry Tea Community Information Event	Information event held in Village Hall
July 2016	Village survey	Survey delivered to all households/residents by Street Champions although on-line version also available
Aug 2016	Stall at Crowhurst Fayre	Information stall at village Fayre with competition to generate interest
Sept 2016	Crowhurst Brownies	Meeting to get youth involvement and ideas
Oct 2016	Survey results exhibition	Exhibition and presentation giving survey results and final Vision of NP
Oct 2016	Aims and Objectives mtg	Discussion with residents to pin down the aims and objectives of the NP
Nov 2016	Crowhurst Primary School mtg	3 meetings/exhibitions with Crowhurst Primary school children to get their view of the village and what they would like to see in the future.
Nov 2016	Claverham Community College Student Engagement	Mtg with Crowhurst students at Claverham College to get their ideas. Mtg to try and ensure whole community involved as had been noted from survey that under 18 respondents were under-represented.
Nov 2016	Youth Group meetings	Meetings with Crowhurst Scouts, Cubs and Playgroup to get views from the younger residents.
Nov 2016	Call for sites Survey	Call for sites survey for housing, community areas and land to be protected. Banners around village to advertise. Delivered to every household in Parish and sent to other stakeholders
Dec 2016	CNPG mtg	Update on the progress of the plan and review of the Aims and Objectives
Dec 2016	Crowhurst Primary School	Exhibition at Primary School
Jan 2017	CNPG mtg	Update on progress of the Plan
Jan 2016	Drop-in for Primary School Parents	Small exhibition held at drop-off and pick-up for Primary School parents to get information about the NP
Mar 2017	Housing Needs mtg with Rother DC	
Mar 2017	Sites Exhibitions	4 sites exhibitions on 26 th Mar (Village Hall, 10-5pm), 29 th Mar (Village Hall 7.30-930pm), 31 st Mar (St Georges Church coffee morning, 9-11am) and 1 st April (Village Market, Village Hall, 10-noon) were carried out showing what sites had been put forward and the initial assessments done by the Planning Consultant. Advertised via flyer to all households,

		posters and banners.
Apr 2017	Sites Feedback mtg	Shortlisted sites and next steps
May 2017	Sites Feedback mtg	Further feedback mtg on shortlisted sites, next steps and a Q&A session.
May 2017	Crowhurst Primary School	Update to School
June 2017	Village survey on Shortlisted sites and Housing Need	Delivered to every household although more emphasis placed on trying to get people to fill in on-line.
July 2017	Survey results presentation	Presentation on residents preferred options and numbers of houses per site and housing need.
Aug 2017	Information stall at Crowhurst Fayre	
Aug 2017	Ideas Forum	Ideas forum for residents to raise concerns/give views on topics related to NP
Oct 2017	Sites Exhibitions	4 exhibitions held on 7 th Oct (Village Market 10-noon), 10 th Oct (St Georges Church Parish Room 7.30-9.30pm), 13 th Oct (St Georges Church coffee morning, 9.30-11.30am) and 13 th Oct (Village Hall, 7.30-9.30pm) outlining the further site assessment and landscape assessments done of the Shortlisted Sites to get down to the 3 sites proposed to go into the NP.
Oct 2017	Claverham Community College	Student engagement regarding sites and housing needs
Jan 2018	PC approved draft Plan to go for consultation	
Jan – Feb 2018	Reg 14 Consultation 16th Jan – 28th Feb	Documents available on NP website, via PC website and Rother DC website. 3 exhibitions took place on 19 th Jan (coffee morning, St Georges Church), 3 rd Feb (Village Market, Village Hall), 18 th Feb (Village Hall). Draft plan also available in Church. Flyers delivered to every household with dates and banners put up in village.
Apr 2018	Meeting with Rother DC about Reg 14 comments	

Figure 2 – Consultation events held

Meeting minutes, survey results and other information can all be found on the NP website <http://www.crowhurstneighbourhoodplan.org/>

3.4 A lot of work also went on “in the background” by the task groups, particularly Environmental, Heritage and the Land Use Task Groups. The Land Use TG was heavily involved, along with the Planning Consultant in reviewing sites and site related survey results and comments. The Environmental and Heritage TGs both liaised with many people to look at their aspects of the plan and consolidate that information into supplementary documentation that can be found on the NP website.

4.0 Regulation 14 Consultation Responses

4.1 The NDP Regulation at Regulation 14 requires that the pre-submission Plan is taken to consultation by the Parish Council. This is a formal statutory consultation period of 6 weeks with the statutory bodies, stakeholders, the Local Planning Authority and the community. It then requires the Parish Council to consider those representations received and whether any further changes may be required because of these. The Reg.14 Pre-submission consultation and publicity was from 16th January to 28th February 2018. Three exhibitions were held:

Fri 19th Jan 2018 – St Georges Church, alongside their regular coffee morning. 9-11am

Sat 3rd Feb 2018 – Crowhurst Village Hall, alongside the monthly village market. 10-2pm

Sun 18th Feb 2018 – Crowhurst Village Hall. 10-4pm.

These were advertised by banners in the village and by flyer to every household in the Parish. The plan with all its supplementary and background information was also available on the NP website at <http://www.crowhurstneighbourhoodplan.org/> and via the Rother DC website. A hardcopy of the main document was available in St Georges Church.

Statutory bodies and other stakeholders (listed in Appendix 1) were emailed to invite them to comment on the draft plan.

4.2 Figure 3 below sets out the comments received and the response.

CE1(4)	would benefit from rewording to ‘ <i>Where development is in accordance with other policies in the development plan development will be expected....</i> ’.	
RDC (para 4.2.4.4)	<p>5. Whilst the objectives and intentions of this policy CE2 Biodiversity are understood the need to be proportionate is also identified in this para. The expectations 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 December 2017. Clear advice as to the type of applications that must be accompanied by an Ecological Survey and Report is given in item 4 of the Local List of Planning Application Requirements. This excludes planning applications for change of use and development to an existing dwelling (householder).</p>	Amend
Pages 35/36 (Policy CE2).	<p>6. . The requirements within this policy exceed what is possible under planning practice for reasons as explained above. Suggested rewording would be as follows : <i>Development proposals (Any new development) will be required to demonstrate that the biodiversity of the site and its surroundings is conserved and provides opportunities for enhancement of the natural environment where practicable</i></p> <p>Item 2 (i) Exceeds the legislative requirements of what information can be required to support planning applications as explained re para 4.2.4.4. Advice and sources of information to assist the submission of planning applications can be flagged up the supporting text but cannot be required in the manner for ‘<i>any new development</i>’ as expressed in Policy CE2 (2) (i) Suggest rewrite as follows : <i>Development proposals will need to integrate biodiversity into schemes by inclusion of appropriate enhancement and mitigation measures including :</i> <i>(i) new hedgerow and tree planting, native wildflower planting and habitat creation</i> <i>(ii) conservation and retention of existing wildlife corridors and creation of new wildlife corridors and connections where possible</i> <i>(iii) provision within residential curtilages of bat boxes, bird boxes, wildlife friendly fencing where appropriate</i></p>	<p>Amend</p> <p>Amend</p>

	<p><i>(iv) any lighting should conform to the principles of the Bat Conservation Guidance</i></p> <p><i>(v) any new drainage should be wildlife friendly and measures to combine SuDS with wildlife habitat enhancement should be undertaken where appropriate</i></p> <p><i>(vii) any new planting should incorporate native planting including those which are defined as good pollinators for native species</i></p> <p>The final paragraph of Policy CE2, for reasons explained above, should be deleted from the Policy as it conflicts with the advice in the NPPF and statutory validation requirements and in any event is a process issue rather than a land use matter...In conclusion the objectives of Policy CE3 are fully understood but the scope and wording of the policy must comply with the legislative framework set down nationally via the NPPF et al.</p>	<p>Amend.</p> <p>New developments will be encouraged to use checklist</p>
RDC Policy CE3	<p>7) In order to provide general conformity with Core Strategy policies it is suggested following rewording for the introduction section of the policy ; <i>'New development will not be supported (permitted) where This can include but not be limited to Veteran and Aged Trees, Ancient Woodland, significant trees Good quality trees and hedgerows and ponds</i></p>	<p>Amend to “not supported”</p>
RDC policy CE4 – point 1	<p>8) - Reference to the NPPF guidance is not now correct. NPPF guidance has been revoked and replaced by Planning Practice Guidanc(e) (PPG). Needs rethinking in view of the current situation.</p>	<p>Amend</p>
RDC Policy CF1	<p>9a. Policy Introduction. The term <i>'and supported'</i> appears to be superfluous</p>	<p>Amend</p> <p>Remove from first sentence (line 2)</p>
RDC Policy CF1	<p>9b. (point 3) The term <i>'village envelope'</i> is not consistent with the term <i>'development boundaries'</i> that is used elsewhere in the Plan. Should read <i>'..... and exceptionally outside the development boundary...'</i>.</p>	<p>Amend as suggested</p>
RDC Policy CF1	<p>9d. (point 6) green spaces and CNDP Map 3. Would refer to publication <i>MyCommunity/locality – Neighbourhood Planning Local Green Spaces 7. Designation of Local Green Space</i> which states <i>'Not all green spaces will be suitable for formal designation as Local Green Space</i>. The criteria in Paragraph 77 of the NPPF must be applied Whilst a number of the designations would comply with the required definition there are certain areas of farmland on CNDP Map 3 which would need to be justified in the evidence base and</p>	<p>Amend</p> <p>Ensure difference between “open spaces” that are part of character and Local Green Spaces. Map numbers changed as Open/Natural Spaces and Local Green Space now on separate</p>

	in the terms of para 77 of the NPPF. Such land would be protected by the Core Strategy policies OSS2:Use of Development Boundaries and EN1 Landscape Stewardship.	maps
RDC Policy CF1	Also in relation to greenspaces and landscape the boundaries and extent of both the High Weald AONB and the Combe Valley Countryside Park should be shown on the CNDP Map 3 and also on the final Neighbourhood Plan for Crowhurst. In this regard RDC would object to point 6 and the CNDP Map 3 as some of the proposed greenspaces do not comply with NPPF requirements.	Amend Add AONB boundary onto all applicable maps.
RDC Policy CF1	9e) CF1 duplicates a lot of Policy CO1 in the Core Strategy (strategic policy) – not sure point 2 is specifically needed –the other elements of the policy build on CO1. Recommend that Rother District Council Core Strategy Policy CO1 Community Facilities and Services is referenced in the supporting text	Amend Add ref to Policy CO1 of Core Strategy
RDC CB1.3	10a) point 3 –Very concerned about the requirement of this part of the Policy which needs further evidence, refinement and/or clarification. i. national floorspace standards – robust evidence needed – to demonstrate the need for and the impact on viability. ii. Building for Life standards no longer exist. iii. New housing should accord to accessible/adaptable standards – robust evidence needed – needs based and viability based, does it mean all housing or just a proportion? What part of the building regulations (M4(2), M4(3)(a) or M4(3)(b)? – needs to be clear. Does this apply to all development?	Amend Amend to Build for Life 12, reference emerging DaSA. Accessible houses needed because: 22% people over 65yrs in 2011 census. (higher than England) 31% in 45-64yrs that will be getting older. Rother evidence only 500-600 more costly to build M4(2) 3 bed house. In 2011 Crowhurst also had 20% residents say long term health or disability issue. Similar to East Sussex, higher than England.
RDC CB1.4	10b - Concern at this requirement – all housing should have access to private amenity space. Why would this not be practical ? Access to the local footpath network would not be an acceptable alternative	Amend
RDC CB1.5	10c. parking provision should meet the relevant standards – the relevant standards would be as defined by ESCC Highways? Also suggest should ' <i>be of porous or permeable construction</i> '	Amend as suggested
RDC CB1.6	10d What does ' <i>appropriate</i> ' mean ? What circumstances would not be appropriate for this requirement ?	Amend
RDC	10e. points 7 and 2- these two points could probably be combined	Noted but no change

CB1.2 and .7		
RDC CB1.8	10.f Rather vague and difficult to enforce. Would normally seek a 'fabric first' approach to energy conservation, not renewable energy add - ons, particularly on small scale housing schemes	Amend New developments only. Feel important that renewable energy included in design of new housing. Fuel poverty high in area as village is not on mains gas and will help resist climate change
RDC CB2	11a. Policy introduction rather long and repetitive. Suggest that the majority could be in the supporting text as it provides background to the policy rather than being policy in itself	Noted
RDC CB2.1	11b. (point 1) repeats statute and not strictly necessary	Noted but no change This point is important to the community
RDC CB2.2	11c. (point 2) this is contrary to the NPPF which requires decision makers to assess harm to heritage assets i.e. the policy cannot state that a proposal will be automatically refused if it involves demolition	Amend
RDC CB2.3	11d (point 3) Any planning application submitted to RDC which relates to development within an Archaeological Notification Area will have to be accompanied by an archaeological report so point 3 is not necessary and could be deleted	Amend
RDC CH1	12a. point 1 Suggest that this be reworded to read 'The development shall be planned and carried out in a comprehensive.....'	Amend as suggested
RDC CH1	12b) Concern expressed about how points 2 & 3 of the policy interrelate – part 2 asks for 40% starter homes or for the elderly – what evidence is this based on? It is assumed that in this context 'starter homes' are not being considered as part of the affordable homes provision? The 40% for elderly - what evidence is this based on – is there really a need for this type of housing? What is accommodation for the elderly? However there will be a need to establish how the mix is to be spread across market/affordable units	Amend wording from “elderly” to “downsizers”. The mix of homes proposed and the need for 40% 1 or 2 bed homes were identified through the Housing Needs Survey, undertaken during development of the Plan.
RDC CH1	12c. Point 3 – 40% affordable – prioritise occupation by local people – would not accord with LHA allocations policy as those in the highest need take priority in the bidding system as described below :Attention is drawn to the fact that there is a national requirement to house homeless people and hence the RDC allocation policy inevitably gives priority to such	Amend

	households In planning terms Point 3 will either require omission or redrafting	
RDC CH1.5	12d. Point 5 – delete the words ‘more than’	Amend as suggested
RDC CH1.7	12e. Point 7 – not sure of the difference ? – if it is not viable to ‘provide’ amenity space how will the development manage to set aside land for it ? Suggest that such village green/amenity space be identified as part of the allocation	Amend
RDC CH1	12f. Need to check why is a LAP required in CH2 but not here?	Noted A play area in CH2 will service the northern part of the Village, inc CH1; the Recreation Ground play area services the southern part of the Village, inc CH1 residents
RDC CH1	12g. The aerial and landscaping plans are supporting information– Would suggest that the quality of the illustrations be upgraded in the final document.	Noted. Maps to be re-done with help from RDC
RDC CH2	13a. point 1, Suggest rewording as above in CH1 ‘The development shall be planned and carried out in a comprehensive.....’	Amend as suggested
RDC CH2	13b. Point 3 –.40% affordable Comments as above relating to CH1 – prioritise occupation by local people – would not accord with LHA allocations policy as those in the highest need take priority in the bidding system as described below : Attention is drawn to the fact that there is a national requirement to house homeless people and hence the RDC allocation policy inevitably gives priority to such households In planning terms Point 3 will either require omission or redrafting	Amend wording
RDC CH2	13c. The aerial and landscaping plans are supporting information– Would suggest that the quality of the illustrations be upgraded in the final document.	Noted. Maps to be re-done with help from RDC
RDC CH3	14a) This policy could require a commuted sum towards affordable housing in line with the RDC current approach and in line with the emerging DaSA. Suggest an additional criterion to read – A financial contribution be made towards affordable housing in the locality in accordance with RDC policy	Amend re Commuted sum to cover affordable housing needs. Add note to make clear that this would be a requirement in any case.
RDC CH3	14b)The aerial and landscaping plans are supporting information– Would suggest that the quality of the illustrations be upgraded in the final document.	Noted. Maps to be re-done with help from

		RDC
RDC Business para 4.4.2.1	15. text talks about the value of the Pub but policy CC1 does not specifically reference the retention of such commercial premises	Amend Add extra reference to supporting existing businesses
RDC CC1.1	16a. point 1 .Suggest amended wording to read ‘...viability of an existing business or and represent its sustainable growth’	Amend as suggested
RDC CC1	16b. (point 3) – ‘brownfield land outside development boundaries’ – not part of the ‘exceptions’ listed in CS1 – a consistency issue and concern expressed about the possible unintended consequences for development in the AONB. Needs further clarification as not all brownfield would be suitable for business use or sustainable.	Amend
RDC CC1.5	16c. (point 5) Needs clarification- What sort of development ‘supports home working’? would this be allowed outside development boundary? Difficult to enforce, but in these post-internet days, every home can act as ‘livework’ unit. The distinction is if staff are employed at, but not resident at a dwelling. In planning terms even that can be a matter of fact and degree	Amend wording
RDC CC1	16d. (point 6) – this would be very difficult to demonstrate in an application and for a planning officer to come to a view on this especially as the relevant strategies are not defined. Also it is unlikely that it could it actually be a material consideration? The use of where possible illustrates that this part of policy CC1 is likely to be deemed unworkable.	Remove
RDC CC1	16e. (point 7) Largely already said in policy intro – wording there could be amended and expanded such that there is no need for point 7.	Noted
RDC CC2.4	17a. (point 4) – This point is not considered relevant or necessary as it is covered by CIL	Remove
RDC CC2.5	17b. (point 5) – reference should be made in the text to the ESCC documents Guidance for Parking at New Residential Development Transport Development Control October 2017 and Guidance for Parking at Non Residential Development . The word ‘maximum, should be deleted and the following rewording is advised ‘the required vehicle and cycle parking in accordance with relevant ESCC guidance’	Amended as per ESCC comment
RDC CC2	17c. (point 6) The proposed parking area is a concern; the NP gives no indication as to how potential sites for this identified need for parking have been evaluated, and the proposed location could have significant landscape character implications; it is highly prominent in long views from the west, and at present there is a clear definition between the	Amend Proposal for a layout will be included. Area has had a building on within last century and appropriate landscaping

	church/churchyard and the immediate countryside to the west, which could be suburbanised by the introduction of a parking area here. The proposed carpark location on Appendix Map 6 appears as a somewhat unevaluated, unscaled site and also conflicts with the area shaded 'important open area' on Appendix Map 2. There may be other more suitable sites (e.g. around the village hall, or at western end of 'developable area' of site CH1) which would have less visual impact in the landscape and be similarly convenient for access to community facilities. The NP cannot include indicative schemes and the boundaries of such proposals should be clearly and accurately defined to scale on an OS based map.	will be included to minimise visual impact.
RDC Para 5.2.1	18) – <i>subject to resources the PC will prepare an AMR</i> –Suggest that the monitoring should be a requisite part of the ongoing work associated with an adopted NP and that resources should be made available to undertake the task.	Amend
ESCC	<p>1. Strategic Economic Infrastructure (Transport Policy)</p> <p>1.1 In terms of overall comments, Crowhurst NP is well written and comprehensive in terms of consideration of transport, including in the context of the existing village and associated amenities, and in respect of new development.</p> <p>1.2 One of the aims of the NP is (3.3) Infrastructure, Transport and Business, which seeks to:</p> <p>ITB1) To improve road safety for all road users ITB2) To reduce the amount and speed of traffic through the village ITB3) To enhance opportunities for walking and cycling around the village ITB4) To maintain & enhance access to public transport especially the train service ITB5) To seek ways to manage parking issues</p> <p>1.3 We are supportive of this comprehensive set of transport related aims, and welcome their inclusion within the NP.</p>	Noted
ESCC 4.3	<p>1.4) In 4.3 'The Village Environment', the social objectives include '<i>6. Improve access to local facilities, where possible, including maximising opportunities for utilising public transport and other local services.</i>'</p> <p>This is supported, and reflective of the objectives of the County Council's Local Transport Plan 2011 - 2026.</p>	Noted

<p>ESCC CB1</p>	<p>1.5) Policy CB1 Design – We are pleased to note that this policy takes into consideration (5) that <i>‘development should meet the relevant parking standards’</i>. Specifically, attention needs to be paid to East Sussex County Council’s Guidance for Parking at New Residential Development and Parking Standards Guidance at non-residential Development, and include the provision of electric vehicle charging points. ESCC is requesting that all Neighbourhood Plans include the following policy.</p> <p><i>Car parking: Electric Vehicle Charging Infrastructure</i></p> <p><i>New housing developments should be required to provide electric vehicle charging points. There should be at least one charging point per dwelling for houses and for flats which have an allocated car parking space. For flats which don’t have an allocated parking space, provision needs to be made for a shared communal charging point. With regard to public car parking and residents car parking (both on-street and off-street), long term consideration needs to be made, in co-operation with ESCC and Rother DC, for the provision of electric vehicle charging points.</i></p>	<p>Amend and add in suggested policy on electric vehicle charging Will help future proof development as petrol and diesel cars are phased out</p>
<p>ESCC Economy 4.4.1</p>	<p>1.6 The Economic Objectives (page 60) which are relevant to this team are to:</p> <p><i>1. Support and improve links with new and existing rural businesses through sympathetic small scale development, particularly that which can reduce out-commuting. 4. Ensure that adequate infrastructure is provided alongside new development to ensure access, services and quality of life is maintained for both new and existing residents. 5. Ensure new development promotes safe access for pedestrians and vehicles and is able to support opportunities for utilising public transport.</i></p> <p>1.7 We support these three economic objectives. There is a need to improve sustainable transport infrastructure to reduce reliance on the private car, whilst improving other types of infrastructure, such as technology to enable greater homeworking. This complies with our Local Transport Plan 2011 – 2026, and our East Sussex Growth Strategy.</p>	<p>Noted</p> <p>Noted</p>
<p>ESCC Business 4.4.2</p>	<p>1.8 Most residents are reliant on out commuting for work. It is also understood that a number of people work from home and so the policy should also support such live/work principles to reduce out-commuting and congestion, which would accord with Policy EC4 of the Rother Core Strategy.</p> <p>1.9 The NP supports development which supports home working or reduces out commuting such as live work units or ancillary development that supports home working, i.e. home offices. We support these business principles and are pleased to see the inclusion of these</p>	<p>Noted</p> <p>Noted</p>

	matters within the NP.	
ESCC Infrastructure 4.4.3 / CC2	<p>1.10 The NP highlights that village surveys which were undertaken show a lot of concern over parking within the village – primarily around the recreational ground and the Village Hall/school/church area and in the Forewood Rise development. The NP proposes that any new development should be entirely self-sufficient with off-street parking such that residents do not need to park on the surrounding roads.</p> <p>1.11 Whilst we recognise problems associated with car parking, new development will need to comply with the East Sussex Guidance for Parking at New Residential Development.</p>	<p>Amend</p> <p>Noted</p>
ESCC Infrastructure 4.4.3	1.12 The Parish Council have identified improvements to the footpath between parts of the village to be one of the priorities to which the Parish Council’s proportion of CIL monies would be spent – although this is subject to review. We would support the use of the Parish Council’s proportion of CIL monies to go towards improvements to local highway infrastructure which would improve accessibility and safety for those living, working in, or visiting the area. Should advice be sought on the development of any proposals, the Strategic Economic Infrastructure Team at ESCC, should be contacted in the first instance	Noted
ESCC Policy CC2.5	<p>1.13 The NP states that <i>‘any development would be expected to be supported by the necessary infrastructure and also provide access for existing and future residents to key facilities and village assets in order to promote safety and an inclusive community’</i>, and that <i>‘the following criteria should be met’</i>:</p> <ul style="list-style-type: none"> • Safe pedestrian and vehicular access and, where it is practicable, off-road pedestrian routes provided to the key parts of the village and public transport links. • All development proposals must meet the maximum vehicle and cycle parking in accordance with relevant County Council standards. Provision must also be made for visitors and trades-people and that provision laid out to make a positive contribution to the development and its environment. • Development should not cause adverse effects on highway safety or congestion. • Support will be given to measures to improve parking and road safety where there is an identified need. <p>1.14 We are pleased to see the inclusion of this comprehensive set of transport considerations associated with new development included within the NP, although please</p>	<p>Noted</p> <p>Amend</p>

	note that the parking guidelines set by ESCC do not refer to “maximum” parking provision. As previously stated, reference to the would be worthwhile mentioning, as well as the links to the objectives to the Local Transport Plan 2011 - 2026, to which this NP complies.	
ESCC	2. Transport Development Control 2.1 It is considered that all three proposed allocations are in locations that offer good opportunities to access local services, such as the school, railway station and village hall, by foot. They can therefore be considered to be sustainably located.	Noted
ESCC CH1	2.2 Station Road is unadopted highway. For a residential development the vehicular access into the site requires appropriate width, gradient and visibility splays. It is recommend that for a development of 12 houses an access with a minimum width of 5.0m is provided with sufficient radii either side to enable larger vehicles (refuse/emergency) to enter and leave the site. Visibility splays measuring 2.4m x 43m should be provided either side of the new access. A footway is required on either side of the access and this should continue onto Station Road and connect the site with the existing pedestrian facilities on Forewood Lane.	Amend will take account of access requirements in the site development There should be a footpath down the left-hand side of the access road, as you exit, which will continue to join the footpath on Forewood Lane.
ESCC CH1	2.3 Appropriate on-site vehicle and cycle parking: the number of spaces for the residential element of the proposal should be in accordance with the ESCC Parking Demand Calculator. Parking spaces would need to meet the required minimum dimensions to be counted towards the overall provision. The minimum sizes are as follows: Parking Spaces: 2.5m x 5m Car Ports: 2.8m x 5m Garages: 3m x 6m or 3m x 7m if cycle storage is included. Regardless of size, garages remain less likely to be used for parking and therefore only count as 1/3 of a parking space. Internal Layout – ESCC supports the approach to development set out in Manual for Streets and Manual for Streets 2, which has been adopted guidance for residential street design since their introduction in 2007 and 2010. However, as the site is accessed via an unadopted highway the street(s) within the development site could not be adopted by the County Council.	Amend Ref in Policy CC2 - Infrastructure
ESCC CH1	2.4 Any new development proposal should be accompanied by a Transport Report, Statement or Assessment (depending on the scale of development) to assess the impact on the surrounding highway network. In this case, and all other proposed allocations, a	Noted A transport assessment would form part of the site development planning

	Transport Report will be required to accompany any application on this proposed allocation. See: https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/ for further information.	application
ESCC CH2	2.5 Policy CH2- Land south of Forewood Rise – Access requirements are likely to be similar to those detailed above. The road serving the site is subject to a 30mph speed limit and therefore visibility splays measuring a minimum of 2.4m x 43m would again be required	Noted
ESCC CH2	2.6 The new access would need to take into account the nearby Public Right of Way (PROW).	Noted Policy states that PROW (1066 Walk) should be retained and an attractive context achieved.
ESCC CH2	2.7 On site vehicle and cycle parking and internal layout should again be provided as above.	Noted
ESCC CH2	2.8 Improvements to the footway on Forewood Lane (widening) as part of any development proposal would be beneficial to improve pedestrian connectivity	Noted Development should connect with footways on Forewood Lane. Improvements at this point can be discussed.
ESCC CH3	2.9 Policy CH3- Land adjacent to the Station Car Park- Both Station Road and Craig Close are privately maintained. Station Road is a public footway and Craig Close is a private road. I understand that unauthorised parking is potentially an issue here so it is very important that there is allocated parking for this development. We note the reference to providing less parking than what would normally be stipulated in the ESCC Parking Guidelines and support the rationale for this, provided the current issue with unauthorised parking is not exacerbated. The site is too far from the junction where it meets the public highway to have any concerns from a highway perspective.	Amend
ESCC CH3	2.10 With regards to the location of any new vehicular access, it is recommended that this is provided approximately 10-15m into Craig Close so that traffic properly enters Craig Close rather than entering on the corner which could be confusing to other drivers.	Noted Craig Close resident preferences are for site not to access via their private road but via Station Car Park
ESCC 4.3.3.3 / CB1	3.1) Noise: EH8 mentions noise but there is then no policies covering noise. The area is not identified in the Environmental Noise Directive maps as currently being subject to high levels	Amend paragraph and policy

	of noise from transport, and other environmental sources of noise are not likely to be significant. However, to reduce the likelihood of future unacceptable changes to noise levels the NP could clearly state that all development will be expected to follow the guidance set out in the Planning Noise Advice for Sussex (2015) (attached).	
ESCC 4.3.3.3 /CB1	3.2) Air quality: EH8 also mentions air pollution. The area does not include, nor is it close to, a currently designated Air Quality Management Area. Nevertheless, to reduce the risk of deterioration in local air quality, and to support the NPPF's objective to mitigate climate change, it is recommended that a policy on electric vehicle charging points as mentioned above in paragraphs 1.11 and 1.12 is included.	Amend paragraph and policy
ESCC 4.2.6.3	3.3) Climate change: it's unclear what the NP's objectives are, beyond what is already required by the NPPF	Amend paragraph to better explain how policies can help with climate change
ESCC Section 2 Section 3	4.1) The plan is informed by a series of background papers including the Environment Description, Crowhurst Heritage and Character Assessment and Landscape Character, Sensitivity and Capacity Assessment. These provide a sound basis for the development of the policies and proposals in the plan and help to ensure that the landscape character and visual amenity of the parish would be conserved and enhanced in accordance with planning policy. 4.2) The list of Aims is supported	Noted
ESCC 4.3	4.3. The aim to conserve green spaces could be strengthened if it is upgraded to a Local Green Space (LGS) policy, as defined in the NPPF (paras 76 – 78). This could be incorporated into a policy for multifunctional green infrastructure which also picks up the aims of enhancing public rights of way in the parish.	Amend so there is a separate Local Green Space map.
ESCC CH2	4.4. Map 3 identifies open spaces to be protected and retained and is supported and could form the basis of the LGS policy mentioned above. This map does not include the proposed area to be retained as open countryside in association with Policy CH2 Land South of Forewood Rise. To be consistent with the similar description for the open space associated with CH1 it is recommended that this area be included on MAP3. This would also protect the amenity of the 1066 Country Walk PROW 5a where it crosses this field.	Amend. Map numbering changed as a new LGS map created.
ESCC	4.5) In relation to the landscape and visual amenity of the parish all policies in the plan are	Noted

	<p>supported. Particular support is given to the following:</p> <ul style="list-style-type: none"> • Policy CS1 - Development Boundaries is supported. • Policy CE1 - Landscape Character is supported and welcomed. • Policy CE3 - Natural Features is supported and welcomed. • Policy CB1 - Design is supported and welcomed. • Policy CH1 - Station Road Development is supported. • Policy CH2 - Land south of Forewood Road is supported (see comment above with regard to the designation of the open countryside area to be conserved). • Policy CC2 - Infrastructure is supported. The proposed car park adjacent to the church is supported in principal. The car park and access to it would need to be carefully designed and landscaped so as not to detract from the setting of the church and long views from the south as identified in Map 2. The policy could be stronger in this regard. 	
ESCC: 4.2.4	<p>5. Ecology</p> <p>5.1 The plan should make reference to Local Wildlife Sites (LWS) or Sites of Nature Conservation Importance (SNCI). These are mentioned in the Environment Description but not in the main Plan.</p> <p>5.2 Data from the Sussex Biodiversity Record Centre should be used to inform the plan. It is not clear whether this has been done.</p>	<p>Amend Add in reference to LWS/SNCIs</p> <p>Amend Add ref to SBRC about habitats and protected species</p>
ESCC Policy CE2	<p>5.3 The policy should also make reference to protected and notable species including Species of Principal Importance as listed under Section 41 of the Natural Environment and Rural Communities Act. For consistency, the policy should also refer to Habitats of Principal Importance (although it should be noted that the list was drawn from the UK BAP and therefore includes Priority BAP habitats). 2i states that new development is expected to be supported by an initial ecological appraisal and if required any further ecology surveys, unless it can be demonstrated these are not required.</p> <p>5.4 In line with BS42020: <i>Biodiversity - Code of practice for planning and development</i> and CIEEM technical guidance, all relevant developments, including all proposed allocations in</p>	<p>Amend Add reference to protected species to CE2.1 (now CE3.1)</p> <p>Noted Part of required Planning</p>

	<p>this Neighbourhood Plan, should be informed by an Ecological Impact Assessment. As a minimum, this should comprise a Preliminary Ecological Appraisal Report (PEAR) if no further surveys are required, if sufficient detail is available in relation to the scheme design and sufficient information is provided about mitigation and enhancement to provide certainty to the decision maker</p>	documentation
ESCC CE3,CE4	<p>5.5) Policies CE3 (Natural Features) and CE4 (Blue Infrastructure) Policies CE3 and CE4 are welcomed.</p>	Noted
ESCC CH1	<p>5.6 There are local records of bats, dormice and reptiles as well as notable invertebrates and native bluebell. These species should be taken into consideration in development design.</p>	Noted
ESCC CH2	<p>5.7 The western tip of the site is adjacent to Foredown Wood LWS and there are local records of bats, dormice and reptiles, as well as notable invertebrates and native bluebell. Dormice are known to be present in Fore Wood which is connected to two small woodland areas bordering the site via hedgerows. It is therefore likely that dormice will be present in those woodlands and hedgerows. As such, all tree and hedge boundaries should be retained and protected with a suitable buffer from development to reduce the impacts of increased predation.</p>	<p>Noted Policy is to retain hedgerows and add more on western edge.</p>
ESCC CH3	<p>5.8 There are local records of hedgehog and native bluebell. These species should be taken into consideration in development design.</p>	<p>Noted Environment policies cover this</p>
ESCC 2.2 & 4.3.4	<p>6.1) On the whole this is a good draft and takes serious consideration of impact on the parishes' heritage. It is encouraging that the parish has set up a Research and Heritage Group and we would support their further research.</p> <p>6.2) The heritage background is a good start but very basic and it clearly has not drawn on information from the East Sussex Historic Environment Record. Although this section discusses historic buildings, non-designated historic buildings are not considered (although they are referred to later on in the Plan). (There was no point 6.3 in the comment)</p>	<p>Noted</p> <p>Amend Make better reference to the information in supplementary documents</p>
ESCC 4.2.1	<p>6.4) Objective number 6 on page 29 (preserve and enhance heritage assets) is a good proactive objective</p>	Noted

ESCC 4.3.4.1	6.5) There are actually 14 Archaeological Notification Areas currently defined within the parish and it is worth noting that the ANAs are about to be reviewed for Rother District, so more may be added and existing ones redefined	Amend
ESCC CB2	6.6) It should be noted that in planning terms, a heritage asset can also be buried archaeological remains. In relation to the loss of non-designated heritage assets how will these be identified and by who? Is the Parish Council suggesting that a local list should be compiled?	Noted Policy context says heritage can be buried remains. Non-designated assets listed in Character and Heritage Assessment 2017
ESCC CB2	6.7 Criteria number 2 of the proposed policy (loss of heritage assets) is a good start, but needs to clarify that all major developments regardless of whether they relate to an ANA will need to go through a pre-application archaeological assessment.	Noted. Hastings Area Archaeological Research Group (HAARG) have offered to do an initial assessment
ESCC P46	6.8 The 'Policy justification' section on page 46 (section 4.3.4 Heritage) includes some good justification.	Noted
ESCC CH1	6.9 The archaeological potential and significance of this site is unclear as it has not been subject to any archaeological investigation. Its topographic location and proximity to medieval and post-medieval sites suggests it has a medium to high potential to contain remains. Assessment would need to be carried out as part of any planning application, and ideally (to clarify risk and costs) be carried out prior to allocation.	Noted HAARG have offered to undertake a survey of sites CH1 and CH2. As CH3 was part of the railway station in 20 th century it is unlikely to have any significant remains.
ESCC CH2	6.10 The archaeological potential and significance of this site is unclear as it has not been subject to any archaeological investigation. Its topographic location and proximity to medieval and post-medieval sites suggests it has a medium to high potential to contain remains. Assessment would need to be carried out as part of any planning application, and ideally (to clarify risk and costs) be carried out prior to allocation.	Noted HAARG have offered to survey both CH1 and CH2
ESCC CH3	6.11 The archaeological potential and significance of this site has not been assessed, but is likely to be low due to recent modern disturbance	Noted
ESCC	7.1) We welcome the acknowledgement within the policy justification that surface water flooding is one source of flood risk within the parish. The policy itself can be broadly supported as it is considered to accord with the NPPF and strategic policies produced by the District Council. However, we would suggest that paragraph 2 of the policy is amended to state, "Any new development will be expected to incorporate the use of Sustainable	Amend as suggested

	Drainage Systems <i>that are appropriate to the site and its ground conditions</i> (SUDS as....". We would also suggest that the words " <i>and necessary maintenance</i> " are added to the end of the sentence that starts "Any new development will be required to ensure flooding is not increased...".	
ESCC Rights of Way (ROW) Team CH1	The land at station road) I note that footpath 8a running through the site at Court Lodge Farm is to be retained. No doubt as and when plans for any development come forward there may be need to consider a minor diversion under the panning regulation, to integrate the footpath with the site layout. However, I have no doubt that the path could be accommodated within the development of the site and the acknowledgement of this within the plan is supported.	Noted
ESCC ROW team CH2	Land south of Forewood Rise) I note that reference is made to the need to retain the 1066 walk (FP 5a) as an attractive link to this site. Again, we would very much support a green corridor approach as a means of maintaining quality of the route.	Noted
ESCC ROW Team CF1	The improvement of Footpaths 17a and 18 to create an all-weather path would also be supported. This will no doubt be dependent on the necessary funding being identified through CIL or other relevant channels. Regarding the proposed 'review' of footpaths suggested within Policy CF1 I regret that am not sufficiently clear of the intention behind the policy to provide a view as to whether the County Council could support it. Changes to the Parish's paths could realistically only be made where the circumstances were appropriate for orders to be made under either the Town and Country Planning Act where a change was required by approved development, or where diversions would meet the requirements of the Highways Act, for example where there is clear public benefit to the change of route. Circumstances where paths can be changed under the Highways Act in the interest of protecting ecologically or archaeologically protected areas are unlikely in reality to arise.	Noted Any improvements, changes or additions to footpaths would need to be discussed and agreed with ESCC.
ESCC ROW CC2 Infrastructure	The proposed provision of a car parking area close to the Church. Whilst we would support the provision of any additional access to connect the parking with the path network and specifically Footpath 6a, it is very unlikely that the County Council could support a diversion of Footpath 6a from its current alignment. In general, and unless the circumstances are exceptional, the diversion of paths cannot be proposed in the interests of protecting	Noted Landowner is keen to see parking area join up to footpath 6a and also to better protect Manor Ruins (Scheduled Ancient Monument on

	landscape features. Indeed, the connection between rights of way and the ancient tracks and building within the High Weald is specifically protected within the AONB Management Plan. As a promoted path following an ancient route the County Council would be unlikely to support any diversion of Footpath 6a.	private land) from intrusion and damage/vandalism whilst still enabling viewing. Further discussions needed.
High Weald AONB Unit CH1 and Forewood Lane	<p>It is disappointing that the High Weald AONB Unit has not been involved in the preparation of this Neighbourhood Plan prior to the formal Regulation 14 stage. It is clear from the draft Plan that the community puts a great deal of weight on the quality of their rural setting, much of which lies within the High Weald AONB. It is also encouraging that the evidence base includes a very detailed Landscape Character, Sensitivity and Capacity Assessment which is unusual for a neighbourhood plan and very much welcomed.</p> <p>However, this assessment would have benefitted from the Unit's input in terms of the AONB character components, which are largely absent from the assessment, even though it quotes the High Weald AONB Management Plan as a source. It also omits reference to the Historic Landscape Characterisation work which is key to understanding the cultural heritage of the area. For instance, Site CH1 Land at Station Road and Forewood Lane is part of a medieval (1066-1499) informal fieldscapes system, a factor unacknowledged in the Plan or the evidence base. The development of such a site would have a significant adverse impact on the AONB, which is considered to be one of the best surviving coherent medieval landscapes in Northern Europe.</p>	<p>Noted</p> <p>Amend - Follow up with AONB and add better referencing.</p>
HW AONB Unit. CH1, CH2,CH3	Neither the Landscape Character Assessment nor the Strategic Environmental Assessment provide a clear justification as to why sites within the AONB (CH1, CH2 and CH3) have been selected in preference to sites located outside the AONB. Indeed whether they are inside or outside the designated area is not even mentioned in the SEA assessment. This fails to demonstrate that the Parish Council has met its duty to have regard to the purpose of conserving and enhancing the AONB (Section 85 of the Countryside and Rights of Way Act).	Amend Add better referencing to work done as to why sites chosen
HW AONB Unit CE1	Finally, Policy CE1 Landscape Character of Crowhurst fails to acknowledge that the AONB covers the developed area of Crowhurst as well as much of the surrounding countryside and does not refer to the need to have regard to the High Weald AONB Management Plan. It is	Amend

	<p>strongly recommended that a separate policy be included in respect of the land within the parish that is in the AONB that could cover these points.</p> <p>I am happy to advise on wording, but would point you towards policy HK6 of the Horsted Keynes Neighbourhood Plan as an example. This can be viewed at http://www.midsussex.gov.uk/media/80332/horsted-keynes-neighbourhood-plan-nov-2017.pdf</p>	
<p>Sustainable Development Sussex and Kent Team (Natural England)</p>	<p>We welcome Policy CE1- Landscape Character of Crowhurst.</p> <p>However, we object to the following policies, which relate to the allocation of a major development sites within the AONB (please also see below):</p> <ul style="list-style-type: none"> • Policy CH1 (A) Development proposals for 12 units. • Policy CH1 (C) Development proposals for 12 units. <p>(See also comments on SEA)</p>	<p>Noted</p> <p>Amend Add more reference to how sites chosen CNP feels that of all sites considered, the chosen ones are best and most sustainable and viable</p>
RSPB CH2	<p>This site is particularly sensitive in terms of ecology due to it bordering the Fore Wood Special Site of Scientific Interest (SSSI), which is also an RSPB Nature Reserve.</p> <p>We welcome the decision to develop on the Southern end of the site (site 41), which will achieve a significant distance from the Fore Wood SSSI, while maintaining an open area of countryside (site 3) to act as a buffer zone to the woods. However, the RSPB is concerned that there is no mention within Policy CH2 of the requirements to maintain the land to its present state or any forms of mitigation to reduce potential access into the woods if the usages does change (see below comments further detail). This detail is key to ensuring there is no impact on the sensitive adjoining site.</p> <p>On the landscape strategy for site 'A' the area marked as "remain as open countryside" is adjacent to the Fore Wood SSSI. It is not clear from the document what is meant by the term "remain as open countryside". If the area is to persist as arable farmland it is not expected that there would be any additional impact on the reserve. However, if it is proposed that this area is to be used as recreational green space it could encourage residents to access the woodland along the boundary of the "remain as open countryside" area where there are</p>	<p>Noted</p> <p>Open countryside planned to remain as farmland (other than 1066 Walk that goes through part of it). Any recreational space associated with CH2 will be south of the 1066 Walk.</p>

	<p>currently no official paths. Although we welcome visitors to the woodland, we request that visitors use the official footpaths to minimise disturbance to the wildlife. Part of the SSSI designation of the site is for the breeding bird assemblage that it supports, and an influx of residents creating new desire lines for access could have a negative impact on the breeding bird population. Therefore, if the area is to be used as a recreational greenspace, we would request that a 10m buffer zone be excluded from access along the boundary of the woodland and planted with native hedgerow species. Therefore providing a natural barrier and discouraging access into the woodland along this boundary.</p> <p>The RSBP would recommend “open countryside” is defined within the plan and incorporated into the wording of Policy CH2.</p>	
<p>Historic England</p>	<p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets including 25 Listed Buildings, notably the Grade II* Hye House, Hye House Lane and the Grade I Parish Church of St George - note that the whole church and any curtilage buildings are covered by the listing not just the tower as stated in para 2.2.2. There is a single Scheduled Monuments, Manor House (Remains of), located adjacent to the parish church.</p> <p>In line with National Planning Policy Framework (Paragraph 126), it will be important that a positive strategy is included in the plan for this area that conserve those elements which contribute to the significance of the historic environment and those heritage assets that contribute to its character so that they can be enjoyed by future generations of the area. In this respect we welcome the inclusion of Policy CB2 heritage, and the supporting justification, which we judge fulfils this requirement.</p> <p>We note that a Heritage Reports has been prepared by a Heritage Task Group, which we welcome, and assume that this is relied upon as the evidence base for the draft neighbourhood plan. If you have not already done so, however, we would recommend that you speak to the planning team and historic buildings conservation officer at Rother District Council, and with the staff at East Sussex County Council archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway</p>	<p>Noted Amend wording of 2.2.2</p> <p>Heritage Task Group worked with the then County Archaeologist to prepare Heritage Doc, and accessed the Historic Environment Records, amongst others. A Heritage and Character Assessment was also carried out by AECOM.</p>

	<p>(www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced set out advice on its website to help parishes and forums to consider the historic environment in the preparation of their neighbourhood plans. The advice is intended to help to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. This can be found at: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p> <p>You may also find the advice in “Planning for the Environment at the Neighbourhood Level” useful. This has been produced by English Heritage, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from: http://content.historicengland.org.uk/content/docs/planning/neighbourhood-planninginformation-aug14.pdf. (Please note this document is currently being updated and a link to the revised consultation version is included in the above webpage).</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p>	
Hastings Borough Council CC1	<p>I am writing to you regarding your Regulation 14 (pre-submission) consultation on behalf of Hastings Borough Council which is the owner of Upper Wilting Far, Crowhurst Road, St Leonards, East Sussex, TN38 8EG. The whole of this farm falls within the boundaries of the Neighbourhood Plan area. I have attached a map of the farm for your information. The hatched areas of the map are subject to a compulsory purchase by East Sussex County Council and will be transferred to them as soon as the compensation has been finalised. Whilst allocating sites with the plan, we propose that the whole of Upper Wilting Farm be</p>	<p>Noted but no change to Plan. Business site allocation is not part of the Crowhurst Neighbourhood Plan. While we do support renewable energy implementation, Aim EH7 is intended to relate to small-scale renewable energy sources, mostly on</p>

	<p>allocated as a site for renewable energy generation; this includes both wind turbines and ground mounted solar photovoltaic installations. There are two main planning reasons why we believe that the site should be allocated for this purpose:</p> <ol style="list-style-type: none"> 1. The Rother District Council Development and Site Allocation (DaSA) Local Plan allocates the western fringe of Hastings for wind turbine development. 2. The current draft of the Neighbourhood Plan includes policy EN7 which states: ‘To promote the use of renewable energy and sustainable materials’ <p>Additionally, the council believes that the shift to non carbon energy generation is central to the preservation of the natural environment. There is additional benefit that Rother (and potentially Crowhurst Parish Council) could benefit from the business rates income generated from such installations.</p> <p>In broad terms it is the current intention of the Council to apply for permission to erect wind turbines on this site, provided certain criteria can be satisfied. The council wishes to assure the Parish Council that our plans do not involve the very large traditional turbines that can be seen, for example at Pett Levels. The technical restrictions of connecting wind turbines at this location mean that a group of much smaller, vertical axis turbines are likely to be more suitable for reasons of financial viability. I have attached a brochure of a typical manufacturer for your information; although we have not yet started looking for a supplier. We would be glad to share further information in this respect.</p> <p>We believe that this type of equipment is far less intrusive; carried little to no adverse environmental impact; and is quiet and does not create flicker.</p>	<p>new housing development, rather than stand-alone major sites. We do have concerns about the impact of the proposal on the setting of the HW AONB, the Combe Valley Countryside Park, as well as the Ancient Woodland that forms part of the farm. The allocation of the entire Upper Wiltling Farm site would not be appropriate within the Plan, even if the intention is not to use the whole site. Any planning application would need more details than we have at present and would need to comply with the Neighbourhood Plan and Rother saved policies.</p>
Highways England	<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. Having reviewed the Crowhurst Neighbourhood Plan - Regulation 14 Consultation, we note that the Rother District Council Local Plan Core Strategy identifies that Crowhurst should deliver 20 dwellings and that the Crowhurst Neighbourhood Plan identifies three sites for development totalling 30 dwellings as follows:</p>	Noted

	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 (minimum of 6 homes). Accordingly, Highways England does not offer any comments at present on the Crowhurst Neighbourhood Plan – Regulation 14 Consultation. 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.	
Southern Water	No comments at this stage	
	Resident Comments	
Resident CH1	<p>I continue to have 3 deep difficulties with the Station Road (CH1) site, albeit it now seems pretty clear that building would be restricted to the area suggested on your map; I would not support an extended site.</p> <p>Access – problematic.</p> <p>a) the appalling road surface – in spite of periodic surface patching, the tarmacadam becomes gradually pockmarked with irregularly shaped ruts. Water continues to flow down the upper part, but also appears to well up from what I understand to be likely underground springs which may be partially instrumental in lifting the road surface.</p> <p>b) Happily the suggestion of an access route via the upper part of Station road appears to have almost wholly (?) discarded in favour of using the present farm access nearer to the bottom of the road. May I urge you to discard any fragment of possibility of an higher access higher up the road. Cutting across the present verge would likely interfere with drainage. Railtrack have commented (2000) that a lower part of this verge could not be released for sale*. There are significant sized oaks along the verge, other trees, and scrubber screening vegetation. However an access via the present farm gate potentially exacerbates another problem, viz:</p> <p>2. Parking – problematic particularly at times of school drop-off and collection. The plethora of cars at such times make road safety, particularly for the school children and perhaps their younger siblings, an issue.</p> <p>3. Safety of Station Road itself – including the blind corner above the present Farm access.</p>	<p>Noted</p> <p>Vehicular access to the site should be via the farm access location.</p> <p>Residents of Station Road should continue to pressure Network Rail to maintain road to a satisfactory standard.</p> <p>The developer should be responsible for making good any additional damage done during construction</p>

	<p>Parked cars inevitably narrow the road such that there is often not room for two to pass, one going up, the other down, without one tucking in between parked vehicles.</p> <p>Most users are circumspect and careful, but those rushing for a train may momentarily not be. Also, young people delight in freewheeling eg cycles, down the road, having no apparent awareness of the danger of the blind corner near the bottom of the road. So there is a very real risk of collision.</p> <p>Clearly a solution has to be found and reconciled with any proposed building that would increase traffic.</p>	
<p><i>Resident</i> CH1</p>	<p>I feel strongly that the solution lies in an adaptation of the access to the proposed new lower station road up-to-12 dwellings site.</p> <p>i) One that could involve an area of off road parking just below the buildings themselves. Alternatively,</p> <p>ii) although I understand that Rother found the present green field below the barn untenable for building on, I am not sure this whether this would also preclude a parking site. I envisage a one-way semi-circular road that branches off the present farm entrance, and joins the through road through the village (Forewood Lane) to the right of the present post box if one stands with one's back to the church gate.</p> <p>This would not rule out keeping part of the present field as green sward within the loop, but would, I think make it impractical to build a pond here. Such a green patch could be an on-foot access to the aforesaid road, and be also easier to maintain than a pond.</p> <p>Has the idea of a pond arisen because if cleverly constructed, it might in some way act to attract/drain off excess water (as policy 5.57) at time of potential flooding to the bottom of Station Road??</p> <p>I am very glad that it is planned to preserve the field character & views of and from the upper part of the site.</p> <p>Footpaths: I) However, ref. 5.61 Site CH3 is the 'only formal pedestrian route with good access to the railway station and to the central part of the village'. Does this mean the very variably safe and variably squodgy walking along the road from Chapel Hill? And does it include walking up Station road itself and dodging traffic thereon? I understand there are thoughts to make a pedestrian access above the site, so that new house owners can walk to the station without having to go down to the farm entrance and up the road. A very encouraging plan to reduce traffic up the road, but may I suggest this needs to be planned</p>	<p>Noted</p> <p>A parking area in the corner of Station Road/Forewood Lane unlikely to be viable due to flooding issues.</p> <p>Note</p> <p>There is no firm plan for a pond on the proposed Village Green/community space. Any pond constructed there would have recreational and aesthetic value only. Previous investigation into construction of a pond to assist water management proved to be not viable.</p>

	<p>and coordinated carefully, (see note above*) and avoid thinking the path can just cut through the verge wherever.</p> <p>ii) policy CF1&CC2 – walking route between Forewood land and Sampson's lane is a thoughtful proposal, and certainly considerably safer than walking up Chapel Hill, and the route I used to take with my (wellington'd) children to the school (negotiating through leakage from a then slurry pit!) many years ago...but I don't know how feasible or how used it would be.</p> <p>iii) Footpath linked with possible car parking space above and next to the upper church gate. I did not see this mentioned on the document Crowhurst Neighbourhood Development Plan Regulation 14, (Pre-submission) Consultation Documents. (Nor, interestingly, could I find the splendid maps on display in the recent excellent presentations in the village hall etc). May I reiterate that any proposal to alter any footpath other than the paved one to make a safe dog-leg behind and around such a space needs to be transparent, so that the village knows that they are voting for this in addition to a car parking space that might significantly inhibit part of one of the loveliest views in the village.</p>	<p>Amend Point 6 of Policy CC2 is for parking area to link with adjacent amenities and footpaths and for measures to mitigate effects on heritage and landscape. Make clearer what we are proposing</p>
<p><i>Resident</i> CH3</p>	<p>Land adjacent to the railway station (CH3)</p> <p>This seems an ideal site in many ways, if the buildings are sensitively designed and handled. 5.77 mentions 'flatted development' of not more than 2 stories– presumably this could encompass maisonettes rather than flats??</p> <p>I suspect that access to rail travel will not negate occupiers' need for a car, so am sure that 'sufficient parking' will not prove superfluous. I do have, however, significant concern regarding access of building equipment up the somewhat grotty station road surface, and imagine that contracts will state the need to allow access to residents and station users.</p>	<p>Noted Maisonettes count as flats in planning terms (gov.uk definition of general housing terms). Access and working hours etc are usually a planning condition.</p>
<p><i>Resident</i> CH2</p>	<p>I am at present unsure as to whether the 12 proposed dwellings will be in a line along the hedge boundary, or whether it is envisaged to have a double row further into the field?? If the former, it seems to be a site of great potential attractiveness to buyers, and one which will not impede the views from the present houses in Forewood Rise. It will, however be difficult not to obstruct the view of 1066 walkers along that particular stretch, and take some planning to marry access road and footpaths. I note that the owner of a part of the land (but not that where the donkeys dwell?) has displayed a notice (at the kissing gate accessing the site) stating the present footpaths, and a desire not to change them? Number</p>	<p>Noted. Site layout subject to developer but will be carrying out workshops to get resident ideas should the developer be willing to work closely with us. Part of view of 1066 Link will change but policy is to ensure it still has an attractive context</p>

	of dwellings proposed: I understand that 12 dwellings have been proffered on both CH1 and CH2 partly in anticipation of a possible increase in Crowhurst's quota of dwellings – and the higher number will obviate a restarting of the whole CNDP process – and partly to avoid any developer selling off his quota of affordable housing once the number of dwellings on a site is above 11	
Resident 3.5/4.3	<p>I strongly suspect this (<i>shop</i>) is untenable. The one we used to have closed. I don't know how many people expressed a willingness to man a community shop in the survey which asked the question, but I would be sceptical about this being practicable, after the first enthusiasm dies away. Also, would it be considered an amenity that would lead Rother to demand more housing in the village??</p> <p>Finally, may we urge the committee to compose a note to add to the final voting form, to emphasise the importance of as good a turnout (?66%?) of those adults among the 891 residents of Crowhurst, as there was for the first survey.</p> <p>I understand that although 26 out of 50 voters would be sufficient to “pass” the final document, such a low turnout might give grounds to a developer to challenge the outcome, thereby negating everyone's work and participation.</p> <p>Perhaps the 'street champions' could also be asked/urged to attempt to emphasise this verbally when they distribute the forms.</p>	<p>Noted</p> <p>Noted</p>
Resident	<p>1) As Crowhurst needs a shop, could one of the dwellings that we need to build incorporate a shop area within it e.g a shop on the bottom floor and a residential dwelling above.</p> <p>2) Crowhurst also needs a new Village Hall. If a shop cannot be made part of any of the new dwellings, could space be made within a new Village Hall for a shop.</p>	<p>Noted</p> <p>Unlikely to be feasible to have a shop as part of new housing developments. Will look at possibility/need for shop in a new village hall in future.</p>
Resident Housing	<p>1. We support the proposal that housing development should be shared across the 3 'proposed' sites – A, C and D. We would not support the 'short listed' sites (B and E).</p> <p>2. The 20 houses should be distributed across all 3 sites and not on only 1 or 2 of the sites.</p> <p>3. All efforts should be taken to preserve natural wildlife habitats.</p> <p>4. Any housing development should be 'sensitive' to the local environment/ countryside.</p>	<p>Noted</p> <p>Survey showed preference for dwellings to be distributed across sites</p>

<p><i>Resident Housing</i> 4.3.5</p>	<p>5. We would challenge the proposal that only 40% of the houses built should be classed as 'affordable housing', our view is that given the identified shortage/ drive by central government for housing development this number should be increased to 80%.</p>	<p>Noted Not substantiated by the Crowhurst Housing Needs survey or Rother DC housing list and unlikely to be financially viable. 40% complies with Rother DC Core Strategy.</p>
<p><i>Resident</i> (2.7.2)</p>	<p>6. Consideration should be given to the local infrastructure ensuring enough places at the local Church of England Primary School for young family's and access to health services for both young family's and older people. 7. The chosen developer (for the building of the 20 houses) should be required to contribute a percentage of their profit to support the development of the local infrastructure i.e. the redevelopment of the Village Hall and/ or School Buildings.</p>	<p>Noted The CIL charged to developers can be used to fund development of local infrastructure projects.</p>
<p><i>Resident</i></p>	<p>8. We would urge Crowhurst Parish Council to strongly campaign to Rother District Council to ensure the full utilisation of all Brownfield Sites over Greenfield Sites for housing as reflected in the Council for the Protection of Rural England Report (CPRE) dated 12th February 2018.</p>	<p>Noted</p>
<p><i>Resident</i> (3.1.2)</p>	<p>Firstly, congratulations to Ros Day, and all the people who have been involved in producing the report....a massive effort.....so "well done, everyone"! 2, The report is comprehensive, and covers all aspects of village life. It has assimilated the views of the villagers who have responded to the questionnaires and/or attended village meetings.</p>	<p>Noted Thank you</p>
<p><i>Resident</i></p>	<p>3. My feeling is that site CH1(C), at the bottom of Station Rd will intrude too much on the historic, scenic centre of the village, and destroy the very core of the village.. It would be better to relocate it so that the development site abuts on the existing houses further up Station Road on the right-hand side, and continues the linear development. A single lane access road could still enter the site via the present farm gate, and run parallel to Station Rd. The houses - suitably designed to blend in with the vernacular architecture (possibly clad in cedar, or tile-hung), and eco-friendly (eg ground-source heating) - could lead off the single lane feeder driveway. The area nearer the centre pf the village, and adjacent to the present farmer's barn, gate, etc, could be landscaped and planted with indigenous deciduous woodland species, thereby ameliorating the impact on the centre of the village and further improving the look of the area near the church. 4. The other two proposed sites are appropriate, and, provided that the emphasis is on</p>	<p>Noted Landscape assessment said development further up Station Road would intrude on the AONB landscape too much so that is not a possibility. The site will be screened by the existing tree line and new planting. These points are highlighted in our design, heritage and environmental policies Agree that the development should incorporate vernacular style design</p>

	vernacular, energy-saving and eco-friendly construction, then they should get the "go ahead".	and be eco-friendly.
Resident CF1	Object. We would urge retention of the footpath across Cinderbrook (part of the 1066 Bexhill to Battle Walk) in its current form. It is a rural footpath across sometimes muddy and waterlogged fields where cattle and/or sheep graze. Mud and water are a common winter feature of our clay soil landscape and this is a rural village. We do not object to both locals and walkers passing very close to our home; indeed we enjoy talking to them; however we feel that a hard track will destroy the attractive characteristics of this part of the village - as the greenway has partly done in Combe Haven. We appreciate that people are concerned about walking up Chapel Hill (we know the hazards) but the costs of raising the lengthy section of ground across Cinderbrook and adjacent fields clear of water and mud would be better spent creating a footway up Chapel Hill on the short section of land bequeathed in 1951 to East Sussex County Council for this specific purpose.	Noted. Any upgrade of path would need to be environmentally and landscape sensitively designed.
Resident CH1	Object to site CH1. It will block my view from the front of my house. This is my main garden area. Traffic noise will be an issue. Very concerned about the safety of the access via the farm track. The road is already very busy because of the station and at school times. When cars are parked on the road there will be no view to get out of the site. It would be better if the access was directly from Forewood Lane.	Noted. a) There will be a change in the view but it is expected that the trees/hedge fronting the site onto Station Road will remain. b) Some extra traffic but small compared to amount already going up Station Rd (Craig Close is a much larger development). It should be going slowly as it turns into development, rather than accelerating up the hill so extra traffic noise should be minimal. c) It will be for the developer to design a safe access to the site. Access directly from Forewood Lane unlikely to be viable, due to flood risk and extra cost.
Resident	Am also very concerned that the flooding issue in this area will be made worse by the extra	Noted.

CH1	housing and the associated roads and hardstandings.	Policy CE4 (now CE5) states that development should not make flooding worse. Preventative measures should be put in place by developer (including use of SuDS and permeable surfaces)
<i>Resident</i> CH1	Many houses in Station Road have subsidence problems. I don't see how more houses can be safely built	Noted It is for the developer to investigate the requirements for sound construction
<i>Resident</i> CH1	Extra cars from the development will cause extra air pollution and noise. The lower part of Station Road is very fragile. Construction traffic and the extra residential traffic would have a detrimental effect on this already poor surface.	Noted Policy being added to include infrastructure for charging of electric cars so as these become more available, any pollution should decrease. Risk of damage to the bottom of Station Rd by construction traffic is noted and will be monitored. The developer will have to make good any damage
<i>Resident</i> CH1	If it had to happen it would be better if the back gardens backed onto Station Road so the site road is further away from me. This would disrupt me less with headlights	Noted
Resident CH2	Just a few concerns regarding the impact on the beautiful views - however it's a great site if you are one of the new home owners!	Noted The development is sited according to the guidance of the landscape architect, to ensure it is discrete and sensitive to the landscape
<i>Resident</i> CH1	Site C -Road maintenance - not sure how extra traffic would impact on a badly maintained road - potholes are terrible up Station Road and at its entrance.	Noted. Station Rd is owned by Network Rail. Extra traffic from new development should not be a significant extra

		amount from current usage.
Resident CH2	I have concerns over the access via the existing farm gate. It is very close to the bend where traffic often fails to slow down. I am also concerned that I will be restricted when parking on and off my driveway which is almost opposite the proposed access.	Noted Requirement to create safe access will be part of planning requirement
Resident CH2	Policy CH2 Bullet point (3) a) What is the significance of the of the closing statement “shall be secured by a legal agreement for use by local people in perpetuity”, b) Should the “in perpetuity” also be used in Policy CH1, Bullet point (3) on page 50 for consistency?	Amend Policies on affordable housing for CH1 and CH should be the same. However, RDC must assign affordable housing on need, so we cannot specify its use by local people only.
Resident CH2	I know it's been a very lengthy and exhaustive process and that a lot of time consuming work has gone into the plan. So it is with great respect that I suggest the following: I think the site at Foreward rise makes great sense and potentially agree with the site that runs alongside station road on the land of Court Lodge Farm. I'm trusting that the only reason why a prominent and central site like Court Lodge Farm was chosen was due to thorough elimination of the other sites. But my concern is, that I do not understand why the plan would include the main drive up to and including the large barn. My point here is that we would be endorsing the development of a site to become a prominent feature right in the centre of the village which would be a crying shame for Crowhurst and is TOTALLY avoidable. Surely this whole consultation was instigated with a view that no negative impact on the village aesthetic was to be brought? My suggestion is that you do not include the main driveway access AND the hugely visually prominent barn area in the plans, just the area behind. My alternative is, that access to the housing site spur off left from the main entrance and that the development area include the field strip between the public footpath and hedgerow of Station Road. That way, there is more than enough space for development over the proposed sites but NO impact to the aesthetic or current views to residents. There is no beneficial reason that can see to include this area and my simple suggestions above would alleviate all of those concerns. If residents wish for the barn to be returned to a pleasing natural aesthetic in the future then a community project that I would like to propose in conjunction with the Neighbourhood Planning group and residents could benefit the whole community young and old whilst adding to the natural aesthetic rather than detrimentally changing the centre of the village. Including the barn would preclude any	Noted The landscape strategy places development between the farm buildings and the hedgerow along Station Road.

	future sustainability and community cohesion that would result from this project and as I said above irreversibly and unnecessarily, ruin the view right in the centre of the village with a new development of houses? I do hope you will consider my revisions as sensible. Once this decision is made it is irreversible.	
Resident CH2	I am a bit concerned that the size of the site area Station Road compared with Forewood Rise area is a lot smaller. I am concerned that if for any reason that building on site of Station Road doesn't go ahead that all houses will be built in Forewood Rise site. Obviously that would cause more light pollution, noise etc. This would have more impact on th RSPB wood. Also not sure what the play area would consist of! Does this mean lights etc. This also could have impact on RSPB wood.	Noted No street lighting planned – not appropriate for area. Would resist an increase in housing number on CH2, even if CH1 did not go ahead. Play area would not require lighting and would consist of a small number of pieces of play equipment.
Resident Infrastructure	It would be a shame that the field next to the church may be used for parking. I feel we are losing green fields already with the building of houses and to lose another field for hard standing would be another loss for the village also hedges to make way for larger entrance for cars. This is a narrow part of road for cars to pass without cars trying to pull out on to it. Parking for 10 cars at peak times will not make any difference to parking for school or village hall. Who will pay for this to be done?	Noted Will commission a design. Many residents liked idea in survey. We believe it will make a difference at peak times and also allow better turning for cars. Land being donated but cost to create and maintain will have to be found. It will have landscaping.
Resident / Crowhurst footpath warden	Personally I am in favour of the alternative footpath to Chapel Hill, going across the field up my lane. It might interest you to know that it was suggested many years ago (probably over 25) by a past resident, " <i>name removed</i> ", but it never came to fruition. I agree that there would need to be a fence due to farm animals in the field, particularly cows. I think that would be a safer option. From looking at the documents I can't see that any of the footpaths are going to be affected by any of the proposed sites and that they will stay as they are.	Noted
Landowner	We have carefully read through the plan and do not have any additional comments.	Noted
Landowner	I fully support the conclusions of the above mentioned documents	Noted

Public	Have non-listed heritage assets been identified?	Noted Listed in Character and Heritage Assessment 2017
Public	I would be concerned that whilst encouraging live-work units is exemplary, the size restrictions you are wishing to exercise via other policies militates against the effectiveness of this idea	Noted Home-working does not always need to take up much space and is also about ensuring relevant infrastructure is put in place (e.g internet)
Public Housing	I question whether the well meaning restrictions on types and tenures of dwellings will be practical on sites where there are 12 or fewer being proposed	Noted We believe it is possible to allocate certain numbers of bed sizes and affordable housing in schemes.
Resident SEA Para 5.61	However, ref. 5.61 Site CH3 is the 'only formal pedestrian route with good access to the railway station and to the central part of the village'. Does this mean the very variably safe and variably squodgy walking along the road from Chapel Hill? And does it include walking up Station road itself and dodging traffic thereon?	Noted 5.61 of SEA relates to site Ch1 which will be connected to the only paved footpath in village and the amenities of the Church, Village Hall and School Good access to Station refers to its distance
Crowhurst Park Housing	On behalf of Crowhurst Park and Pelham Gates Log Home Development. I would like to support the 3 proposed building plots as identified by the neighbourhood plan. However, I note that the village and indeed the district seems to have a shortage of smaller 2 bedroom bungalows. I believe that by granting Crowhurst Park full planning permission for its Pelham Gates Scandinavian Log home development the Council could rectify this situation. It would also help with Rother's 5 year housing supply requirements as planning already exists for the 11 ½ month usage of the 49 'second homes' (other local councils presumably would not object as partial planning already exists). The homes would be restricted to the over 55's like a retirement development, this would also then free up larger family homes in the district as people would have somewhere affordable to down size to. The Park is a sustainable location with a shop, clubhouse and meeting rooms, as well as a members Leisure Club. There is also a bus stop at our entrance, and a footpath leads to the village and the railway station. The	Noted. Crowhurst Park proposal discussed with Rother DC. CNP Team can see benefits in a small residential area within Crowhurst Park (particularly for downsizing) but also understand Rother DC objections in that building is only allowed in the location because it is tourism use. A move to residential (which under current planning laws would not be allowed in this location) could reduce the benefits that tourism

	<p>main holiday village would remain for holiday use with its current fleet of 60 rental lodges marketed by Hoseasons part of Wyndham Vacation Rentals. This brings substantial benefits to both Crowhurst and Battle via employment opportunities and the 10,000 holiday makers spend money in the local shops, pubs and restaurants. www.crowhurstpark.co.uk The Log Homes are very high quality, substantial, highly insulated and meet/exceed full building regulations and are designed for year round living in Scandinavia .The heating uses renewable heating via air source heat pumps and the windows are triple glazed.www.pelhamgates.co.uk Full Rates are payable by the Log Home Leaseholders creating revenue for the local Council.</p>	<p>bring to the area. It was felt important to keep up a dialogue with the owners of Crowhurst Park to promote use of village amenities etc. but no change to Plan is possible.</p>
	Other comments	
Wealden District Council	<p>We note that this Neighbourhood Development Plan has not been subject to a Habitats Regulations Assessment screening to date. We consider that Habitats Regulations Screening is necessary to determine whether the plan is likely to have a significant effect. The outcome of a Habitats Regulations screening assessment may also have an impact upon the results of the Strategic Environmental Assessment. For the above reasons, we consider that the plan does not currently meet the necessary legal tests or requirements as relevant to European Directives including The Habitats Directive and the Strategic Environmental Assessment Directive.</p>	<p>Habitat Regulation Screening opinion sought from RDC. Response that one is not needed. RDC carried out a HRA that covers Neighbourhood Plans that generally conform to their saved policies.</p>
Gladman Brooks	<p>Crowhurst Neighbourhood Plan This section highlights the key issues that Gladman would like to raise with regards to the content of the CNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination. Gladman are particularly concerned that in several of the policies set out in the draft plan, reference is made to ‘permitting’ or ‘refusing’ planning permission. We would like to remind the Steering Group that it is not within the remit of a Neighbourhood Plan, to determine planning applications. Planning applications will be determined by the local planning authority, Rother District Council. We therefore suggest that any references to ‘permitting’</p>	Noted

	or 'refusing' planning applications are removed or replaced with reference to 'supporting' or 'not supporting' planning applications.	
Gladman CS1	<p>Policy CS1 – Development Boundary</p> <p>Policy CS1 states that within the defined development boundary, development will be 'permitted' subject to compliance with other policies and proposals for development outside the boundary will not normally be 'permitted'. Gladman do not consider the use of development boundaries to be an effective response to future development proposals if it would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy. The Framework is clear that development which is sustainable should go ahead without delay. The use of development limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).</p>	<p>Noted.</p> <p>Amend "permitted" but no other changes deemed necessary.</p> <p>Complies with RDC Core Strategy to use development boundaries as a way to focus development into sustainable locations and to protect against intrusive development beyond the substantially built up area of the village. This does accord with para 115 of the NPPF to protect the AONB. The development boundary has been reviewed and extended slightly.</p>
Gladman CE2	<p>Policy CE2 - Biodiversity</p> <p>This policy states that all new development will be required to demonstrate that the biodiversity of the site and its surroundings is conserved. Paragraph 113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives appropriate weight to their importance and contributions to wider networks. As This policy states that all new development will be required to demonstrate that the biodiversity of the site and its surroundings is conserved. Paragraph 113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives appropriate weight to their importance and contributions to wider networks. As currently drafted Gladman do not believe this policy aligns with the Framework given that the policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with</p>	<p>Amend</p>

	the approach set out within the Framework.	
Gladman Brooks	<p>Policy CB2 – Heritage</p> <p>Policy CB2 states that proposed developments will be required to preserve the identified special character of the Parish’s heritage assets. The Framework requires a distinction to be made between designated and non-designated assets and different policy tests should then be applied to each. Paragraph 132 of the Framework makes it clear that great weight should be given to a heritage asset’s conservation and that ‘the more important the asset, the greater the weight should be’. With reference to designated heritage assets, the Policy should refer specifically to paragraphs 133 and 134 of the Framework which sets out that Councils should assess the significance of the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 135 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset</p>	Amend

	SEA Comments	
Sustainable Development Sussex and Kent Team (Natural England)	<p>Crowhurst Neighbourhood - Strategic Environmental Assessment (SEA)</p> <p>We note that, in relation to the number of housing allocations required by the local planning authority, it is stated in the SEA that:</p> <p><i>“Policy RA1 of the Core Strategy sets out the strategy for the rural areas of the District, including Crowhurst, which includes the delivery of 1,670 dwellings over the plan period. Part of this allocation includes 20 new homes within Crowhurst.”</i></p> <p>and</p> <p><i>“In fact, the plan will provide an addition 10 dwellings having regard to the 6 units to be provided at the brownfield site within the existing development boundary.”</i></p> <p>We also note that the SEA, whilst assessing the housing sites against SEA objectives, there was no specific assessment of impact on landscape. In addition, the site selection criteria did not include whether the site was within the AONB, which as part of the parish is not within</p>	<p>Amend SEA with better referencing to explain how sites within the HWAONB were chosen, compared to sites outside.</p> <p>Shortlisted sites had landscape assessments done on them to see what mitigating work could be done to reduce harm to the AONB landscape. This reduced the size of</p>

	<p>this designated landscape, would be expected.</p> <p>In conclusion, we object to the further allocation of housing, in particular, as represented in Policies CH1 (A) and CH1 (C) and to the lack of information provided to demonstrate the validity of the allocations, including the lack of assessment of the impact of that policy on the AONB protection objective, within the SEA document.</p> <p>The NPPF (para 115) indicates that <i>“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”</i> whilst (Paragraph 116) states that <i>“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</i></p> <ul style="list-style-type: none"> • <i>the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</i> • <i>the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and</i> • <i>any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”</i> <p>Provision of such information would be expected, in order to enable an assessment by the local planning authority or the independent examiner.</p>	<p>the initial sites put forward to those now proposed in order to reduce impact on the wider landscape. One of the criteria for initial site selection was landscape and sustainability. Both sites CH1 and CH2 are close to existing facilities in the village. A Heritage and Character Assessment was done to help define the character areas of the Parish. A Landscape assessment was also done.</p>
RDC SEA	<p>Page 3 (Table) – The appropriateness of ‘Housing’ (with the objective of ‘access to housing’) as an SEA objective is questioned, as it is more of an SA objective, under the ‘social’ heading. I note that the RDC Screening Opinion only referred to its Objective 7 – Access to services and facilities. This could be a significant point if it skews the assessments. To avoid this, it would be advisable to omit this element of the SEA Accessibility objective. Such considerations can still properly form part of the sites appraisals. (NB This comment is also very relevant to Figure 14, but also to Figure 15 and p38.)</p>	Amend
	<p>Page 3 and pages 23-25 - Aside from the above, the SEA topics and objectives are consistent with RDC’s ‘Screening Opinion’ and generally flow through the document. There are a couple of errors though which can be readily corrected:</p> <p>a) The Natural and Built Environment topics/objectives are missing from the Non-Technical Summary (NTS) table on p3 (see Figure 14 for correct version)</p>	Amend

	b) The list of SEA topics following para 5.1 has 'Natural Environment' in twice; the second one should be deleted.	
	<p>Page 5 and pages 29-30 - There is perhaps some confusion over the term "<i>reasonable alternatives</i>". In an SEA context, these are alternatives that meet the policy parameters (e.g. available sites adjoining the village for a scale of development not significantly exceeding the target, or varying topic policies that are each broadly consistent with national and strategic policies). Alternatives that fall outside such parameters can be said to be not reasonable alternatives and need not be assessed. Others should be – but may still be discounted through the SEA and/or sites appraisal processes. Paragraphs 9-12 of the NTS should be reread in this light and amended as appropriate. (Incidentally, I think para 12 should refer to allocated sites ...) On the same point, para 4.8 could usefully refer to a much higher level of growth being not a reasonable option as it would not conform with the settlement strategy of the Core Strategy.</p> <p>Incidentally, it is rather difficult to follow what options of housing need are being referred to on p29/30 and what the 'preferred option' is? I read it that it is an option that provides small sites in or on the edge of the village that meets the plan's objectives as well the housing requirement, with a modest element of flexibility?</p>	Noted
	<p>Page 9 (2.3) - The error regarding coverage of the AONB in the Screening Opinion is acknowledged. It is appreciated that most but not all of the Parish lies within the High Weald AONB, but that doesn't affect the Opinion, which essentially identifies that there is the potential for significant landscape impacts from development proposals in the CNP. It will be necessary to consider the impact of any policies on the AONB and its setting in the SEA and site assessments.</p>	Noted
	<p>Page 30 (Development Boundary) – It is agreed that not having a development boundary would not be a reasonable option, although it may be arguable that the inclusion of dwellings along Forewood Lane would be, though the case is rightly made, on its more loose-knit form and potential for inappropriate intensification, that this is not a favoured option.</p>	Noted
	<p>Pages 31 -35 (Site Allocations) - The 38 sites referred to at para 4.16 are not immediately identifiable. By implication, it is assumed that most of these were not reasonable options for SEA? Also, Figure 16 variously refers to 'Access and Housing' and 'Accessibility' – see point 1 above. (Figures 17 and 18 do refer just to 'Accessibility' although some headings are lost in narrow columns.)</p>	Amend
	<p>Page 35 (Section 5) - It is not uncommon for alternatives to be 'no policy' for topics, but as a general comment, if there are significantly different reasonable options for policies, they may</p>	Noted

	warrant assessment. This will be for your judgement, but may need to be further assessed in response to comments received.	
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Figure 3 – Regulation 14 comments and response

5.0 Further Amendments

Once the draft plan had been amended, based on the Regulation 14 comments, it was sent for a “healthcheck” via the Neighbourhood Planning Technical Support package. Intelligent Plans and Examinations reviewed our draft Submission documents. Their comments and our amendments are listed below in Figure 4.

Comment	Response
1. Page 8. Paragraph 1.2.1 (and again at 1.2.2) – the period 2011-2028 is of course 17 years, rather than 15 years. We consider that sub-section 1.2 (Context) could be usefully extended to provide rather more detail about the Rother Local Plan. The Core Strategy was adopted in 2014, and the emerging Development and Site Allocations (DaSA) document has recently been submitted for examination.	Amended as suggested
2. Page 10 – the statements at paragraph 1.3.3 are all correct, and this Health Check has assessed the Plan against the NPPF and Planning Practice Guidance (PPG), published in 2012. As per the Important Note on page 2, a revised NPPF was published by the Government on 24 July 2018 (with appropriate transitional arrangements) and we suggest that an additional paragraph be inserted (as 1.3.4) to note this.	Added as suggested
Page 12 – the Designation Map in the printed version of the Plan that we have reviewed would have benefitted by being clearer and with a scale indicated. This is an important map in the Plan, and we would recommend seeing whether it is possible to improve its clarity for future users of the Plan. We also suggest that it be numbered Map but remain in the main body of the Plan.	A clearer version is being sourced from RDC. Will be numbered Map D1

<p>3. Page 13 – paragraph 1.7.4 – Whilst it is not essential, it would be useful if rather more text could be provided about the outcomes of the SEA for the Plan, possibly drawing on the material at paragraph 5.81 of the SEA.</p>	<p>Extra text added about SEA.</p>
<p>Pages 18-21 – Section 2 is well drafted and provides a good synopsis of the key characteristics of the Parish. We assume, from the comment at paragraph 2.3.3, that there are no bus services serving the Parish, in which case that should be stated</p>	<p>Amended</p>
<p>Page 24 - sub-section 3.3 - ITB8): should be <u>sewerage</u> rather than sewage</p>	<p>Amended</p>
<p>Page 27 – paragraph 4.1.1 – there are in fact no national targets for new housing, although the Government currently has policy aspirations for 300,000 new homes to be built per annum, and there are no targets distributed down to County Councils or District Councils. The process of identifying the number of new homes required in each district is undertaken by District Councils, previously through a mechanism known as Full Objectively Assessed Housing Need (FOAHN) and now to be replaced (under the requirements of the revised NPPF) by Standardised Methodology for the calculation of Local Housing Need. Rother District Council’s assessment of housing need has been undertaken so far through the FOAHN process. The first part of paragraph 4.1.1 should be redrafted to reflect these points.</p>	<p>Amended</p>
<p>Page 27 <i>et seq</i> – Section 4 – one of the major omissions from the Plan as presently drafted is the failure to make prominent reference to the requirement to promote and achieve sustainable development. Whilst referred to at paragraph 1.3.3 (and as point 5 in paragraph 4.2.1), it is not carried through into the Aims of the Plan (at Section 3) or more specifically as a Policy (within Section 4). We recommend that a new short sub-section be inserted in Section 4 (possibly as new subsection 4.2, with existing 4.2-4.4 being re-numbered 4.3-4.5 respectively) setting out how the Plan seeks to promote and achieve sustainable development in the Plan area. As previously noted, a new Policy (possibly numbered SD1) on how the Plan will seek to contribute to the achievement of sustainable development would be a sensible addition. We would suggest that some of the material presently contained in Section 5 of the Basic Conditions Statement could easily be</p>	<p>Extra sub-section added to Section 4 to describe how the plan and its policies support sustainable development. As it was felt that the current policies do support sustainable development, a policy just on this was not added.</p>

incorporated in the Plan to address this matter.	
Page 32 – Policy CS1 – we note the Policy’s reference to the Crowhurst Landscape Character, Sensitivity and Capacity Assessment (CLCSCA), but wonder whether it should also be referring to the Heritage and Character Assessment and the East Sussex County Council Landscape Assessment, in the light of the justification for Policy CE1	Amended as suggested
4. Page 34 – Policy CE1 – we make the same point (as for Policy CS1) with regard to this Policy, noting the justification set out at paragraph 4.2.3.1.	Amended as suggested
5. Page 36 – Policy CE2 – it is difficult to understand, from a policy perspective, what the phrase “and <i>help to reconnect occupiers with the landscape</i> ” in point no. 2 is intended to mean. We consider that the phrase can be deleted without losing the purpose of point no. 2. With regard to point no. 5, to be precise, the phrase “ <i>from still used medieval or earlier fields</i> ” could be reworded to “ <i>fields that have been in use since the medieval period or earlier</i> ”.	Amended “reconnect” with “connect”. Amended point 5 as suggested
6. Page 39 – Policy CE3 – the interpretation of this Policy, and specifically clause 1, would be assisted if it were accompanied by a map (in the CNDP Map series) showing the designated Site of Nature Conservation Importance and Local Wildlife Sites.	SNCI’s added to CNDP Map 4 – Local Green Space
Page 40 – heading to sub-section 4.2.6 should be Policy CE4	Corrected
7. Page 41 – Policy CE4 – we would suggest rewording the last sentence of this policy to read “ <i>Where the benefits or need for the development are considered to justify the removal of any such important features, development will only be supported where appropriate mitigation and compensatory measures are put in place to address their removal</i> ”.	Amended as suggested
8. Page 43 – Policy CE5 – in criterion 1, the correct title is “Planning Practice Guidance”. In the final sentence of the policy the words “ <i>which achieves a betterment ...</i> ” have an alternative meaning in planning/land valuation, and we would suggest replacing them with “ <i>which secures an improvement ...</i> ”.	Corrected Planning Practice Guidance. Amended final sentence as suggested.
9. Page 47 – Policy CF1 – we are concerned that this Policy is seeking to	Policy CF1 (Community Facilities, Open Space and Recreation) split into:

<p>cover rather too many topics as a single policy. In particular, we would suggest that the proposed designation of Local Green Spaces (which is an important element of Neighbourhood Planning) as criterion 7 should, preferably be a separate policy to be accompanied by CNDP Map 9. (Map 9 presently constitutes an aerial photograph, which is useful, but it should be accompanied by a map (or Inset maps) showing the boundaries of each Local Green Space on an Ordnance Survey base map at the appropriate scales). The evidence for the four spaces identified would be better presented in a discrete evidence base document that directly assesses the sites against NPPF paragraph 77 criteria. In addition, this document should include photographs of the sites and also provide information on the extent (in hectares) of each site and their ownership. We assume that the owners of the proposed sites have been contacted in accordance with advice in the PPG¹. Policy CF1 covers three discrete topics, community facilities and buildings, existing open spaces and Local Green Spaces, each of which has separate justification in policy and evidence terms. The Policy is also referring to four separate Maps. We recommend that sub-section 4.3.2 be restructured leading possibly to three separate policies, with appropriate maps (see above) in order to improve the Plan for future users.</p>	<p>CF1 – Community Facilities CF2 – Open Space and Recreation CF3 –Local Green Space</p> <p>Changes made to policy justification to explain separate policies. Extra map added for LGS, so other maps renumbered.</p>
<p>Page 50 – Policy CB1 – we would recommend the deletion of criterion 3 in the Policy, as it is referring to standards and regulations that are not part of primary Town and Country Planning legislation. We consider that paragraph 4.3.3.2 addresses the points adequately</p>	<p>Left criterion 3 in as important to residents that quality housing is built and this point helps with that.</p>
<p>Page 52 – Policy CB2 – the proposed identification of 11 non-designated heritage assets within the scope of this Policy (at criterion 4) needs to be addressed in more detail than is presently the case. Crucially, the assets should be individually identified on an accompanying map (to be linked to the Policy) with a summary of the key architectural/historical features etc. for each of the 11 buildings being listed within the Policy Justification (within or after paragraph 4.3.4.3). As presently drafted, the Plan is not presenting the necessary justification for an examiner to endorse the identification of these heritage assets.</p>	<p>A separate document explaining why each proposed building should be identified as a non-designated heritage asset created. Map showing is already in the Heritage and Character Assessment 2017 by Aecom.</p>
<p>Page 57 – Policy CH1 – the site selection process is likely to come under</p>	<p>Extra section added in policy justification explaining the process of how sites</p>

¹ PPG Reference ID: 37-019-20140306.
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<p>detailed scrutiny. The draft Plan should ensure that it is clear why the 3 allocated sites proposed are more suitable than others, for example, those which lie outside the High Weald Area of Outstanding National Beauty (AONB). The Qualifying Body must also ensure that the allocations accord with the principle of sustainable development and has regard for conserving and enhancing the AONB (Section 85 of the Countryside and Rights of Way Act 2000 (as amended)² and footnote 9 to paragraph 14 of the NPPF). Criterion (2) of the Policy refers to “downsizers”, and the term is also used elsewhere in the Plan, alongside “upsizers”. These are not acknowledged planning policy terms, although are frequently used by the media etc. We would recommend the deletion of these terms, and their replacement by wording such as “smaller households”, “single persons”, “larger households”, as appropriate to the context. Policies CH1, CH2 and CH3 should each be accompanied by an individual Proposal Map (at the largest possible scale on an Ordnance Survey base map) to identify the precise site boundaries for each site, and we suggest the replacement of the aerial photographs (which do not conform with the presentation of a Development Plan proposal) on pages 58, 62 and 66 with those Proposal Maps. These maps should be referenced within the text of each Policy, and it is possible that CNDP Map 7 could be removed after the incorporation of the Proposals Maps. We note that the High Weald AONB had reservations about the suitability of this allocation and we strongly advise that the Qualifying Body ensures that the High Wealds AONB are supportive of the proposed allocation</p>	<p>were chosen and the criteria used. Term downsizers removed and replaced with “those needing smaller homes” Map 8 of site allocations redone by RDC. More discussion has taken place with the HW AONB Unit.</p>
<p>Page 61 – Policy CH2 – the above comment regarding “downsizers” also applies to criterion 2 of this Policy. With regard to this Policy, we note that it does not contain any specific design requirements, beyond the height limitation of two storeys. In view of the clear need to avoid any harm to the AONB landscape, we would suggest that some further consideration might be given as to whether Policy CH2 should set out any more explicit design requirements, such as the use of local vernacular materials. The Policy also refers (at criterion 4) to “<i>any necessary transport improvements as part of the</i></p>	<p>Term “downsizers” removed and replaced with “those needing smaller homes”. Added “use of local materials and the layout should suit the High Weald AONB” added to point 6. Point 4 amended to “...any necessary safety improvements at the access location...”</p>

² A parish council is a public body for the purposes of the general duty imposed in section 85(1), by virtue of section 85(3)(a).

<p><i>scheme</i>". It would be helpful to users of the Plan, if the nature of any such improvements could be identified at least in the Policy Context.</p>	
<p>Page 65 – Policy CH3 – we understand the reasoning for the term "<i>flatted development</i>", but it might be preferable to reword criterion 1 to read "<i>the development shall comprise 1 or 2 bedroom units in the form of flats or apartments</i>". Specific and local justification for Clause 3 of the Policy needs to be provided as it does not appear to be in general conform with Core Strategy Policy LHN2 iv) b). Additionally, there is a contradiction between the Policy which requires a minimum of 6 dwellings and paragraph 4.3.8.3 of the draft Plan, which suggests that it is appropriate to limit the development to 6 units only. Finally, what is the justification for requiring affordable housing contributions from sites that do not meet the definition of major development, contrary to national policy?</p>	<p>Point 1 amended as suggested. Point 3 – Meets National Planning Policy Guidance which over-rides RDC Core Strategy Policy LHN2 (iv) – it allows for onsite affordable housing provision for developments of 10+ dwellings and a commuted sum on developments of 6-10 dwellings in AONBs.</p>
<p>Page 68 – Policy CC1 – we would suggest re-titling the Policy and the heading of sub-section 4.4.2 to be "Economic Development" to reflect the wider purpose of this section of the Plan</p>	<p>Renamed to Economic Sustainability</p>
<p>Page 70 – Policy CC2 – in criterion 3 the usual planning term is "high speed broadband" rather than "<i>high speed internet</i>".</p>	<p>Amended as suggested</p>
<p>Page 73 – Section 5 (Implementation and Monitoring) – we are pleased to see this section, and the commitment to formally review the Plan on a five-yearly cycle. The section could be extended by a listing (or table) under <i>Implementation</i> of the key projects/actions that the Plan is seeking to achieve over the Plan period up to 2028, and which agencies/partners (such as Rother District Council and East Sussex County Council) are expected to be involved in the implementation and delivery of those projects, and in what timeframes. An example is the proposed car park near the churchyard. This would also enable the Parish Council to consider which projects should be allocated any Community Infrastructure Levy (CIL) funding in the future.</p>	<p>Some additional information has been added to Section 5.</p>

Figure 4 – Table of comments and amendments from the "Healthcheck"

6.0 Conclusion

The aim of the Steering Group has always been to have as much interaction with residents as possible. For the Plan to work, the ideas needed to come from the residents themselves. As can be seen from the Figures above, lots of consultation did take place and the Steering Group has listened to residents and statutory bodies. The final plan is created from resident ideas and concerns about the future development of Crowhurst.

Appendix

1. List of Regulation 14 consultees

Category 1 - Statutory Bodies / Utilities etc:
ESCC
Rother District Council (RDC)
Battle Town Council -
Catsfield Parish Council - Clerk
Hastings Borough Council -
Highways England
AONB and High Weald Authority
Ramblers (East Sussex Countryside Officer)
Homes & Communities Agency
East Sussex Fire & Rescue Service
Environment Agency
Natural England
RSPB
Historic England

Category 2 - Local Community Organisations:
St George's Church
Schoolhouse Trust
Crowhurst Chapel
Crowhurst School
Claverham Community College
Martin's Oak Surgery - GP
Coombe Valley Countryside Park CiC
The Powdermill Trust

Sussex Police
Sussex Police & Crime Commissioner
Sussex Wildlife Trust
Woodland Trust
The Powdermill Trust (re Quarry Wood)
East Sussex Healthcare (NHS)
Hastings and Rother CCG
UK Power Networks
Southern Water
South East Water
British Telecom
Network Rail
South Eastern Rail
Optivo Housing Association

Rother Voluntary Action

Category 3 - Non-resident Landowners and/or Stakeholders
Site 1 landowner
Site 2 landowner
Network Rail - see above
Developer

Category 4 - Local Businesses
The Plough
Crowhurst Park
Brakes Coppice
Furnace Garage
Hye House
Home of Healing
The Firs
Green Hill (Rooks Care)

Category 5 - Clubs and Societies in Crowhurst
Community Information Market Table
Crowhurst & District Horticultural Society
Crowhurst Brownies
Crowhurst Community Arts
Crowhurst Cricket Club,
Crowhurst Cubs,
Crowhurst Drama Group,
Crowhurst Fayre Committee,
Crowhurst Flood Watch,

Crowhurst Football Club,
Crowhurst Link,
Crowhurst News,
Crowhurst Playgroup,
Crowhurst Road to Nowhere Action Group,
Crowhurst Scouts,
Crowhurst Short Mat Bowls Club,
Crowhurst Society,
Crowhurst Stoolball Club,
Crowhurst Tennis Club,
Crowhurst Village Hall Management Committee,
Crowhurst Village Hall,
Crowhurst Village Market,
Crowhurst Women's Institute,
Crowhurst Youth Club,
Crowhurst Youth Football Club,
Doctor's Village Surgery, see above
Friends of Crowhurst School,
Little Dragons, Leader,
Parish Magazine,
Plough Inn Golf Society,
Quarry Wood,
The Growhursts

Category 6 - Others
Crowhurst Footpath Warden
Birdlife – RX Wildlife
Crowhurst Tree Warden