

Battle Civil Parish

Neighbourhood Plan 2019-2028

Strategic Environmental Assessment

Published by Battle Town Council under the
Neighbourhood Planning (General) Regulations 2012 and
EU Directive 2001/42 on Strategic Environmental Assessment

To accompany the
Reg. 15 Plan Proposal Submission of
the Neighbourhood Development Plan

NOVEMBER 2020

Battle Neighbourhood Plan



CONTENTS

GLOSSARY and abbreviation table

Section 1: Background	[5]
Introduction	
Why is an Environmental Report needed?	
Purpose of this Environmental Report	
Methodology	
Baseline characteristics	
Constructing the framework	
Section 2: Assessing the objectives of the NP	[20]
Section 3: Assessing the sites of the NP	[24]
Section 4: Assessment of the policies of the NP	[29]
Section 5: Conclusion	[31]

APPENDICES

Appendix 1: Screening determination

Appendix 2 : Relevant Plans & Programmes

List of Figures

Figure 1: Flow Diagram showing the relationship between the SEA process and production of the neighbourhood plan

Figure 2: Battle Conservation Area Appraisal

Figure 3: Designated neighbourhood area map

List of Tables

Table 1: Constructing the Framework

Table 2: BATTLE CP NP Objectives against assessment framework

Table 3: Assessment of the BATTLE CP NP sites

Table 4: Summary of the sites

Table 5: Assessment of the BATTLE CP NP policies

Table 6: Summary table of the effects of the plan assessed against the SEA objectives

Glossary

<i>AECOM</i>	A government approved agency to assist Neighbourhood Plans with technical support for their Plans.
<i>AMR</i>	Annual Monitoring Report – this contains information on progress in preparing planning policy documents as set out in the Local Development Scheme (LDS) and the extent to which the policies set out in local development documents are being achieved.
<i>Biodiversity</i>	The living component of the natural world, encompassing all plant & animal species.
<i>Biomass</i>	Biological material from living, or recently living organisms, useful as an environmentally friendly fuel.
<i>Community Right to Build Order</i>	Gives local people the power to deliver the development that their local community wants.
<i>DASA</i>	Development and Site Allocations – implements the development strategy and core policies set out in the Core Strategy.
<i>Designated heritage asset</i>	A valued component of the historic environment
<i>Environmental Impact Assessment</i>	As assessment of the possible positive or negative impacts that a proposed project might have on the environment, also includes social and economic considerations.
<i>Flood zone</i>	Flood zones divide the floodplain into 3 areas which represent different levels of flood risk. Flood zone 1 is the lowest risk; flood zone 3 is the highest risk. See the Environment Agency website for more details.
<i>Habitat</i>	Place in which species or a community of species live, with characteristic plants and animals
<i>Historic Environment</i>	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, landscape & flora.
<i>Historic Environment Record</i>	Provides access to resources relating to the historic environment for public benefit and use. Available through your local authority or from the Heritage Gateway website.
<i>Habitats Regulation Assessment</i>	An assessment of the likely significant effects of a plan or project on a European wildlife site. Part of EU law.
<i>Local Green Space Designation</i>	Protects green spaces of particular importance to local communities

<i>Local Nature Reserve</i>	Places with wildlife of geological features that are of special interest to a local area
<i>Local Plan</i>	Development plan for the area, setting out strategic development policies and allocating sites for development, prepared by the local authority
<i>Local Wildlife Site</i>	An area of special importance to local nature conservation
<i>Neighbourhood Development Plan</i>	A document outlining general development policies and allocating sites for the development of land in a neighbourhood.
<i>Neighbourhood Development Order</i>	Gives planning permission for specific developments or types of development the community wants to see in the neighbourhood
<i>Registered Park and Garden</i>	Site designated to be of national importance whose preservation much be considered when determining planning applications for development on or affecting the site.
<i>Scheduled Monument</i>	Scheduled on a list of nationally important archeological sites & monuments. English Heritage takes the lead in identifying sites in England which should be placed on the schedule by the Secretary of State for Culture, Media and Sport There are nearly 20,000 scheduled sites with legal protection under this process.
<i>Strategic Environmental Assessment</i>	A system of incorporating environmental considerations into policies, plans & strategies. Part of EU law.
<i>Sustainable Drainage Systems</i>	A system designed to drain surface water in a more sustainable fashion, helps to improve water quality, enhance the environment, and reduce flood risk.
<i>World Heritage Site</i>	Area designated as important to heritage under relevant national legislation. The list of Heritage sites for England can be found on the English Heritage Website

Abbreviations

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ASA	Archaeologically Sensitive Area
Battle CP NP	Battle Civil Parish Neighbourhood Plan
BOA	Biodiversity Opportunity Area
DaSA	Development and Site Allocations
EA	Environment Agency
HRA	Habitat Regulations Assessment
PROW	Public Right of Way
RDC	Rother District Council
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SUDs	Sustainable Drainage Systems
TPOs	Tree Preservation Order(s)

Section 1: Background

Introduction

- 1.1 A strategic environmental assessment has been undertaken to inform the Battle Civil Parish Neighbourhood Plan (Battle CP NP). This Environmental Report supports the BattleE CP NP and shows the effects on the environment, in line with the requirements of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC. This report is being consulted upon at the same time as the Plan Proposal Submission Battle CP NP in accordance with the Environment Assessment Regulations.

Why is an Environmental Report needed?

- 1.2 There is no legal requirement for a neighbourhood plan to have a sustainability appraisal (as set out in section 19 of the Planning and Compulsory Purchase Act 2004). However, a Basic Condition for a neighbourhood plan is to “be in compliance, and not breach, any EU Obligations”, particularly those that have been incorporated into UK law.
- 1.3 There are a number of Directives of relevance to the environment, although when it comes to neighbourhood planning there are 3 that are explicitly directed in Planning Practice Guidance (PPG)¹. This document relates to the requirements of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC about protecting the environment through integrating environmental considerations into the formulation of plans or programmes. Therefore the focus of this document is on the environmental effects that could be caused as a result of the Battle Civil Parish Neighbourhood Plan.
- 1.4 A Screening of the Neighbourhood Plan was submitted to Rother District Council (RDC) and this was sent to the statutory bodies for consultation and a final response from the District Council received on 11th March 2019. This can be seen in **Appendix 1**.
- 1.5 Additionally, it should be noted that in terms of the Habitats and Birds Directives², relating to conservation interests and protecting or improving the condition of designated sites is also relevant. These Directives have been transposed into UK law as the Conservation of Habitats and Species Regulations 2010. A screening exercise was carried out in the Core Strategy Development Plan Document Appropriate Assessment Screening Report³. Due to the position of the Parish, beyond the usual distance of 10km from a European site, it would not be expected that anything proposed in the Battle CP NP will have an impact on site integrity. As such, no Appropriate Assessment is required of the Battle CP NP. This was confirmed in a letter from Rother District Council on 11th March 2019, where they confirmed that an HRA is not required.⁴

¹ Paragraph 078 of Planning Practice Guidance

² 92/43/EEC and 2009/147/EC

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

⁴ <http://www.rother.gov.uk/CHttpHandler.ashx?id=26381&p=0>

Purpose of this Environmental Report

- 1.6 The purpose of this Environmental Report, which accompanies the submission version of the Battle Civil Parish Neighbourhood Development Plan, is to:
- Identify, describe and evaluate the likely significant effects of the Battle CP NP and alternatives; and
 - Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.
- 1.7 The Environmental Report contains:
- An outline of the contents and main objectives of the Battle CP NP and its relationship with other relevant policies, plans and programmes;
 - Relevant aspects of the current and future state of the environment and key sustainability issues;
 - The SEA Framework of objectives against which the Battle CP NP has been assessed;
 - The appraisal of alternative approaches for the Battle CP NP;
 - The likely significant environmental effects of the Plan;
 - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Plan; and
 - The next steps for the Battle CP NP and accompanying SEA process.

Methodology

- 1.8 The methodology has incorporated all those that are necessary as set out in the legislation. This is an iterative process and incorporates stages for public consultation on the documents produced. **Figure 1** sets out the relationship between the SEA process with the production of the Neighbourhood Plan. This document represents the first available regarding expected impacts on the environment of the Battle CP NP.

- 1.9 The work relating to each of the stages set out in **Figure 1** for the Battle CP NP is briefly explained here.

Screening

- 1.10 Though small in scale, as the Neighbourhood Plan may be allocating sites, providing an overall framework for development and the Parish contains sensitive natural and heritage assets that may be affected by the proposals in a plan, an environmental report is required. The exact process and response relating to this can be seen in the preceding Introduction section.

Scoping

- 1.11 The first stage of forming this SEA Scoping Report has been the collation and formation of environmental and related information on the Parish. In forming the suggested framework to be used, a review of those established for the Development and Site Allocations (DASA) incorporating elements agreed at a County level, was done. The majority of the focus in forming the framework has related specifically to the environmental issues of particular relevance to the Parish.
- 1.12 Consultation at this stage is only required to be with the three statutory bodies (Natural England, Historic England and The Environment Agency) who have responsibility for the natural and built environment, regarding the scope and detail of the assessment. Rother District Council processes mean that this is integrated into the screening stage and the

response that they provide to that. The final framework was marginally amended to take account of comments received in the response from the statutory conservation bodies and Rother District Council.

- 1.13 The baseline of the Parish in the following section of this report contains thematic topics from Annex I of the SEA Directive.

Environmental Report

- 1.14 The environmental report is the main part of the process and is required to include information on the likely significant effects of implementing the plan and any 'reasonable' alternatives taking account of the objectives plus geographical scope of the plan. Annex 1 sets out the 13 thematic issues that must be considered in terms of likely significant effects including the requirement for the cumulative and interrelationship between these, plus measures to prevent; reduce; and as fully as possible offset any significant effects of implementing the plan.

Post-Adoption statement

- 1.15 Once the plan has been through the further stages of passing the examination, referendum and is 'made' by the District Council, a short statement is required reporting on how the plan took environmental considerations into account and the monitoring that is to be taken forward.

Restrictions that have applied to the method

- 1.16 Although a neighbourhood development plan is a lower tier than a core strategy, it should be remembered that it is still a project level document. Therefore, the content of the Battle CP NP cannot provide information that would be expected for an application or site. In terms of this assessment therefore the same is applicable and it should be remembered that accurately predicting all effects will not be absolute as more detailed information will be needed (i.e. design). Reflecting this, especially in terms of synergistic or cumulative impacts, causes professional judgement to be needed. A clear example of where this applies, is in terms of exact impacts of climate change because although there is a greater level of evidence, this is not always as firm as for other topics.
- 1.17 The formulation of the methodology began with the information contained within the Development and Site Allocations (DASA) Sustainability Appraisal Scoping Report⁵. Following this the first action was a review of the relevant plans and programmes, which can be found in **Appendix 2**. The content of these documents has been the first point of reference for collating the baseline, along with information and statistics from more localised sources. However, there are a number of thematic areas where no more localised information was available and this has been reflected in the assessment.

⁵<http://www.rother.gov.uk/CHttpHandler.ashx?id=15112&p=0>

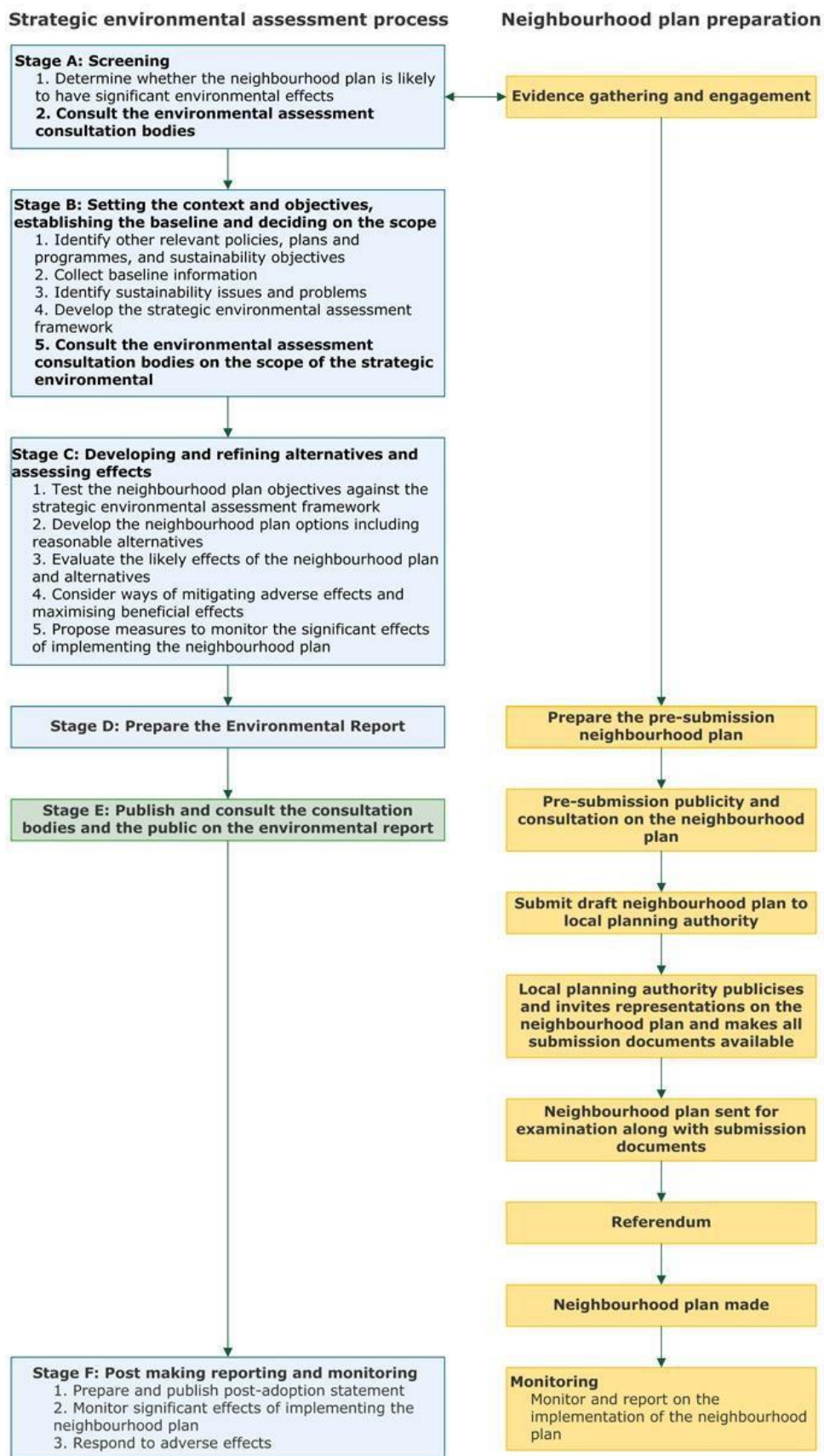


Figure 1: Flow Diagram showing the relationship between the SEA process and production of the Neighbourhood Plan

Baseline characteristics

- 1.18 The Battle Civil Parish Neighbourhood Plan is being prepared to be in general conformity with the provisions of the Rother Local Plan.
- 1.19 The Rother Core Strategy was adopted in 2014. The Core Strategy, which forms Part 1 of the Local Plan, is the key planning policy document within the Rother Local Plan. It sets the overall vision and objectives for development in the district up to 2028 and includes policies relating to the scale and distribution of development across its towns and rural areas. It also contains 'core policies' that address key issues facing the district, in relation to sustainable resource management, community development, housing, the economy, the environment and transport.
- 1.20 The Core Strategy will be accompanied by, when adopted, the Development and Site Allocations Local Plan (DaSA). The DaSA will form Part 2 of the Council's new Local Plan and develops the spatial strategies and core policies set out in the Core Strategy. It reviews existing site allocations and development boundaries and will allocate specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also put forward more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues.
- 1.21 The Parish of Battle comprises three distinct parts within the Parish boundary, namely the hamlet of Telham, Battle Town and Netherfield. The hamlet of Telham and village of Netherfield are separated from Battle Town by agricultural land, some forestry and open spaces. Whilst nearly all areas within the boundary have some historic significance, Battle itself is of national and international importance, with the "Senlac" battle ground, which is protected by English Heritage, the abbey and its market town profile established over many centuries. It also acts as a service centre for a large rural hinterland which stretches far outside its Parish boundary. The entire Parish also falls within the High Weald Area of Outstanding Natural Beauty and retaining the 1970 designated conservation area status in Battle, is of paramount importance. Within Battle Civil Parish there are two designated (electoral) wards for Rother DC designated wards, North Battle, Netherfield and Whatlington (Whatlington is outside the Civil Parish) and South Battle and the hamlet of Telham. The area classed as Netherfield runs from the bottom of Netherfield Hill, Netherfield Road onto Darwell Hill terminating at Darwell Hole. Houses border the main routes through the village but due to historic associations with British Gypsum an estate was constructed at Darvel Down, which housed many of the Mountfield mine workforce at that time.
- 1.22 In relation to housing delivery in the Neighbourhood Plan area, the Core Strategy suggests that 475 dwellings in Battle and 48 dwellings in Netherfield should be delivered in Battle Parish between 2011 and 2028.
- 1.23 In regards to the characteristics of the area covered by the BATTLE CP NP (as set out in Schedule 1(2) of the regulations), it is worth noting particularly that:
- a) the area is within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty;
 - b) The historic core of Battle is a Conservation Area;
 - c) Aside from the Conservation Area designation, there is a rich historic legacy in many Listed Buildings, many of which fall within an Archaeological Notification Area.

- 1.24 The whole of the Parish of Battle is within the High Weald AONB. The NPPF (2019) (Paragraph 172) states that: *'Great weight should be given to conserving and enhancing 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 these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.'*
- 1.25 The adopted Core Strategy (September 2014) notes that the combination of the AONB designation, the historic core and the accessibility limitations, make a high level of future growth inappropriate in Battle. However, it also notes that there is a need to support the town's role and foster economic viability which will entail allowing appropriate residential development in and around Battle.
- 1.26 The town of Battle is used as a conduit to facilitate access to a number of industrial complexes on the outskirts of Hastings and St Leonards via the A2100, in addition to its new use as a transport corridor facilitating an approach to the new Hastings – Bexhill Link Road (A2690). This has generally increased the problems associated with additional transportation within the confines of our historic town, such as illegal parking and congestion. This has not improved the environment for those living, working or shopping along Battle High Street. There has also been an ongoing problem with coaches associated with the transportation of visitors to the town to access the historic centres, such as the Abbey, which offload their passengers around the Main Square in front of the Abbey, causing additional congestion at most times of the year. Whilst Battle Station is situated on the Town's periphery, accessing its services is not helped by the distinct lack of public transport within the Parish. The station provides regular services to both London and Hastings with connections to services for Brighton, Eastbourne and Ashford, as well as Gatwick Airport via Tonbridge. Bus services are infrequent and limited in their destinations.
- 1.27 Netherfield, part of which is situated on B2096, Battle to Heathfield Road, suffers from a lack of public transport requiring the constant use of private vehicular traffic to access medical services, recreational facilities and employment, due to its isolation and lack of investment over a considerable period of time. This has resulted in a dramatic increase in the number of households needing 3-4 cars to enable household family members to access a variety of different pursuits at peak periods. The deteriorating state of the highway system around the rural settlement of Netherfield indicates that a substantial investment would be required to make this village into a rural business hub and therefore an employment hotspot.
- 1.28 Telham, is a hamlet, situated between Battle and Hastings along the A2100 with additional areas situated along Telham Lane. It boasts a church and a Public House. Public transport plays a greater role in the lives of the local inhabitants as is facilitated by the hourly bus service between Battle and Hastings.

- 1.29 Battle Conservation Area was designated in June 1971 by East Sussex County Council. As shown on the map below, the area is dotted with a multitude of listed buildings. Additional details can be found on the Rother District Council website.

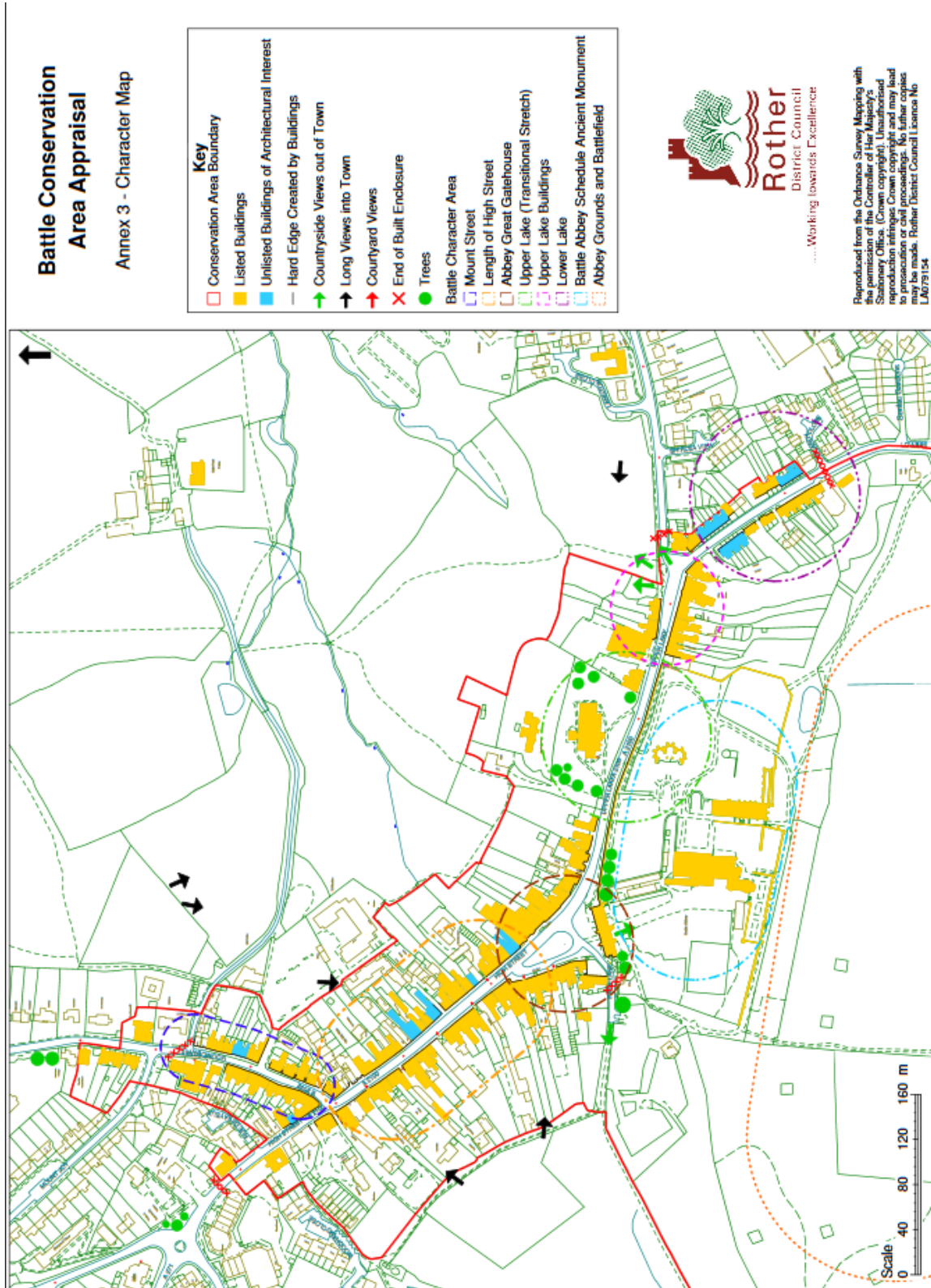


Figure 2: Battle Conservation Area Appraisal

- 1.30 The town centre forms the historic core, and consists of a long central street, High Street, with the Abbey Gate House at its south-eastern end and the mediaeval precincts wall beyond it. The High Street is continued to the south-east in Upper Lake and Lower Lake while to the northwest end of the High Street there is a Y-fork formed by High Street itself and Mount Street. Almost all the buildings in these four streets date from the eighteenth century or earlier. It is this part of Battle which is contained within the designated Conservation Area.
- 1.31 The Town of Battle provides the majority of facilities and services which sustain the residents of the whole Civil Parish of Battle and entices a large number of visitors from all over the world. It has sustained a vibrant community not only with its historical heritage but the amenities that it offers.
- 1.32 Battle is on the main railway line between Hastings and London and runs regular services throughout the day and evening to and from Charing Cross and Cannon Street rush-hour services. By travelling southwards to St Leonards Warrior Square and Hastings, Coastway services to Brighton, Eastbourne and Ashford can be accessed. By travelling northwards to Tonbridge, services to north Kent and Surrey (including Gatwick) can be accessed. The Town has a small number of infrequent day-time bus routes to Bexhill, Heathfield, Hawkhurst and Hastings.

This SWOT analysis was originally drafted in 2015 (and subsequently elaborated); it represents early Steering Group analysis of the known issues within the Battle CP NP. Since then many consultations have modified ideas somewhat into what is now the Neighbourhood Plan. It is interesting to note how, over time, comments and understandings have improved the Plan detail; however this historic SWOT analysis provided important basic underlying commentary on issues that remain to this day in the Plan.

<h2>STRENGTHS</h2> <ul style="list-style-type: none"> ➤ Internationally recognised centre of historic value ➤ A diverse friendly community ➤ Accessibility ➤ High quality of built and natural environment 	<h2>WEAKNESSES</h2> <ul style="list-style-type: none"> ➤ Traffic congestion ➤ Parking difficulties and charging ➤ Lack of public transport to the rural villages ➤ Types of Planning permissions granted within the High Weald AONB ➤ High Rents ➤ High cost of heritage asset maintenance ➤ Highway maintenance
<h2>OPPORTUNITIES</h2> <ul style="list-style-type: none"> ➤ To deliver a range of developments within the Parish which addresses the issues raised by the community as a whole and meets the sustainability housing requirements on mix and types both now and in the future ➤ To be instrumental in creating growth and development for the Parish ➤ To ensure good design and quality are an integral part of the development programme across the Parish ➤ To improve the quality and provision of local parking ➤ Address Parish congestion issues ➤ To strengthen the historic and heritage aspects of the built and natural environment. ➤ Assist in community cohesion projects 	<h2>THREATS</h2> <ul style="list-style-type: none"> ➤ The provision of housing development within the Civil Parish, which might not reflect the housing needs of the community ➤ Lack of resources to identify ideas and formulate strategies to achieve the vision of the Parish community.

Results from baseline review

- 1.33 The review of the baseline information above plus the responses to the screening mean the following sustainability aspects would occur relating to the environment without the BATTLE CP NP:
1. As the population ages there will be increased need for ease of access to services and facilities;
 2. Warmer, wetter winters predicted will mean there will be increased occurrence of flooding if no action is taken;
 3. Potentially drier summers will also mean a greater number of restrictions on water usage and likely continuance of water quality;
 4. Without a reduction in the number of vehicles being used in the Parish, there is the potential for more air quality exceedance linked to exacerbation of issues around congestion;
 5. Without applying specific localised standards there is a higher risk of heritage assets being detrimentally affected;
 6. The extent of important habitats and species will continue to be reduced and their condition to deteriorate; and
 7. There could be a gradual erosion of key characteristics that are important to the High Weald AONB.
- 1.34 To clarify the process in relation to the 'scoping' stage, RDC has already produced a 'Sustainability Appraisal Scoping Report' that is considered applicable to the SEA process of Neighbourhood Plans produced within the District.
- 1.35 Particular reference should be made to the 'Sustainability Appraisal Framework' which contains decision-aiding questions to help inform the SEA process. As the Scoping Report states, this framework *'is also considered relevant and applicable to Neighbourhood Plans produced within the District'*. The scope of information to be included in the environmental report should address the SEA objectives set out below. The level of detail should reflect the geographical extent of the Neighbourhood Plan as far as practicable, drawing on the Council's own Scoping Report referred to above and baseline information already provided and any available from other sources to meet regulatory requirements.
- 1.36 In relation to the SEA process for the Battle Neighbourhood Plan, it is considered that the following objectives from the Sustainability Appraisal Framework should be screened in for SEA purposes:
- 7: Improve accessibility to services and facilities for all ages across the District
 - 9: Improve efficiency in land use and encourage the prudent use of natural resources
 - 10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
 - 11: Reduce emissions of greenhouse gases
 - 12: Minimise the risk of flooding and resulting detriment to people and property
 - 13: Maintain, improve and manage water resources in a sustainable way
 - 14: Conserve and enhance bio-diversity and geo-diversity
 - 15: Protect and enhance the high quality natural and built environment

Issues without the Neighbourhood Plan

- 1.37 Many issues that affect the way the Parish will form into the future are not directly connected to the physical environment but the social or economic. Largely these tend to be connected to the population and the position of the settlements within the wider District.
- 1.38 Without the Battle CP NP development will be controlled through the development plan formed of the planning documents produced by the District Council and those of relevance from the County Council or statutory agencies.
- 1.39 However, if no actions were included or taken at a local level then the following would most likely continue or exacerbate over the time of the Battle CP NP:
- i. Issues in terms of accessing services and facilities, especially in terms of adequate provision
 - ii. Continued higher car usage and worsening of air pollution
 - iii. Further loss of biodiversity
 - iv. Erosion of the special contribution the town and villages and its setting, makes to the High Weald AONB

Constructing the framework

- 1.40 The development plan for Battle following the making of the neighbourhood plan will be formed of the Rother District Plan and the Battle CP NP. In terms of creating the framework, the first point has been to consider that set out within the Rother Sustainability Appraisal. It also takes account of District Council's policies, plans and strategies including the Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.
- 1.41 The Rother framework contains 16 objectives and for the purpose of this exercise, those of most relevance to the Parish have been selected. Though the descriptions of the decision aiding questions and indicators are the same as the Rother DASA, the range of statistics used is more localised to be more specific to the Parish and geographical area concerned. It is important to note that the DASA may be updated but the general ethos should remain the same.
- 1.42 The overall framework that has been used for the assessment is set out over the next pages, showing the questions used and the direction of trend shown by the figures.

Table 1: Constructing the framework

Objective	Decision-Adding Question	Indicators
SEA topic: Material Assets, Air, Climatic Factors, Biodiversity, Soil		
Improve efficiency in land use and encourage the prudent use of natural resources	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Use land in sustainable locations that has been previously developed in preference to greenfield sites · Re-use buildings and materials · Protect and enhance the best and most versatile agricultural land · Maximise potential for providing facilities, i.e. from larger sites · Apply suitable density standards to ensure the best use of developable land in appropriate locations · Have potential to layout site to maximise energy efficiency (e.g. solar gain) · Have availability of utility services on site (water, electricity, sewerage, etc) 	
SEA topic: Material Assets, Air, Climatic Factors, Biodiversity, Human Health		
Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Improve travel choice · Reduce the need for travel by car / lorry · Reduce the need to travel for commuting · Have access to public transport (buses, train services) and non-car modes to access services. · Have access to pedestrian & cycle routes for localised leisure opportunities · Have highway capacity. · Avoid impact on and from AQMA. · Improve air quality · Not worsen or, where practicable, mitigate traffic congestion · Ensure that development is not at risk from land instability 	<ul style="list-style-type: none"> · Background levels of air pollutants · Number of Air Quality Management Area (AQMA)s · Commuting patterns in/out District · Mode of travel to work · Licenced vehicles by vehicle type
SEA Directive Topics: Population, Material Assets, Air, Climate Factors		
Improve accessibility to services and facilities for all ages across the District	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Have good access to shops, services, educational and medical facilities, pubs, community hall, play areas, sports pitches, places of worship, library, nursery, petrol filling station. · Have scope to facilitate the above via on or off-site provision. · Improve accessibility, particularly in the rural areas of the District · Support delivery of quality public transport 	<ul style="list-style-type: none"> · Distance to key services · % households within 30 minutes public transport of: <ul style="list-style-type: none"> - GP - Hospital - Primary & secondary school - Employment - Major retail centre

	<ul style="list-style-type: none"> · Enhance the Public Right of Way (PRoW) and cycle network · Support the timely delivery of infrastructure needs associated with new development · Encourage the provision of services and facilities in accessible locations · Help support the continued viability of services, particularly in rural areas 	<ul style="list-style-type: none"> · % completed retail, office & leisure development in centres
SEA Directive Topics: Landscape, Cultural Heritage, Soils		
Protect and enhance the high quality natural and built environment	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Ensure protection and enhancement of the AONB and respect the key features and characteristics of the High Weald AONB and its setting · Protect, enhance and avoid negative impacts upon sites & features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled ancient monuments, registered battlefields, archeologically sensitive areas (ASAs)) · Minimise adverse visual impact on landscape setting of towns and rural settlements · Respect the historical settlement context. · Promote development in character with the area · Seek to ensure that development is in keeping with the landscape character, including National and Local Landscape Character Areas. · Avoid negative impacts on coastal and marine environment including seascapes, protected marine areas and undeveloped coast. · Protect of gaps and avoid the coalescence of settlements. · Promote development that is in scale and proportionate to host settlement · Ensure building design, arrangement and materials used complement and add to character of area. · Promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment. · Ensure that development is not at risk from land instability 	<ul style="list-style-type: none"> · Number of Conservation Areas · Number of Listed Buildings · Listed Buildings of Grade I and II* at risk · % of Listed Buildings at risk · % of Conservation Areas at risk · Landscape character assessment · % of businesses within the High Weald that are land-based (in comparison to the wider south-east).
SEA Directive topics: Biodiversity, Flora, Fauna		
Conserve and enhance	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Protect and enhance locally valued habitats and species 	<ul style="list-style-type: none"> · Number & area designated sites

biodiversity and geodiversity	<ul style="list-style-type: none"> · Prevent and, where appropriate, reverse habitat fragmentation · Provide opportunities for provision & enhancement of green space / green infrastructure. · Establish or maintain a network of areas that maintain both the distribution and abundance of threatened species and habitats · Provide green space / green infrastructure which has added value via reducing pressure on international sites. · Avoid harm to Ancient Woodland. · Avoid harm to BAP Habitats. · Avoid harm to Rare & Protected species and their habitats. · Have scope to mitigate and enhance habitats. · Acknowledge and protect important trees, particularly mature specimens. · Acknowledge the actions identified for the Rother, Brede and Tillingham Woods Biodiversity Opportunity Area (BOA) and scope to develop opportunities. · Avoid net loss of biodiversity · Avoid any areas at risk from instability or necessary for mineral supplies · Ensure the location and design of sites does not cause the further fragmentation of habitats and protects and enhances network routes for flora and fauna movement · Support landscaping that enhances native biodiversity · Have a positive nature conservation plan. 	<ul style="list-style-type: none"> · Condition of designated sites · Number and area of Local Sites · Area of ancient semi-natural Woodland. · No further losses of ancient woodland · Area of Biodiversity Action Plan habitat – gains or losses over time · Loss of hedgerows · Number of Tree Preservation Orders (TPOs) in place
SEA Directive Topics: Climatic Factors, Material Assets, Water, Human Health		
Minimise the risk of flooding and resulting detriment to people and property	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Reduce the number of properties at risk of flooding in the Parish · Avoid locations within flood zones, including EA Flood zones, EA defined areas of surface water risk and Local Surface Water Management Plans/ Strategic Flood Risk Assessment (SFRA) identified issues of localised flooding. · Ensure that appropriate flood risk protection measures are in place to protect well-being. · Avoid exacerbating flood risk off-site by increasing run-off · Provide scope for, and 	<ul style="list-style-type: none"> · Properties at risk from flooding · Planning permissions granted contrary to EA advice on flood defence grounds Number of applications approved within area of surface water flooding

	promotion /adoption of Sustainable Drainage Systems (SuDS).	
SEA Directive Topics: Water, Human Health, Material Assets, Climatic Factors		
Maintain, improve and manage water resources in a sustainable way	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Protect & improve water quality (groundwater and surface water) · Require the use of water efficiency measures · Minimise the risk of pollution to water sources · Avoid locations within groundwater source protection zones/aquifer. · Ensure new development has sufficient sewerage and waste water treatment capacity to avoid harm to water quality · Implement SuDs where appropriate to avoid run-off of polluted water to water courses or aquifers · Ensure any SuDS includes scope to enhance and enrich habitats and amenity value 	<ul style="list-style-type: none"> · Water consumption per household · Quality of river water · Rivers of High or Good chemical and biological water quality (passing Water Framework Directive criteria).
SEA Directive Topics: Climatic Factors, Material Assets		
Reduce emissions of Greenhouse gases	<p>Does the option/policy?</p> <ul style="list-style-type: none"> · Reduce emissions through reduced travel, energy consumption · Promote renewable energy generation · Promote community involvement, understanding & action on climate change · Help reduce greenhouse gas emissions through reducing car travel. · Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to provide alternatives to car travel · Promote reduced energy use in new development (waste management and reduce energy demand from non-renewable resources). · Have potential for energy generation from renewable resources, including micro-generation as part of the energy requirements of new development · Have potential to maximise passive solar gain <p>Net Loss / Gain of Trees</p>	<ul style="list-style-type: none"> · Emissions of greenhouse gases · Consumption of gas and electricity Number of applications and discharge of conditions granted for renewable energy
Above factors may interact in a combined way and may increase cumulative effects either positively or negatively.		
Potential to mitigate negative effects and enhance positive effects		
Actions or change that could reduce or remove effect		
Derived from combination of above		

Section 2: Assessing the objectives of the Battle CP NP

- 2.1 The area for which the Plan will relate was designated by Rother District under resolution in April 2015. This is shown in the figure below and so the geographical scope applicable for the assessment. Figure 3: Neighbourhood Area Designation – Delineated by the Civil Parish Boundary.

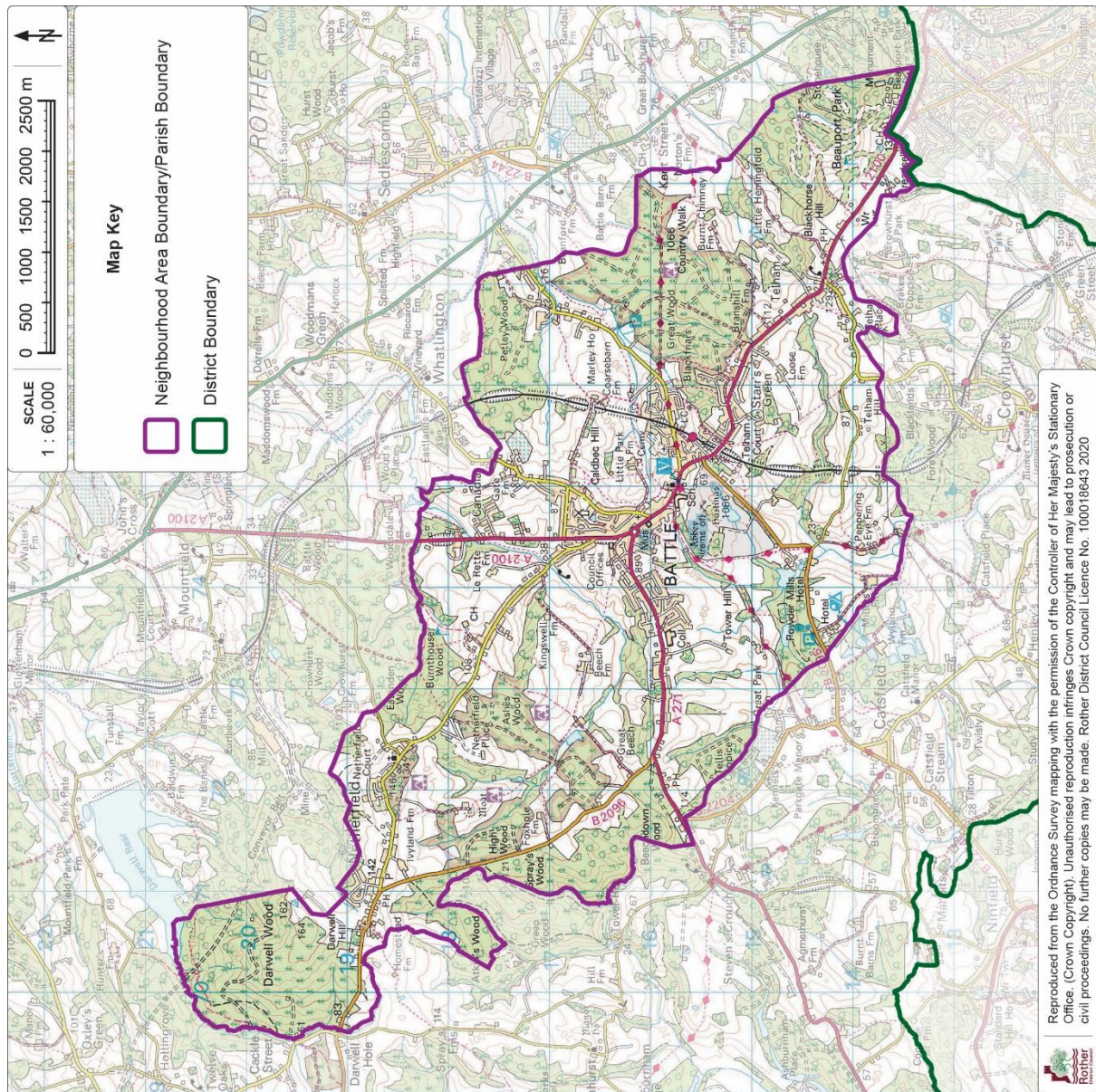


Figure 3: Designated neighbourhood area map

- 2.2 The Battle CP NP is intended to cover the period 2019-2028 and sets out the following vision that is supported by 9 objectives under 4 themes.

VISION

All the communities within the Civil Parish, wish to create a safe and friendly environment where people, both local and others, want to live, work and play. This goal will be met through engagement with the local community and should directly reflect the community's own views and aspirations. It will secure the future through the formulation of policies and objectives, which not only support sustainability, but also development that enhances and respects the unique historic nature of the area. These strategies will pay particular attention to the ecological, agricultural, public enjoyment and intrinsic values of the Civil Parish. The preservation of our countryside and heritage is a priority.

OBJECTIVES

NOTE: The following list of objectives have been identified by the community as the key issues which are important to them. Therefore, those elements which seek to highlight land use issue will be addressed via policies within the Plan and the non-land use issues and therefore outside the scope of the neighbourhood plan policies; will be addressed via community aspirations and community projects.

OBJECTIVE 1: Residential Development Sites:

The community acknowledges it is required to include in the plan the housing numbers set up by the Government and Rother District Council – at least 475 for Battle and the hamlet of Telham and at least 48 for Netherfield. The aim is for development sites within the defined Development Boundaries to reflect not only the AONB character of the locality but to embody the design principles embodied in the Battle CP Design Guidelines and the High Weald Housing Design Guide. Where possible the proposed locations should minimise local impact and address sustainability, environmental and spatial considerations, by robust assessment of all the factors which applies to the application.

OBJECTIVE 2: Traffic Mitigation Measures:

To require that Transport Assessments are undertaken for all development proposals within the Civil Parish in order to consider the wider implications and associated costs of traffic movements on the environment and local infrastructure with an overall aim of reduction in the impact of traffic movements and improvements for sustainable travel modes.

OBJECTIVE 3: The Maintenance of Green Gaps:

To formulate a policy that not only recognises the separate identities of the village of Netherfield and the hamlet of Telham and their unique relationship to Battle Town established over centuries, but enables them to retain the landscape characteristics of the High Weald AONB and prevent urban sprawl through creative solutions within the overall strategic aims of the Core Strategy.

OBJECTIVE 4: Developments should meet the needs and wishes of the community: Development objectives must reflect the wishes of the community as evidenced from survey results and demonstrable needs identified through forums and exhibitions together with comments received through letters, emails, monthly articles in the local newspaper and Battle Town Council newsletter and meetings with various stakeholders within the Parish of Battle.

OBJECTIVE 5: The Protection of Open Spaces and the Countryside:

Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB. In addition, information that has been gathered by the Group on a number of identifiable green spaces which have yet to be afforded protected status, but would be lost for the purposes of sport, leisure and agricultural uses if policy decisions were to change within the RDC Strategic Aims, must also be given that protection. To protect and enhance our existing and future open spaces, any new development proposal should conserve and enhance the environment, ecosystem and biodiversity, ensuring that it gives protection to heritage assets, habitats and provides appropriate movement corridors for wildlife.

OBJECTIVE 6: Protection of Heritage Assets within the Parish Settlements:

A community is defined by its most important assets and where there are additional historical attributes attached to those assets no major changes should be allowed that would change the character of the town or other areas of the district which enjoy such history. Whilst this will influence development proposals for historic as well as listed building it reflects the community's wishes and is essentially what attracts the many thousands of tourists to the area every year. It is important that the presence of below ground heritage assets (both known and unknown) is properly considered at an early stage in development proposals.

OBJECTIVE 7: Enhance the role of Tourism within the Parish:

Diversity improves the experience of tourism, and thereby increases the number of tourists within the Parish, as it caters for a variety of experiences to be satisfied. One of the aspirational aims within the Neighbourhood Plan is to encourage the placement of public art exhibits around all areas of the Parish. These are being funded by public subscriptions and developer contributions. This initiative will lead to many permanent exhibits within the Parish.

OBJECTIVE 8: The enhancement of Village/Town Centres within the Parish:

The separate communities which make up the Civil Parish of Battle are being encouraged to provide the facilities – whether social, sporting or otherwise – desired by the residents and visitors alike, with possible allocation by Battle Town Council of the Community Infrastructure Levy monies which may be used for enhancing and developing those facilities. An example of this objective is the ambition to set up a part time health provision in Netherfield.

OBJECTIVE 9: To alleviate where possible the Traffic Congestion within the Parish:

Battle Town Council will seek to lobby appropriate authorities to address poor parking facilities, volumes and speeding traffic. From the surveys conducted, residents have commented on being concerned about safety measures within the Parish. The Plan seeks to highlight both sustainable travel and capacity/safety improvements.

2.3 Table 2 demonstrates that there is predominately a positive relationship between the objectives and no negative correlations, which confirms that the Plan has been positively prepared and addresses the matters scoped, into the assessment.

2.4 In assessing the impacts of the objectives of the Plan, the following symbols will be used in Table 2

- + Positive impact
- Negative impact
- = No/negligible impact
- ? Uncertain impact

Table 2: Battle CP NP Objectives against assessment framework

Objectives 7, 9, 10, 11, 12, 13, 14 and 15 are from the Sustainability Appraisal framework from the RDC screening determination

Objective (see preceding page for full NP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
OBJECTIVE 1: Residential Development Sites: To provide homes within the Parish boundary	+	+	=	=	+	=	=	+
OBJECTIVE 2: Traffic Mitigation Measures	+	+	?	?	?	?	+	+
OBJECTIVE 3: The Maintenance of Green Gaps: To protect the green gaps between Battle and the surrounding settlements	+	+	+	+	=	?	+	+
OBJECTIVE 4: Developments should meet the needs and wishes of the community	+	+	+	+	=	?	=	=
OBJECTIVE 5: The Protection of Open Spaces and the Countryside	+	+	+	+	=	?	=	=
OBJECTIVE 6: Protection of Heritage Assets within the Parish Settlements	+	+	+	+	+	+	+	+
OBJECTIVE 7: Enhance the role of Tourism within the Parish	+	+	+	=	+	+	+	+
OBJECTIVE 8: The enhancement of Village/Town Centres within the Parish	+	+	+	=	+	+	+	+
OBJECTIVE 9: To alleviate where possible the Traffic Congestion within the Parish	+	+	?	?	?	?	+	+

Section 3: Assessing the sites of the Battle CP NP

3.1 As part of the Neighbourhood Plan (NP), Rother District Council requires the Civil Parish of Battle to allocate housing for the following:

For Battle

Area	Target	Completions (01/04/11 - 31/03/19)	Permissions (01/04/19)		Allowances (01/04/24 - 31/03/28)		Residual requirements
			Small sites	Large sites	Small site windfalls	Exception sites	
Battle	475	34	33	158	12	N/A	238

The figure for Netherfield is 23, as below

Settlement	Core Strategy Large Site Requirement	Large Site Completions (01/04/13 - 30/10/18)	Large Site Permissions (01/10/18)	Residual requirements
Netherfield	48	0	25	23

NOTE: These figures were provided by RDC as at 1 April 2019.

The current residual housing allocation for Battle stands at 18 dwellings and for Netherfield at 23 dwellings as at 1 April 2019.

3.2 The site selection process was carried out in an open and transparent way including consultation with the community. The following are key stages of the site process undertaken:

- **July 2015** inaugural meeting – Chair – Cllr R. Jessop
- **Nov 2015** – Appointment of Consultant – AiRS – for survey of local needs
- **Nov/Dec 2015** – Call for sites (1)
- **April 2016** – Survey of local needs – AiRS
- **June 2016** – Stage 1 pro-forma desk top assessments. This included a review of the SHLAA assessments and call for sites (1)
- **Autumn 2016** – Preliminary site visits
- **April 2017** – Parish Assembly – First consultation with Civil Parish – Exhibition at Memorial Hall
- **April 2018** - Parish Assembly Exhibition
- **March/April 2018** – Call for sites (2)
- **July 2018** – appointment of AECOM Consultancy for site selection
- **April 2019** – AECOM Consultancy appointed to prepare Design Codes
- **May 2019** – Public exhibition of proposed preferred sites priority list
- Meeting with shortlisted landowners/developers

3.3 AECOM Consultancy was commissioned to undertake an independent site appraisal for the Battle Neighbourhood Plan on behalf of Battle Town Council. The work undertaken was agreed with the Town Council and the Ministry of Housing, Communities and Local Government (MHCLG) in July 2018.

3.4 Battle has been allocated a housing target of 475-500 dwellings between 2011 and 2028 within the DaSA and therefore has a requirement to allocate sites suitable for housing development within its boundary to ensure that it is in line with the DaSA. However, taking into account outstanding commitments and schemes which are not yet implemented (including the Blackfriars

Site), there remains an outstanding housing need of 18 dwellings for Battle and 23 dwellings for Netherfield as at 1st April 2019.

- 3.5 The site assessment method used by AECOM Consultancy is based on the Government's National Planning Practice Guidance. The relevant sections are Housing and Economic Land Availability Assessment, Neighbourhood Planning and the Neighbourhood Planning Site Assessment Toolkit. The methodology for carrying out the site appraisal included the following stages:

1. Identify Sites to be included in the Assessment

SHLAA: A total of 47 sites in Battle and 10 sites in Netherfield were considered in the 2013 SHLAA. The conclusions of these sites have been reviewed, to understand whether there are any that can be screened out of the more detailed assessment is undertaken.

Local call for sites: Battle Town Council (BTC) conducted a call for sites in both 2015 and early 2018 for residents of the Parish to submit potentially suitable locations for new housing. These sites were submitted by both landowners and developers, so they are all assumed to be available. A total of 18 sites in Battle and 3 sites in Netherfield were considered.

These sites were sifted, to rule out any sites that had any insurmountable constraints, before a more detailed assessment was undertaken.

2. Initial Sift of Sites

The sifting stage conducted by AECOM Consultancy, resulted in 43 sites being sifted out, leaving 35 sites taken forward for assessment. These were either assessed at a high level, because they had already been assessed at SHLAA level, or at a more detailed level, to establish whether they would be appropriate for allocation in the Battle Neighbourhood Plan.

3. Site Assessment

4. Consolidation and review of Results

5. Indicative Housing Capacity

- 3.6 Assessing the sites against the Battle specific local criteria shows that the following sites are suitable to meet the Neighbourhood Plan's vision and objectives. These are

- BA3: North Trade Road
- BA11: Land at Blackfriars (including 3 separate areas)
- BA23: Land r/o 26 Hastings Road
- BA23x: see BA31a
- BA25: Land at Lillybank Farm, London Road
- BA NS116 / BA28: Land North of Loose Farm
- BA31a See BA23: Reduced Glengorse Housing
- BA36: Land at Caldbec House, Caldbec Hill
- BA40: Land adj to 73 North Trade Road
- BA NS103: Land to the east of Battle (west of Great Wood) Marley Lane
- BA NS108: Land at Chain Lane, Battle between Watchoak House and Stone Cross, Chain Lane
- BA NS117: Land east of and adjacent to Cherry Gardens Allotments and Mount Street Carpark
- BA NS118: Land to the SW of Cedarwood Care Home
- NE01: Land south of Darvel Down
- NE06: White House Poultry Farm

- 3.7 Table 3 assesses each of the sites which have been brought forward as part of the AECOM site assessment process, individually against the aspects of the SEA framework. The site assessment is as objective as possible with a typical RAG (red,amber,green) rating with commentary in the appropriate boxes to provide clarity where necessary. This section should be read in conjunction with the AECOM site assessment.

Table 3: Assessment of the Battle CP NP sites

Objectives 7, 9, 10, 11, 12, 13, 14 and 15 are from the Sustainability Appraisal framework from the RDC screening determination

Sites	Site Assessment Suitability Rating (as per AECOM report)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
BA3: North Trade Road									
BA11: Land at Blackfriars (including 3 separate areas)									
BA23: Land r/o 26 Hastings Road									
BA25: Land at Lillybank Farm, London Road									
BA NS116 / BA28: Land North of Loose Farm									
BA31a See BA23: Reduced Glengorse Housing									
BA36a: Land at Caldbec House, Caldbec Hill									
BA40: Land adj to 73 North Trade Road									
BA NS103: Land to the east of Battle (west of Great Wood) Marley Lane									
BA NS108: Land at Chain Lane, Battle between Watchoak House and Stone Cross, Chain Lane									
BA NS117: Land east of and adjacent to Cherry Gardens Allotments and Mount Street Carpark									
BA NS118: Land to the SW of Cedarwood Care Home									
NE01: Land south of Darvel Down									
NE06: White House Poultry Farm									

3.8 Following the consideration of the findings of the site assessments undertaken for the Neighbourhood Plan, the SEA findings, consultation with the site owners/promoters and the public and an ongoing consideration of viability and achievability the current version of the Neighbourhood Plan allocates the following sites:

Netherfield

- NE NS102 (part of NE06) White House Poultry Farm : up to 23 dwellings
- NE05a and NE05r Swallow Barn off B2096: up to 10 dwellings

Battle and the hamlet of Telham

- BA31a Glengorse: up to 20 dwellings
- BA36a Land at Caldbec House, Caldbec Hill: up to 5 dwellings
- BA11 Blackfriars: up to 220 dwellings

It is important to note that the proposed number of dwellings and sites being proposed may differ from the desk top capacity potentials outlined in the AECOM report because it takes local issues, site availability and deliverability into consideration. Consideration was also given to balancing development potentials between N-W and S-E of town centre so that cross-High Street travel would be minimised.

Table 4: Summary of the sites

Sites	Site Assessment Suitability Rating (as per AECOM report)	
BA3: North Trade Road <i>NOTE: This site been excluded from the Plan because of site availability and deliverability issues.</i>		The capacity of the site is relatively small; therefore development here should not significantly increase vehicle traffic. Suitable access would need to be created which would result in the loss of mature trees on the boundaries. It is a Greenfield site.
BA11: Land at Blackfriars (including 3 separate areas)		Suitable access would need to be created which would result in the loss of mature trees on the boundaries. Significant trees and vegetation on part of the site. It is a Greenfield site.
BA23: Land r/o 26 Hastings Road <i>NOTE: This site been excluded from the Plan because of site availability and deliverability issues.</i>		Site size, in combination with BA31a, is large enough to have traffic impacts. However the A2100 provides routes to both Battle and Hastings which should help distribute new traffic. A large part of the site has trees and vegetation. It is a Greenfield site.
BA23x: see BA31a	N/A	
BA25: Land at Lillybank Farm, London Road <i>NOTE: This site has outline planning permission.</i>		The accompanying Transport Assessment to the planning permission concludes that the new development would have a negligible impact on the local highway network, with the traffic increase being just approximately 3% on London Road during peak hours. Site includes some trees which may have ecology potential. Flood zone 2 and 3 on edge of site and adjacent to some listed buildings.
BA NS116 / BA28: Land North of Loose Farm		The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. The part of the site seen as suitable has limited vegetation and suitable existing access
BA31a See BA23: Reduced Glengorse Housing		Site size, in combination with BA23, is large enough to have traffic impacts. However the A2100 provides routes to both Battle and Hastings which should help distribute new traffic. Site includes some trees which may have ecology potential.
BA36a: Land at Caldbec House, Caldbec Hill		The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. The brownfield part of

		the site has existing suitable access. There is existing vegetation which provides screening for the adjacent listed buildings.
BA40: Land adj to 73 North Trade Road <i>NOTE: This site has outline planning permission.</i>		The outline planning application proposes suitable road access. Site includes some trees which may have ecology potential. BAP Habitat standard pond on west portion of site. It is a greenfield site.
BA NS103: Land to the east of Battle (west of Great Wood) Marley Lane		The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. Site includes some trees which may have ecology potential. Directly adjacent to ancient woodland and Flood Zone 2 and 3 partially on the site.
BA NS108: Land at Chain Lane, Battle between Watchoak House and Stone Cross, Chain Lane <i>NOTE: This site has outline planning permission.</i>		The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. The only access is off Chain Lane which is assumed to be privately owned (according to Battle Town Council). Access to the site would need to be confirmed. Site includes some trees and is very overgrown which may have ecology potential. It is a greenfield site.
BA NS117: Land east of and adjacent to Cherry Gardens Allotments and Mount Street Carpark		The site's only access onto the public highway is Mount Street which may increase traffic due to the proximity to the town centre and one of the main car parks serving the town centre. Situated in close proximity to the high street which has a number of heritage assets along with Little Park Farmhouse (Grade II) and on the edge of the Battle Conservation area. It is a greenfield site.
BA NS118: Land to the SW of Cedarwood Care Home		The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. Listed building adjacent to the site. It is a greenfield site.
NE01: Land south of Darvel Down		The accompanying Transport Assessment to the planning permission concludes that the new development would have a minimal increase in traffic generation on the surrounding road network. Site includes some trees which may have ecology potential and there are TPOs across the site.
NE06: White House Poultry Farm		The Transport Assessment on the adjacent site would indicate that development at this site would also have a minimal increase in traffic generation on the surrounding road network. The site is adjacent to a Listed Building which may require some mitigation.

NOTE: NE05a and NE05r have been omitted from the table. This was originally part of a site combined by AECOM as NE01/NE05a/NE11. The Steering Group took the view that NE05a and NE05r (Swallow Barn) was still suitable for allocation. A commercial decision was made by the developer to only include NE01.

Section 4: Assessment of the policies of the Battle CP NP

- 4.1 All the policies are assessed against the SEA objectives. The main alternatives of the policy areas are:
- No policy and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or
 - The policy either as worded or amended.

In assessing the impacts of the plan and its policies, the following symbols will be used

- + Positive impact
- Negative impact
- = No/negligible impact
- ? Uncertain impact

Table 5: Assessment of the Battle CP NP policies

Objectives 7, 9, 10, 11, 12, 13, 14 and 15 are from the Sustainability Appraisal framework from the RDC screening determination

Proposed Policies	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
Environment								
Policy EN 1: Local Green Space Designations	+	?	+	+	+	+	+	+
Policy EN2: Conservation of the natural environment, ecosystems and biodiversity	+	+	+	+	+	+	+	+
Policy EN3: The High Weald AONB and Countryside Protection	+	+	+	+	+	+	+	+
Policy EN4: Historic Environment	+	+	+	+	+	+	+	+
Policy EN5: Locally important historic buildings, other structures and other non-designated heritage assets	+	+	+	+	+	=	+	+
Economy and Tourism								
Policy ET1: Tourism and Local Economy	+	+	+	=	+	+	+	+
Policy ET2: Sustaining local retail and encouraging employment opportunities	+	+	+	+	=	+	+	+
Policy ET3: Developer Contributions	+	+	+	=	+	+	=	+
Policy ET4: Protection of Assets of Community Value	+	+	?	?	+	+	+	+
Policy ET 5: Community leisure and cultural facilities	+	+	?	?	+	+	+	+

Objective (see preceding page for full NP objectives wording)	7: Improve accessibility to services and facilities for all ages across the District	9: Improve efficiency in land use and encourage the prudent use of natural resources	10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	11: Reduce emissions of greenhouse gases	12: Minimise the risk of flooding and resulting detriment to people	13: Maintain, improve and manage water resources in a sustainable way	14: Conserve and enhance bio-diversity and geo-diversity	15: Protect and enhance the high quality natural and built environment
Housing and Development								
Policy HD1: Development Boundaries	+	+	?	?	+	?	+	+
Policy HD2: Site Allocations	+	=	=	?	+	+	+	+
Policy HD3: Housing mix	+	+	?	?	+	+	+	+
Policy HD4: Quality of Design	+	+	=	=	+	+	+	+
Policy HD5: Protection of landscape character	+	+	+	+	+	+	+	+
Policy HD6: Local Connection	+	+	+	+	+	+	+	+
Policy HD7: Integration of New Housing	+	+	+	+	+	+	+	+
Policy HD8: Protection of the Green Gaps between Settlements	+	+	+	+	+	+	+	+
Policy HD9: Town Centre Boundary	+	+	?	?	+	?	+	+
Infrastructure								
Policy IN1: Traffic mitigation	+	=	+	?	+	?	+	+
Policy IN2: Maintain and improve existing infrastructure	+	+	+	=	+	+	=	+
Policy IN3: Parking and new development	+	+	?	?	+	+	+	+
Policy IN4: Pedestrian provision and safety	+	+	?	?	+	+	+	+

- 4.2 The effects of the Plan and its policies were assessed in respect to the topics identified in the screening, with the reasonable alternatives of having no policy in place and leaving control of development to the policies of the Rother Local Plan and other relevant plans; or the policy either as worded or amended. The plan and its policies would have either positive or neutral effects with the alternative of having no policy having neutral or negative effects on the SEA topics. There are circumstances where it is uncertain of the effects but due to the balance of mainly positive effects, the cumulative is likely to be positive.
- 4.3 Though not having a set of policies and leaving it to the Rother Local Plan would not result in too many detrimental impacts to the environment, the comparison of having the Neighbourhood Plan policies mean there are additional protections and consequently improve the beneficial effects on the Parish.

Section 5: Conclusion

- 5.1 The Battle Civil Parish Neighbourhood Plan was initially exploring the allocation of 18 dwellings for Battle and 23 for Netherfield as allocated by Rother District Council Core Strategy 2014 and as such, it was determined by RDC that an SEA would be required. Due to the status of the Core Strategy, the Plan allocates sites to meet the number it has been required to do, but outlines its reserve site to account for a reasonable uplift. Allocating sites will through its location in the AONB, nature and subject have an impact on the environment and this is assessed through the SEA.
- 5.2 It is not the purpose of the SEA to decide the alternative to be chosen for the Plan or programme. This is the role of the decision-maker who needs to make choices on the Plan or programme to be adopted. The SEA provides information on the relative environmental performance of alternatives, which makes the decision-making process more transparent.
- 5.3 In terms of the formulation of the Plan there was only one main element where alternatives applied. For the majority of the content of the plan there were no 'reasonable' alternatives, apart from not having a neighbourhood Plan and leaving development of the Parish to the development plan and any other document of relevance.
- 5.4 The main area where there were alternatives related to housing. The alternative approach towards the housing number was either not allocating any sites or providing more. If it allocated no sites then it would not meet the basic requirement of being in conformity with a higher tier plan, so not 'reasonable'. The Core Strategy outlines this is the amount that is possible to be delivered in the plan period using the SHLAA 2013.
- 5.5 The alternative to the sites that have been allocated within the Battle CP NP would have been the selection of different sites. The Housing and Development policies will therefore have a general positive impact.
- 5.6 The combined effect of the policies in the Plan will mainly relate to the protection of the natural environment and heritage, and will result in efficient use of land and natural resources.
- 5.7 The Environment, the Infrastructure and the Economy and Tourism policies of the Plan will have the greatest effect on heritage assets and the High Weald AONB. They will provide additional protection to assets/businesses that have been identified as important to the community and the existing town. In the majority of instances, direct impacts are not expected but there will be indirect impacts, although this does not lessen the effect. The greatest impacts tend to be largely focused on accessibility and actions that may cause a difference in forms of travel. However, the benefits to the community on retaining existing business outweigh this impact on a sustainability value. The combined impact of the Infrastructure and Economy and Tourism policies will have a positive effect on provision of services, increasing accessibility and other specific parts of the environment.
- 5.8 Although the overall impacts on the environment are largely positive, there will be no worsening of existing issues connected with the environment and for a significant number will result in positive impacts to the environment from the adoption and implementation of all the

policies contained within the plan. The Environment policies seeks to preserve and enhance the environment and will have a general positive effect.

- 5.9 Without the Battle CP NP, whilst there would be controls exercised by the NPPF, Local Plan and DaSA policies, there would be no Parish specific control over the impacts therefore the Plan has a positive impact generally. The contents of the Battle CP NP ensures that those aspects of specific relevance to the town and Parish are recognised and addressed as well as helping to contain impacts to a smaller spatial area.
- 5.10 SEA guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the plan. Where practical this report identifies the likely impacts each policy has on achieving the framework set out. It therefore concludes that the policies of the Battle CP NP will have a positive impact on the environment.

Summary of the likely effects of the preferred Plan

Table 6: Summary table of the effects of the Plan assessed against the SEA objectives

SEA Topic	Effects of the Battle CP NP over time	Can the effect be measured?	Comment
7: Improve accessibility to services and facilities for all ages across the District	Positive	Yes- Census Annual Monitoring Report (AMR) CIL monitoring	The Plan provides opportunities for accessibility as far as constraints will allow
9: Improve efficiency in land use and encourage the prudent use of natural resources	Positive	AMR	The Plan promotes efficient use of land as far as constraints will allow and allocates housing sites
10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Minor positive	Yes-Census data Travel Plan monitoring Air quality data CIL Data	The Plan provides opportunities to reduce reliance on car and promote other travel options
11: Reduce emissions of greenhouse gases	Minor positive	RDC data	Landscape, design and access policies support reduction in carbon emission
12: Minimise the risk of flooding and resulting detriment to people and	Positive	Flood events and surface water flooding Planning application and SUDS provision	The use of SUDS and design to reduce consumption will help meet this objective
13: Maintain, improve and manage water resources in a sustainable way	Minor Positive	SUDS provision and environmental agency data Water consumption data	The use of SUDS and design to reduce consumption will help meet this objective
14: Conserve and enhance bio-diversity and geo-diversity	Positive	Natural England	The ecology led nature of the plan will protect existing habitat and seek to deliver positive gains in all parts of development.
15: Protect and enhance the high quality natural and built environment	Positive	Landscape assessments	The policies will protect the landscape value of the Parish and ensure development protects the identified character of the Parish

Next stage

- 5.11 The SEA has been updated following the Pre-submission consultation to reflect the changes necessary to address comments made at this consultation stage.
- 5.12 The Plan Proposal Submission of the Battle CP NP will be submitted to Rother District Council along with the SEA. Rother District Council will consider whether the Plan is suitable to go forward to an Independent Examination. The Examiner will consider whether the Plan is appropriate in having regard to national policy and whether it is in general conformity with the Rother Local Plan.
- 5.13 Should the examination be successful; it will be recommended to be put to a local referendum. The SEA report may need to be updated should the Plan be modified as per the Examiner's report. If the Plan goes to referendum and more than 50% of those who vote agree with the Plan, then it will be 'made' (adopted) by Rother District Council.
- 5.14 The final stage will be the post adoption statement that will be issued when the Plan is 'made'. This will summarise the process and how impacts to the environment have been taken into account and will be produced by Rother District Council.
- 5.15 The 'made' Plan will be monitored by the Parish and the District having regard to the SEA indicators set out in the District council's Annual Monitoring Report (AMR).

Appendix 1: Screening determination

Your ref:
Our ref: 6.3a BNP
Please ask Frank Rallings
for:
Direct dial no: 01424 787634
Date: 11 March 2019

Donna Moles Consultancy
moles.consultancy@gmail.com
by email

Dr Anthony Leonard
Executive Director

Town Hall
Bexhill-on-Sea
East Sussex TN39 3JX

Dear Donna

SEA Screening for the Battle Neighbourhood Plan

Further to your request for an SEA screening opinion I have now received the comments of the Statutory Environmental Bodies (SEB's) which are as stated below :

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment (SEA) screening opinion

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at:

<http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans>

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

7

Historic England

Thank you for consulting Historic England on the requested screening opinion for SEA of the Battle Neighbourhood Plan. We are pleased to see positive elements of plan making already emerging, including the character assessment document among the supporting information that you have supplied.



We note that the steering group have already undertaken some review of potential housing sites and have established a short list. Given the plan area's importance for its historic environment and the density of heritage assets (including larger designated assets such as the Conservation Area and Registered Battlefield, which are likely to have extensive settings, we suggest that allocating sites for development that have not otherwise been assessed for a higher level or equivalent plan document, such as the Local Plan, has potential for likely significant environmental effects, depending on the locations of those sites and their relationship with heritage assets (including non-designated assets and previously unidentified assets). As such, unless it is demonstrable that none of the sites assessed as potential allocation sites would have impacts that merit assessment (including where their allocation might be suitable subject to mitigation), we feel that SEA of the plan should be required.

To determine the likely effects of the plan and any mitigation measures that may be required, it may be necessary for any assessment of potential allocation options to include consideration of sites that have already been rejected where there is any reasonable potential of their being considered for allocation.

We would be pleased to advise on any potential sustainability objectives that should be considered, but given Battle's particular historic significance we would suggest that whilst it may be suitable to include one or more general objectives to consider the plan area's designated and non-designated heritage assets according to their significance, it would also be appropriate to include separate objectives to focus attention on the need to conserve and enhance the heritage significance of the registered battlefield and listed and scheduled abbey complex. It would also be helpful to consider whether an objective should be identified to manage potential conflict between the promotion and enjoyment of the town's heritage as an asset attracting visitors and its continuing conservation and the character and amenity of the town as a whole - sorry this is a bit of a mouthful - It might be helpful to discuss with you and the steering group whether there are any perceived conflicts in the town in this area.

Please don't hesitate to contact me if you have any queries

Yours sincerely

Rob Lloyd-Sweet

Rob Lloyd-Sweet | Historic Places Adviser | South East England | Historic England
Mobile: 07825 907288

Eastgate Court | 195 – 205 High Street | Guildford | Surrey | GU1 3EH

Environment Agency

We have no comments to make at this stage from a planning point of view but are happy to respond at the scoping stage under our discretionary planning advice service.



Neighbourhood Planning –National Planning Practice Guidance

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

In the opinion of the Local Planning Authority, an SEA should be undertaken for the Battle Neighbourhood Plan (BNP). I have set out the reasoning below in relation to the criteria for determining the likely significance of effects, as contained in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

1. The BNP will allocate sites and form part of the 'development plan' and thereby exert a direct and substantial influence over development proposals coming forward in the period.
2. As regards the characteristics of the area covered by the BNP (as set out in Schedule 1(2) of the regulations), I note particularly that:
 - a) the area is wholly within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty;
 - b) Battle is an historic town containing the Abbey and the 1066 Battlefield, a Conservation Area, and many listed buildings along with Ancient Monuments, Parks & Gardens of Special Historic Interest, Archaeological Notification Areas and Archaeologically Sensitive Areas located within the town and its environs;
 - c) Within the rural part of Battle parish there are different components of the AONB including Ancient Woodlands, SSSI's, Local Wildlife Sites (SNCI's) and certain BAP habitats, along with areas liable to flooding.

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

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



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

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

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

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

Yours sincerely,



Frank Rallings DipTP(Nottm) FRTPI
Neighbourhood Planning Liaison Consultant
Strategy & Planning Service
Rother District Council



Appendix 2: Relevant Plans & Programmes

Title	Date
International	
European Landscape Convention	2004
European Strategy on Sustainable Development	2001 and 2009 Update
EU Seventh Environmental Action Plan to 2020	2013
European Communities Directive on the Conservation of Wild Birds. Directive 2009/147/EC (this is the codified version of Directive 79/409/EEC as amended)	2009
EC Council Directive on the Conservation of Habitats and of Wild Fauna and Flora 92/43/EEC	1992
The Landfill Directive (1999/31/EC)	1999
EU COM (2002) 581 final: Proposal for a Directive concerning the quality of bathing water	2002
EU Water Framework Directive (2000/60/EC)	2000
EU Air Quality Directive - Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	2008
National	
National 'Planning Practice Guidance' (PPG)	2018
National Planning Policy Framework	2018
Department of Health 'White Paper - Healthy Lives, Healthy People'	2010
The Conservation of Habitats and Species Regulations 2010 (Chapter 8 covers Land Use Plans)	2010
Town and Country Planning Act 1990	1990
Planning and Compulsory Purchase Acts 2004 and 2008	2004 & 2008
DEFRA Sustainable Development Strategy 'Foundations of our Future'	2002
DfT 'Towards a Sustainable Transport System: Supporting economic Growth in a Low Carbon Economy'	2007
Planning (Listed Buildings and Conservation Areas) Act	1990
White Paper Heritage Protection for the 21st Century	2007
DCMS 'The Historic Environment: a Force for Our Future'	2001
DEFRA 'Future Water: The Government's Water Strategy for England	2008
ODPM 'The Planning response to Climate Change: advice on better practice'	2004
DEFRA 'Climate Change Act'	2008
The Air Quality (England) Regulations 2000 and 2002 Amendment	2000 & 2002
DEFRA 'Air Quality Strategy for England, Scotland, Wales and NI'	2011
DfT 'Delivering a Sustainable Transport System'	2008
Wildlife and Countryside Act 1981 (as amended)	1981
Biodiversity: UK Action Plan	
DEFRA Securing the future: delivering UK sustainable development strategy	2005
UK Climate Change Programme	2006
Countryside and Rights of Way Act (CROW)	2000
Making space for water Taking forward a new Government strategy for flood and coastal erosion risk management in England	2005
Safeguarding our soils: A Strategy for England Defra	2009
The Flood and Water Management Act 2010 HMSO	2010

Department for Transport Guidance on Accessibility Planning in Local Transport Plans	2004
Department for Transport Delivering a Sustainable Transport System	2008
Department for Transport Active Travel Strategy	2010
DEFRA Noise Policy Statement for England	2010
Energy Act	2008
DECC UK Renewable Energy Strategy	2009
CLG & DfT 'Manual for Streets 1 & 2'	2007
Environmental Protection Act	1990
Ministry of State for Environment and Agri-Environment 'Nottingham Declaration on Climate Change'	2000
Conservation (Natural Habitats &c) Regulations	2010
Natural Environment and Rural Communities Act	2006
DEFRA Natural Environment White Paper Defra	2011
Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Working Together for Clean Air	2011
CLG 'Code for Sustainable Homes': Setting the Sustainability Standards for New Homes and accompanying Technical Guidance - November 2010	2008 & 2010
County	
Pride of Place – a Community Strategy for East Sussex	2003
ESCC, SDNPA and B&HCC 'Waste and Minerals Local Plan for East Sussex'	2013
Southern Water 'Water Resource Management Plan 2015-2040'	2014
South East Water 'Water Resource Management Plan 2015-2040'	2014
South East River Basin Management Plan and Actions	
NHS East Sussex Downs & Weald 'Investing in Life'	2009
East Sussex Downs & Weald PCT, Hastings & Rother PCT 'Reducing Health Inequalities in East Sussex'	2010
Sussex Biodiversity Opportunity Areas	2009
Environment Agency Catchment Flood Management Plan: Rother and Romney	2013
ESCC 'Strategic Open Space Study'	2011
East Sussex 'Green Infrastructure Study'	2014
East Sussex Environment Strategy Group 'East Sussex Environment Strategy'	2011
High Weald AONB Joint Advisory Committee 'The High Weald AONB Management Plan (2014-19)'	2014
Environment Agency 'River Basin Management Plan South East River Basin District	2009
East Sussex Landscape Character Assessment	2010
Local/District	
Rother District Core Strategy	2011
Rother District Core Strategy 'Equalities Impact Assessment'	2011
Neighbouring Neighbourhood Plans	
Rother Community Plan	2014
Rother Economic Regeneration Strategy	
Rother Cultural and Leisure Strategy	
Rother District Council Housing Strategy	