

***Sustainability  
Appraisal (SA)  
Report***

***January 2015***

***Ashurst Wood  
Neighbourhood Plan***

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# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake a Sustainability Appraisal (SA) of the emerging Ashurst Wood Neighbourhood Plan.
- 1.1.2 The Neighbourhood Plan is being prepared by Ashurst Parish Council using the powers in the Localism Act 2011. The Neighbourhood Plan area is the civil parish of Ashurst Wood. This area was formally designated by the local planning authority, Mid Sussex District Council (MSDC), on 9th July 2012.
- 1.1.3 The Neighbourhood Plan (NP), once 'made', will present planning policy and guidance for the neighbourhood area. Alongside the MSDC Local Plan (2004) and the District Plan (once adopted), it will provide a framework for determining planning applications.

## 1.2 SA explained

- 1.2.1 SA is a mechanism for considering and communicating the likely significant effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse sustainability effects and maximising the positives. The SA process reflects the requirements of the Strategic Environmental Assessment (SEA) Directive and transposing regulations.<sup>1</sup> SEA of this NP is a legal requirement.<sup>2</sup>
- 1.2.2 In-line with the SEA Regulations, a report (the 'SA Report' in this instance) must be published for consultation alongside the draft plan. The SA Report must present information on the likely significant effects of implementing the plan and reasonable alternatives, as well as certain other specified information. The report must then be taken into account, alongside consultation responses, when finalising the plan.<sup>3</sup> **Consultation questions** can be found in Appendix 3.

## 1.3 Structure of the SA Report

- 1.3.1 This document is the SA Report for the Ashurst Wood NP and hence must provide certain specified information. Essentially, there is a need to answer four questions:
1. What's the scope of the SA?
    - Parameters for the SA were established through 'scoping' work at the outset of the process. Scoping involves: review of the sustainability context and baseline; analysis of key sustainability issues / objectives; and consultation with designated agencies.
  2. What has plan-making / SA involved up to this point?
    - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration. 'Reasonable alternatives' must have been appraised.
  3. What are the SA findings at this stage?
    - i.e. in relation to the draft plan.
  4. What happens next (including monitoring)?
- 1.3.2 Each of these questions is addressed in turn within this report. **Table 1** explains more about the regulatory basis for answering these questions.

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<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>2</sup> SEA is not an automatic requirement for NDPs, but is a requirement where an NDP is 'screened-in' at the outset on the basis that there is the potential for significant environmental effects.

<sup>3</sup> Schedule 2 of the Regulations lists the information that must be presented in the Environmental Report.

**Table 1:** Questions answered by the SA Report, in-line with Regulatory requirements.

<i>SA Report question</i>	<i>In line with Regulations the report must include...</i>	
What's the scope of the SA?	What's the plan seeking to achieve? <hr/>	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	Relevant sustainability protection objectives, established at international or national level  Any existing sustainability problems which are relevant to the plan including those relating to any areas of a particular sustainability importance
	What's the sustainability 'baseline'?	Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan  The sustainability characteristics of areas likely to be significantly affected  Any existing sustainability problems which are relevant to the plan including those relating to any areas of a particular sustainability importance
	What are the key issues & objectives that should be a focus?	Key sustainability problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) appraisal
What has plan-making / SA involved up to this point?		Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)  The likely significant effects associated with <b>alternatives</b>
		Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal / a description of how sustainability objectives and considerations are reflected in the draft plan
What are the SA findings at this current stage?		The likely significant effects associated with <b>the draft plan</b>
		The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing <b>the draft plan</b>
What happens next?		A description of the monitoring measures envisaged

N.B. The right-hand column of Table 1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix 1** of this report.

*What is the scope of the SA?*

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## 2 What is the scope of the SA?

### 2.1 Introduction

2.1.1 This chapter of the report introduces the reader to the scope of the SA. In particular, and as required by the Regulations, this chapter answers the series of questions below.

- What's the plan seeking to achieve?
- What's the sustainability 'context' / 'baseline'?
- What are the key issues and objectives that should be a focus of SA?

#### Consultation on the scope

2.1.2 The SEA Regulations require that *"When deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.<sup>4</sup> As such, these authorities were consulted on the SEA scope for seven weeks (between the 9<sup>th</sup> December 2013 and the 28<sup>th</sup> January 2015). A summary of comments received is presented in **Table 2** below. These comments have been taken into account.

**Table 2:** Comments received on the SEA scope

<i>Organisation<sup>5</sup></i>	<i>Comment</i>	<i>Response</i>
Environment Agency	<p>The EA is pleased to see that objectives have been included to protect and enhance the environment.</p> <p>Indicators should relate to the environmental constraints in the local area and may include flood risk, water quality, biodiversity.</p> <p>SA should take account of relevant policies, plans and strategies, including local Strategic Flood Risk Assessment, flood risk strategies and South East River Basin Management Plan.</p> <p>Take into account joint advice on neighbourhood planning, published together with Natural England, English Heritage and the Forestry Commission at <a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a></p>	<p>Noted</p> <p>Objectives 4/Env and 6/Env cover the matters mentioned. There is no flood risk in Ashurst Wood.</p> <p>Context messages have fed into the SA process. The Parish Council has reviewed the South East River Basin Management Plan - Ashurst Wood is north of the area covered by the management plan.</p> <p>Ashurst Wood Parish Council requested a desktop Report from the Sussex Biodiversity Records Office.</p>
Natural England	<p>Welcomes consideration of the impact of proposals on the Ashdown Forest SPA. SA should also consider the possibility of impacts on nearby SSSIs.</p>	<p>4/Env refers to SSSI and the likely significant effects of the NP on the SSSI have been identified in this report.</p>

<sup>4</sup> In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

<sup>5</sup> Note that no response was received from English Heritage



<i>Organisation<sup>5</sup></i>	<i>Comment</i>	<i>Response</i>
	<p>Natural England supports the Sustainability Objectives and Indicators. Natural England will need to look at future planning permissions and refusals to monitor the success in delivering objectives, especially 2, 3 and 4.</p> <p>Natural England sent a plan showing the scale of ancient woodland in and around the parish.</p>	<p>Noted</p> <p>See Figure 2.</p>
High Weald AONB Unit	Notes reference to AONB in the text and objectives and to the Management Plan in the appendix. No further comments.	Noted
Forest Row Parish Council	<p>A very interesting and comprehensive document.</p> <p>Suggest more information about the cycle route mentioned in section 5.</p> <p>Felt Ivy Dene Industrial Estate should be mentioned in more detail.</p> <p>Notes that there is nothing in document about Forest Row. There is a need to keep a strategic gap between Ashurst Wood and Forest Row as well as AW and East Grinstead. There are close links between the two villages, including the link between the two churches and the inclusion of AW residents in FR activities including hospital transport service.</p>	There is no defined strategic gap between Ashurst Wood and Forest Wood. The NP is not an appropriate vehicle for implementing a strategic gap.

## 2.2 What is the plan seeking to achieve?

The Environmental Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

2.2.1 The purpose of the Ashurst Wood NP is to provide a locally specific and long-term plan for the area that is in accordance with the wishes of those living and working in the area, while recognising the need for sustainable development.

2.2.2 The draft plan's vision for the area is that development in Ashurst Wood would "...preserve and protect Ashurst Wood's characteristics as a rural village, while at the same time ensuring that it remains a vibrant, safe, and welcoming community, and an attractive location for people to live."

2.2.3 More specifically, the NP will address the following areas:

- Countryside and the Environment:
  - To protect and respect the landscape, wildlife and countryside of the Parish, and cherish its natural beauty
  - To minimise the impact of any future development on the landscape and scenic beauty of the AONB
  - To ensure Ashurst Wood remains a village and avoid coalescence with East Grinstead
  - To recognise the importance of the Ashdown Forest SPA and SAC.
- Housing:
  - To ensure an appropriate mix of housing for local needs, including affordable housing
  - To identify specific sites for housing to help meet local needs.
- Local Economy:
  - To support local business and retain local employment
  - To encourage new business and employment opportunities into the area
- Highways, Transport and Communications:
  - To improve safety for all highway users, including pedestrians, cyclists and horse-riders
  - To promote and support public transport, and travel by foot, cycle and horse
  - To continue to support community transport initiatives.

### [Relationship with Mid Sussex District Council's Local plan](#)

2.2.4 The local planning authority for the area is Mid Sussex District Council (MSDC) and the relevant Plan is currently the Mid Sussex Local Plan 2004; however, MSDC is in the process of preparing a new District Plan. A draft Plan was withdrawn in May 2014 and a new draft was published for consultation in October 2014. The new draft plan carries some weight.

2.2.5 It is also important to note that because Ashurst Wood lies within the High Weald Area of Outstanding Natural Beauty (AONB), the High Weald AONB Management Plan (2014) sets a framework for the NP.

### [What is the plan not looking to achieve?](#)

2.2.6 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application / development management process). The strategic nature of the plan is reflected in the scope of the SEA.

## 2.3 What is the sustainability context / baseline?

The Environmental Report must include...

- The relevant sustainability objectives, established at international / national level;
- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan’;
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

### Introduction

2.3.1 An important step when seeking to establish the appropriate scope of an SEA is reviewing context messages in relation to broad problems / issues and objectives (‘the sustainability context’) and exploring more about sustainability issues that are apparent locally at the current time or are likely to emerge in the future (‘the sustainability baseline’). In-light of context/baseline review, key issues for the plan are summarised below under a series of topic headings (with more detailed information available within the SEA Scoping Report).

### Nature conservation, geology and landscape

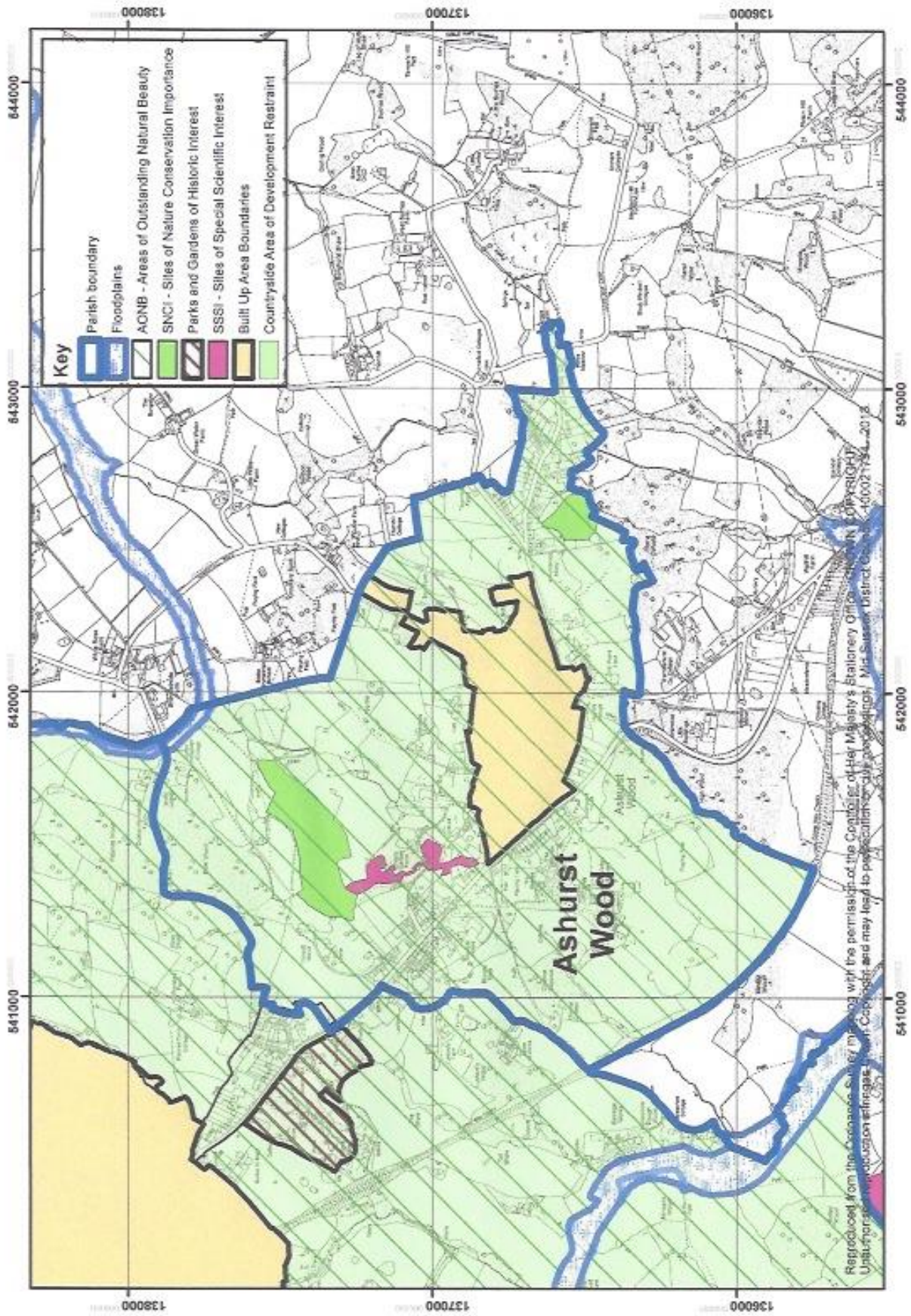
2.3.2 There is a rich and varied pattern of habitats, species and biodiversity, recognised by the extensive and varied landscape and nature conservation designations that cover land within the parish. The parish of Ashurst Wood is located within the High Weald **Area of Outstanding Natural Beauty** (AONB), which was designated in 1983.

2.3.3 The parish is made up of large areas of open spaces, with farmland, ancient woodland, and park areas, and one **Site of Special Scientific Interest** (SSSI) at Mills Rocks. The Ashdown Forest SPA is also nearby. The Neighbourhood Area also includes two Sites of Nature Conservation Importance (SNCI). **Figure 1** sets out some of the nature conservation constraints in the area. **Figure 2** shows the extent of Ancient Woodland in and around the parish.

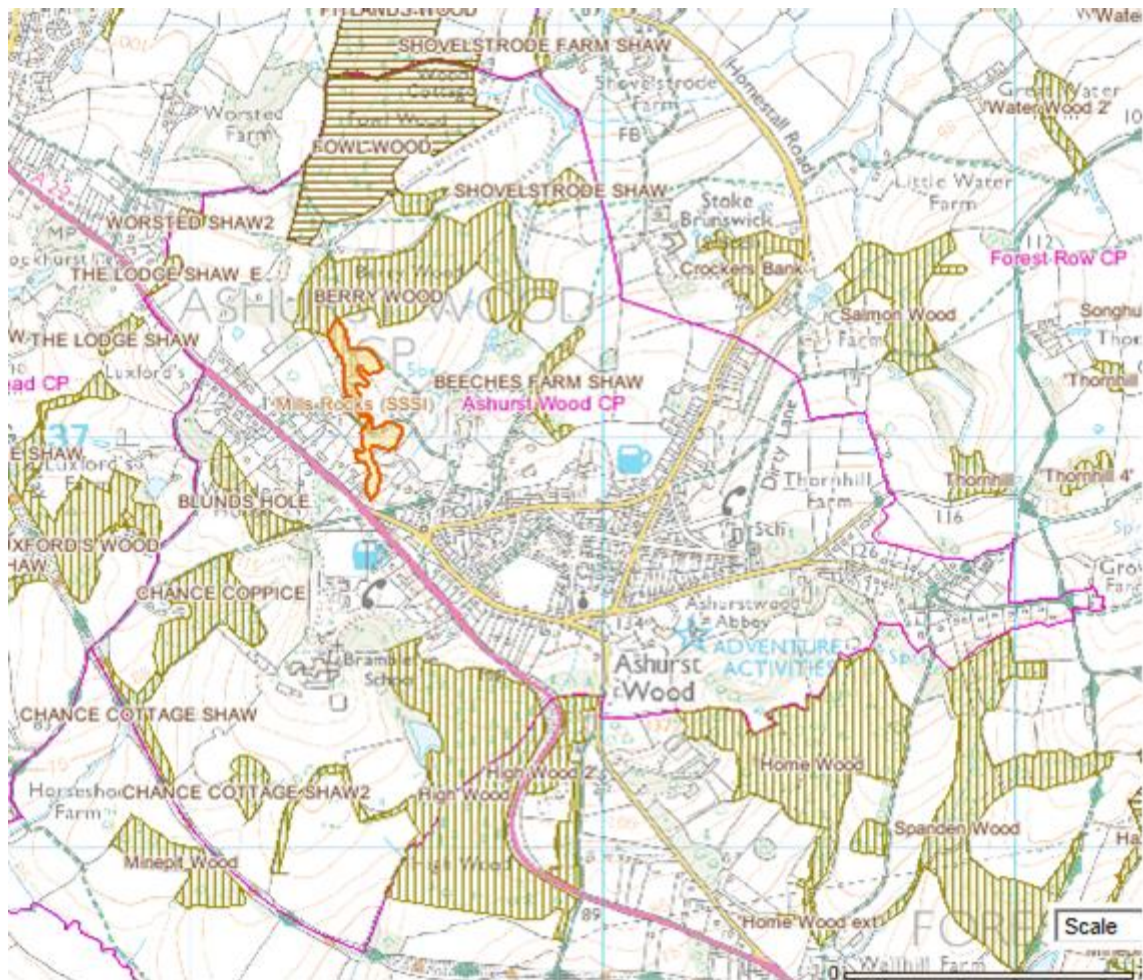
2.3.4 The High Weald countryside gets its ridges, valleys and rolling landscape from the underlying bands of sandstone and clay. The landform consists of plateau, ridges and valleys, deeply dissected with narrow, steep sided valleys. The junction between the permeable sand and impermeable clay is marked by the presence of seepage lines and springs/streams in wooded areas which support **rare and unique flora and fauna**. These are called ghyll springs/streams, a traditional Sussex term of the High Weald.

2.3.5 The geology of the parish largely comprises Tunbridge Wells sand and Wadhurst clay. Mills Rocks has one of the few outcrops of Tunbridge Wells Sandstone in the county, with a community of ‘Atlantic’ plants. This community is unusual and supports several rare plants with a restricted distribution. Particularly notable is reed fescue grass *Festuca altissima* which has only one other southern English locality and occurs sparsely elsewhere in Britain. The hay-scented buckler fern *Dryopteris aemula* also grows on the rocks and the rich bryophyte flora (mosses and liverworts) includes *Odontoschisma denudatum*, *Cephalozia connivens* and *Calypogeia neesiana var meylanii*.

2.3.6 Ashurst Wood is situated on a prominent ridge 400 feet (122 m) above sea level. The elevation location of the village is defined by an **attractive countryside setting**, being surrounded on all sides by high quality landscape. There are many attractive views looking out from the village, towards the village, and from local rights of way, with extensive views reaching as far as the North Downs to the north, and across the Ashdown Forest to the south. There is also easy **access** to open countryside via the local network of footpaths, which includes the Vanguard Way and the High Weald Landscape Trail. The footpaths also link up with the Sustrans road traffic free cycle path that runs along the old railway line, and links East Grinstead to Groombridge, as well as the Weir Wood Reservoir to the south, which is a Local Nature Reserve.



**Figure 1:** Nature conservation designations.



**Figure 2:** Ancient woodland in and around the parish (Source: Natural England)

### Heritage

- 2.3.7 The earliest and only pre-historic fact known about Ashurst Wood is that the Lewes Road - Hammerwood Road - Cansiron Lane route has been a ridge-way track for animals and humans for at least 5,000 years.
- 2.3.8 Although not mentioned in the Domesday Book of 1086, by that time the area had been settled to the extent that there was a substantial farm group on either side of Ashurst Wood. To the south-west the demesne farm at Brambletye consisted of one large farm, 14 small holdings, a mill and a priest. While at Shovelstroe to the north, there was a demesne farm, one large farm and three small holdings. A farm track ran between the two groups and is still in use today.
- 2.3.9 Both areas have had some importance as iron-working sites during the Roman occupation in the 1<sup>st</sup> and 2<sup>nd</sup> centuries AD. Brambletye's origins date back to the Mesolithic Age, as many flint flakes and implements have been found on both sides of the river Medway, around Brambletye Manor.
- 2.3.10 The first mention of Ashurst Wood was in 1164 as the 'foresta de Esseherst'. This was the Norman version of its Saxon name 'aesc hyrst', meaning simply 'ash wood'. In 1189 it was described as the 'boscum de Aisherst', the 'wood of Ashwood'. In 1248 it had become 'Askhurst' and by 1279 it was 'Escheherst'. From then on its name stayed much the same but with the addition of the 'wood'.
- 2.3.11 By the mid-16<sup>th</sup> century, farming in Ashurst Wood was more prosperous. Rents, in the form of Manorial dues had been frozen since the Middle Ages, and prices of corn and livestock were rising. Farmers also benefited from the increased demand for timber for house and ship building. Local townsmen were also profiting from markets, iron-working and tanning.

- 2.3.12 At the same time, coinciding with greater individual wealth, the 'Great Rebuilding' began transforming the housing stock of England around 1570 - 1640. In Ashurst Wood this started with great houses such as Brooklands and Great Surries around 1550, and continued with Little Water, Little Surries, Pock Hill (now Blackberry Farm), Grove Farm, Luxfords and Owletts (now demolished), ending in the middle 1600's with Little Beeches and Fir Tree Cottage.
- 2.3.13 In the 19<sup>th</sup> century Ashurst Wood was still mainly an agricultural village. Scattered cottages situated on the ancient road and trackway network, and hardly changed to the present day, housed the labourers who worked in the large farms surrounding the village and other businesses, as well as a few tradesmen including a grocer, carpenter, and bricklayer.
- 2.3.14 The first railway arrived in East Grinstead in 1855, from the London-Brighton main line, and in 1884 the direct line to London via Oxted opened. East Grinstead was now so accessible from London that increasing numbers of the wealthier people bought or built family houses in the area. The railways also radically changed local farming from beef for sale and enough arable to feed the human and animal population of the farm, to dairy and even poultry which could be sent by rail early and quickly to London.
- 2.3.15 Ivy Dene Laundry was founded in the village in the early 20<sup>th</sup> century and, with its manual and labour intensive work, soon became a significant local employer. By the 1970s most of the laundry's work came from large contracts with hospitals and hotels. The business closed in 1982, partly a result of a change in laundry services procurement policy in the NHS.
- 2.3.16 In the 19<sup>th</sup> and early 20<sup>th</sup> century most cottages had gardens (carved out of the Common) which were large enough to grow all their vegetables and to keep chickens and a pig. With long working hours, low wages, and public transport, leisure activities were largely confined to the village. There were, and remain, two public houses (The Three Crowns and the Maypole). There were also two churches - Congregational (founded 1859) and the Mission Room (subsequently upgraded to St Dunstan's) built in 1884 by Donald Larnach Nevill of Brambletye for the Estate. This was converted to a house (Rockaway House, Lewes Road) in 1979 when St Dunstan's Church moved to its present site in Hammerwood Road in 1979 after the Congregational Church was forced to close.
- 2.3.17 Sport was another popular leisure activity. A cricket ground now occupied by Wray Close was mentioned in the 1842 Tithe Schedule for Ashurst Wood; and the Larnach Institute Football Club (named after its headquarters in Hammerwood Road) was formed in 1919. The club was re-formed in 1920 and joined the East Grinstead and District Junior League. The Club still plays in the Mid Sussex League and has a flourishing junior section, both playing at the recreation ground. Stoolball and Badminton have also flourished in the village over the years.
- 2.3.18 Three day schools were recorded as being in the village as long ago as 1818. However, the Ashurst Wood Day School, as the Primary School was originally known, was originally located in the "Old Schools" in Hammerwood Road in 1873. The school moved to its present site in 1910. The original building was much smaller than it is today. It was enlarged after each of the two World Wars. There have also been more recent extensions – a hall was provided in 1990, an extension linking this to the main entrance in 1993-4 and two classrooms replacing the last of the temporary classrooms, new toilets, a library and a group room in 2009.

### [Air and climate](#)

- 2.3.19 Air quality in Ashurst Wood is generally good and there are **no Air Quality Management Areas (AQMA)** in or near the parish. The main potential sources of atmospheric pollution arise from the proximity of **Gatwick Airport**, and the busy **A22 major road** that passes through the parish. The climate of the parish is described as a local variant of the British sub oceanic climate.

## Water

2.3.20 Water is supplied to the parish by South East Water. Most of the water (75%) comes from underground aquifers; the rest comes from the reservoirs at Ardingly and Arlington or from neighbouring water companies. The specific source of the supply can vary as the Company moves water around the region depending on levels of supply. The Company has a duty to supply new developments with water, and has a 25 year Water Resources Management Plan (WRMP). Periods of low rainfall can lead to pressure on supplies. The wider region was subject to a hosepipe ban between April and July 2012.

## Human characteristics

2.3.21 The Civil Parish of Ashurst Wood is predominantly a rural area, focused on the village settlement of Ashurst Wood, which has a formally defined village built-up area. The parish also extends along the A22 road towards East Grinstead, as far as Luxfords Lane and Hectors Lane, along Wall Hill Road towards Forest Row, as far as John Pears Field, and along Maypole Road, towards the A264 East Grinstead to Tunbridge Wells Road, as far as the West Sussex boundary. The majority of the population and dwellings are located in the main village to the north of the A22.

2.3.22 Ashurst Wood is not a deprived area when measured against national statistics. However, there are some members of the community, including the elderly and those who live alone, who do not enjoy the same level of prosperity as the wider population. The population of the parish was 1833 at the date of the Census in 2011 (1.31% of the total Mid Sussex population). In terms of age, the highest proportion of villagers (412) fall within the census age range age 45 to 59. Over 60% of villagers are aged 30 or above. This indicates an age profile that is somewhat out of balance.

2.3.23 Ashurst Wood is a popular place for families to live – given high quality countryside and ease of access to employment areas such as at Gatwick, Crawley, Tunbridge Wells, Brighton and London – and this is reflected in relatively high property prices locally.

2.3.24 Of the 723 dwellings in Ashurst Wood parish in 2011, 79% were owner occupied (not including part owned/part rented), compared to 74.3% of dwellings in Mid Sussex; 59 (8.16%) dwellings were social rented housing, compared to 10.6% in Mid Sussex and 13.7% in the South East; 74 (10.23%) were privately rented, compared to 12.75% in Mid Sussex and 16.27% in the South East. 40.5% of households lived in detached houses (compared to 34.8% across West Sussex and 28% across the whole of the South East). There were 191 households in the parish (more than 25%) comprising of just one person in 2011. In 2014, 12 new affordable homes for local people were built on a rural exception site.

2.3.25 Nursery, preschool and primary education is available in the village. Ashurst Wood Primary School currently provides schooling for 110 children. Numbers have grown since 2009, when there were 101 children on the roll; however in 2000 there were over 130 children at the school. The Ashurst Wood Community Pre-School is run by a committee, with space for around 24 children. Brambletye School is an independent day and boarding preparatory for children from nursery to age 13; whilst state secondary schooling is provided at Sackville School and Imberhorne School in nearby East Grinstead, and also in Chailey, East Sussex.

## Roads and transport

2.3.26 Ashurst Wood Parish is bisected by the A22 Lewes Road, with a proportion of village dwellings lying directly adjacent to the A22. This road suffers from high volumes of traffic, being the London to Eastbourne road, and the main north to south route across the Ashdown Forest. There are adverse effects for the local environment, particularly as a result of heavy goods vehicles. The speed of traffic on the A22 has also been an issue, and a 30mph limit introduced in 2007 applies to the section of the A22 that passes through the parish.

- 2.3.27 Plans to construct a by-pass for East Grinstead are also relevant to traffic concerns, as one proposed route for the by-pass connected with the A22 in Ashurst Wood. While plans for a by-pass have been shelved, East Grinstead has sought a by-pass for many decades, and such plans may well be revisited.
- 2.3.28 Speeding and pedestrian safety have long been a worry in the village. This was identified as an issue of concern in the Ashurst Wood Village Plan 2007, when 77% of respondents considered driving at inappropriate speed and inconsiderate driving on village roads was a problem. Narrow roads, lack of pavements, and on street parking accentuate the problems. Lack of pavements at the top of Wall Hill, and by the War Memorial, are a particular concern regarding pedestrian safety. 'Rat running' is also an issue - particularly along Maypole Road, parts of Hammerwood Road, Park Lane and Woods Hill Lane – with implications for pedestrian safety.
- 2.3.29 The nature of some of the residential roads and pavements in the village also means that parking is an issue. In the Ashurst Wood Village Plan 2007, 73% of respondents considered parking a problem. There is insufficient parking, both for residents, and for people visiting the village for events, such as football on the recreation ground. Areas identified as problem areas included School Lane, the village hall and shop, Maypole Road, Hammerwood Road and Woods Hill Lane.
- 2.3.30 The village is served by direct bus routes to East Grinstead, Tunbridge Wells, Crawley, Uckfield and Haywards Heath/Brighton, and the nearest railway stations are at East Grinstead (to London) and Three Bridges in Crawley (to Brighton). The daytime frequency of buses is reasonable but connections to train services at East Grinstead are not always reliable. The bus service is less good at other times, such as evenings and early mornings, and there is a very limited Sunday service to Tunbridge Wells and Crawley only. Most journeys are operated without support from any of the three County Councils involved, and they remain under review and potential threat.

### Infrastructure

- 2.3.31 Ashurst Wood is well served with two recreation grounds. John Pears Field was donated to the village in 1970 by Mrs Molly Pears as a memorial to her husband, to be used as a village meeting place and recreation area, and has two tennis courts and a children's playground. The recreation ground in Hammerwood Road is the main sports area, with a football pitch, a small sports pavilion and a children's playground. There are several community spaces that can be hired by local groups and residents, including the Village Centre, the John Pears Pavilion at John Pears Field, and a hall at St Dunstan's Church. There is also a weekly community café.
- 2.3.32 Village services include a post office/news store, a larger village shop, two public houses, a hairdresser, a vehicle servicing garage, a blacksmiths/forge, butchers, mobile library (monthly), mobile waste amenity service. The NP residents' survey showed support for the provision of allotments (over 100 respondents), to replace those previously on the site of the Primary School playing field. There is one Church of England Church in Ashurst Wood, St Dunstan's. The Parish Council's offices are located in the centre of the Village, close to the village shop.
- 2.3.33 Broadband internet speed is an issue. The West Sussex County Council Better Connected project aims for the majority of residents and businesses in the County to be able to access superfast fibre-based broadband speeds by Spring 2016, but this will only benefit the homes connected to the East Grinstead exchange (about 1/3 of the Parish).

### Economic characteristics

- 2.3.34 According to the 2011 census of 1,269 residents aged 16 to 74, 912 are classed as economically active, with 198 part-time employees, 455 full-time employees, 190 self-employed, 33 full-time students and 36 unemployed (2.9%). The qualifications and skills level of the local population is generally high. Of 1,452 people aged over 16, 517 or 35.6% are qualified to Level 4 degree level or above, compared to 29.9% across the whole of West Sussex. A large proportion of residents are employed in 'professional occupations, although many others are employed in skilled trades, caring /



leisure and other areas of work. There are 75 rail commuters in Ashurst Wood, while 85 people walk or cycle to work, 569 drive a van or car, and 84 work from home.

2.3.35 There is a limited amount of local employment, including the two village pubs, the village store, post office, ironmongers/forge, butchers, Primary School, Brambletye preparatory school, and businesses located in the small Ivy Dene industrial estate and at Wealden House.

## 2.4 What are the key issues / objectives that should be a focus of the SA?

The Environmental Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal.

### SWOT analysis

2.4.1 In support of context/baseline review, the Parish Council undertook a Strengths, Weaknesses, Opportunities and Threats (SWOT) assessment for the NDP. The outcomes are presented below.

**Table 3:** SWOT analysis for the NP

<p><b>Strengths</b> Safe community environment, relatively low crime, valued school, outstanding landscape setting, designated land (e.g. AONB, SSSI, SNCI), access to Ashdown Forest, and open countryside via footpath network, distinct village identity, good range of leisure opportunities including recreations grounds, choice of pubs, village shop and Post Office, village clubs, Youth Club, school, welcoming Church. Access to London via rail link, and to East Grinstead, and other surrounding towns by bus. Community events and community café</p>	<p><b>Weaknesses</b> Traffic speed, volume and weight, and parking issues, pedestrian vulnerability, inadequate pavements and verges in certain areas, no health facilities e.g. doctors surgery, high house prices, high rental prices, relative lack of affordable housing for local people, no allotments, piecemeal pavements and verges, poor Broadband service. Poor service and rail connection during peak times.</p>
<p><b>Opportunities</b> Improve pedestrian safety, (for, example by improving pavement network, or with 20mph speed limit through village), implement traffic management/calming, provide better safe cycle access. Improve contact and service to elderly, strengthen identity and pride in community, provide allotments, garden share and community growing. Encourage local small businesses. Improve appearance of local industrial business area/visual amenity by improving character, appearance. Promote greater co-operation with neighbouring councils. Encourage the use of renewable energy.</p>	<p><b>Threats</b> Climate change, loss of biodiversity, drought or water interruption, danger from HGVs and fast traffic, increased traffic through village, over or inappropriate development leading to loss of rural character, erosion of village identity through coalescence with neighbouring town and loss of strategic gap, loss of services such as buses, shops, mobile library, loss of agricultural land, loss of local distinctiveness and erosion of rural countryside features. Increased pollution, noise and air, from aircraft landing and taking off at Gatwick airport. Poor service outcomes due to lack of coordination between different authorities. Lack of community cohesiveness and participation in village life. Increased crime and social nuisance, decreased security and safety. Overall loss of amenity.</p>

## Key issues and objectives

2.4.2 In-light of context / baseline review and SWOT analysis, the Parish Council was able to establish key issues and objectives that should be a focus of SA.

**Table 4:** Key issues facing the parish

<i>Challenges currently facing the Parish</i>	<i>What might happen without the plan</i>
To protect and enhance the countryside and open spaces of Ashurst Wood parish, while ensuring any changes benefit community as a whole.	Failure to preserve and safeguard countryside and open spaces of Ashurst Wood parish and/or changes made to detriment of community as a whole.
Retaining the distinctiveness and character of the village, avoiding over or inappropriate development, and preserving the development gap between the village and the nearby town of East Grinstead.	Pressure to build, and to extend designated built up area boundaries may lead to coalescence with East Grinstead, loss of strategic gap and loss of village identity and characteristics.
To balance restricting development to within the built up boundaries of the village, with meeting the housing needs of Parish residents.	No suitable sites for suitable housing for local people would be identified.
To protect outstanding landscape setting of village and encourage pride in settlement maintenance and appearance, minimising loss of agricultural land to development	District Plan policies are strategic in nature and may not provide adequate protection against pressure for development in countryside, and of agricultural land. Also they may not prioritise development of brownfield sites in preference to greenfield sites.
Problem of traffic speed, volume and weight, parking problems, lack of pedestrian/cyclist safety in village.	Residents' lives will be further blighted, possibly endangered, without policies on sustainable transport and road safety.
Maintaining viability of Primary School and Pre-School through adequate pupil numbers.	School may close.
Need to maintain and enhance the high quality natural environment, wildlife networks and biodiversity of the parish	District Plan policies are strategic in nature and may not provide adequate protection
Infrastructure improvements such as roads, crossings, parking, school facilities, pavements	Funding for Infrastructure requirements may not be achieved
Inadequate and potentially reducing public transport options	Further erosion of options, increased car dependency and/or isolation
Supporting an ageing population	Potential issues of care/support/transport and suitable local homes
To ensure that there is adequate access and quality of key services and facilities available to the community, including shops, businesses, and infrastructure, such as water and communications	Access or quality of the services and/or facilities may be inadequate.

<i>Challenges Facing Ashurst Wood Parish</i>	<i>Effect without the Neighbourhood Plan</i>
Support and flexibility for local businesses	Existing policies may not meet their needs and aspirations
No allotments	No potential allotments would be identified.
Promoting community responsibility for parishioners own, others' and community assets and ensuring a cohesive and safe village community	Declining community responsibility for private and community assets and safety for villagers.
Encouraging the sense of community and engagement in local topics and community events.	Declining sense of community and engagement in local topics and community events.

**Table 5:** Sustainability objectives (the 'SA framework')

	<i>Sustainability objectives</i>	<i>Indicators</i>
1/Env	Retain the distinctiveness and <b>character</b> of the village by preserving its historic and environmental features.	<ul style="list-style-type: none"> <li>- number of developments within the gap</li> <li>- number of applications for listed building consent</li> <li>- number of listed buildings within the parish</li> </ul>
2/Env	Protect and enhance the <b>natural beauty</b> of AW, including its geology and landform, ridgetop settlement pattern, rights of way and open spaces.	<ul style="list-style-type: none"> <li>- number of trees with preservation orders maintained or increased</li> <li>- condition of footpaths and rights of way maintained or improved</li> </ul>
3/Env	Protect the outstanding <b>landscape</b> setting of the village through the reuse of previously developed land and buildings where appropriate, including reuse of materials.	<ul style="list-style-type: none"> <li>- development of brownfield sites where possible/appropriate</li> <li>- new employment floorspace on previously developed land</li> <li>- quality and quantity of agricultural land lost to development</li> </ul>
4/Env	Conserve and enhance the <b>biodiversity</b> of the Parish, its wildlife habitats and species, including those of its SSSI,	<ul style="list-style-type: none"> <li>- Data from Sussex Biodiversity Records Office.</li> <li>- condition of SSSI</li> <li>- protection of priority habitats and species</li> <li>- mitigation arrangements to protect nearby SPA/SAC.</li> </ul>
5/Env	Reduce impact on <b>climate change</b> , and vulnerability to its effects	<ul style="list-style-type: none"> <li>- promote energy efficiency in new buildings</li> <li>- promote the use of renewable energy</li> </ul>
6/Env	Maintain and improve the <b>water</b> courses and aquifers in the parish, and use and manage water resources in a sustainable manner	<ul style="list-style-type: none"> <li>- data from SE Water on water consumption</li> <li>- data from Environment Agency on water quality</li> <li>- use of domestic water recycling systems increased</li> </ul>
7/Env	Encourage reuse, <b>recycling</b> and food composting	<ul style="list-style-type: none"> <li>- amount of waste sent to landfill reduced</li> <li>- amount of domestic waste recycled increased</li> </ul>
8/Env	Reduce the impact of <b>traffic</b> in the village, and improve safety for pedestrians, cyclists and horse-riders	<ul style="list-style-type: none"> <li>- traffic speeds in village reduced</li> <li>- volume of through traffic, in particular number of HGVs passing through village, reduced</li> <li>- number of cycle journeys increased</li> <li>- journeys to work/school by sustainable means increased</li> <li>- funding for highway safety schemes</li> <li>- unsafe parking reduced</li> </ul>
9/Soc	Ensure that residents have the opportunity to live in a decent, well	<ul style="list-style-type: none"> <li>- number of new homes built</li> <li>- number of affordable homes built</li> </ul>

	<i>Sustainability objectives</i>	<i>Indicators</i>
	constructed and affordable <b>home</b>	<ul style="list-style-type: none"> <li>- number on housing waiting lists</li> <li>- number of homes constructed to Code for Sustainable Homes standard</li> </ul>
10/Soc	Ensure that the community has adequate access to the key <b>services</b> it needs, including health facilities, convenience shops, schools, recreation and leisure.	<ul style="list-style-type: none"> <li>- number of shops in village</li> <li>- distance between homes and key services</li> <li>- financial contributions towards facilities and services</li> <li>- volunteer hospital driving scheme.</li> </ul>
11/Soc	Ensure that the community has a high quality and <b>healthy lifestyle</b>	<ul style="list-style-type: none"> <li>- increase opportunities for sport/exercise</li> <li>- access to green spaces within walking distance of homes</li> <li>- provision of allotments</li> <li>- figures on long term illness and general health</li> </ul>
12/Soc	Ensure a <b>cohesive and safe</b> village community	<ul style="list-style-type: none"> <li>- crime statistics</li> <li>- homes built to Secured by Design standards</li> <li>- number of active neighbourhood and farm watch schemes</li> </ul>
13/Soc	Encourage sense of <b>community</b> and engagement in local issues, and the inclusion of vulnerable groups	<ul style="list-style-type: none"> <li>- participation in Parish Council elections</li> <li>- numbers reading Parish Council newsletters</li> <li>- numbers attending annual parish meeting</li> <li>- activities for vulnerable groups.</li> </ul>
13/Econ	Encourage and support local <b>businesses</b> and promote the enhancement of business units, locations and estates.	<ul style="list-style-type: none"> <li>- Number of shops</li> <li>- Number of businesses, including those on Ivy Dene Industrial Estate</li> </ul>
14/Econ	Facilitate employment opportunities, including home working	<ul style="list-style-type: none"> <li>- Number of people employed within Parish</li> <li>- Number of new businesses</li> <li>- Access to improved broadband service.</li> </ul>

*What has plan-making / SEA  
involved up to this point?*

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# 3 What has plan-making / SEA involved up to this point?

## 3.1 Introduction

The Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for developing the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

3.1.1 The 'story' of plan-making / SEA up to this point is told within this chapter of the SA Report. Specifically, this chapter explains how preparation of the draft ('pre-submission' version) plan has been informed by appraisal of alternatives in relation to the key issue of **housing numbers**.

### *Reasons for focusing alternatives appraisal on this issue*

3.1.2 At the current time it is felt that there is merit in presenting alternatives appraisal findings in relation to 'housing numbers' only. This is clearly an issue that is somewhat contentious, i.e. an issue in relation to which opposing views might exist. Addressing contentious issues systematically, via consideration of alternatives, is a means of ensuring that the final policy approach is sufficiently justified.

3.1.3 At the current time, it is not felt that there is a reasonable need to present appraisal findings in relation to the **spatial strategy** – i.e. the spatial approach that should be taken to growth. In-line with the objectives of the plan, the preferred spatial strategy is one that reflects the prevailing pattern and grain of development as described in the Character Assessment, and as such there is little room for manoeuvre. It is also the case that site specific work ('Site Assessment') clearly points to a preferred approach / does not indicate alternative approaches that necessitate appraisal / consultation. **Appendix 2** presents further information in relation to Site Assessment work.

3.1.4 Some **other issues** have been the focus of alternatives consideration in the past, but at the current time, no other **clear and meaningful** sets of alternatives emerged. **Box 1** sets out the rationale for developing policy for each topic area and the preferred approach adopted (and why alternatives have not been considered at this stage).

## **Box 1: Issues that have not been a focus of formal alternatives appraisal**

### Countryside and environment

The community values the attractive landscapes surrounding the village and its location in the High Weald Area of Outstanding Natural Beauty. Responses to the residents' survey undertaken in 2013 show that most people choose to live in Ashurst Wood because they love the countryside. There is also strong support for the retention of a development gap between Ashurst Wood and East Grinstead and particularly strong support for the importance of protecting the landscape setting of the village by building new homes on previously developed sites wherever possible.

The aim of the policies is therefore to protect and respect the landscape, to minimise the impact of future development on the AONB and to avoid coalescence with neighbouring settlements.

There were three 'options' identified in the December 2013 Scoping Report:

1. Identify a "local gap" (as defined in the Local Plan) between the village and East Grinstead;
2. Encourage appropriate infill development and use of brownfield sites; and
3. Limit development outside built-up areas.

These are not seen as reasonable alternatives as they are unable to be compared together meaningfully. Furthermore they are not mutually exclusive, rather a 'shopping basket' from which one, or all could be selected.

As described in Table 2, there is no defined strategic gap between Ashurst Wood and Forest Wood. The NP is not an appropriate vehicle for implementing a strategic gap. The prioritisation of brown field sites has been brought forward through the site policies. Policy 2, in seeking to prevent coalescence also includes elements from these options.

Whilst there is no singular policy that addresses these options, there are a series of policies that include these elements. This perhaps reflects the fact that the options were not meaningfully comparable i.e. they were solving different issues.

### Business and economy

There are limited job opportunities within Ashurst Wood and most residents of working age are employed outside the village. The biggest employer of local residents is Brambletye School. The residents' survey showed a desire to encourage businesses that provide local employment. Such businesses often mean that residents can obtain goods and services locally without having to travel by car further afield, e.g. the village shop and the hairdressers. The industrial estate at Ivy Dene Lane is home to several small businesses. Although considered as a possible housing site by MSDC in 2006, it was deemed unsuitable following public consultation during which residents supported its continued business use. There are limitations to the potential of the site due to its location and restricted access.

The aim of the policies is to support local businesses and retain local employment and to encourage new business and employment opportunities.

There were three 'options' identified in the December 2013 Scoping Report:

1. Retain Ivy Dene Industrial Estate;
2. Retain and improve Ivy Dene Industrial Estate; and
3. Produce a list of local facilities (such as the Post Office) to be nominated for listing by the local authority as an asset of community value.

These are not seen as reasonable alternatives as Option 1 essentially represents the baseline (the do nothing scenario). Option 2 is a policy option but there are no alternatives identified e.g. other economic areas which could be retained and improved. This is a policy option but there are no alternatives identified, rather a list of potential assets of community value to be proposed.

The listing of local facilities as assets of community value can be done separately from the Neighbourhood Plan process as it is not a land use policy.

Policy 15 continues the allocation of the land at the Industrial Estate for business purposes while offering support for the option of physical improvement of the area in order to make it more attractive to present and potential future businesses. Policy 16 seeks to prevent the loss of viable business premises while Policy 17 supports the expansion of existing businesses and the creation of new ones.

### Amenities

There are currently no allotments in Ashurst Wood and over 100 residents have expressed an interest in renting one. Since it was formed in 2000, the Parish Council has rented office facilities. With growing responsibilities, it considers that a dedicated office and meeting area would allow it to better serve the community.

There were two 'options' identified in the December 2013 Scoping Report:

1. Provide allotments in the village; and
2. Develop a dedicated Parish Council Office, including meeting facilities.

These are not seen as reasonable alternatives as they are unable to be compared together meaningfully i.e. it is understood that these options are not mutually exclusive e.g. if you pick allotments, you can still have a dedicated parish Council Office.

Policy 3 seeks to facilitate the provision of allotments on suitable land. Policy 22 provides for the use of developers' contributions to support local infrastructure needs. The supporting texts lists a number of potential items of expenditure, including allotments and the proposed new Parish Council office and meeting room. The list will help to ensure that development can help towards meeting the needs of the community.

### Highways and transport

Most households in the village have at least one car (only 8.4% have none) and the majority of working residents drive to work. There are three bus routes serving the village but the main method of transportation for residents is the car. The village has a number of narrow roads and lanes, often with no pavements, which lead to issues with parking and concerns about pedestrian safety. Residents regularly report concerns about traffic speed and the numbers of HGVs passing through the village. There are also concerns that new houses will lead to further traffic problems.

The aim of the policies is to improve safety for all highway users, including non-motorists and to support the use of public transport and community transport schemes.

There were four 'options' identified in the December 2013 Scoping Report:

1. Encourage a cycle link to the Forest Way;
2. Encourage a cycle lane on Lewes Road;
3. Promote and support the establishment of a 20mph zone in the village; and
4. Discourage HGVs from driving through the village.

These are not seen as reasonable alternatives as they are unable to be compared together meaningfully. They are not mutually exclusive, rather a 'shopping basket' from which one, or all could be selected.

Policy 19 seeks to ensure that applications for new development consider how they can include measures to reduce traffic and provide measures to mitigate the impact of any increased traffic generated by the scheme. This will include providing or contributing towards schemes that promote the use of public or community transport and non-motorised forms of transport. The list in the supporting text to Policy 22 includes several road safety items, including a 20 mph speed limit and cycle paths.



## 3.2 Housing numbers

### Introduction

3.2.1 In order to 'tell the story' of alternatives consideration, the following three questions are answered in turn:

- What are the reasons for selecting the alternatives dealt with?
- What are appraisal findings in relation to the alternatives?
- What are the reasons for developing the preferred approach (in-light of the appraisal)?

3.2.2 These questions reflect the regulatory requirement for the SA Report to present 1) appraisal findings for reasonable alternatives and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

### Reasons for selecting the alternatives dealt with

3.2.3 The report: "*Housing for the Ashurst Wood Neighbourhood Plan*"<sup>6</sup> sets out in detail the evidence and understanding that has fed-in. The salient points are summarised here.

3.2.4 The Local Plan 2004 does not set out any policies relating to housing supply, whilst the proposed submission version of the District Plan (May 2013) set a target of allocating land for 10,600 new homes across the whole District (across the period 2011 – 2031). The plan was for a focus at Burgess Hill and land for 2,300 to 2,800 homes allocated through Neighbourhood Plans.

3.2.5 The District Plan was formally withdrawn in May 2014 and a new draft District Plan was published by MSDC on the 14th October 2014. However this draft does not currently specify what is necessary regarding housing supply (although it does include proposed allocations at Burgess Hill). In the absence of higher level policy, the Parish Council has given lengthy consideration to alternative approaches that might be taken to housing supply.

3.2.6 There is a desire to address housing need; however, housing need is difficult to establish accurately. An Objectively Assessed Housing Need (OAHN) figure has been established for the District, and that figure can be pro-rated for Ashurst Wood leading to a housing need figure of 113 new homes for the plan period; however, this figure is not thought to be a reasonable option. Ashurst Wood is relatively constrained – i.e. constrained relative to many other locations in the District – and hence it is not appropriate to simply pro-rata the OAHN figure.

3.2.7 In addition to the OAHN figure, there is a need to take into account a range of other factors when considering housing supply options for Ashurst Wood. Factors include: current housing commitments; planned homes in Burgess Hill; Residents' Survey 2013 responses; affordable housing need, Common Housing Register; and historical growth. On the basis of all of these factors, the following alternatives emerge:

1. **Option 1:** 27 market homes (which would deliver eight affordable homes)
2. **Option 2:** 62 market homes (the preferred option)
3. **Option 3:** 78 market homes (to keep growth to around 10% over 20 years).

3.2.8 A low growth option of 16 market homes was also considered, but eventually discounted as 'unreasonable' on the basis that whilst current housing needs might be met future housing needs would not.

### Appraisal findings

3.2.9 For each of the 'housing figure' options, the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping as


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<sup>6</sup> Ashurst Parish Council (2014) *Housing for the Ashurst Wood Neighbourhood Plan*. Ashurst Parish Council

a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.




- 3.2.10 Effects are predicted taking into account the criteria presented within Regulations.<sup>7</sup> So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the appraisal as appropriate. The potential for ‘cumulative’ effects is also a consideration.
- 3.2.11 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the options will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.<sup>8</sup>
- 3.2.12 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.




**Table 6:** Housing quantum alternatives appraisal findings


Objective	Discussion of effects (and relative merits in more general terms)	Rank of preference		
		Option 1: 28 dwellings	Option 2: 62 dwellings	Option 3: 78 dwellings
1/Env	<p>This objective focuses mainly on heritage assets such as listed buildings. It is assumed that there is a direct relationship between the amount of development and the effect on the character of Ashurst Wood i.e. that the more development is permitted, the greater effect on the distinctiveness and character of the village.</p> <p>The distinctiveness and character of the village has been identified as a particularly important aspect of the Neighbourhood Area and as such it is likely to be sensitive to smaller changes.</p> <p>Given the above, a lower level of development would logically be a preferred option relative to 1/Env and as such would be the higher ranked option. In terms of significant effects, it has been determined that 78 is the highest figure that would be borne by Ashurst Wood given its known constraints and as such, anything under this would not be significant. There might however be <b>Minor Negative</b> effects of all three options presented as further, undesirable sites might need to be allocated which have the potential to cause harm to the AONB.</p>	 1	2	3

<sup>7</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

<sup>8</sup> A major assumption relates to housing density. This is assumed to remain constant i.e. additional housing would lead to commensurate additional land take / there would be no potential to deliver additional housing through higher density development and hence avoid additional land take.

<p><b>2/Env</b></p>	<p>This objective focuses mainly on the natural beauty of the Neighbourhood Area, specifically its geology, landform, settlement pattern, rights of way and open spaces.</p> <p>The geology and landform of the area are unlikely to be affected by the plans development proposals. Higher levels of development might create an impact on users of rights of way and open space resulting in a negative effect on user experience through overcrowding or deterioration in condition.</p> <p>Given the above, a lower level of development would logically be a preferred option relative to 2/Env and as such would be the higher ranked option. In terms of significant effects, it has been determined that 78 is the highest figure that would be borne by Ashurst Wood given its known constraints and as such, anything under this would not be significant. There might however be <b>Minor Negative</b> effects of all three options presented as further, undesirable sites might need to be allocated which have the potential to cause harm to the AONB.</p>		<p>2</p>	<p>3</p>
<p><b>3/Env</b></p>	<p>This objective focuses mainly on the use of land in the Neighbourhood Area, specifically reuse of brownfield land and the reuse of buildings.</p> <p>The geology and landform of the area are unlikely to be affected by the plans development proposals. Higher levels of development might create an impact on users of rights of way and open space resulting in a negative effect on user experience through overcrowding or deterioration in condition.</p> <p>Given the above, a lower level of development would logically be a preferred option relative to 3/Env and as such would be the higher ranked option. In terms of significant effects, it has been determined that 78 is the highest figure that would be borne by Ashurst Wood given its known constraints and as such, anything under this would not be significant. There might however be <b>Minor Negative</b> effects of all three options presented.</p>		<p>2</p>	<p>3</p>
<p><b>4/Env</b></p>	<p>This objective focuses on the potential impacts on biodiversity in the Neighbourhood Area.</p> <p>It is assumed that it is likely that for each additional dwelling, there would be increased land take and more sites required for allocation. This additional land take has the potential to disturb / destroy habitats and the species they support. Furthermore, increased development would increase transport and recreation pressures on biodiverse sites.</p> <p>Given the above, a lower level of development would logically be a preferred option relative to 4/Env and as such would be the higher ranked option. In terms of significant effects, the key effect would be that on the European Site (although this is some 7 km distant).</p>		<p>2</p>	<p>3</p>

	<p>There might however be <b>Minor Negative</b> effects of all three options presented as further, undesirable sites might need to be allocated which have the potential to cause harm to biodiversity (such as the loss of the garden at Abbey View).</p>			
<b>5/Env</b>	<p>This object focuses on reducing the impact on climate change. This is assumed to be climate change mitigation (the reduction of Greenhouse Gas emissions). This also addresses the vulnerability of the effects of climate change (adaption) such as flooding and hot / dry / raining spells and extreme weather events.</p> <p>There are likely to be increased impacts of the plan the higher the level of development. This is assuming increased transport movements and increased energy consumption (assuming that new developments <u>are not</u> carbon neutral).</p> <p>This being the case, there are likely to be <b>Minor Negative</b> effects of all options but the effects would increase the more development is delivered. Given the scale of the development, these effects would not be significant.</p>		2	3
<b>6/Env</b>	<p>This objective focuses on water pollution and consumption.</p> <p>It is assumed that for each additional dwelling, there would be increased demand for water (unless the dwellings are water neutral). There might therefore be an increase in water consumption as the housing limit increases. Option 1 would likely score the best.</p> <p>With regard to pollution, it is considered that the effect, given the sale of development proposed, would be <b>Neutral</b>.</p>		2	3
<b>7/Env</b>	<p>It is considered that none of these options would have an effect on this objective.</p>	N/A	N/A	N/A
<b>8/Env</b>	<p>This objective focuses on changes in transport flows in and around the village.</p> <p>It is assumed that there is a direct relationship between the amount of development proposed and an increase in transport movements. It is not possible at this stage to determine what the effect of this change might be other than to say that there may be an effect on air quality, noise and safety. The effect is likely to be <b>Minor Negative</b> given the scale of development proposed in all options.</p>		2	3
<b>9/Soc</b>	<p>When considering the level of housing to be built, logic would say that given the level of demand in the village, the higher number the better.</p> <p>With this in mind it is considered that Option 3 would perform best in this regard as it would provide the most</p>	3	2	1

	market and affordable housing to the area. There are likely to be positive effects on this objective and potentially <b>Major Positive</b> effects through the higher levels of provision.			
<b>10/Soc</b>	It is considered that none of these options would have an effect on this objective.	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>11/Soc</b>	In focusing on health, there is a relationship between housing of a good standard and physical and mental health. Provision of market and affordable housing should therefore have <b>Minor Positive</b> effects, increasing as the amount of development increases.	<b>3</b>	<b>2</b>	
<b>12/Soc</b>	It is considered that none of these options would have an effect on this objective.	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>13/Soc</b>	It is considered that none of these options would have an effect on this objective.	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>14/Econ</b>	It is considered that none of these options would have an effect on this objective.	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>15/Econ</b>	It is considered that none of these options would have an effect on this objective.	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Summary:</b>	There is a tension identified in the appraisal. This tension is between the preservation of the natural environment and delivery of housing development to accommodate need in the village. This is a common issue and one that must be resolved by planners taking into account community views and potential effects on the sustainability baseline. Whilst the appraisal is fairly evenly weighted, it is likely that the best option is one that lies in the middle ( <b>Option 2</b> ). Under this option provision of housing will certainly lead to beneficial effects, and whilst there may be negative environmental consequences, there is the potential for mitigative policies to ensure that significant negative effects on the baseline are avoided.			

### [Reasons for selecting the preferred approach](#)

3.2.13 In considering the housing requirements for the Neighbourhood Plan, a lengthy consideration of all relevant factors has been carried out, including the need to provide local affordable housing; these are explained in more detail in the document, ***Housing for the Ashurst Wood Neighbourhood Plan*** which forms part of the evidence base for this Plan. The conclusion reached is that the Neighbourhood Plan should plan for **62** new homes between 2015 and 2031. This approach is felt to be broadly in-line with alternatives appraisal findings.

*What are the SA findings at this stage?*

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# 4 What are the SA findings at this stage?

## 4.1 Introduction

The Environmental Report must include...

- The likely significant effects associated with the draft plan approach; and
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach.

4.1.1 This section of the SA Report presents appraisal findings in relation to the Draft (pre-submission) Plan. The draft plan essentially presents a spatial strategy for the village, as well as a range of supporting policies.

**Table 8:** The spatial strategy

<i>Site</i>	<i>Approximate capacity</i>
Land between 98- 104 Maypole Road	5
Mount Pleasant Nursery, Cansiron Lane	3
Willow Trees, Lewes Road	2 - 4
Spinney Hill, Lewes Road	2 - 4
Wealden House (EDF)	50+
Wealden House (LIC)	unknown

### Methodology

4.1.2 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability topics, objectives and issues identified through scoping as a methodological framework. To reiterate, the topics considered in turn below are as follows:

- Nature conservation, geology and landscape
- Heritage
- Air and climate
- Water
- Human Characteristics
- Roads and Transport
- Infrastructure
- Economic characteristics

4.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.<sup>9</sup> Because of the uncertainties involved there is inevitably a need to make assumptions. Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

4.1.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.<sup>10</sup> So, for example, account is taken of the **probability, duration, frequency** and **reversibility** of effects as far as possible. **Cumulative effects** are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

4.1.5 The appraisal is presented in a way that eschews the matrix based approach for a more narrative driven appraisal. This has been done to provide a more transparent and consistent appraisal. Furthermore, the appraisal has been structured according to *policy relevance* i.e. only the policies

<sup>9</sup> The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.

<sup>10</sup> Environmental Assessment of Plans and Programmes Regulations 2004

that are considered relative to a certain objective are included in the appraisal. For example, under 'Nature conservation, geology and landscape' it was not considered appropriate to appraise the effects of policies relating to Policy 21 – 'High Speed Broadband' as there was no robust 'pathway' for the effect.

## 4.2 Nature conservation, geology and landscape

The sustainability objectives relevant to this section are:

- 2/Env: Protect and enhance the natural beauty of AW, including its geology and landform, ridgetop settlement pattern, rights of way and open spaces.
- 3/ENV: Protect the outstanding landscape setting of the village through the reuse of previously developed land and buildings where appropriate, including reuse of materials.
- 4/Env: Conserve and enhance the biodiversity of the Parish, its wildlife habitats and species, including those of its SSSI.
- 7/Env: Encourage reuse, recycling and food composting.

### The proposed spatial strategy

4.2.1 Due to the constrained nature of the Neighbourhood Plan area with regard to the geographical location of the village within the High Weald AONB, the geology and landform of the area and the character of the Neighbourhood Area established through the Character Assessment the spatial strategy has been developed to ensure that the character is not affected. This has been reflected in the site allocation process where sites that have the potential to have an adverse impact on the AONB (such as the Ashburnham site and Land at Dirty Lane sites) have not been included in the Neighbourhood Plan.

4.2.2 It is assumed that growth can be delivered in a fashion at each of the sites without significant loss of habitat, while providing new open space within the allocated areas which can aid habitat connectivity (decreasing the potential of habitat fragmentation) through the enhancement of green infrastructure connecting the community both within the Neighbourhood Area and to the wider area.

### Specific policies

4.2.3 Policies 6 – 10 set out the specific policies for each preferred site. Policy 7 includes provision for the possible remediation of the site, should it be required, and the provision of land management to ensure that the rural character of Cansiron Lane is preserved. Policy 8 includes similar provisions with regard to preserving the rural character of the area. Policy 9 includes provision for the retention of rural character, preservation of Ancient Woodland, and the removal of contamination. Policy 10 includes provision for retention of rural character and the preservation of Ancient Woodland.

4.2.4 With regards to thematic policies -

- Policy 1 (Protection of the Countryside) seeks to provide a high level of protection for the countryside in and around the village. Specifically it seeks to conserve and enhance the valued landscapes and beauty of the area and deliver good quality design.
- Policy 2 (Preventing Coalescence) seeks to prevent development that would reduce openness or increase intensification of development. This would help to preserve the character of the area.
- Policy 13 (Design) seeks to ensure good design in new developments. Specifically it seeks to ensure that the character of the area is maintained and, that green hedging is used where possible.
- Policy 22 (Infrastructure) seeks to ensure that developments include all necessary green infrastructure within the development and that developers' contributions are used to provide local infrastructure improvements for the benefit of the Parish.



### [The plan as a whole](#)

- 4.2.5 The expansion of Ashurst Wood, through the provision of further housing and economic development will result, directly, in land take in the village. The land take and building of new developments has been identified as a threat to the character of the area and also has the potential for impacts to biodiversity, dependant on the biodiversity value of the sites being developed (this is unknown at the time of the appraisal). It is concluded that whilst there is a threat and that there might well be an impact, it is unlikely given the scale of the development, and the nature of the spatial strategy, that these are likely to result in significant effects (positive or negative) for nature conservation, geology and landscape. It is considered that the effect of the plan on these objectives would be **Neutral**.

## 4.3 Heritage

The sustainability objectives relevant to this section are:

- 1/Env: Retain the distinctiveness and character of the village by preserving its historic and environmental features.

### [The proposed spatial strategy](#)

- 4.3.1 Due to the constrained nature of the Neighbourhood Plan area with regard to the geographical location of the village within the High Weald AONB, the geology and landform of the area and the character of the Neighbourhood Area established through the Character Assessment the spatial strategy has been developed to ensure that the character is not affected. This has been reflected in the site allocation process where sites that have the potential to have an adverse impact on the AONB (such as the Ashburnham and Land at Dirty Lane sites) have not been included in the plan.
- 4.3.2 It is assumed that development will be delivered in a fashion at each of the sites without significant loss or impact on the heritage assets in the village. With the appropriate policies in place it might be that development can enhance the 'townscape' and character of the village.

### [Specific policies](#)

- 4.3.3 Policies 6 – 10 set out the specific policies for each preferred site. Policy 7, Policy 8, Policy 9 and Policy 10 all include provision for retention of rural character which should help to preserve the heritage assets of the village.
- 4.3.4 With regards to thematic policies -
- Policy 1 (Protection of the Countryside) seeks to provide a high level of protection for the countryside in and around the village. Specifically it seeks to conserve and enhance the valued landscapes and beauty of the area and deliver good quality design.
  - Policy 2 Policy 2 (Preventing Coalescence) seeks to prevent development that would reduce openness or increase intensification of development. This would help to preserve the character of the area.
  - Policy 13 (Design) seeks to ensure good design in new developments. Specifically it seeks to ensure that the character of the area is maintained and, that green hedging is used where possible. The policy also specifies that development should use "design that respects the scale and character of existing and surrounding buildings with reference to the Character Assessment"

### The plan as a whole

4.3.5 The expansion of Ashurst Wood, through the provision of further housing and economic development will result, directly, in land take in the village. The land take and building of new developments has been identified as a threat to the character of the area and also has the potential for impacts to the 'village-scape' and to the character of the area. There are a number of policies in the plan that seek to limit this impacts. With appropriate design there should be a **Neutral** impact. However, the plan could be strengthened with a design policy / bullet that require the preserving and / or enhancement of heritage assets. This would accord with the background text under 5.2 Countryside and Environment that states: "...the conservation of wildlife and cultural heritage are important considerations".

#### 4.3.6 **Recommendation:**

- Include a bullet in Policy 13 – Design which sets out to preserve and / or enhance the cultural heritage and historic assets of the village

## 4.4 Air and climate

The sustainability objectives relevant to this section are:

- 5/Env: Reduce impact on climate change and vulnerability to its effects.

### The proposed spatial strategy

4.4.1 The scale of development in the village is modest and as such is unlikely to have a significant effect on overall Greenhouse Gas (GHG) emissions and their effect on the climate.

### Specific policies

4.4.2 Policies 6 – 10 set out the specific policies for each preferred site.

4.4.3 With regards to thematic policies -

- Policy 13 (Design) seeks to ensure that new developments adopt "the principles of sustainable urban drainage where appropriate". SuDs can provide both water conservation measures but also climate change adaptation measures. The SuDs proposals should reflect the ability of SuDs to provide both.
- Policy 19 (Impact of new development on traffic) seeks to mitigate for any increased traffic in the village resulting from development. If this were to reduce the additional traffic generated then this might minimise the effects generated by new development. It is unlikely to ameliorate these effects entirely i.e. there will be additional traffic generated.
- Policy 21 (High Speed Broadband) seeks to support developments that provide super-fast broadband and designing to include super-fast broadband in new developments. If it is assumed that the provision of super-fast broadband would encourage residents to work from home more often, then this might reduce the effect of increased traffic caused by development. It is unlikely to ameliorate these effects entirely i.e. there will be additional traffic generated.

### [The plan as a whole](#)

4.4.4 The expansion of Ashurst Wood, through the provision of further housing and economic development will result, directly, in increased energy use (overall) in the village. This is based on the fact that each additional resident would increase the amount of energy used by the village. The only way this would be prevented would be by implementing policy that required all new development to be zero carbon. Further transport movements, increasing traffic in the area might also result in negative effects on air quality. Given the scale of development, and the sensitivity of the village (i.e. there is no AQMA designated in the area) it is likely that the effect on this objective would be **Neutral**.

4.4.5 **Recommendation:**

- Expand to reflect water consumption and climate change adaptation.

## **4.5 Water**

The sustainability objectives relevant to this section are:

- 6/Env: Maintain and improve the water courses and aquifers in the parish, and use and manage water resources in a sustainable manner.

### [The proposed spatial strategy](#)

4.5.1 The nature and scale of development in the village is modest and as such is unlikely to have a significant effect on water pollution (and water quality) and water consumption.

### [Specific policies](#)

4.5.2 Policies 6 – 10 set out the specific policies for each preferred site. There are no specific mentions of water issues in these policies as the parish are of the view that Policy 13 covers this area adequately.

4.5.3 With regards to thematic policies

- Policy 13 (Design) seeks to ensure that new developments adopt “the principles of sustainable urban drainage where appropriate”. SuDs can provide both water conservation measures but also climate change adaptation measures. The SuDs proposals should reflect the ability of SuDs to provide both. Also, given that Ashurst Wood is a rural area, this policy should be rephrase to use the term ‘Sustainable Drainage System’, and remove the ‘urban’.

### [The plan as a whole](#)

4.5.4 The expansion of Ashurst Wood, through the provision of further housing and economic development will result, directly, in increased water use (overall) in the village. This is based on the fact that each additional resident would increase the amount of water used by the village. The only way this would be prevented would be by including policy that required all new development to be water neutral. Given the scale of development, and the sensitivity of the village (i.e. there is no indication that water cannot be supplied to the village by South East Water) it is likely that the effect on this objective would be **Neutral**.

## 4.6 Human Characteristics

The sustainability objectives relevant to this section are:

- 9/Soc: Ensure that residents have the opportunity to live in a decent, sustainably constructed and affordable home.
- 11/Soc: Ensure that the community has a high quality and healthy lifestyle.
- 12/Soc: Ensure a cohesive and safe village community.
- 13/Soc: Encourage the sense of community and engagement in local issues and the inclusion and support of vulnerable groups

### The proposed spatial strategy

4.6.1 The proposed spatial strategy sets out to deliver 62 dwellings over the plan timescale. Of this, a certain proportion is to be 'affordable'. This is set out in more detail in **Policy 14** – 'Affordable Housing'. There has been an identified need for the provision of affordable homes in the village, particularly young adults wishing to leave home, and young families. It is not clear what the provision of social housing would / will be. There is a risk in the strategy in regard to delivery of housing and the link between demand and delivery. **Policy 9** – 'Wealden House, Lewes Road (EDF site)' is by far the largest site (minimum of 50 dwellings) and is 10 times larger than other sites proposed. There is a risk that if the delivery of this site is delayed, the housing need may be accentuated through waiting for market and affordable housing to become available. This is particularly sensitive with regard to affordable housing as it is the only site that breaches the threshold set out in Policy 14.

### Specific policies

Policies 6 – 10 set out the specific policies for each preferred site. Affordable housing would be provided on schemes of 11 or more in the village (with smaller schemes (between 6 – 10) providing a financial contribution). With this in mind, only Policy 9 – 'Wealden House, Lewes Road (EDF site)' would provide affordable housing as the capacity of the site is a minimum of 50 dwellings. The capacity of Policy 10 – 'Wealden House, Lewes Road (Life Improvement Centre)' is unknown at the present time. It is also noted that Policies 6 and 7 include elements to ensure village safety (safe access from Maypole Road and safe boundaries respectively).

4.6.2 With regards to thematic policies -

- Policy 3 (Allotments) seeks to support proposals for new allotments in and around the 'Built Up Area Boundary of Ashurst Wood.' The provision of allotments can create an increase in community cohesion, particularly when desired by the receiving community.
- Policy 13 (Design) seeks to ensure "safe access for pedestrians, cyclists and road users".
- Policy 16 (Village businesses) seeks to ensure the retention of existing business premises in the village. Small businesses, pubs, post offices and other business activities can create and maintain community cohesion and this should be a factor considered along with their financial viability.

### [The plan as a whole](#)

4.6.3 The expansion of Ashurst Wood, through the provision of further housing and economic development will result, directly, in a number of dwellings being delivered that, whilst below the historical delivery rate, should go some way to meeting the housing need. This is balanced against the need and desire to preserve the character of the area which closely relates to the social cohesion of the village e.g. if the level of development were unsustainable the village may become fragmented both socially and physically. Some elements of the plan will contribute to community safety but it is felt that the plan might benefit from some additional design points that focus on safe design (Designing out Crime for example) as well as safe access not only to the properties but also to community facilities. It is considered that the effect of the plan on these objectives would be **Minor Positive** overall driven mainly through the effect on objective 9/Soc.

4.6.4 **Recommendation:**

- Augment Policy 13 – ‘Design’ to include Design out Crime and access to facilities elements.

## **4.7 Roads and Transport**

The sustainability objectives relevant to this section are:

- 8/Env: Reduce the impact of traffic in the village, and improve safety for pedestrians, cyclists and horse-riders

### [The proposed spatial strategy](#)

4.7.1 It is accepted that as the level of development increased, the amount of transport movements and therefore traffic (whether significant or not) will also increase. This being the case, it is difficult to see that there wouldn't be a negative effect on this objective as a result of any level of development, or spatial strategy.

### [Specific policies](#)

4.7.2 Policies 6 – 10 set out the specific policies for each preferred site. Affordable housing would be provided on schemes of eleven or more in the village. With this in mind, only Policy 9 – ‘Wealden House, Lewes Road (EDF site)’ would provide affordable housing as the capacity of the site is a minimum of 50 dwellings. The capacity of Policy 10 – ‘Wealden House, Lewes Road (Life Improvement Centre)’ is unknown at the present time. It is also noted that Policy 6 includes elements to ensure village safety (safe access from Maypole Road)

4.7.3 With regards to thematic policies -

- Policy 13 (Design) seeks to ensure “safe access for pedestrians, cyclists and road users”.
- Policy 19 (Impact of new development on traffic) seeks to ensure that an assessment of traffic generation is undertaken for development proposals and that mitigation of impacts is provided.
- Policy 20 (Parking Provision) seeks to provide adequate parking provision (off-street) for new developments.
- Policy 22 (Infrastructure), whilst not explicitly, does identify in the supporting text a range of measures to improve road safety such as a 20 mph speed limit, safety improvements at School Lane/ Maypole Road junction and traffic calming.

### [The plan as a whole](#)

4.7.4 The expansion of Ashurst Wood, through the provision of further housing and economic development will result, directly, in a number of dwellings being delivered that, whilst below the historical delivery rate, should go some way to meeting the housing need. The net result of this is a likely increase in transport movements and traffic. Traffic has been identified as a key issue in the

village and any effect on this issue is likely to have an effect. The impact of the increase in traffic has, to some extent, been mitigated through a number of policies, both site specific and thematic. However it is considered that these policies are rather ‘treatment’ based rather than ‘preventative’ in that it seems that a developer can propose ways of mitigating the potential impact rather than trying to avoid the impact from the outset. Given the sensitivity of this issue, and the scale of change, there are likely to be **Minor Negative** effects on this objective. It is recommended that the plan adopts a more proactive approach to minimising transport movements (both during construction and ‘operation’ by augmenting either **Policy 13** or **19** to the effect that new developments should design transport minimisation in from the outset and, where possible, avoid generating increased transport movement or traffic.

## 4.8 Infrastructure

The sustainability objectives relevant to this section are:

- 10/Soc: Ensure that the community has adequate access to the key services it needs, including health facilities, convenience shops, schools, recreation and leisure.

### The proposed spatial strategy

- 4.8.1 It is accepted that as the level of development increased, the demand on key services would also increase. There is the potential therefore for negative effects on this objective as a result of the delivery of the spatial strategy.

### Specific policies

- 4.8.2 None of the site policies make reference to providing or accessing key services. Realistically, only Policy 9 provides the level of development needed to require any contributions / considering of impacts on key services.
- 4.8.3 With regards to thematic policies -
- Policy 4 (Recreation Space) seeks to support developments that would enhance the Recreation Ground or John Pears Field and to protect assets unless there are exceptional circumstances. In this case, replacement facilities should be provided.
  - Policy 13 (Design) seeks to ensure “safe access for pedestrians, cyclists and road users”.
  - Policy 22 (Infrastructure), whilst not explicitly, does identify in the supporting text a range of measures to improve infrastructure provision, specifically local facilities and services. It is noted that health facilities and schools are not mentioned.

### The plan as a whole

- 4.8.4 Scoping identified “*Maintaining viability of Primary School and Pre-School through adequate pupil numbers*” as key issues and that without the Neighbourhood Plan the Primary School or Pre-school might close. It is assumed that the spatial strategy would provide enough of an increase in population that the school would remain viable and that the access improvements set out in the background text of Policy 22 would serve to improve access to the school. The SWOT analysis identified as a key weakness the lack of “*health facilities e.g. doctors surgery*” in the area. There is mention of the provision of health services ( the “*Establishment of a satellite GP surgery within the village*”) in the plan. It is likely that the effects on this objective would be **Minor Positive**.

## 4.9 Economic characteristics

The sustainability objectives relevant to this section are:

- 14/Econ: Encourage and support local businesses and promote the enhancement of business units, locations and estates.
- 15/Econ: Facilitate employment opportunities, including home working

### The proposed spatial strategy

4.9.1 There are no sites allocated for economic use. However, the delivery of housing in the village is likely to have economic impacts given the increase in population that would accompany this.

### Specific policies

4.9.2 Policy 15 relates to the Ivy Dene Lane Industrial Estate. The policy seeks to ensure no increase in gross floorspace on the site, that development is low rise, that development improves the site and that the “*amenities of neighbouring residential properties are safeguarded.*”

4.9.3 With regards to thematic policies -

- Policy 16 (Village businesses) seeks to prevent the loss of exiting business premises.
- Policy 17 (New and expanding businesses) seeks to ensure that new businesses don't harm residential amenity or the highway.
- Policy 18 (Brambletye School) seeks to protect the environs of Brambletye School, ensure that it does not detract from the character or appearance of existing building.

### The plan as a whole

4.9.4 The plan itself does not appear to be 'pro' economic development. As identified in the plan, and in the NPPF, Neighbourhood Plans should support a strong rural economy by promoting the retention and sustainable growth of local business and enterprise. There is a clear link between housing provision and providing jobs for those residents. Admittedly this is not necessarily a 1:1 ratio and in Ashurst Wood a significant number of residents are employed outside of Ashurst Wood. Nonetheless there needs to be some reconciliation between the provision of new homes and the provision of additional jobs. Given the constraints to the Ivy Dene Lane Industrial Estate that limit the gross floorspace, thought should be given to alternative business uses that generate either a larger number of jobs, jobs that are high in terms of output or jobs that the village aspires to develop to encourage economic growth and insure flexibility for the rural economy in the village. It is considered that at this stage the effect of the plan is likely to be **Minor Negative** on this objective.

4.9.5 **Recommendation:**

- Consider alternative business uses for the Ivy Dene Lane Industrial Estate that could generate different types / quantum of employment.

## 4.10 How has the plan changed as a result of the appraisal?

4.10.1 During the course of the SA, a number of recommendations have been made to the NP and the Parish Council has responded to a number of these. **Table 9** sets out the recommendations that have been taken on-board so far (note that the appraisal above has been updated to reflect these changes).

**Table 9:** Recommendations accepted by the Parish Council

<i>Plan area</i>	<i>Recommendation</i>
Air and climate	Amend SuDS bullet in the policy to remove 'urban'

Roads and transport	<p>Require developers to demonstrate that all traffic reduction measures have been considered prior to considering measures to mitigate the effects of traffic.</p> <p>Amend policy to: “This should demonstrate that traffic reduction measures have been considered <i>to avoid negative impacts prior to</i> providing measures to mitigate the impacts of increased traffic. Mitigation could include providing or contributing towards schemes that promote walking, cycling, use of public transport or local transport arrangements.</p>
Infrastructure	Consider addressing the identified weakness of health provision in Policy 22.
Economic characteristics	Consider a more positive wording for economic growth in Policy 17 e.g. ‘encouraged’ rather than ‘permitted’.



***What are the next steps  
(including monitoring)?***

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# 5 What are the next steps (including monitoring)?

## 5.1 Introduction

The Environmental Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

5.1.1 This section of the report explains next steps that will be taken as part of plan-making / SA, in-line with the Neighbourhood Planning Regulations.<sup>11</sup>

## 5.2 Plan finalisation

5.2.1 Subsequent to consultation on the draft ('pre-submission) plan and SA Report (in-line with **Regulation 14**) the main issues raised will be identified and addressed by the Parish Council.

5.2.2 Once the plan has been finalised it will then be submitted to MSDC. **Regulation 15** requires that the Parish Council submit (to the Local Authority) the 'Proposed' Plan and a 'Consultation Statement'. The Consultation Statement must describe issues or concerns raised through the Pre-submission Plan / SA Report consultation and how these have been addressed. It will probably be appropriate that this SA Report is updated and submitted alongside the Proposed Plan.

5.2.3 **Regulation 16** then requires that the Local Authority 'publicises' the Proposed Plan so that stakeholders can make representations that may then be considered at Inspection. It will be appropriate for the Local Authority to also publicise the updated SA Report, with a view to informing representations.

5.2.4 **Regulation 17** requires that the Local Authority submits (to the person appointed to carry out the Inspection) the Proposed Plan and a copy of any representations which have been made in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit the updated SA Report, with a view to informing the Inspection.

5.2.5 **Regulations 18 and 19** require that, subsequent to the Inspection, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated SA Report, with a view to informing the Referendum.

5.2.6 **Regulation 20** states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SA Statement must be published alongside the adopted Plan. The SA Statement must present:

- information on the decision (i.e. must answer the question 'What has plan-making / SEA involved up to this point?); and
- measures decided concerning monitoring.

## 5.3 Monitoring

5.3.1 At the current stage – i.e. in the SA Report - there is a need to present 'a description of the measures envisaged concerning monitoring'. In light of the appraisal findings presented in this report, it is suggested that monitoring might focus on: Traffic monitoring (both traffic counts and emissions); Health provision; and Economic growth.

<sup>11</sup> See <http://www.legislation.gov.uk/ukxi/2012/637/note/made>

# Appendix 1 – Regulatory requirements

The information that must be contained in the SA Report is listed in Annex 1 of the SEA Directive / Schedule 2 of the SEA Regulations; however, interpretation of the regulatory requirements is not straightforward. The table below ‘interprets’ requirements.

## Annex 1

## Interpretation of Annex 1

### *The report must include...*

### *The report must include...*

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What are the key issues &amp; objectives?</i>	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i>	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i>	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i>	

## Appendix 2 - Site Assessment

The Site Assessment<sup>12</sup> undertaken by the Parish Council took into account:

- Policy restrictions – including landscape character, environmental designations and local and national planning policy; and
- Potential impacts – on the environment, listed buildings, important designated sites. The cumulative impact on character and infrastructure of developing more than one site.

The Site Assessment concluded that seven sites were suitable for development. Of these, one is subject to a planning application. **Table A** sets out whether sites were included or excluded from the plan.

**Table A:** Site suitability

Site	In / Potential / out of the plan	Summary reasons
1	Out	- The proposed development would be harmful to the character of the AONB. Although only on the edge of the strategic gap, there is no obvious defensible boundary to the north of the site to contain development and prevent pressure for further development. There is no justification for relocating the Village Hall to the site as access and parking facilities would not be improved.
2	Out	- The proposed development would be harmful to the character of the AONB. Although only on the edge of the strategic gap, there is no obvious defensible boundary to the west of the site to contain development and prevent pressure for further development.
3	Out	- Site is acceptable but is already the subject of a planning application and so it is not necessary to allocate it in the Plan
4	In	- The site is surrounded on all sides by dwellings, so could be viewed as an infill site. Any development should reflect the character of the immediate area. Safe access on to Maypole Road must be provided. Development could result in loss of the tall hedge but would provide an opportunity for road safety improvements including a pavement. There is a need for allotments in the village, however the topography and size of the site may make it unsuitable for such use.
5	Out	- Despite its proximity to the built up area, development of the two fields on this site would create an unacceptable extension of the village into the countryside and would fail to enhance or conserve the natural beauty of the High Weald AONB. There is a need for allotments in the village and the field behind the primary school could be a suitable location. The provision of parking facilities for the school would also be a benefit. However the possible benefits of the proposal are outweighed by the substantial disadvantages. Development of Field 2 could lead to pressure to develop further land to the north and east. - The number of new homes proposed would generate significant extra traffic, which would have an impact on the road network throughout the village, in particular the narrow sections of Hammerwood Road by the top of Maypole Road and the Church, which could only be mitigated by major highways improvements.
6	In	- There is support from residents for the improvement of this site, long regarded as an eyesore. The position of the site at the edge of the parish boundary and outside the built up area means that any development must be at a low density and in keeping with the character of neighbouring dwellings. - Cansiron Lane is very narrow and has no footpaths. It is well used by walkers. The distance from facilities means that new residents will inevitably use cars and any increase in traffic along this lane must be minimal in order to protect the amenity of current residents.

<sup>12</sup> the prevailing pattern and grain of development as described in the **Character Assessment**

Site	In / Potential / out of the plan	Summary reasons
		<ul style="list-style-type: none"> <li>- Development of this site could have a positive impact on the character of this part of the village provided any proposal involves remediation of the whole site and includes appropriate design and screening. Widening of the land alongside the site could provide useful passing points.</li> </ul>
7	Pot	<ul style="list-style-type: none"> <li>- This is a contained site which had permission for development many years ago. One dwelling would have minimal impact. Extra traffic would be created along Cansiron Lane, which is narrow with no footpaths. However the site is located close to the start of the lane and the addition of a layby / passing point along the front of the site would be an improvement.</li> <li>- This site could come forward under the proposed windfall policy and will not need specific allocation</li> </ul>
8	Out	<ul style="list-style-type: none"> <li>- This is a very small site and would lead to loss of much of the garden of Abbey View. The positioning of the proposed dwelling would be very close to the properties at Ashurst Wood Abbey opposite. Dwellings in this part of Hammerwood Road and Cansiron Lane are typically detached with large gardens. The site is triangular and any dwelling built on it would look cramped and the overall appearance would be out of keeping with the surrounding properties.</li> </ul>
9	Pot	<ul style="list-style-type: none"> <li>- This site has potential if other, more favourable sites prove to be unavailable. The location would be acceptable for allotments which would benefit the village. Any development would need to provide strong tree screening to the south and be of a character and density that fits in with surrounding housing.. There is no separation from site 10 and a joint proposal covering the combined sites would be preferable. It is not clear that it would be possible to mitigate satisfactorily the significant Highways issues that would result from development</li> </ul>
10	Pot	<ul style="list-style-type: none"> <li>- This site has potential if other, more favourable sites prove to be unavailable. Development would need to provide strong tree screening to the south and be of a character and density that fits in with surrounding housing. There is no separation from site 9 and a joint proposal covering the combined sites would be preferable.</li> <li>- It is not clear that it would be possible to mitigate satisfactorily the significant Highways issues that would result from development</li> </ul>
11	In	<ul style="list-style-type: none"> <li>- The proposal would involve sub-division of a garden and the loss of woodland. Development will only be acceptable if it does not harm the character of the surrounding area. The screening along the front of the site and along the boundary to the footpath must not be lost, and satisfactory access onto the highway must be demonstrated. Any new dwellings must not dominate, in size or height, the existing or neighbouring properties.</li> <li>- Allocation of this site could lead to pressure to develop on other large gardens in Lewes Road and other parts of the village.</li> <li>- Redevelopment of sites 11 and 12 together would be an alternative option, enabling a better distribution of properties within the plot to be achieved. Such development will only be acceptable if it includes a range of dwelling sizes and an appropriate proportion of affordable homes and is in accordance with all policies of this Plan.</li> </ul>
12	In	<ul style="list-style-type: none"> <li>- The proposal would involve sub-division of a garden and the loss of woodland. Development will only be acceptable if it does not harm the character of the surrounding area. Development of the sloping, wooded area in front of the house might be difficult as adequate screening will need to be maintained. Satisfactory access onto the highway must be demonstrated. Any new dwellings must not dominate, in size or height, the existing or neighbouring properties.</li> <li>- Allocation of this site could lead to pressure to develop on other large gardens in Lewes Road and other parts of the village.</li> <li>- Redevelopment of sites 11 and 12 together would be an alternative option,</li> </ul>

<b>Site</b>	<b>In / Potential / out of the plan</b>	<b>Summary reasons</b>
		enabling a better distribution of properties within the plot to be achieved. Such development will only be acceptable if it includes a range of dwelling sizes and an appropriate proportion of affordable homes and is in accordance with all policies of this Plan.
<b>13</b>	<b>In</b>	- There is public support for the use of this brownfield site. Two apartment blocks, totalling 14 flats, have been built on a former part of the site and development at a similar scale would be acceptable, but careful design would be needed to respect the character of adjoining and neighbouring buildings including the Victorian Manor House.
<b>14</b>	<b>In</b>	- There is public support for the development of brownfield land at Wealden House. Two apartment blocks, totalling 14 flats, have been built on a former part of the site and residential development could therefore be acceptable, but development of the small car park would need to relate well to the use of the rest of the site and the adjoining site. - There is little information about proposals for site 14. However it is part of the overall Wealden House site and access to the neighbouring site 13 is over this site. Therefore it should be included in the Plan.
<b>15</b>	<b>Pot</b>	- A small development is possibly acceptable and suitable subject to road widening and satisfactory access. However, the site is located in the northern fringes of the village, which is a rural area comprising mainly dispersed properties and farms, so sensitive design would be paramount. Site not currently available.
<b>16</b>	<b>Out</b>	- This site was included in the HSD after being identified as a possible location for a rural exception site. Although MSDC has concluded that it is suitable for development, the site is rural in character and with no obvious defensible boundaries to protect against further development into the countryside. Could be considered in the future as an exception site, but would not need to be allocated in the Neighbourhood Plan.

It is clear that as part of the site assessment, the sites were assessed against both SA Objectives (through the 'Sustainability' section) and Suitability (i.e. in line with the objectives and strategy of the plan). A number of sites were excluded for logical reasons e.g. impact on the AONB, and there are a number of 'potential' sites that are considered to be eligible for allocation but for justified reasons are not able to be allocated in this plan e.g. site availability, or surplus at this stage of plan making.

## Appendix 3 – Consultation questions

Question	Comments
1. Does the SA Report evidence base provide a suitable basis for the appraisal?	(If not, please provide detailed comments and if possible, data sources)
2. Are there any further reasonable alternatives that should be considered?	(If so, please provide details)
3. Do you have any comments on the appraisal findings?	(If so, please provide details)
4. Are there any further effects likely?	(If so, please provide details)
5. Does the monitoring framework represent a suitable set of indicators to monitor the effects of the plan?	(If so, please provide details such as alternative indicators)





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