

Crowhurst Neighbourhood Plan Review

2018-2028

Reg 14 Consultation Statement

1.0 INTRODUCTION

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

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

1.2 In accordance with section 15 of the Neighbourhood Planning (General) Regulations, this statement has been prepared by the Crowhurst Neighbourhood Plan Monitoring and Review Group on the behalf of Crowhurst Parish Council to accompany its submission to Rother District Council of the submission version of the Reviewed Crowhurst Neighbourhood Development Plan (CNDP). This Statement sets out details of events and consultations. The rationale behind the Neighbourhood Plan and consultation events is to ensure as many residents as possible are aware of the Plan and its Review.

2.0 THE PLAN PREPARATION PROCESS

2.1 Crowhurst Parish Council took the decision to produce a Neighbourhood Plan at its meeting on 5th October 2015 after a working party had looked at the pros and cons. Formal designation of the Parish of Crowhurst as a Neighbourhood Plan area was completed in December 2015. The Plan preparation process was led by Crowhurst Parish Council, with decisions delegated to its Neighbourhood Plan Steering Group, which consisted of 4 Parish Councillors and, initially, seven residents. After much work, the Crowhurst Neighbourhood Development Plan was successfully 'made' on 8th July 2019. The Plan and associated documents can be found on the Crowhurst Parish

Council website [Crowhurst Parish Council - Neighbourhood Plan](#) and the Rother District Council website [Crowhurst Neighbourhood Plan – Rother District Council](#)

- 2.2 A Design Guide Task Group was then set up in late 2019 to help give developers and Rother District Council (RDC) Planning Officers guidance when planning application came forward. The initial idea was that this would be an advisory document to begin with, and then be incorporated into the Neighbourhood Plan during a review several years after it was made. The Design Guide was largely based upon the High Weald Management Plan and the more specific High Weald Housing Design Guide, the Crowhurst Landscape Character, Sensitivity and Capacity Assessment (CLCSA) and the Character and Heritage Assessment 2017. Exhibitions and surveys enabled input from residents to ensure it was made local for Crowhurst. Information about surveys, feedback and consultations can be found in Fig 1 in Section 3.1. RDC was also consulted at different stages.
- 2.3 Approval for the renaming of The Advisory and Monitoring Group to the Monitoring and Review Group and its new Terms of Reference was given in Feb 2023. Funding for the review of the CNDP was agreed by the Parish Council in July 2023.

3.0 Community Engagement

3.1 Along with various events listed in Fig 1 below, regular feedback on the Design Guide and then the CNDP Review was given to the Parish Council at its meetings.

Date	Event
Feb2019	Rural Village Design Talk Initial talk in village given by an architect which started the idea that a separate Design Guide, on top of the Design policy in the CNDP would be useful.
2020	Some work went ahead but at a much slower pace due to the Covid-19 pandemic
Feb 2021	Crowhurst News (monthly village magazine) update about the Design Guide
Mar 2021	Crowhurst News (monthly village magazine) update about the Design Guide and upcoming consultation
April 2021	Village wide consultation on the Draft Design Guide Surveys delivered to every household with information on where to see the Design Guide online or how to get a hardcopy
April 2021	Email sent out on village email list to remind residents to give feedback
June 2021	Crowhurst News update
Sept 2021	Crowhurst News update
Nov 2021	Crowhurst News update about the survey results
Sept 2023	Presentation to Parish Council
Nov 2023	Flyer to all households with information about the Regulation 14 Consultation for the Reviewed CNDP and Design Guide A3 poster put up in village with information about the consultation and events Crowhurst News update about the consultation
Nov 2023	A3 posters put up in village with information about the Consultation
13 Nov 2023 – 12 Jan 2024	Regulation 14 Consultation of the Reviewed Crowhurst Neighbourhood Plan Documents were put up on the Parish Council website along with information on how to comment

24 th Nov 2023	Consultation event at St Georges Church coffee morning
Dec 2023	Crowhurst News reminder about the Consultation
2 nd Dec 2023	Consultation event at Village Market
Sun 10 th Dec 2023	Consultation event at Warmer Crowhurst session, Crowhurst Village Hall
January 2024	Village email reminder about the consultation
April 2024	Report and consultation feedback at the Parish Assembly

Fig. 1 – Consultation events

4.0 Regulation 14 Consultation Responses

- 4.1 The NDP Regulation at Regulation 14 requires that the pre-submission Plan is taken to consultation by the Parish Council. This is a formal statutory consultation period of 6 weeks with the statutory bodies, stakeholders, the Local Planning Authority and the community. It then requires the Parish Council to consider those representations received and whether any further changes may be required because of these. The Reg.14 Pre-submission consultation and publicity was from 13th November 2023 to 12th January 2024. The minimum 6 weeks was extended because of the Christmas/New Year period. Three exhibitions were held:

Fri 24th Nov 2023 – St Georges Church, alongside their regular coffee morning. 9-11.30am

Sat 2nd Dec 2023 – Crowhurst Village Hall, alongside the monthly village market. 10-1pm

Sun 10th Dec 2023 – Crowhurst Village Hall, alongside the Warmer Crowhurst session. noon-4pm.

These were advertised by posters in the village and by flyer to every household in the Parish. The plan with all its supplementary and background information was also available on the Parish Council website at <https://www.crowhurstpc.co.uk/neighbourhoodplan/current-reviews> and via the Rother DC website. Hardcopy of the main documents were also available if anyone needed them.

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

4.2 Figure 2 below sets out the comments received and the response

Location	Respondent	Comment	Amendment
P24, para 2.5 Housing and Population	ESCC 3.6	<p>Chapter 2 Crowhurst – A Rural Village; This section is described as establishing a summary of Crowhurst. To support and reinforce the health and wellbeing aspect of policies within the CNDP, it is suggested that health intelligence data on population demographics is used to show the trends, key issues, and health inequalities in the parish in this section. For example, a breakdown of population by all ages in a table in Section 2.5 Housing and population, and to set out the proportions of the population in good or bad health, that can be compared with the District and nationally to build up the profile of the health of parish residents. Please also refer to area profile on the East Sussex in Figures website for Crowhurst: https://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=area&submode=result&areaname=crowhurst&areatype=PA and more general information in the East Sussex State of the County 2023 report: https://democracy.eastsussex.gov.uk/documents/s51141/Appendix%20</p>	<p>No amendment More detailed information can be found in the Crowhurst – A Rural Village Nov 2017 document in Appendix 4.</p>

		<p>1%20Focus%20on%20East%20Sussex%202023.pdf In addition the Rother District profile within East Sussex Joint Strategic Needs Assessment (JSNA) in the following link is a useful source of local health and inequalities data to add context to Section 2.5: https://www.eastsussexjsna.org.uk/area-profiles/rother-district-area-profile/</p>	
P27, para 3.1.1 The Vision	ESCC 3.3, 3.7	<p>This can be realised by including the above as well as adding a separate section in ‘3. A Vision for Crowhurst’ on Health and Wellbeing (or community wellbeing) that clearly emphasises the links between health, the environment, and healthy placemaking. This would demonstrate the CNDP’s commitment to health throughout the plan. For context on understanding the built and natural environment and its links to health, please refer to the Health Map (Barton and https://www.wellbeingforlife.org.uk/sites/default/files/Forces%20and%20factors%20-%20handout%20with%20attribution.pdf). This is particularly important as it will acknowledge the links between achieving healthy outcomes for people and place through the built and natural environment, the links between people and achieving sustainable outcomes, ‘nature for health’, ‘planetary health’, ‘ageing in place’ and climate change adaptation for example</p> <p>The vision and aims section need to integrate health and wellbeing issues more holistically and comprehensively. It is suggested that the vision includes reference to ‘<i>maintaining and enabling healthy lifestyles</i>’ and refers to the benefits to physical health and wellbeing particularly in relation to access to the natural environment and community facilities: <i>‘maintain the village’s rural character by protecting the countryside and environment around its boundaries, promoting, maintaining and</i></p>	<p>Amendment: “maintain the village’s rural character by protecting the countryside and environment around its boundaries, promoting, maintaining and enabling healthier lifestyles, community spirit and enhancing infrastructure, facilities and services for residents of all ages and abilities”</p>

		enabling healthier lifestyles, community spirit and enhancing infrastructure, facilities and services for residents of all ages and abilities’.	
P28, para 3.3	ESCC 1.1, 1.2, 1.3	<p>We welcome that the ‘Aims’ ITB1 to ITB5 reference transport as well as the relevant ‘Aims’ (H1-2, EH8 and CS1-6) that can also be linked to transport provision.</p> <p>In relation to aims ITB1 & ITB2, they are both referring to similar factors i.e. ‘improving road safety and reducing congestion’. It is suggested you may wish to consider only including ITB1, which is referring to both of the above factors more broadly. You could refer to any traffic speed issues etc. in more detail within the text.</p> <p>In relation to ITB3, to ensure alignment with ESCC’s draft Local Transport Plan 4, it needs to reference wheeling alongside walking and cycling. (wheeling refers to mobility scooters and wheelchair users.) Please also consider referring to walking, wheeling and cycling as part of short local journeys and also as part of longer journeys. Therefore, the following suggested amendments to ITB3 are as below – <i>‘To enhance opportunities for walking, wheeling and cycling as part of short journeys (within the village) or as part of longer journeys.’</i></p>	<p>Noted</p> <p>No amendment</p> <p>Amendment ITB3 <i>“To enhance opportunities for walking, wheeling and cycling around the village”</i></p> <p>Reference to wheeling also updated throughout document.</p>
P29, para 3.5	ESCC 3.8	<p>Chapter 3. A Vision for Crowhurst; It is suggested the following points be incorporated within the Aims:</p> <ul style="list-style-type: none"> • maintain and improve access to nature and to play and recreation increasing physical activity and providing health and wellbeing benefits such as positive mental health. • maintain and improve social cohesion and reduce social isolation and loneliness. • Maintain and improve food security through access to healthy food, and growing spaces. 	<p>Amendment:</p> <p>CSF4) To support health services, facilities and activities that help to encourage everyone to lead healthy and active life styles, both physically and mentally;</p> <p>CSF6) To support and enhance community events, leisure and cultural activities for everyone of all ages and abilities in the village</p>

		<ul style="list-style-type: none"> lifetime and adaptable homes that meet the needs of the aging population. maximising opportunities for healthy design principles. active travel. healthy lifestyles and mental health. 	It was felt the other points were already stated in the NP.
P35, para 4.1.3	ESCC 3.24, 3.25	<p>The CNDP should demonstrate that health and wellbeing is at the forefront of thinking behind the Plan by strengthening links to opportunities for active travel, social cohesion, and planning for all age groups. If there is no specific policy for health and wellbeing, where these issues could be covered, then stronger wording should pick up these elements within relevant policies to ensure there is a strong health and wellbeing thread through the Plan.</p> <p>The CNDP should also strengthen references to climate change adaptation/mitigation by including benefits to human health alongside planetary health. The CNDP contains no references to food, through food growing, private gardens, community growing spaces or allotments that contribute to physical and mental wellbeing. Please see recent communications on a community agriculture project that highlights the opportunities to tackling food security and while contributing to wider agricultural diversity for surrounding areas: Visit to Crowhurst Community Agriculture Project – Transition Town Hastings</p>	<p>Physical and mental health and well-being references have been added throughout the NP. Para 4.2.4.3, Policy CE2, Policy CE6, Para 4.3.1, 4.3.2.6, 4.3.2.8, Policy CF3, Para 4.3.3.1, 4.3.3.3, Policy CB1, para 4.4.3.4, 4.4.3.5.</p> <p>Amendment: Para 4.1.3 Overall, each policy within the CNDP contributes to the sustainable development of the Parish. It is not therefore considered necessary to have a separate policy on sustainable development or climate change. Policies that promote sustainability and climate change mitigation also include benefits to human and global health. Also Policy CF1 Support the provision of community growing space/allotment if a suitable proposal comes forward and a long term management plan is established</p>

			And Para 4.3.3.3 ..and that development provides opportunity for recreation, including private gardens, community growing spaces or allotments. These spaces are also invaluable from both a landscape and design perspective and a physical and mental health and wellbeing perspective and thus should be viewed as an integral part of the design approach.”
P36, Para 4.2.1	ESCC 3.9	The section should expand on the benefits to health and wellbeing from the environment. It should acknowledge the potential benefits of increasing physical activity for all ages and abilities through active travel, recreation, and play, connected neighbourhoods, also the mental and wellbeing benefits associated with access to nature and quality built and historic environments.	Felt that this was better put into social benefits para 4.3.1. Amendment criteria 5 Maintain and enhance areas of open space and where possible encourage new open space, sports and play space facilities and ensure access to the countryside is maintained for all, encouraging physical activity and active travel to support the mental and physical health and wellbeing of residents of all ages and abilities
P36, para 4.2.1	Resident	Protecting important landscape features requires enforcement e.g. TPOs	Amendment 4) “To protect important landscape features within the Parish such as trees, hedgerows, verges, ponds and watercourses and protected biodiversity assets...”

			10) Ensure transparent processes with RDC about changes put forward to alter the protection of any area within the Parish such as TPO's and section 41 habitats.
P40, Policy CE1	Southern Water	<p>Southern Water understands the desire to protect areas located outside of the defined development area. We support the intention of the policy and suggest some amendments to wording to help ensure that no barrier is created to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.....(NPPF info)</p> <p>....We therefore recommend additional policy wording be included in Policy CE1 to ensure consistency with National Policy, and we provide a wording suggestion below for your consideration:</p> <p>Development will only be supported where it meets the following criteria...</p> <p>5. in very special circumstances for example where it relates to necessary utilities infrastructure where no reasonable alternative location is available.”</p>	<p>No amendment.</p> <p>Utilities are usually considered significant infrastructure and are not dealt with by NPs</p>
P40, Policy CE1	Resident	Not to be radically altered	Noted
P42, para 4.2.4.3 and Policy CE2	ESCC 3.10	Accessibility to the High Weald National Landscape (previously referred to as Area of Outstanding Natural Beauty (AONB)) for recreation for health and wellbeing benefit should be incorporated into the supporting text and policy	<p>Amendment:</p> <p>“The area of the Parish outside the HWNL, still shares many of the characteristics of the HWNL .Crowhurst village itself presents significant HWNL character that is largely intact and</p>

			<p>unspoilt. Accessibility to this landscape for recreation brings health and well-being benefits. Having regard to the great weight..."</p> <p>Policy CE2 Development within the High Weald National Landscape (NL) – formerly known as the High Weald Area of Outstanding Natural Beauty (AONB) will only be supported where it conserves or enhances the natural beauty of the parish, including promotion of accessibility for health and wellbeing, and has regard to the High Weald AONB Management Plan.</p>
P44, para 4.2.5.3	Resident	<p>"...developers should aim to link any new habitats..." Use of "aim" not strong enough wording? Provides the opportunity to be ignored</p>	<p>Amendment ...The importance of wildlife corridors and wider connectivity is noted and developers should aim to must link any new habitats to current areas to allow for the movement and dispersal of flora and fauna...</p>
P44, para 4.2.5.4	Resident	<p>"The policy will require an integrated approach to all parts of the development, including those traditionally engineered parts of the development, including habitat within buildings such as bird boxes including swiftbricks, hedgehog homes, insect hotels and wildlife friendly SuDS to maximise biodiversity opportunities in all parts of the building and site...."</p>	<p>Para 4.2.5.4 says it must be done. Amendment to Policy CE3 "iv) New development should must take opportunities to incorporate new habitat within buildings and across the site..."</p>

	Resident RDC	<p>- Is this mandatory or encouraged? "... The policy will also encourage native planting from local or UK only sources (to limit disease transfer) that is appropriate to the site conditions and also where possible planting that represents good pollinators for local wildlife"</p> <p>- If only encouraged does it give an opportunity to be ignored?</p> <p>Whilst we strongly support the inclusion of native tree planting, we recommend that this is extended to climate-resilient planting</p>	<p>Amendment .. The policy will also encourageensure new planting is native and climate resistant – trees such as Crab Apple, Juniper, Osier Willow, Hazel, Blackthorn/Sloe or Silver Birch would be suitable..."</p> <p>Also amendment to Policy CE3 2 (viii) "Any new planting shouldmust incorporate native, climate resilient planting, from local or UK sources only (to limit disease transfer), and those which are defined as good pollinators for native species"</p>
P45, Policy CE3	Resident	Ensuring achievement of Biodiversity Metric Gain has the potential to ensure environmental and healthy community benefits for the village, particularly from the creation of a Village Green and pond	Noted
P45, Policy CE3	RDC	<p>We recommend that it would be more relevant to refer to the Biodiversity Metric rather than biodiversity software. BNG does not apply to all applications, and we would like to see that this is qualified in the policy e.g. 'It's important to note that the following cases are exempt from the Biodiversity Net Gain (BNG) requirement: Permitted development, householder applications, small-scale self-build and custom-build sites.'</p> <p>Whilst we strongly support the inclusion of native tree planting, we recommend that this is extended to climate-resilient planting.</p>	<p>Amendment Policy CE3 intro "Any new development will be required to demonstrate that there will be a net gain in biodiversity of the site of at least 20% or the higher of any subsequent regulations (bar allowed exception sites), shown using the Biodiversity Net Gain (BNG) softwaremetric..."</p> <p>Amendment Policy CE3 2 (vii) "Any new planting shouldmust incorporate native, climate resilient</p>

			planting, from local or UK sources only, and those which are defined as good pollinators for native species”
P46, Policy CE3	Resident	<p>“... and new wildlife corridors should be created as part of the new development where possible; Opportunities to connect with wildlife corridors on adjacent land should be explored and boundaries permeable to wildlife must be used; if possible, porous boundaries used;</p> <p>- Use of "should" not strong enough wording? Provides the opportunity to be ignored?”</p>	<p>Amendment Policy CE3 2 (iii)“Existing wildlife corridors should must be retained, buffered, restored and strengthened, and new wildlife corridors should be created as part of the new development. Opportunities to connect with wildlife corridors on adjacent land should must be explored and boundaries permeable to wildlife must be used</p>
P47, Para 4.2.6.2	Resident	<p>“Having regard to the latter, the policy seeks to extend this protection to other undesignated habitat and landscape features in order that their wider and cumulative value for landscape character and biodiversity is taken into account as part of development. It is recognised, that sometimes loss is unavoidable on some development, but the policy requires that the design of development seeks to minimise such impacts through design where possible and, where this is not the case, then suitable compensation be provided within the site. It is also vital that the development provides evidence that the important features can be protected during the development and over the lifetime of the development. For example, tree protective fencing and that there is suitable separation space between trees, hedgerows and buildings to avoid later pressures for removal.”</p> <p>Requires enforcement - will there be resources for that?</p>	<p>Resources would mostly need to come from RDC/ESCC. Amendment “... For example, tree protective fencing and that there is suitable separation space between trees, hedgerows and buildings to avoid later pressures for removal. The Parish is keen and will be vigilant in ensuring RDC and ESCC abide by all Wildlife Acts, regulations, laws and guidance as well as their own environmental policies.”</p>
P49, Para 4.2.7.2	RDC	<p>Where it is stated ‘Monitoring before and after development’, we have reservations about how practical this is and how it would be enforced e.g. who will monitor this and who will assess submissions? Currently</p>	<p>We believe it is important that any potential pollution generated during development is monitored. Nearby</p>

		RDC development management officers are not trained to do this, and this is unlikely to change. The Local Lead Flood Authority also do not have capacity. Management of pollution is the duty of other authorities, and the legislation is outside planning. We recommend that this sentence is deleted.	watercourses could be assessed by the developer in their environmental report. Amendment “...The use of SuDS would also help to ensure that watercourses are not polluted during or after development - monitoring of water quality of potentially affected watercourses would be needed. The local Environment Group will regularly monitor watercourses and any required Environmental reports needed for development should include water quality of nearby watercourses. ”
P50, Policy CE5	RDC	We would like to see mention of ground waterflooding in the policy as this is relevant to the area.	Amendment Policy CE5 intro: The existing network of streams, ponds, springs and rivers and their flood plains shall be maintained and protected and there will be a presumption against development within areas at risk of flooding (fluvial, pluvial or groundwater) in order that development is directed to areas of low risk”
P50, Policy CE5	Southern Water	Urban creep presents an ever-increasing challenge to communities as this combines with the effects of climate change to worsen the risk of localised flooding. Southern Water supports all policy requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. This aligns with our own work to address problems caused by excess surface water in our sewerage network in	Noted

		order to protect water quality in rivers and sea, and preserve water resources into the future.	
P53, Policy CE6	RDC	We welcome the addition of this policy, but please note that local heritage assets are mentioned only in the policy but not justified in the supporting text; we recommend the reference here is deleted.	Amendment to para 4.2.8.2 to include local heritage assets. “...Light pollution also affects UK protected mammals such as bats, badgers, hedgehogs, and diminishes biodiversity overall in the parish. Light pollution can also affect the health and wellbeing of residents causing sleep disturbances and other health issues. It can also affect heritage assets by negatively altering the perception of important architectural details. ”
P53, Policy CE6	ESCC 3.11	The continuation of no street lighting in the Parish should consider the impact on pedestrian safety and the impact on making routes less attractive reducing active travel options.	No amendment No street lights/reducing light pollution is a core part of NP
P53, Policy CE6	Resident	I was looking at some websites selling outdoor lights. I noticed Screwfix described theirs as 'cool white' - didn't see any warm white ones. John Lewis had some warm white ones - cost might be an issue	Noted. As the perception of this issue increases, more should become available so costs should decrease.
P54, para 4.3.1	ESCC 3.12	We welcome the inclusion of the social objectives below, but they need to be reflected more strongly within policies in the CNDP to strengthen the health and wellbeing benefits in the CNDP, particularly around social inclusion and accessibility for all to open spaces and the countryside, and active travel.	Amendment to criteria 1,5 and 6: 1.Promote and reinforce the existing strength of community within the Parish and maximise opportunities for social inclusion by all sectors of the community to promote physical and mental health and wellbeing

		<ol style="list-style-type: none"> 1. Promote and reinforce the existing strength of community within the Parish and maximise opportunities for social inclusion by all sectors of the community. 2. To support and enhance community facilities that will meet current and future demands e.g. Village Hall, Recreation Ground, Village Pub, Youth Club hut, Parish Room and support opportunities for new facilities e.g. shop, where needed. 3. Ensure development is inclusive in terms of accessibility and adaptability having regard to space standards, lifetime homes and other quality standards. 4. Deliver the homes that meet the needs of the community including, but not limited to: first time buyers, people needing/wanting larger or smaller dwellings, the elderly and those who cannot currently access the housing market. 5. Maintain and enhance areas of open space and where possible encourage new open space, sports and play space facilities and ensure access to the countryside is maintained for all to support the mental and physical health and wellbeing of residents 6. Improve access to local facilities, where possible, including maximising opportunities for utilising public transport and other local services. 7. Support use of existing facilities for community events including potential for dual use of facilities to maximise opportunities for social and community interaction. 8. To support social, health and educational opportunities, facilities and activities for all residents, but particularly children and young people. 	<p>5. Maintain and enhance areas of open space and where possible encourage new open space, sports and play space facilities and ensure access to the countryside is maintained for all, encouraging physical activity and active travel to support the mental and physical health and wellbeing of residents of all ages and abilities.</p> <p>6. Improve access to local facilities, where possible, including maximising opportunities for active travel, utilising public transport and other local services</p>
P55, para 4.3.2.1	ESCC 3.13	The supporting text in this section should be strengthened:	Amendment: “...the village does contain a range of facilities which are of value to the

		Para 4.3.2.1; <i>'...the village does contain a range of facilities which are of value to the community and should be protected to enable active and healthy lifestyles</i>	community and should be protected to enable active and healthy lifestyles."
P55, Para 4.3.2.3	ESCC 3.13	The supporting text in this section should be strengthened: In short, the Parish will support the future vitality of their community facilities, including utilising CIL receipts from new development to secure suitable upgrades to these assets and seek opportunities for active travel options to improve accessibility and increase physical activity for health and wellbeing benefits'.	Amendment: In short, the Parish will support the future vitality of their community facilities, including utilising CIL receipts from new development, to secure suitable upgrades to these assets, which will help increase the physical and mental health and wellbeing of residents.
P56, Para 4.3.2.5	ESCC 3.13	The supporting text in this section should be strengthened: <i>The existing or alternative footpath across the field could possibly be raised slightly and/or hardened to enable all weather use (including during flood or near flood conditions), and made accessible for all users including walking and wheeling push chairs'</i>	Amendment: "... There is a local desire to improve part of the 1066 Country Walk Bexhill Link to the southern part of the village to create a safe walking and wheeling route that is accessible all year round. The aim would be to create a safer alternative to Chapel Hill for pedestrians walking travelling between the recreation ground area and the school or station. The existing or alternative footpath across the field could possibly be raised slightly and/or hardened to enable all weather use (including during flood or near flood conditions), and made accessible for all walking and wheeling users. including push chairs. "

<p>P56, Para 4.3.2.6, Policy CF2</p>	<p>ESCC 3.14</p>	<p>The supporting text should acknowledge the physical health and mental wellbeing benefits of recreational open space to the population. The policy needs to acknowledge the potential health benefits to the population of maintaining and improving access to the countryside. Consider the inclusion of a Green Infrastructure policy that would draw together elements of open space, recreation and play space, and could include reference to landscaping within developments and green corridors, which include walking and cycling opportunities, can provide benefits for health and wellbeing creating improved access to nature including the surrounding countryside. Reference should be made to how this supports healthy lifestyles.</p> <p>In addition, criterion 3 should be strengthened by adding that recreational open space should be accessible and cater for all ages, abilities and genders, please have regard to guidance from Make Space for Girls that is provided in this link: https://www.makespaceforgirls.co.uk/resources/safer-parks-for-women-and-girls-guidance.</p>	<p>Amendment: “...This would accord with the NPPF which seeks to protect and enhance Public Rights of Way and recognises the importance of opportunities for sport to creating healthy communities. The policy also recognises the importance of improving access to nature and open spaces/countryside, including allotments, to support the physical and mental health and wellbeing of communities.”</p> <p>Amendment Policy CF2, criteria 3 Protect sports and play space and facilities and encourage more where appropriate. These spaces should be accessible and cater for all ages and abilities to support the mental and physical health and wellbeing of residents.</p>
<p>P57, Para 4.3.2.8, Policy CF2</p>	<p>ESCC 3.15</p>	<p>The policy and supporting text should acknowledge the physical health and mental wellbeing benefits of local green spaces. This includes health benefits of increasing physical activity through enabling more walking and cycling within the area and access to play and recreational areas. Reference should be made to maintaining and improving the accessibility of local green spaces for all ages and abilities and improving the quality and linkages between local green spaces and key destinations.</p>	<p>Amendment: The Local Green Space Description document, describing these areas is referenced in Appendix 4. Access to Local Green Space for residents of all ages and abilities is recognised as being important to supporting physical and mental health and wellbeing.</p> <p>Amendment Policy CF3</p>

			1.The following areas are designated as Local Green Space to support the Physical and mental health and wellbeing of the community and are shown on CNDP Map 3 and the Proposals Map
P58, Policy CF1	Resident	The proposals to develop and strengthen the village hub in conjunction with the CH1 development should bring significant benefit to the village	Noted.
P59, Policy CF2	Resident	1.a) Supporting improvements to the footpath between Forewood Lane and Sampsons Lane (Crowhurst 17a and 18 or new), as shown on CNDP Map 6, to an all-weather pedestrian use as a practical alternative to Chapel Hill - Only pedestrian use? Use by cyclists as well?"	The path is likely to remain a Public Right of Way (footpath) rather than be upgraded/reclassified to a bridleway which would need to be wider.
P59, Policy CF2	Resident	"improving the footpath link between the bottom of Station Rd and Sampsons Lane would enable safer, healthy walking and strengthen the connection between the two village focal points	Noted.
P60, Policy CF3	RDC	The proposed Cinderbrook Local Green Space is a large area of land which could conflict with Local Green Space criterion set out in NPPF Paragraph 106(c) 'local in character and is not an extensive tract of land.' The reports of use supplied in the evidence are largely anecdotal, and we feel further evidence to demonstrate such a large piece of land is used and valued by the community may be helpful when the plan review goes to examination e.g. some monitoring of use to demonstrate how many people cross the site to access the two village centres. The evidence mentions that the land's function is also to separate the two centres and prevent coalescence and we suggest considering designating the site as a Green Gap instead. We would be happy to discuss this further with the Parish Council	Amendment: Cinderbrook has been removed from the Policy and supporting text. It is currently part of the Strategic Gap in the Local Plan and the HWNL which should provide protection.
P60, Policy CF3	Southern Water	Southern Water understands the desire to protect local green spaces. We support the intention of the policy but suggest some	Cinderbrook has been removed from the Policy. Otherwise, no amendment.

		<p>amendments to wording to help ensure that no barrier is created to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development. This is of particular importance in relation to the Cinderbrook site mapped on page 100 of the draft Plan as public sewers cross the southern half of this site....(NPPF info)...</p> <p>We therefore recommend additional policy wording be included for consistency with National Policy, and provide a suggestion below for your consideration:</p> <p>Development on Local Green Spaces will only be permitted in very special circumstances, for example where it relates to necessary utilities infrastructure where no reasonable alternative location is available, or that will include development that enhances the use and attributes of the space for the reasons it was designated.”</p>	Significant utility infrastructure is not normally dealt with by NPs
P60, Policy CF3, CE1	Partnership and Strategic Overview Environment Agency	<p>As all the proposed housing site allocations (CH1, CH2, CH3) are in FZ 1 and not currently shown to be at risk from surface water flooding, we have no comments.</p> <p>We would encourage the use of natural flood management/land management practices in the wider catchment including areas of Local Green Spaces (Policy CF3) and Important Open Areas (Policy CE1) to reduce flood risk</p>	Noted
P60, Policy CF3	Resident	Welcome designation of the two additional areas	Unfortunately, one of the new areas has been removed from the Policy following consultation. There are still 5 LGS areas designated.

<p>P61, Para 4.3.3.1, Policy CB1</p>	<p>ESCC 3.1, 3.2, 3.17</p>	<p>Whilst it is acknowledged that many of the policies within the Crowhurst Neighbourhood Development Plan (CNDP) will have possible benefits on health and wellbeing, particularly the focus on good design and connections with the natural environment the plan would be greatly strengthened by emphasising the links and opportunities in ‘planning for health and wellbeing’.</p> <p>3.2 This means articulating health and wellbeing as a key priority and outcome of healthy design and ‘healthy and sustainable placemaking’. The CDNP often does not acknowledge the health and wellbeing benefits and the importance of development proposals maintaining and improving the health and wellbeing of the population in order to reduce health inequalities and create opportunities for creating health equity and prosperity as well as healthy and sustainable places</p> <p>The importance of high-quality design and the reference to ‘Building for a Healthy Life’ is welcomed. However, this document should be referred to within the wider context of creating healthy neighbourhood design and not just related to housing. Neighbourhood design should also cater for an aging population.</p> <p>The policy and supporting text should refer more to the health and wellbeing benefits of good design both physical through being well connected and accessible and mental health and wellbeing through creating attractive safe places. The design of developments should maintain and improve social cohesion through good connection with existing communities, where layout and movement avoid physical barriers and severance and encourages opportunities for social interaction. Safe pedestrian access should be for all ages and abilities. Reference should also be made to the ‘Active Design’ Guidance principles that create places which enable active and healthier lifestyles</p>	<p>Amendment Para 4.3.3.1: Section 12 of the NPPF stated that design is key to the concept of Sustainable Development and should contribute to making places better for people and promoting health and wellbeing. Design should ensure new development creates health and sustainable placemaking to create opportunities for health equity and prosperity as well as healthy and sustainable places.</p> <p>Amendment Policy CB1: “Development should be of high quality design and have regard to its site and village context to reinforce and create a sense of place, to enhance the quality and safety of the village environment and to ensure design plays an important role in the sustainable growth of the village; one that supports the creation of healthy multi-generational neighbourhoods. Development (including subdivision of dwellings) will be expected to comply with the following criteria:..”</p> <p>More references to health and well-being have been put in to the NP.</p>
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		in this link: https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance	
P61, Para 4.3.3.2	ESCC 3.16, 3.19	<p>The CNDP should also strengthen references to climate change adaptation/mitigation by including benefits to human health alongside planetary health.</p> <p>Suggest amending wording to read; <i>‘New development should seek to mitigate against and adapt to climate change by complying with Policy CC3... allow for climate change and’</i></p> <p>It is suggested that reference is made to the Housing our Ageing Population Panel for Innovation (HAPPI) principles as well as including the guidance produced by the Royal Town Planning Institute - Dementia & Town Planning, RTPI 2020. Also to reflect older people’s needs especially in relation to dementia reference in the supporting text could be made to the East Sussex Dementia Joint Strategic Needs Assessment Dementia JSNA (eastsussexjsna.org.uk).</p>	<p>Amendment: “...New development should must seek to mitigate against and adapt to climate change by complying with allow for climate change and reference Policy CC3 - Renewables and Policy CE6 - Dark Skies...”</p> <p>Amendment para 4.3.3.2 “...and thus it is imperative that the new housing is adaptable for future needs and to ensure any new homes are suitable for a diverse range of people. Reference can be made to ‘Housing our Ageing Population Panel for Innovation (HAPPI)’ principles and the Royal Town Planning Institute ‘Dementia & Town Planning’, RTPI 2020. (or subsequent) information. Census data from 2021 for the wider area shows an increased percentage of the population being over 65...”</p>
P63, Policy CB1	Resident	It is important to incorporate the Design Guide into the NP, to make clear to developers how we require site development to proceed	Noted.
P64, Policy CB1	RDC	The Local Plan refers to ‘massing’ (DHG9: Extensions, Alterations and Outbuildings) which refers to overbearing or overshadowing. This has more weight than Criterion 7 and consequently the inclusion of this	Amendment: “7.Development should not adversely affect the amenity of neighbouring properties in terms of massing ,

		<p>criterion would undermine existing policy. We recommend adding 'loss of light and massing' to the policy</p>	<p>overlooking, loss of light or privacy or other overbearing impacts including all forms of pollution by following County Council guidance"</p>
P64, Policy CB1	Resident	<p>"4.....Opportunities to promote wildlife and biodiversity enhancement should be demonstrated using the Biodiversity Net Gain software if appropriate"</p> <p>Contradicts(?) "Any new development will be required to demonstrate that there will be a net gain in biodiversity of the site, shown using the Biodiversity Net Gain software" stated in Policy CE3 biodiversity initial para, p44 (p45</p>	<p>Amendment: "...Opportunities to promote wildlife and biodiversity enhancement must be sought and ecological gain demonstrated using the Biodiversity Net Gain software metric, (bar exception sites) if appropriate" Policy CE3 has also been amended to take account of exception sites that do not need to show BNG</p>
P67, Policy CB2	ESCC 3.18	<p>The policy justification could include the mental health and wellbeing benefits of protecting quality built and historic environments</p>	<p>No amendment. Policy justification already mentions social benefits.</p>
P67, Policy CB2	RDC	<p>We support this policy as it cites the need to preserve or enhance in alignment with Section 16 of the Planning Listed Buildings and Conservation Areas Act and references the underlying intentions of the NPPF.</p>	<p>Noted.</p>
P73, Policy CH1	RDC	<p>RDC are considering sites within Crowhurst parish within the HELAA to support the new Local Plan which will include reassessing existing allocated sites where appropriate. The draft HELAA is expected to be published in April 2024. Affordable housing: Given the small size of each allocated site (CH1/CH2/CH3) we recommend that the following sentence is added to point 3 under CH1 and CH2: 'where a proposal exceeds the 40% affordable housing policy requirement this will be a</p>	<p>Amendment Policy CH1: "3. The development shall provide 40% of the properties as affordable homes on site. Where a proposal exceeds the 40% affordable housing policy requirement this will be a factor that is considered favourably in line with other</p>

		<p>factor that is considered favourably in line with other Neighbourhood Plan and Local Plan policies.’ The rationale behind this is as follows: in a 12-unit scheme, 40% on site AH would be 4.8 units. 2 of these would need to be provided as First Homes units leaving only 2 units to be acquired by a Registered Provider and provided for affordable housing or social rent. In the current market it is unlikely that many Registered Providers will express an interest in acquiring only 2 units on a scheme. To generate further interest in affordable housing delivery in the village the policies CH1, CH2 and CH3 could allow for additional affordable housing to be delivered. This can still include market housing through the provision of Shared Ownership homes and a requirement that both rented and affordable home ownership products are provided on each site is recommended.</p>	<p>Neighbourhood Plan and Local Plan policies;”</p> <p>Also amendment Policy CH2</p> <p>3. The development shall provide 40% of the properties as affordable homes on site. Where a proposal exceeds the 40% affordable housing policy requirement this will be a factor that is considered favourably in line with other Neighbourhood Plan and Local Plan policies;</p>
P73, Policy CH1	RDC	<p>We recommend additional wording to Criterion 5 to ensure that local context is considered in building design: “The design principles shall be based on the Crowhurst Design Guide and Policy CB1 and be of contemporary, quality design, that conserves, enhances and draws inspiration from the local context and character, potentially referencing the adjacent farm buildings. Development shall not exceed 2 storeys. The layout and design should also be informed by a site specific landscape assessment;’ The development site CH1 is within the setting of a scheduled ancient monument this should be referred to within the policy.</p> <p>Suggest Criterion 9 is revised to read: ‘The layout of the development will ensure appropriate amenity for future occupiers is provided and to prevent harm from the adjacent farm uses while maintaining proper farming operations;’</p> <p>Include climate resilient (from earlier comment)</p>	<p>Amendment Criteria 6</p> <p>“The design principles shall be based on the Crowhurst Design Guide and Policy CB1 and be of contemporary, quality design, that conserves, enhances the local context and character, potentially referencing the adjacent farm buildings... “</p> <p>We don’t want pastiche copies of local architecture. Although scheduled monument not specifically mentioned the wider area is so it’s context/design is included.</p> <p>Amendment Criteria 7</p> <p>“The development shall retain the existing tree line along Station Road and</p>

			<p>include new native, climate resilient planting buffers to the north and eastern boundaries as set out..”</p> <p>Amendment Criteria 9 The layout of the development will ensure sufficient separation from the adjacent farm uses to maintain amenity of properties and the proper farming operations The layout of the development will ensure appropriate amenity for future occupiers is provided and to prevent harm from the adjacent farm uses while maintaining proper farming operations</p>
P73, Policy CH1	Resident	<p>Access to site on right of Station Road –</p> <ol style="list-style-type: none"> 1) the road is inadequate for building vehicles - would these access via the farm entrance. 2) why not an entrance NEXT to the farm path. 3) bank and 'wild area' between road and hedge needed for water drainage. Increase of water cascading down Station Road in recent years and object to access roads crossing it 	<p>Noted.</p> <p>The policies already in place should minimize issues and may improve drainage. Any new or upgraded access onto the development site would need to ensure that drainage is improved.</p>
P73, Policy CH1	Resident	<p>I know nothing about contracts and specifications for housing developments but given the importance of affordable housing if it was at all possible to specify the contract so that the affordable housing was built first and the developer could not build any other houses until that was completed it might be a step in the right direction. Would all the development on this site have to be carried out by one developer?</p>	<p>Noted.</p> <p>This would be up to RDC and any planning conditions and the developer would depend on the landowner.</p>

P73, Policy CH1	Resident	I appreciate the care that seems to have been put into the planning, to including angles the houses are to be in relation to the sun, sheltering/buffering of trees, communal spaces to give a sense of belonging and community.. including the green and pond. Also commendable the plan to include affordable housing.”	Noted
P73, Policy CH1	Resident	Welcome the intention to seek to secure other gains alongside the CH1 development, including Village Green / pond and improved management of water flows	Noted
P78, Policy CH2	ESCC 3.20	With reference to the lack of equipped play space and general under-provision, recreational open space should be provided that is accessible and caters for all ages, abilities and genders, having regard to guidance from Make Space for Girls that is provided in this link: https://www.makespaceforgirls.co.uk/resources/safer-parks-for-women-and-girls-guidance .	Amendment Criteria 8: A children’s play area (LAP), suitable for all abilities and genders , shall be incorporated into the scheme as part of the development
P78, Policy CH2	RDC	Does housing need data suggest that the local need is still for 1 and 2 beds as this is higher than the Local Plan requirement of 30%?	No amendment. Census data indicates that the need for more 1 and 2 bed properties is greater than before (fewer dwellings available and more smaller households) than when plan made in 2019
P78, Policy CH2	Resident	Of the 3 sites this one looks the least problematic for development	Noted.
P82, Policy CH3	Resident	Bearing in mind the ongoing issues with Network Rail - if all else fails, would it be possible to incorporate semi-basement parking facilities under the dwellings? i.e. allow the building to be up to 2.5 storeys high with a half height basement incorporated at the foundation stage - so vehicles would be driven downhill under the dwellings. Drainage of rainwater into the basement would have to be prevented/managed	No amendment. This would have to be looked at during actual planning application.

P82, Policy CH3	Resident	Removing the trees and laying concrete foundations will affect the land drainage into adjoining properties. Overflow parking will impact on Craig Close, this is not acceptable as it is a Private Road. Please use this site as another green space.	No amendment. The site was chosen because it used to be part of the Station and so was brownfield and would not have had any trees on. Policy is that development would need to address water run-off. While the NP would like to ensure there is sufficient parking on all developments, the NP is not allowed to specify more than the ESCC parking calculator.
P82, Policy CH3	Resident	Access via Station Road - flats in wooded area of Crowhurst Station car park, concern it will be adding to a possibly overloaded infrastructure to present houses	No amendment. This would be considered during the actual planning permission process.
P86, 4.4.3.2	ESCC 3.22	The policy and supporting text should provide more details on the physical health and mental wellbeing benefits to the population and the environment of increasing active travel opportunities in the area by recognising the co-benefits of alternatives to car use. This would help to address the challenges around transport and car ownership, and to improve connectivity for residents around the parish.	Amendment: “...While active travel is to be encouraged, census data shows that 20% of households have 3 or more vehicles, compared to 12% in Rother. Therefore, any new development should be entirely self-sufficient...” Amendment 4.4.3.4 “At the present time, the Parish Council, via village surveys, have identified the village hall (or other community facilities) and improvements to the footpath between parts of the village to be priorities to which any monies would be spent. This will help encourage active travel and improvements in the physical

			and mental health and wellbeing of residents...”
P87	ESCC 1.4, 1.5, 1.8	<p>We have noted that references to transport are distributed throughout the NP rather than in one dedicated chapter or section. We recognise that the following key transport related challenges and opportunities have been identified, are distributed throughout the document:</p> <ul style="list-style-type: none"> • Electric Vehicle charging points for new developments (1.0.1 – economy and policy CC2 point 5). • Access to countryside (2.1.2). • Noise from Combe Valley Way (2.3.1). • Parish served by rail, though access by all modes and parking (none at station) can be a challenge (2.3.2). • Few bus services to village (weekly supermarket and college only) (2.3.3). <ul style="list-style-type: none"> • Higher number of households with cars than the Rother average, resulting in parking concerns and needs for new development with appropriate parking spaces (2.3.4, 4.4.3.2). • Pavements and road safety a concern (2.3.5) and safe access to development sites (policies CH1-3, 4.4.1). • Location of new development to reduce dependency on car, particularly for travel within the parish (4.0.13). • Public Rights of Way (4.2.3.1) (including protection of these (4.3.2.5)) and routeways (4.2.4.2) – high number of footpaths in parish and historic routeways. • Parking in the central part of the village, including increasing parking for community facilities (4.3.2.3), and the wider village (4.4.3.2). • Walking to local amenities is difficult (4.3.2.5) due to dispersed nature of the village and lack of roadside pavements. Paragraph 4.3.2.5 includes some proposals the community would like to see. 	<p>Amendment – added new para 4.4.3.5:</p> <p>There are a number of key transport related challenges and opportunities identified throughout the CNDP. These include policies to improve sustainable and active travel and the health and wellbeing of residents:</p> <p>Policy CF2 – Rights of Way and Recreation Policy CB1 - Design Design Guide (particularly Sections 6 and 7) Policy CH1 - Land at Station Road and Forewood Lane Policy CH2 – Land South of Forewood Rise Policy CC2 - Infrastructure</p> <p>An ongoing challenge is sustainable transport connectivity to the wider area. Reference can also be made to ESCC Local Transport Strategy documents such as: Draft Local Transport Plan 4 (or subsequent/adopted) Local Cycling and Walking Infrastructure Plan</p>

		<ul style="list-style-type: none"> • Maintaining existing routes to/through development sites (policies CH1 and CH2). • Policy CC2 concerning safety, access and connectivity (point 1), electric vehicle charging (point 5) and development impacts on the transport network (point 7). <p>1.5 However, to strengthen the inclusion of transport within your plan we suggest that a more detailed transport section is included within the Infrastructure Section (4.4.3). You may wish to consider including the relevant Aims, for example ITB3, EH8 and CSF4, and other points made throughout the document, as outlined above. This would help create a vision for the village in relation to transport and active travel with clear standards and guidance to be followed for new development, within the NP area. This would also help to identify opportunities and direct funding from CIL receipts and other planning contributions towards any transport measures.</p>	
P87	ESCC 1.6	In addition to the above identified issues and opportunities, it is suggested that you also consider the inclusion of the transport needs to allow for wider connectivity to and from the parish, for example for children accessing the local primary school who do not reside within the parish	No amendment. Public transport has been mentioned and transport form outside the Parish is not really under the remit of the NP.
P88, Policy CC2	Resident	Of the two route options for the carpark link to the PRow, the one entirely within the field is far preferable	Noted.
P88, Policy CC2	RDC	We are pleased to see EV provisions include shared points, and we would welcome the policy also allowing for a parking space in new development for car shares.	Noted. Spaces for car clubs are included in the Design Guide Criteria 7.5.2
P88, Policy CC2	ESCC 3.21	Health and wellbeing benefits should be emphasised in the supporting text and policy. Local services which are well connected enabling people to access them by active travel (walking, wheeling or cycling) provides	Amendment to Policy CC2 considered more appropriate:

		<p>opportunities for physical activity with benefits to health and wellbeing. Connected places also benefits people’s mental health through social connection. It is suggested that the policy includes that <i>‘developments should contribute to an improved public realm which is inclusive, age friendly and creates places where people can meet.’</i></p> <p>In addition, this section would benefit from making the links between food security and providing local growing opportunities, with the benefits to the population highlighted in the General Comments section.</p>	<p>“Any development would be expected to be supported by the necessary infrastructure and also provide access for existing and future residents to key facilities and village assets in order to promote safety and contribute to an improved public realm which is inclusive, age friendly and creates places where people can meet an inclusive community. The following criteria should be met...”</p> <p>Reference to local growing opportunities has been added to Policy CF1, Para 4.3.2.6 and 4.3.3.3</p>
P88, Policy CC2	Resident	<p>Object to car parking near village hall. Instead advocate use of the field opposite the Manor House and on the right of the bottom of Station Road. It would need the level raising, packed cinder on top, but much more practical (cars going to village hall/school/church - increased traffic over past few years) as vehicles are at present lining the roads, and the access would smoothly divert them safely with an in/out, and parents and children could disembark safely</p>	<p>No amendment. This area, if available, is being considered for a community area with potential pond to help with flooding. A car park here would not help with the issues.</p>
P90, Para 4.4.4.1	RDC	<p>We welcome this addition to the CNDP and advise the term ‘carbon neutral’ is changed to ‘net zero’</p>	<p>Amendment: “...In line with this, Rother District Council declared a climate emergency and aims to achieve carbon neutrality net zero by 2030...”</p> <p>Amendment Para 4.4.4.2 “...To support carbon neutrality net zero efforts, renewable energy solutions that</p>

			reduce fossil fuel dependency and offset carbon emissions are crucial.”
P90, Policy CC3	RDC	Regarding the potential impact of renewable infrastructure, we recommend that the wording is amended to include Historic England i.e. <i>‘Current best practice from Natural England and, where relevant, Historic England must be followed, as should relevant policies from Rother District Council and the CNDP.’</i> A criterion should also be included which refers to the High Weald National Landscape, i.e. <i>‘preserves and seeks to enhance the landscape and scenic beauty of the High Weald National Landscape’</i>	Amendment “5. Should preserve and seek to enhance the landscape and scenic beauty of the High Weald National Landscape.” Amendment final Para “Current best practice from Natural England, and Historic England where relevant , must be followed, as should relevant policies from Rother District Council and the CNDP...”
P90, Policy CC3	ESCC, 3.23	Amend wording to remove the word ‘man-made’; <i>‘In light of man-made climate change, †The Parish welcomes various small-scale and community renewable energy initiatives to help mitigate the causes of climate change’</i>	Amendment: “In light of man-made To help mitigate the causes and effects of climate change, the Parish welcomes various small-scale and community renewable energy initiatives...”
P90, Policy CC3	Resident	I'm dubious about ground source heat pumps as unless they use an expensive vertical borehole they need a lot of land. I'm concentrating on improving insulation	Noted
P90, Policy CC3	Resident	Appears there is a double spacing "minimize visual" in Anaerobic digesters section	Amended
P90, Policy CC3	Resident	This is an important addition to the NP	Noted
Design Guide	Resident	Nothing ultra modern! Keep to Sussex style buildings	Noted.

			The guide states that housing should be informed by local context and character , thereby reflecting and complementing the surrounding area.
Design Guide	Resident	This is an essential new component of the NP. It makes clear our requirements and also gives certainty to developers regarding the basis for an acceptable site development plan	Noted
Design Guide, P2	RDC	Paragraph 3 should refer to the 'High Weald Housing Design Guide' rather than the 'High Weald Design Guide	Amended as suggested.
DG, P3	RDC	The guide states that <i>'The "enhancement" of architectural quality clearly implies adoption of quality, contemporary design, not plagiarising earlier styles.'</i> We feel that the additional text below will make clear that while contemporary is favoured, more traditionally reflective design may be appropriate in certain circumstances: <i>'The "enhancement" of architectural quality clearly implies adoption of quality, contemporary design. New development could also be informed by more traditional design, although it should not plagiarise earlier styles.'</i>	Amendment "...The "enhancement" of architectural quality clearly implies adoption of quality, contemporary design, informed by local, traditional character but not slavishly copying or not plagiarising earlier styles..."
DG, P13	RDC	Refer to the LETI Climate Emergency Retrofit Design Guide as well as the LETI Climate Emergency Design Guide.	Amendment added
DG, P24	RDC	The photo shows holiday lets, not new housing, please amend this.	Amendment New housing holiday lets at Park Farm, Crowhurst. Dwellings The units are clustered around a courtyard in a manner reminiscent of a farmstead. Similar approaches in form and layout could be suitable for residential development.

DG, P25	RDC	We recommend the addition of the following text to emphasise the importance of context whilst seeking a contemporary approach: 'Design should be high-quality, contemporary <i>and be informed by local context and character. It should not seek to copy traditional or earlier design details. It should relate to the village settlement pattern and existing design topography, including through appropriate scale and use of local building materials</i>	Amendment: "Design should be high-quality, and contemporary and be informed by authentic local architectural identity without just copying and not seek to copy traditional or earlier design details. It should relate to the village settlement pattern and existing design topography, including through appropriate scale and use of local building materials"
DG, P25-27	RDC	We are particularly impressed with the suggested criteria on optimising intelligent solar design, e.g. use of wide fronted dwelling typologies aligned to east west roads and narrower, deeper plans for north-south oriented roads and primary roof pitches facing within 30 degrees of due south	Noted
DG, P28	RDC	"Use of side and back lanes can open up opportunities for parking courts which might also include garage or parking barn solutions." We recommend emphasising that these should be seen primarily as public space, pleasant small courtyards that support a social activity like sitting or communal growing, which has some parking integrated into them. They must be small-scale, serve no more than five dwellings, and well overlooked, defined by buildings bordering the space, arranged to animate the courtyard, or bounded by appropriate planting.	Amendment: "Use of side and back lanes can open up opportunities for parking courts which might include garage or parking barn solutions Parking courts should be seen as primarily public space, supportive of social activity such as sitting and communal planting, should serve no more than five dwellings, be well-overlooked and be defined by buildings and other suitable landscape elements to 'hold' and animate the space"

DG, P33	RDC	<p>Apply the High Weald Colour Palette and restrict the use of bright coloured materials, such as white painted weatherboarding, to locations which are less exposed to important views across the village, where sensitivity to change is more important.”</p> <p>We recommend clarifying that attention should be paid to the prevailing local style to help new development feel ‘of the place’. As such, white painted weatherboarding could well be appropriate in some areas / locations exposed to important views depending on the context</p>	<p>Amendment</p> <p>Apply the High Weald Colour Palette to underpin the local (or regional) identity so that development ‘feels of the place’.</p> <p>and restrict The use of large areas of bright or light coloured materials, which contrast starkly against a mainly vegetated backdrop should be limited or avoided, such as white painted weatherboarding, to locations which are less where exposed to important views across the village. ; where sensitivity to change is more prominent</p>
Appendix 3 Environment Planning Application Checklist	RDC	<p>The list refers to ‘Historical Conservation Areas’ however Crowhurst does not have any conservation areas and so we recommend this is amended to <i>‘Impact upon heritage assets and their setting.’</i></p>	<p>Amendment</p> <p>Any impact on Heritage assets and their setting?</p>
Appendix 4	ESCC 4.2	<p>The majority of the links in Appendix 4 just take you to the Parish Council homepage and therefore we were unable to readily locate the <i>Crowhurst Heritage and Character Assessment</i> or <i>Historical Heritage of Crowhurst</i> documents. Historic Environment/Heritage doesn’t feature under the ‘Your Environment’. It is assumed that these will all be updated to take you to the precise part of the website to access the</p>	<p>The links have been amended.</p>

		references and 'Your Environment' will be populated from the assessment docs.	
Appendix 4 – Biodiversity Audit	Resident	The village is extraordinarily lucky to have such a detailed record of its natural environment as a basis for its protection and against which any proposed changes - either positive or negative - can be monitored	Noted

General Comments

RDC	<p>We're delighted to have the opportunity to comment on the Crowhurst Neighbourhood Development Plan Review and can say with confidence that the emerging Plan will be a positive addition to the Rother District Development Plan. We're particularly pleased to see that the Plan is addressing renewable energy and that the Design Guide is ready for consultation. The continuing environmental emphasis in the Plan is very welcome; Crowhurst Parish Council have successfully embedded sustainability and a consistent response to the climate and ecological emergencies throughout their policies.</p> <p>One matter we wish to highlight is that the NPPF has very recently (19 December 2023) amended the requirements on what constitutes an up-to-date neighbourhood plan. Paragraph 14 states that the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided (a) that the plan is less than five years old and (b) 'the neighbourhood plan contains policies and allocations to meet its identified housing requirement' and goes on to reference paragraphs 67-68. Paragraph 68 advises that the local authority (Rother District Council in this case) should provide an indicative figure for the neighbourhood area (Crowhurst Parish Council) which must take into account the latest evidence of housing need, the population of the neighbourhood area and the</p>	<p>Noted. Final submission has been delayed until the emerging RDC Local Plan came out for consultation with indicative housing figures.</p> <p>Reference to the AONB has been amended to National Landscape throughout the NP.</p>
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	<p>most recently available planning strategy of the local planning authority. Rother District’s Core Strategy out-of-date and our housing land supply is currently at 3.09 years, and as you know, we are assessing land across the district through the HELAA process for the new Local Plan. We are not yet certain what the updates to the NPPF mean in practice, but we advise the Parish Council to understand the implications of the amendments before they proceed through the next stages of the plan process. We would be happy to discuss this further with the Parish Council.</p> <p>One final point to note is that AONBs are now recognised as National Landscapes (since November 2023) and we recommend that these references are changed where they occur in the CNDP. The change in terminology does not alter the legal designation, policy status or the relevant considerations</p>	
ESCC 1.7	When active travel is referred to please note that this refers to walking, wheeling (mobility scooter and wheel chairs) and cycling	Reference to active travel, including wheeling, has been updated throughout the NP.
ESCC 2.1-2.4	<p>Education</p> <p>The Neighbourhood Plan only goes as far as the current adopted Rother Local Plan time period of 2027/28. It envisages three housing sites – with a combined total of 30 units. Our pupil and EY Forecasts are based on 22 units being completed between now and 2027/28, so the proposed housing is of insignificant volume and largely already factored into the forecasts.</p> <p>Crowhurst CE Primary School is envisaged to keep within its Published Admission Number (PAN) and capacity within this timeframe. With an average of only 4 in-area births per annum, many of the places will be filled by children from out of area.</p> <p>The one Early Years (EY) setting in the area has an estimated capacity of 25 fte places. As at April 2023, only an estimated 14 fte places were occupied. No immediate EY capacity issues are apparent, although the expanded childcare</p>	Noted

	<p>offer for 2 year olds and under could generate some additional in-area demand for EY places.</p> <p>In conclusion, we have no particular comments to make, or issues to raise, at this stage.</p>	
ESCC 3.4	<p>A useful reference document is the Town and Country Planning Association’s ‘Reuniting Health with Planning in promoting health communities’ that can be found in this link: https://tcpa.org.uk/wp-content/uploads/2021/11/TCPA_5-Years-of-Health.pdf along with the Royal Town Planning Institute’s publication ‘Mental Health and Town Planning’ that includes reference to the built environment: mentalhealthtownplanning2020-final.pdf (rtpi.org.uk) In addition, the following documents contain contextual information on an ageing society: https://ageing-better.org.uk/sites/default/files/2023-11/State-of-Ageing-2023-summary.pdf</p> <p>Chief Medical Officer’s annual report 2023: health in an ageing society - GOV.UK (www.gov.uk) and links to loneliness https://www.eastsussexjsna.org.uk/resources/annual-public-health-report-2022-23-connecting-people-and-places/</p>	Noted
ESCC 4.1	<p>It should be noted that the AECOM Heritage and Character Assessment is now six years old, and changes will have arisen on the Historic Environment Record, including adding new data, since the report’s production. We understand that this will inevitably be the case during the time it takes to produce a Neighbourhood Plan. However this remains important to be aware of.</p>	Noted
Resident	<p>Considering population - a) increased age of elderly; b) increased need of accommodation; c) increased multi age of population; d) increased multi ethnic population.</p> <p>No building should be undertaken on farm or farmable land other than required to sustain farm equipment, stock, etc. There is adequate building land</p>	<p>Noted. We have tried to ensure policies have taken account of the issues you mention. As Crowhurst has a housing allocation from RDC, we had to find sites that were suitable</p>

	throughout this country. Any plan should look ahead 100+ years	and available. This did necessitate sites on farmland.
Resident	Support aim of control of our own affairs. Support 40% affordable and additional environmental protections and the promoting of biodiversity where I believe real progress has been made since inception of Neighbourhood Plan (especially the Environment Group), increase in local green spaces and new renewables policy. Broad agreement with proposed development sites and new pathway at Cinderbrook.”	Noted
Resident	Agree to most of the proposed changes but still feel the Station site is inappropriate.”	Noted
Resident	I think every new resident should be given a copy of the plan when they move into the village just so they understand the objectives.	Noted. Paper copies would be expensive (and not ecologically friendly). However, signposting towards the Parish Council website, where the NP and other information about the village can be found, would be good and will be looked into
Resident	A big thank you to the dedicated and passionate team who have spent a lot of their time voluntarily undertaking these changes which are excellent, the village is very fortunate to have you as residents I have a general comment which maybe due to the wording which has to be used in this update, "should" is used frequently which is not prescriptive and therefore can be ignored? Can it be strengthened an example. "Any lighting should conform" - Policy CE3 Biodiversity, criteria 2 (v), p44 (p45) Thank you again	Noted – Thank you The use of “should” has been strengthened in many places.
Resident	Thank you. We are most grateful to all who have contributed to the Neighbourhood Plan and to this review	Noted – Thank you.

Other Comments

<p>Historic England</p>	<p>Thank you for inviting Historic England to comment on the above document.</p> <p>We welcome the update to this neighbourhood plan and note the changes in respect of the new policies on climate change and dark skies, and additional references throughout the plan to the Crowhurst Design Guide. While we welcome these revisions, we do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:</p> <p>https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at East Sussex County Council.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>	<p>Noted.</p>
<p>Natural England</p>	<p>Thank you for your consultation on the above dated 13 November 2023.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Further information on when to consult Natural England on planning proposals is here- Planning and transport authorities: get environmental advice on planning - GOV.UK (www.gov.uk)</p> <p>Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.</p> <p>Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:</p> <p>Impact Risk Zones:</p>	<p>Noted</p>

	<p>Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.</p> <p>Standing Advice:</p> <p>Natural England has published Standing Advice. Links to standing advice are in Annex A</p> <p>If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.</p> <p>Further information on LPA duties relating to protected sites and areas is here- Protected sites and areas: how to review planning applications - GOV.UK (www.gov.uk)</p> <p>Further guidance is also set out in Planning Practice Guidance on the natural environment Natural environment - GOV.UK (www.gov.uk) and on Habitats Regulations Assessment Appropriate assessment - GOV.UK (www.gov.uk)</p> <p>Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.</p> <p>Should the proposal change, please consult us again.</p>	
Landowner	<p>Thanks for your e-mail.</p> <p>I have spoken to all the relevant parties my side and have the following to report.</p> <p>Everyone is in agreement that the footpath can move to along the bottom of the buildings which is the green line on your map. We do stress that is moving the existing footpath and not adding a new one?</p> <p>I don't see why the ex slurry pit would be a problem. It hasn't had any slurry deposited in there for well over a decade. We contacted the Environment agency about it last year and they were confident</p>	Noted. Cinderbrook has been removed as an LGS.

	<p>that any dangers would have dissipated years ago. is now just a pond.</p> <p>Regarding the Green space for Cinderbrook. I'm afraid no one my side is in favour.</p> <p>I'm happy to discuss further or help with the application to move the footpath</p>	
National Highways	<p>Thank you for inviting National Highways to comment on the Pre-Submission Crowhurst Neighbourhood Development Plan 2018-2028 Review Version 2023.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network. In the case of Crowhurst Neighbourhood, the nearest SRN is the A21 and A259 Trunk Roads.</p> <p>We have reviewed the submission documents and do not wish to make any comments on the Regulation 14 Pre-submission Neighbourhood Plan. However, please continue to consult us at PlanningSE@NationalHighways.co.uk.</p>	Noted
UK Power Networks	<p>Thank you for the below email.</p> <p>As you can imagine we do have numerous assets within the location of the proposed neighbourhood plans.</p> <p>Prior to commencement of work, you will need to make applications to our connections team who will be able to assist you with any adjustments to the infrastructure.</p> <p>This can be found on the below link:</p>	Noted

	Connect a commercial project UK Power Networks Additionally, accurate records can be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA	
Kent, South London and East Sussex Environment Agency	Thank you for consulting us on this Regulation 14. Unfortunately due to lack of resource we are not able to offer comment on this Regulation 14. Should you wish to discuss these matters further, please contact me via the email below.	Noted

Fig 2. Amendments to the Reviewed CNDP based on Regulation 14 comments received

5.0 CONCLUSION

This Consultation Statement shows that the reviewed CNDP has been amended appropriately based on feedback from residents, stakeholders and statutory consultees.

Appendix - List of Regulation 14 consultees

Category 1 - Statutory Bodies / Utilities etc:
ESCC
Rother District Council (RDC)
Battle Town Council
Catsfield Parish Council
Hastings Borough Council
Highways England
AONB and High Weald Authority
Ramblers (East Sussex Countryside Officer)
Homes & Communities Agency
East Sussex Fire & Rescue Service
Environment Agency
Natural England
RSPB
Historic England
Sussex Police
Sussex Police & Crime Commissioner
Sussex Wildlife Trust
Woodland Trust
East Sussex Healthcare (NHS)
Hastings and Rother CCG
UK Power Networks
Southern Water

South East Water
British Telecom
Network Rail
South Eastern Rail
Optivo Housing Association
Southern Housing

Category 2 - Local Community Organisations:
St George's Church
Schoolhouse Trust
Crowhurst Chapel
Crowhurst School
Claverham School
GP, Martin's Oak Surgery
GP, Battle Health Care
Coombe Valley Country Park CiC
The Powdermill Trust (re Quarry Wood) (c/o Owen Johnson)
Rother Voluntary Action

Category 3 - Non-resident Landowners and/or Stakeholders
Landowner CH1, CH2
Landowner CH2
Landowner CH3

Category 4 - Local Businesses
The Plough
Crowhurst Park
Brakes Coppice
D Wilson
Hye House
Home of Healing
Edendale Lodge Care Home

Category 5 - Clubs and Societies
Community Information Market Table
Crowhurst & District Horticultural Society
Crowhurst Beavers
Crowhurst Brownies
Crowhurst Community Arts
Crowhurst Cricket Club
Crowhurst Cubs
Crowhurst Drama Group
Crowhurst Environment Group
Crowhurst Fayre Committee
Crowhurst Flood Watch
Crowhurst Football Club
Crowhurst Link
Crowhurst News
Crowhurst Preschool
Crowhurst Scouts

Crowhurst Short Mat Bowls Club
Crowhurst Society
Crowhurst Stoolball Club
Crowhurst Tennis Club
Crowhurst Village Hall Management Committee
Crowhurst Village Hall
Crowhurst Village Market
Crowhurst Women's Institute
Crowhurst Youth Club
Crowhurst Youth Football Club
Friends of Crowhurst School

Little Dragons
Parish Magazine
Plough Inn Golf Society
The Croqueteers
Quarry Wood,

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