

Rottingdean Neighbourhood Plan Final Strategic Environmental Assessment Determination

Brighton & Hove City Council, December 2015

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Screening Statement on the determination of the need for Strategic Environmental Assessment (SEA) for the Rottingdean Neighbourhood Plan

1. Introduction and Summary of Statutory Consultation

- 1.1 National Planning Practice Guidance states that Local Planning Authorities should have a process in place, as part of its duty to advise or assist, to determine whether or not Neighbourhood Plans are likely to result in significant effects, in accordance with Regulation 9 of the Environmental Assessment of Plans & Programmes Regulation 2004. In September 2015, Rottingdean Parish Council requested Brighton & Hove City Council to carry out a screening exercise based on the Rottingdean Neighbourhood Plan Vision and Objectives, to determine whether the Rottingdean Neighbourhood Plan would require a Strategic Environmental Assessment (SEA).
- 1.2 The screening process involved the following stages:
- Identification of constraints, receptors and their sensitivity
 - Assessment of the characteristics of the Neighbourhood Plan
 - Assessment of the effects of the Neighbourhood Plan
 - Initial Brighton & Hove City Council conclusion
 - Consultation with South Downs National Park Authority
 - Consultation with the three statutory bodies
 - Final conclusion
- 1.3 Brighton & Hove City Council formed an initial conclusion that the Rottingdean Neighbourhood Plan would require a SEA. As the Rottingdean Neighbourhood Area includes land within the South Downs National Park, the South Downs National Park Authority were consulted on this initial conclusion and responded that they were in agreement with its findings. Following this, in order to meet the requirements of Regulation 9 (2b), the draft screening report was sent to the three statutory environmental consultees, Natural England, Environment Agency and Historic England.
- 1.4 Responses were received from all three statutory consultees, some of which concurred with the findings of the draft Screening Statement. A copy of the full responses received can be found in Appendix C. A summary of the comments received can be found below.

Natural England

- Agrees with the conclusion that the Plan **could have significant effects** upon nationally and locally designated sites.
- Agrees with the opinion that a full **Habitats Regulations Assessment** is **not** required.

Environment Agency

- Consider that the Plan **would not have a significant environmental effect** on the issues in their remit (which include: water resources, water quality and flood risk)

Historic England

- Consider that **there is a likelihood** of the plan having significant environmental effects on the historic environment
- Recommends waiting to scope the SEA until it is clear what the likely proposals for land use are, to better guide appropriate evidence gathering.

- 1.5 In summary, the screening process based on the Rottingdean Vision and Objectives document, carried out by Brighton & Hove City Council in consultation with the SDNPA and three statutory consultees indicates that a Strategic Environmental Assessment of the Rottingdean Neighbourhood Plan, covering the following issues should be carried out.

Biodiversity, Fauna and Flora:

Sites of national designation (SSSI):

- notably the Brighton to Newhaven Cliffs SSSI.

Sites of local designation (Local Wildlife Sites and Local Nature Reserve)

- notably Beacon Hill LNR and Whiteway Lane, High Hill Pasture and Balsdean Downland West Local Wildlife Sites.

Air & Climatic Factors:

AQMA (Rottingdean High Street)

Transport and congestion

Cultural Heritage:

Rottingdean Conservation Area

Listed Buildings

Archaeological Sensitivity

Landscape:

South Downs National Park

Material Assets:

Infrastructure (schools)

- 1.6 Following the consultation response received from the Environment Agency the following issues have been removed and should not be included in the SEA:

Water:

- Quality and supply

Air & Climatic Factors:

- Surface Water Flood Risk

- 1.7 The SEA should be carried out by the Neighbourhood Forum or other relevant body and should follow the process set out in the SEA Regulations and summarised in Section 7 of this report.

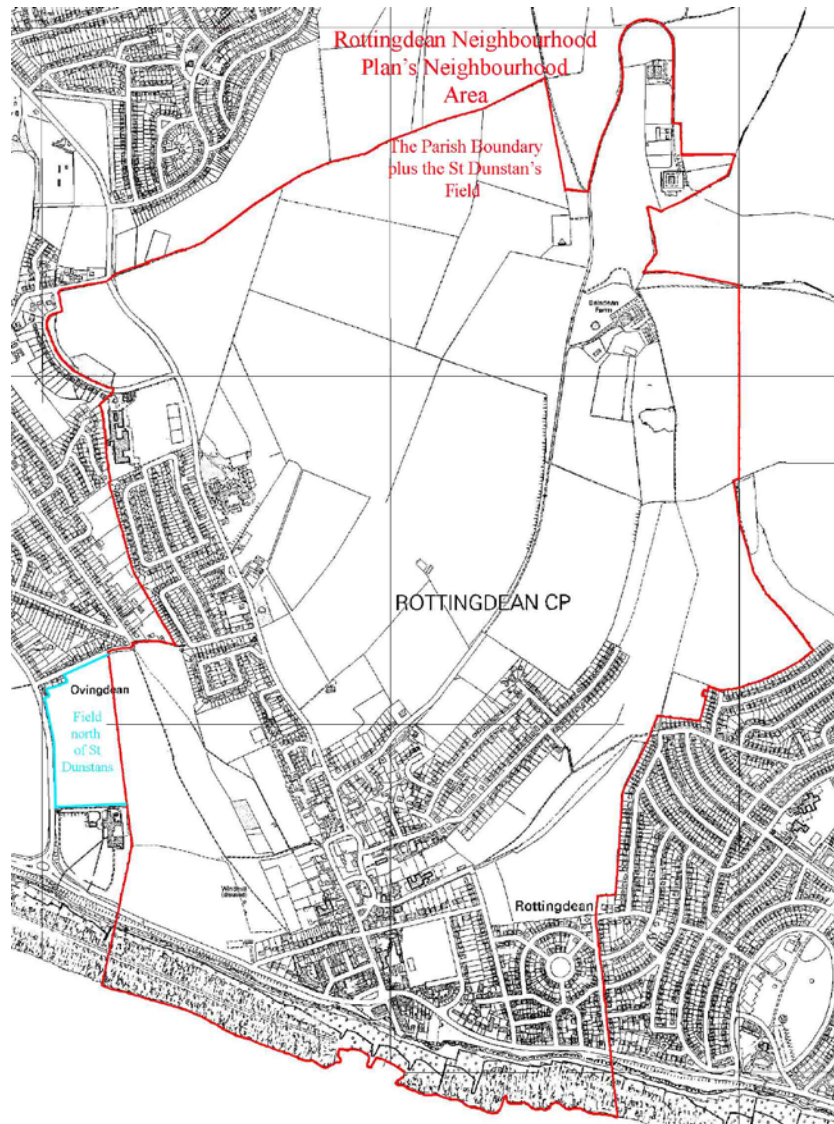
2. Legislative Background and Neighbourhood Planning

- 2.1 The Government has confirmed in its 'National Planning Practice Guidance' that Sustainability Appraisals are only required for development plan documents and do not apply in the case of Neighbourhood Plans. However, Neighbourhood Plans must not breach and must be otherwise compatible with EU and Human Rights obligations. Neighbourhood Plans therefore need to be considered against, for example, the Habitats and Strategic Environmental Assessment Directives and associated regulations.
- 2.2 Strategic Environmental Assessment (SEA) is required by EU Directive 2001/42/EC, to assess the effects of certain plans and programmes on the environment. This Directive was implemented in the United Kingdom in July 2004 with the adoption of the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 2.3 Neighbourhood Plans are not the type of plan that automatically requires a Strategic Environmental Assessment. Whether or not a Neighbourhood Plan will need an environmental assessment will be subject to their scope and the issues they are seeking to address and will depend on whether the plan is determined as likely to have significant effects. These effects can be positive as well as negative. Under Article 3(4) of the Directive, and Regulation 9 of the Regulations, the responsible authority (the city council) must determine which plans, other than those for which an SEA is automatically required, are likely to have significant effects.
- 2.4 Both the Directive (in Annex II), and the Regulations (in Schedule 1), set out specific criteria for determining the likely significance of the effects of a plan. These criteria include the consideration of the characteristics of the plan and the probability, duration, frequency, reversibility and cumulative nature of the effects.
- 2.5 Schedule 2 of the Regulations sets out the issues that a SEA must consider as follows:
- a) biodiversity
 - b) population
 - c) human health
 - d) fauna
 - e) flora
 - f) soil
 - g) water
 - h) air
 - i) climatic factors
 - j) material assets
 - k) cultural heritage
 - l) landscape

All of these issues will be considered in this screening report.

3. Rottingdean Neighbourhood Plan

- 3.1. Rottingdean Parish Council submitted its application to Brighton & Hove City Council, and to the South Downs National Park Authority for designation of its Neighbourhood Area in November 2012. After a formal six week consultation Brighton & Hove City Council Economic Development & Culture Committee and the South Downs National Park Authority Planning Committee in March 2013 resolved to support the Neighbourhood Area application and the area shown in the application should be designated as a Neighbourhood Area.



- 3.2 In 2015, the parish council presented its Vision, Strategic Objectives and Intentions document to the city council. The vision of the Rottingdean Neighbourhood Plan is to:

We want Rottingdean to remain a characterful, chalk downland village by the sea, with its distinctive and vernacular architecture and varied natural features.

We want a village which celebrates, respects and protects its heritage and promotes learning, culture and recreation. We want to ensure a healthier, more sustainable environment with access to quality open spaces and an improved public realm where residents and visitors can visit thriving shops, businesses and heritage assets with ease.

The following table sets out the objectives and intentions

CORE STRATEGIC OBJECTIVES	INTENTION
THEME: Employment & Enterprise To foster trade, tourism and economic development in Rottingdean	<ul style="list-style-type: none"> • To protect the local shopping areas, retain and preserve small shop and business premises along the lines of those that currently exist and conform with existing village characteristics. • To maintain the wide variety of retail establishments within the Village, the presumption should be against the appearance or amalgamation of adjacent shops into large single units, as such amalgamation will reduce the number of individual outlets and change the character of the area. • To support and encourage a vibrant retail and service environment to cater for the needs of the local and wider community. • To support and encourage improved pedestrian and disabled access to retail outlets, businesses, amenities and the public realm • To support and encourage improved broadband access within the Parish • To encourage and expand seaside tourism. • To maintain and enhance facilities and amenities for visitors and residents • To encourage and expand cultural tourism and participation in arts and community events by both residents and visitors • To facilitate access to heritage assets and open spaces • To encourage coach and public transport as means of accessing Rottingdean and take opportunities to promote sustainable tourism

	<ul style="list-style-type: none"> To use tourism to promote local trade and the local economy
<p>THEME: Air Quality and Traffic Reduction</p> <p>To reduce the volume of vehicle traffic passing through Rottingdean to tackle congestion and improve air quality, whilst encouraging sustainable transport</p>	<ul style="list-style-type: none"> To relieve congestion in the High Street, particularly at peak travel times, i.e. between 8am and 9am and 3pm and 6pm when volumes are increased both on the High Street and the A259 Coast Road due to commuter traffic, delivery vehicles and school journeys. To address the high air pollution levels caused by idling traffic and vehicle acceleration by diesel fuelled vehicles at key points in Rottingdean High Street and thus reduce the risk to public health. To encourage greater footfall and increased spend in the High Street by reducing traffic noise, volume and fumes and providing a safer, more accessible and ambient environment. To support a modal shift to greater use of public transport and cycles to access Rottingdean. To support and encourage the set-up of car clubs in the Parish To encourage improved public transport links north of Woodingdean, including to Lewes. To reduce damage to the historic built environment within the Conservation Area through a reduction in vibrations caused by heavy goods vehicles passing through the High Street.
<p>THEME: Environment & Biodiversity</p> <p>To protect and enhance green and open spaces within the Parish, maintaining the strategic gaps which define the village</p>	<ul style="list-style-type: none"> To maintain and improve access to green spaces in Rottingdean for public use, for recreation or amenity space. To use the Planning Brief for the former St Aubyns School, together with Local Green Space designation, to seek to retain the playing-field, potentially under local civic management, offering greater opportunities for public recreational use. To maintain the strategic gaps provided by key green and open spaces which define Rottingdean as a village, distinct from the conurbation of Brighton and Hove and the surrounding villages. To protect and improve the biodiversity located in Rottingdean's green and open spaces, including existing wildlife corridors To maintain and enhance recreational facilities provided by green and open spaces within the Parish of Rottingdean
<p>THEME: Character & Design</p> <p>To maintain the character and key design features of Rottingdean, a historic</p>	<ul style="list-style-type: none"> To maintain Rottingdean as a thriving, vibrant and distinctive village by protecting and enhancing the unique characteristics, including its green spaces, promoting the much loved 'village feel', supporting small-scale, sustainable development and maintaining the high quality natural environment.

chalk downland village	<ul style="list-style-type: none"> • To ensure that any further development and change will be based on a real understanding of the village's past and present and will contribute positively to the future of Rottingdean and enhance its special nature. • To adhere to the planning guidance contained in the St Aubyns Planning Brief • To maintain the historic access to the seafront, improving access and the public realm
THEME: Access To improve disabled access & permeability through the village, making it more pedestrian friendly. To improve IT connectivity.	<ul style="list-style-type: none"> • To have regard to disability and pedestrian access throughout the village in all relevant policies • To support development which enhances broadband access and connectivity
THEME: Planned Housing Growth To ensure that suitable and adequate infrastructure is provided in a timely manner to match identified needs in a period of expansion	<ul style="list-style-type: none"> • To identify suitable sites for development where housing will support the City Plan but also take into consideration the needs of the infrastructure, the need for affordable housing, and ensuring any development respects the unique character of the Parish. • To make best use of any brownfield site within the Parish taking into consideration the need for housing, economic development, employment and recreational facilities • To make best use of any windfall sites which come available during the Plan period, taking into consideration the need for housing, economic development, employment and recreational facilities. • To make provision for local young people to be able to access market housing in the Parish

- 3.3 Once adopted, the Rottingdean Neighbourhood Plan, in conjunction with other citywide adopted planning policies, will be applicable to all applications for development consent and will guide planning decisions within the defined Rottingdean Neighbourhood Area.

4. Screening Assessment of the Rottingdean Neighbourhood Plan

4.1 Introduction to the screening assessment

This stage involves three main steps:

1. Identification of the environmental constraints, receptors or other attributes of the area as outlined under paragraph 2.5 which could be affected by the Neighbourhood Plan, and their relative sensitivity.
2. Assessment of the characteristics of the Neighbourhood Plan against a set of criteria that are set out in Schedule 1 of the SEA Regulations 2004.
3. Assessment of the effects of the Neighbourhood Plan against a set of criteria that are set out in Schedule 2 of the SEA Regulations 2004.

4.2 Identification of constraints and receptors within the Neighbourhood Area

The following table sets out the various environmental receptors, as well as attributes of the area, and whether they could be sensitive to impacts arising from the Neighbourhood Plan. Receptors have been grouped into themes derived from the SEA topics presented in the Regulations.

This table indicates whether there is a potential for adverse impact, or whether it is considered unlikely. It also indicates whether the impact could be of low, medium or high significance, and this is based on the sensitivity of the receptor. Any of the impacts identified will depend on the nature and scale of development and the policies and proposals put forward in the Neighbourhood Plan.

Table 1: Local constraints and receptors and their sensitivity

SEA feature	Further explanation / current situation	Significance / Sensitivity
Biodiversity, fauna and flora		
European Sites	Castle Hill Special Area of Conservation lies to the north of the Rottingdean NA boundary but is not within the Neighbourhood Area (NA) boundary.	Unlikely. See Habitats Regulations Assessment informal pre-screening (Appendix 1) which discounted the likelihood of significant adverse effects on the SAC.
National Sites	Castle Hill (National Nature Reserve and SSSI) lies to the north of the NA boundary. Brighton Marina to Newhaven Cliffs SSSI passes through the NA, which includes the beach and cliffs. Beachy Head West Marine Conservation Zone, extends from the Marina to Beachy Head, passing alongside the Rottingdean coast.	Potential for adverse impacts resulting from certain types of development on the Brighton Marina to Newhaven Cliffs SSSI due to its proximity to the main urban area. Could be of high significance due to the high sensitivity of the designation to further development. Nb: SSSI designated for geological and biodiversity value. Marine Conservation Zone around Rottingdean includes sub-tidal chalk and intralittoral communities. This zone is considered unlikely to be effected by the RNP.

SEA feature	Further explanation / current situation	Significance / Sensitivity
Local Sites	Beacon Hill Local Nature Reserve (declared) within NA. 3 Local Wildlife Sites within NA. Whiteway Lane, High Hill Pasture, and Balsdean Downland West. Additional sites adjacent to boundary.	Potential for adverse impacts. Would be of medium significance due to the sensitivity of the designation to further development.
Ancient woodland	There are no areas of ancient woodland within the Rottingdean Neighbourhood Area, nor in the immediate vicinity.	No.
Soil		
Agricultural Land	According to Natural England, land within the NA falls into two categories: Non-agricultural (land predominantly in urban uses) and Grade 3 (good-moderate).	Unlikely. The majority of the Grade 3 agricultural land appears to be located within the SDNP. It is considered unlikely that the NP will allocate sites within the SDNP. Agricultural land not considered to be sensitive to development in this location.
Mineral deposits	There are no known mineral sites within the NA.	No
Contaminated land	Unknown. There could be potential for contaminated land within the NA, for example, land that is currently in employment uses, such as garages, which may have resulted in land contamination.	Unlikely. Any potential contamination issues would be investigated and addressed as part of any planning application.
Water		
Water quality	The Brighton Chalk Aquifer is an important source of Public Water Supply. This has been designated "poor" status. This is mainly due to quantity issues. The Aquifer is vulnerable to rural and urban pollution. There is a Groundwater Source Protection Zone within the Parish. Zone 1 (highest risk of contamination) covers land within the SDNP (Balsdean Farm/High Hill area). A very small area within the built up area is located within Zone 2, and some of the built up area is located within Zone 3. The rest of the built up area lies outside the Protection Zone.	Potential for adverse impacts. Development will increase demand for water, with Brighton Chalk Aquifer already heavily exploited. Development can increase the risks of pollution particularly within the Groundwater Source Protection Zone. Water quality considered to be of medium sensitivity.
Water supply	The South East is declared as being under water stress.	Potential for adverse impacts. Development will increase demand for water. This could be of high significance due to local pressures on water supply which will be sensitive to development.
Air		
Air Quality Management	Rottingdean High Street part of the declared 2013 AQMA due to	Potential for adverse impacts. Development within the area, as well as

SEA feature	Further explanation / current situation	Significance / Sensitivity
Area	exceedence of NO2.	outside the area could impact upon air quality. This could be of high significance due to current status and existing street form.
Congestion	There are known congestion issues on both the A259 coast road, and also Rottingdean High Street, which leads to Falmer Road and the A27 and is likely to act as a shortcut to the A27 from eastern parts of the city.	Potential for adverse impacts. Development within the area, which could include that coming forward as a result of the Plan, or other development, as well as development from outside the area could impact on congestion within the area. This could be of high significance due to current pressures on road network, which will be sensitive to development.
Climatic Factors		
Flood Risk (coastal/fluviat)	Only the beach area is located within Flood zone 2 and 3 (medium to high risk of flooding). The vast majority of the NA is therefore located within Flood zone 1 (low risk of flooding).	No. It is considered highly unlikely that any development within these zones will take place.
Flood risk (Surface water)	There are some areas of high risk of surface water flooding, including some of site 42 (urban fringe site off Falmer Road), and a linear area that runs parallel to the Falmer Road, on the west side down towards the sea. The area around Dean Court Road has some risk, although this is considered to be lower.	Potentially. There is a risk that development could be located in areas of higher surface water flood risk, or increase the risk of flooding elsewhere. This could be of high significance due to the sensitivity to development.
Transport patterns	A higher proportion of the Rottingdean Coastal ward population have access to a car compared to the BH average (78% compared to 61%) which is likely to be reflective of the out-lying nature of the area. A higher proportion of working residents in the Rottingdean ward travel to work by car, and a lower proportion travel by public transport than the BH averages. (car: 53% vs 40%. Public: 21% vs 24%). Public transport – bus only. Priority bus lane to/from Brighton may have improved this service.	Potentially. There is a risk that development in this location could increase car-based transport, based on current data, contributing to local CO2 emissions and congestion and having other impacts, e.g. air and noise. This could be of high significance due to the sensitivity of the area and the current capacity of the road network.
Green infrastructure	A large proportion of the NA falls under the SDNP designation, which is predominantly natural green-space. Other areas of green infrastructure exist within the NA, including designated sites such as Beacon Hill Local Nature Reserve and local wildlife sites. There are also various areas that are designated as open space typologies.	Unlikely. Impacts on open space/green infrastructure in this location likely to be of low significance.
Cultural Heritage		

SEA feature	Further explanation / current situation	Significance / Sensitivity
Scheduled Ancient Monument	There are two SAM within the NA. Both referred to as the Long Barrow on Beacon Hill.	Unlikely. A SAM is highly sensitive to development. However, the SAM is located on Beacon Hill, which is a LNR and also within the SDNP. Nearby urban fringe sites (44 and 51) were not identified as having residential potential in the Urban Fringe Study 2014, reasons included the potential for risk on the SAM. The NP may allocate sites within the existing built up area adjacent to the SAM, however it is considered unlikely that these sites would have any impacts on the setting of the SAM, that are over and above the existing residual impacts of the existing built up area.
Registered Park & Garden	There are no Registered Parks and Gardens within the Rottingdean Neighbourhood Area.	No.
Listed Buildings	There are 55 listed buildings within Rottingdean, the majority of which lie within the Rottingdean Conservation Area. Some of these are Grade II*.	Potentially. The NP may allocate sites within the built up area, including those which may impact upon listed buildings or their settings. Impact could be of medium significance due to the nature of the designations and their sensitivity.
Conservation Areas	The Rottingdean Conservation Area covers a large proportion of the village centre, around the High Street.	Potentially. The NP may allocate sites within the built up area, including within the Conservation Area, or in a location which may impact on the setting of the Conservation Area. Impact could be of medium significance due to the nature and sensitivity of the designation.
Archaeological Notification Area	Six located within NA. High Hill West, Ashdown Avenue, Grand Crescent and three others un-named covering parts of Beacon Hill, High Hill, and Rottingdean High Street.	Potentially at one site. Urban Fringe site 50 (land west of Falmer Avenue) identified as having residential potential in Urban Fringe Study. Whole site sits within the un-named ANA covering High Hill. Development within an ANA could have an impact on the archaeological remains there. Unlikely to have any impact on ANAs within SDNP, as assume NP will not allocate sites within the National Park. Two ANAs situated within the existing built up area. Sites within these areas could be allocated, however it could be assumed that any existing development in these locations is likely to have disturbed archaeological potential in these locations. Therefore potential for additional disturbance is low in these locations.

SEA feature	Further explanation / current situation	Significance / Sensitivity
Landscape		
National Park	<p>The South Downs National Park features strongly in Rottingdean Parish, with large extents of downland areas situated within both the Parish and the SDNP.</p> <p>None of the built up area is within the National Park boundary however the majority of the built up area is adjacent to the SDNP, which includes Beacon Hill to the west and the entire downland area to the north / east of the village.</p>	<p>Potentially.</p> <p>The NP can allocate sites within the SDNP, and although it is assumed that this is unlikely there is potential for this to happen. In addition, any development within the built up area adjacent to the SDNP could impact on its setting. Impact could be of high significance due to the nature and sensitivity of the designation.</p>
Material Assets		
Schools	<p>There are three primary schools, two of which are in central Rottingdean: Our Lady of Lourdes RC and St Margarets CE; and one which is in Saltdean, Saltdean Primary.</p> <p>There is one secondary school which serves the wider area including Rottingdean: Longhill High School.</p> <p>Number of places/allocations in 2014/2015 as follows:</p> <p>Our Lady – 30 available / 30 allocated</p> <p>St Margarets 30 available / 23 allocated</p> <p>Saltdean Primary – 90 available / 90 allocated</p> <p>Longhill High School – 270 available / 156 allocated.</p> <p>Nb: Saltdean Primary has increased capacity from 60 to 90 in recent years as an exception.</p>	<p>Potentially.</p> <p>There appears to be sufficient capacity at secondary level.</p> <p>At primary level, Saltdean Primary has increased by an additional 30 places for the 2013/14 and 2014/15 admissions. It is unknown whether this school takes children from Rottingdean. Although there were 7 spaces unallocated in one of the schools, this does not seem to be represent a large surplus capacity for the area at primary level. Development in this location could increase pressure on local schools and these would be highly sensitive to development.</p>
Housing	<p>The average house price (all types of housing 2014) in Rottingdean was £415,322. This is higher than the BH average: £331,661, and higher than the England average: £263,933.</p> <p>Across Brighton & Hove, affordable housing delivery is lower than that required to meet local needs.</p>	<p>Potentially.</p> <p>Housing affordability is an issue across the whole of the Brighton & Hove area. Vision & Objectives suggests housing affordability is a key objective. Delivery of housing through the Plan could result in positive impacts, although are unlikely to be significant due to the nature of the housing market.</p>
Public transport	<p>Rottingdean is served by the local bus network. Bus services operate in an east-west direction between Brighton and Saltdean and beyond. This includes the priority bus lane to/from Brighton which may have improved the reliability of this service.</p> <p>There is also a bus service into Woodingdean that then continues to Brighton. There is no bus service that continues from Woodingdean towards the A27, which would enable Falmer or</p>	<p>Potentially.</p> <p>Development could increase bus patronage, particularly at peak times, when services are known to be busy. Public transport provision could be sensitive to further development.</p>

SEA feature	Further explanation / current situation	Significance / Sensitivity
	Lewes to accessed without the need for travelling via Brighton. It is unknown whether these routes operate at full capacity at peak times. Travel to work by public transport is lower than the BH average.	
Local services (shops)	Rottingdean High Street is a defined local centre. It includes a variety of uses to meet various local needs.	Unlikely. Local shops and services are considered to have low sensitivity. Vision and Objectives suggests supporting/improving the local economy is a key objective. Development in this location could boost local economic activity having positive impacts.
Health services	There is one GP based within the Rottingdean village, which is currently accepting patients according to nhs.uk. There are also GP surgeries within Woodingdean and Saltdean. The local children centre is The Deans, which is based in Whitehawk, with a gateway centre in Woodingdean. Health Visitors offer more local drop in sessions at various locations within the Deans, including a monthly session within Rottingdean. Emergency care – Royal Sussex County Hospital situated in the east of Brighton.	Unlikely. General health services appear available. More specialist services, including those for young children are available, although may involve some travel to access regular services.
Population & Human Health		
Demographics	There are 3,210 people living in the Rottingdean Parish (ONS 2015). The population has increased by a similar amount (approximately 10%) as BH over the last 10 years. The parish has a lower proportion of both 0-15s and 16-64s than BH and England, and a higher proportion of over 65s. The majority of residents identify as White British, and a greater proportion than the England average are from a White British background.	Unlikely. It is considered unlikely that the RNP will have a major influence over the population demographic. It has a higher than average proportion of older residents and their needs will need to be addressed. Development in this location could help to balance to demographic, particularly affordable housing for younger people.
Jobs	The proportion of working age adults claiming either Job Seekers Allowance or incapacity benefits is lower than the BH and England average. The proportion of economically active adults in the Parish is slightly lower than the BH and England average. The three main employment sectors for people living in the Parish are education, health & social care, and retail. It is not possible to determine the	Unlikely. Employment levels within the Parish are good. It is assumed that the vast majority of employment needs are met outside the parish. The objectives within the theme Employment & Enterprise could increase local job opportunities.

SEA feature	Further explanation / current situation	Significance / Sensitivity
	distance travelled to work at a Parish-level, however it is assumed that the majority of people work outside the Parish due to the amount and type of job opportunities available locally.	
Vulnerable Groups	The proportion of people within the parish claiming Disability Living Allowance is lower than the BH and England average. The proportion of people claiming Attendance Allowance is similar to BH and England averages. The proportion of people claiming key welfare benefits is lower than BH and England average. The proportion of children in poverty is lower than the BH and England average.	Unlikely. The proportion of various vulnerable groups is either the same or lower than the local and England averages. It is considered unlikely that the RNP will have any significant influence over vulnerable groups.
Crime / safety	All recorded crimes (all crimes) are lower per 1,000 population than the BH and England average.	Unlikely. Levels of crime are lower than average in the parish. It is considered unlikely that crime could increase or safety could be compromised as a result of the Plan. The Plan itself could promote increased community cohesion.
Deprivation	There are no Super Output Areas within Rottingdean that are ranked among the most 20% deprived neighbourhoods in England (multiple deprivation - IMD 2015).	Unlikely. Levels of deprivation appear to be low within the Parish and is therefore not a receptor that could be sensitive to the RNP. It is considered unlikely that the RNP will have any significant influence over deprivation.
Health	Life expectancy for both men and women in the parish is higher than both the BH and England average. No Super Output Areas within the Parish are ranked among the most 20% deprived (health – IMD 2010). Overall, there is a lower proportion of hospital admissions (all causes) than BH and England averages, although there is a higher proportion of admissions for stroke.	Unlikely. Generally health appears to be good in the Parish. It is considered unlikely that the RNP will have any significant influence over health.
Noise	DEFRA road noise mapping indicates that the A259 is a main source of noise pollution, with stretches of this road greater than 75 decibels. The majority of roads within the Parish are around the 60-65 range. The WHO suggests that background noise at a level greater than 55 decibels can pose an annoyance.	Potentially. Noise is an issue at some locations. Any increase in traffic could further increase existing road noise issues, which would increase noise nuisance.
Open Space / PROW	Figures for the amount of open space in the Rottingdean Parish are not	Unlikely. Open space provision, including the land

SEA feature	Further explanation / current situation	Significance / Sensitivity
	<p>available. The Open Space Study Update (2011) assessed provision within “Rottingdean and Woodingdean” sub-area, which also included Saltdean. The following typologies met/exceeded the quantity standards in the sub-area: Amenity Greenspace, Natural/Semi-natural, Outdoor Sports, Parks & Gardens. The following did not meet quantity standards: allotments and children’s playspace. This assessment of open space provision did not include land within the SDNP, which evidently greatly increases the local offer. There are a number of Public Rights of Way around the Parish. There are also some “missing links” identified in the BH 2007 PROM Improvement Plan, with one heading from Falmer Road (Meadow Vale site) across to the area north of Balsdean Farm listed as a priority.</p>	<p>within the SDNP appears good within the sub-area, although there are some deficiencies. It is considered unlikely that the RNP will increase the level of need to the extent whereby local needs cannot be met, over and above those already assessed by the Open Space Study Update 2011.</p>

4.3 Assessment of the Characteristics of the Neighbourhood Plan

This stage of the screening assesses the Vision and Objectives of the Plan against the criteria (1a-1e) as set out in the SEA Regulations.

Table 2 Characteristics of the Neighbourhood Plan

Criteria	Summary of Effects	Significant? Yes/No
(1a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The Rottingdean Neighbourhood Plan will form part of the statutory development plan once adopted and will therefore exert a direct influence over development proposals coming forward in the Parish.</p> <p>Neighbourhood Plans are equivalent to the Local Plan in the hierarchy of statutory planning documents. This includes the adopted Brighton & Hove Local Plan 2005 and the emerging City Plan Part 1. In addition, the Rottingdean Neighbourhood Plan must be in general conformity with the South Downs National Park Local Plan.</p> <p>However, the Rottingdean Neighbourhood Plan only sets a framework for projects located within the parish/neighbourhood area and will have no influence outside this area.</p>	Yes
(1b) the degree to which the plan or programme influences other plans including those in a hierarchy;	The Rottingdean Neighbourhood Plan will respond to rather than influence other plans or programmes. It is equivalent to a local plan in status, however is unlikely to influence other plans and should be in general conformity with the strategic policies set out in the Local Plan.	No
(1c) the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Neighbourhood Plan must be in conformity with national planning policy, the NPPF. All plans have an obligation to deliver sustainable development and therefore it should help to deliver sustainable development and consider the environment.	Yes
(1d) environmental problems relevant to the plan;	<p>There are a number of local environmental issues which are of relevance / more sensitive to the Plan, as described in full in Table 1. These could be affected in an adverse way. These are summarised as:</p> <ul style="list-style-type: none"> - National and local designated sites (biodiversity) - Water: quality and supply - Air quality - Congestion 	Yes

	<ul style="list-style-type: none"> - Flood risk – surface water - Landscape – South Downs National Park - Historic built environment (Conservation Area and Listed Buildings) - Local infrastructure 	
(1e) the relevance of the plan for the implementation of community legislation on the environment (e.g. plans linked to waste or water protection)	<p>The EU has adopted a range of legislation aimed at protecting the environment including:</p> <ul style="list-style-type: none"> - EU Directive 2009/147/EC on the conservation of wild birds. - EU Directive 1992/43/EEC on the conservation of habitats. - EU Directive 2008/50/EC on ambient air quality and cleaner air. - EU Directive 2002/49/EC on environmental noise. - EU Directive 2008/98/EC waste framework directive. - EU Directive 2000/60/EC) water framework directive. - EU Directive 2007/60/EC assessment and management of flood risks. <p>The Rottingdean Neighbourhood Plan will be in compliance and accordance with the City Plan which has already taken account of the existing European and National legislative framework for environmental protection. It should therefore have a positive effect on compliance.</p>	No

4.4 Assessment of the Effects of the Plan

The stage of the screening assesses the possible effects of the Plan against the criteria (2a-2g) as set out in the SEA Regulations. These criteria are used to determine the significance of the effects. This part of the assessment in particular uses the information set out in Table 1.

Table 3: Effects of the Neighbourhood Plan

Criteria	Summary of Effects	Significant? Yes/No
(2a) What are the probability, duration, frequency and reversibility of the effects of the plan?	<p>The probability of adverse effects occurring on the environmental problems outlined under (1d) in Table 2 above is largely dependent on the location of development.</p> <p>Some adverse effects could be avoided through appropriate consideration of the location of development, e.g. impacts on biodiversity, flood risk, landscape and the historic built environment.</p> <p>Some adverse effects are probable regardless of the location of development, such as impacts on air quality, congestion and local infrastructure.</p> <p>The duration of the adverse effects is likely to be long-lived, due to the likely “life” of new development. Effects are considered to be permanent for this reason.</p> <p>Some positive effects are also probable. Such as positive effects on the local housing supply/affordability, and positive effects on the local economy.</p>	Yes
(2b) What is the cumulative nature of the effects of the plan?	<p>Some of the themes of the Plan could have adverse effects in-combination with other themes of the Plan. For example housing provision and improved local economy could both increase transport movements to and within the area.</p> <p>There could also be cumulative effects of the Plan in combination with development coming forward in the local area that doesn't form part of the Neighbourhood Plan.</p>	Yes
(2c) What is the trans-boundary nature of the effects of the plan?	<p>The emerging City Plan Part 1 sets targets and policies to guide development within the Brighton & Hove administrative area. There could be trans-boundary and cumulative effects arising from development within the RNP and the City Plan.</p> <p>The SDNP Local Plan is in its early stages and will include policies and sites for development situated within the</p>	Yes

	<p>National Park, although it is noted that the Local Plan Preferred Options (September 2015) does not allocate any sites within the Rottingdean Neighbourhood Plan area. The South Downs National Park includes land within the Brighton & Hove boundary, and within the Rottingdean Neighbourhood Area. There could be transboundary and cumulative effects arising from development within the RNP and the SDNP Local Plan.</p> <p>The Lewes District boundary adjoins the Brighton & Hove City boundary to the east of the city, at Saltdean. The emerging Lewes District Plan sets targets and policies to guide future development within the district. There could be trans-boundary and cumulative effects arising from development located in the Lewes district, particularly that located along the coastal strip, in combination with development from Brighton & Hove, including Rottingdean.</p>	
(2d) Are there any risks to human health or the environment (e.g. due to accidents)?	<p>The AQMA already covers the Rottingdean High Street area. Poor air quality poses a significant health risk, particular to the young, old and those with certain health issues. Any development coming forward in the area as a result of the Neighbourhood Plan could affect air quality, having indirect effects on health. Although any policies which result in an improvement to air quality would have obvious health benefits.</p> <p>There are not considered to be any other risks of human health.</p>	Yes
(2e) What is the magnitude and spatial extent of the effects (i.e. geographical area and size of population likely to be affected) of the plan?	<p>The Rottingdean NA covers an area of approximately 4.4km² (440 hectares).</p> <p>The Rottingdean Parish population is estimated to be 3,200 (ONS 2013)</p> <p>This magnitude and spatial extent of the Plan is therefore considered to be relatively small.</p>	No.
<p>(2f) Is the value and vulnerability of the area to which the plan or programme relates likely to be affected by the plan or programmes due to:</p> <ul style="list-style-type: none"> Special natural characteristics or cultural heritage, 	<p>There are a number of valued environmental receptors/issues which are considered to be vulnerable to the effects of the Plan.</p> <p>Special characteristics:</p> <p>The SDNP is a highly valued landscape.</p> <p>The Brighton to Newhaven Cliffs SSSI has high geological value and also biodiversity value.</p> <p>The Rottingdean Conservation Area forms the historic</p>	Yes

<ul style="list-style-type: none"> • Exceeded environmental quality standards or limit values, or • Intensive Land use? 	<p>core of the village.</p> <p>Exceeded environmental limits:</p> <p>Part of Rottingdean High Street is a declared AQMA due to the exceedence of NO2.</p> <p>The Parish overlies a Groundwater Source Protection Zone and the water quality of the Brighton Calk Aquifer is classified as poor.</p>	
<p>(2g) Will the plan have an effect on areas or landscapes, which have a recognised national, community or international protection status?</p>	<p>The Neighbourhood Area includes land that is within the South Downs National Park. The National Park designation offers a high level of protection. Proposals within the Neighbourhood Plan must have regard to the impact on the National Park, in particular the purposes of the National Park and the ability of the SDNPA to deliver its duty.</p> <p>Development situated within the SDNP could have an effect on the SDNP, as could development situated adjacent to the SDNP, which could affect the setting.</p>	<p>Yes</p>

5. Summary of initial findings from the screening exercise

- 5.1 The information set out in Section 4 helps to identify local issues and the assessment of these issues against the criteria set out in the Regulations helps to determine whether the characteristics and effects of the plan are likely to be significant.

To summarise, although the spatial extent and magnitude of the Plan is considered to be relatively small, the Plan will have a direct effect over development that takes place within the Parish. There are a number of environmental issues or receptors within the Parish that are considered to be sensitive to the effects of the Plan. Some of the characteristics of the Plan area are highly valued and vulnerable to the effects of the Plan. In addition, some of the effects are considered to be likely and permanent, and the Plan could result in cumulative and trans-boundary effects.

- 5.2 Taking a precautionary approach, it is considered that all issues where there is potential for adverse impact should be considered further in an SEA. These are listed under the SEA heading as follows:

Biodiversity, Fauna and Flora:

- Sites of national designation (SSSI):
 - o notably the Brighton to Newhaven Cliffs SSSI.
- Sites of local designation (Local Wildlife Sites and Local Nature Reserve)
 - o notably Beacon Hill LNR and Whiteway Lane, High Hill Pasture and Balsdean Downland West Local Wildlife Sites.

Water:

- Quality and supply

Air & Climatic Factors:

- AQMA (Rottingdean High Street)
- Transport and congestion
- Surface Water Flood Risk

Cultural Heritage:

- Rottingdean Conservation Area
- Listed Buildings
- Archaeological Sensitivity

Landscape:

- South Downs National Park

Material Assets:

- Infrastructure (schools)

The consideration of these issues through an SEA process should help to minimise the potential for significant adverse impact, and potentially result in beneficial gains.

6. Conclusions & Consultation

6.1 Brighton & Hove City Council Initial Conclusion

On the basis of the screening process, the results from Tables 1, 2 and 3 showed the potential for significant effects arising from the Rottingdean Neighbourhood Plan. As such, it was the council's initial opinion that an SEA was required to be undertaken looking in particular at the impacts on issues set out in paragraph 5.2.

6.2 Liaison with South Downs National Park

As outlined in this report, part of the Rottingdean Neighbourhood Area is located within the South Downs National Park including Beacon Hill to the west of the village, and all of the downland area to the north and east of the village. As the main centre of population (Rottingdean village and built up area) is not located within the National Park, the South Downs National Park Authority have suggested that Brighton & Hove City Council will be the responsibility body for undertaking the initial screening stage, in liaison with the SDNPA. This is for the screening stage only and any subsequent stages of the SEA, when required, are the responsibility of the Neighbourhood Forum.

The SDNPA was informed of the initial screening conclusion and was in agreement that an SEA is required.

In undertaking the SEA, the SDNPA recommended that the Parish Council makes specific reference to the South Downs National Park Preferred Options Local Plan, in particular the Open Coast Policy, SD10 and relevant sections of the South Downs Integrated Landscape Character Assessment (available from <https://www.southdowns.gov.uk/planning/planning-advice/landscape/>) and the South Downs Access Network and Accessible Natural Greenspace Report (available from: <https://www.southdowns.gov.uk/planning/planning-policy/national-park-local-plan/evidence-and-supporting-documents/access-network-and-accessible-natural-green-space-study/>)

6.3 Consultation with statutory environmental bodies

As required by 9 (2b) of the Regulations the three statutory environmental consultation bodies, the Environment Agency, Natural England and Historic England were consulted upon the initial screening report during November and December 2015. Their full responses can be found in Appendix 3. The responses are summarised in the following table.

Consultation Body	Comments
Natural England	<ul style="list-style-type: none">• Agrees with the conclusion that the Plan could have significant effects upon nationally and locally designated sites.• Agrees with the opinion that a full Habitats Regulations Assessment is not required.
Environment Agency	<ul style="list-style-type: none">• Consider that the Plan would not have a significant environmental effect on the issues in their remit (which include: water resources, water quality and

	flood risk)
English Heritage	<ul style="list-style-type: none"> Consider that there is a likelihood of the plan having significant environmental effects on the historic environment Recommends waiting to scope the SEA until it is clear what the likely proposals for land use are, to better guide appropriate evidence gathering.

6.4 Final conclusion

The results of the screening process, in combination with the comments from the SDNPA and the three statutory bodies, indicates that a Strategic Environmental Assessment of the Rottingdean Neighbourhood Plan will be required, covering the topics and issues set out below. It should be noted that these issues and topics have been refined to take into consideration the comments received from statutory consultees.

Biodiversity, Fauna and Flora:

Sites of national designation (SSSI):

- o notably the Brighton to Newhaven Cliffs SSSI.

Sites of local designation (Local Wildlife Sites and Local Nature Reserve)

- o notably Beacon Hill LNR and Whiteway Lane, High Hill Pasture and Balsdean Downland West Local Wildlife Sites.

Air & Climatic Factors:

AQMA (Rottingdean High Street)

Transport and congestion

Cultural Heritage:

Rottingdean Conservation Area

Listed Buildings

Archaeological Sensitivity

Landscape:

South Downs National Park

Material Assets:

Infrastructure (schools)

7. Responsibilities and Next steps

7.1 Responsibilities

When the screening outcome indicates that an SEA is required, it is the responsibility of the Neighbourhood Forum to ensure an SEA is undertaken. This can be undertaken by the Forum itself, or another body.

It is the responsibility of Brighton & Hove City Council to ensure that all the regulatory requirements appropriate to the Neighbourhood Plan have been in met, and that it is compatible with EU obligations, which include the SEA Directive, in order for it to progress to subsequent plan-making stages.

7.2 Scoping Stage

This stage should meet the requirements of paragraphs 1-5 of Schedule 2 of the SEA Regulations and should set out the scope of the SEA. The following table describes what questions that the Scoping Report should address and the according regulatory requirements.

Scoping Report question	In line with Schedule 2 of the SEA Regulations the scoping report must include...
What is the plan seeking to achieve?	<ul style="list-style-type: none">• An outline of the contents, the main objectives of the plan and the relationship with other relevant plans and programmes.
What is the sustainability 'context'?	<ul style="list-style-type: none">• The relevant environmental protection objectives, established at international or national level;• The relationship between the plan and other relevant plans and programmes.
What is the sustainability 'baseline'?	<ul style="list-style-type: none">• The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;• The environmental characteristics of areas likely to be significantly affected; (nb those identified in the screening report)• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none">• Key problems / issues and objectives that should be a focus of (i.e. provide a "framework" for) appraisal. (Nb: this should be based on the issues identified in the screening report)

The Scoping Report needs to meet the requirements of Regulation 12 (5 and 6) by formally consulting the three statutory consultees (Environment Agency, Natural England, Historic England) for a period of 5 weeks and any other body which is considered relevant.

7.3 Appraisal Stage

This stage should meet the requirements of paragraphs 6-10 of Schedule 2 and Regulation 12 (2-3) of the SEA Regulations. The following table describes the questions this stage of the SEA process should address and the according regulatory requirements.

Environmental Report question	In line with Schedule 2 of the SEA Regulations and Regulation 12 (2-3) the Environment Report must include...
How has the appraisal been carried out / methodology	<ul style="list-style-type: none"> • A description of how the assessment was undertaken including any difficulties encountered
What options have been put forward for appraisal	<ul style="list-style-type: none"> • An outline of the reasons for selecting the alternatives dealt with.
What are the appraisal findings of alternative options	<ul style="list-style-type: none"> • The report shall identify, describe and evaluate the likely significant effects of reasonable alternatives. • The likely significant effects on the environment, including short, medium and long-term, permanent, temporary, positive, negative, secondary, cumulative and synergistic on relevant issues.
What are the appraisal findings at this stage	<ul style="list-style-type: none"> • The report shall identify, describe and evaluate the likely significant effects of implementing the plan. • The likely significant effects on the environment, including short, medium and long-term, permanent, temporary, positive, negative, secondary, cumulative and synergistic on relevant issues.
What mitigation will be used to reduce the effects	<ul style="list-style-type: none"> • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan.
What monitoring will be put in	<ul style="list-style-type: none"> • A description of the measures envisaged

place	concerning monitoring the effects of the plan.
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As the appraisal stage should help to inform the production of the Plan, it should be consulted upon alongside the Plan. Any changes or modifications to the Plan following consultation may also require the need for further appraisal, depending on how significant the changes are, and should again be set out in an updated Environmental Report to accompany the final version of the Plan.

The SEA report now forms a formal part of the documents required to be submitted to the Local Planning Authority at pre-submission stage, when required.

Data sources

Environment Agency maps – what’s in your backyard.

Historic England

Natural England including advice to Defra on Marine Conservation Zone designations
<http://services.defra.gov.uk/wps/portal/noise/maps>

Public Rights of Way Improvement Plan 2007-2017 (BHCC)

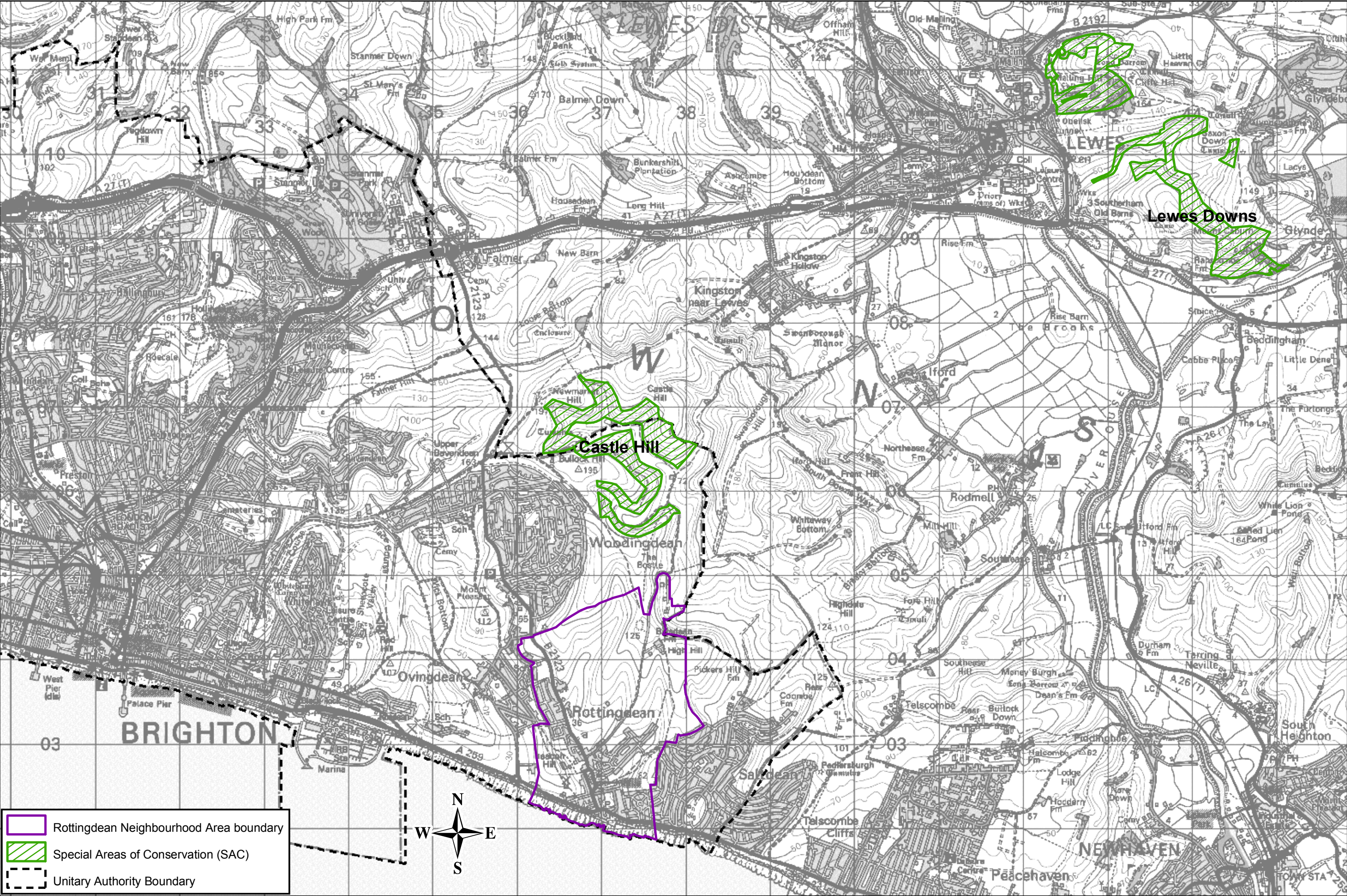
Open Space Study Update 2011 (BHCC)

Community Insight – Local Insight Profile for Rottingdean Parish – October 2015

Neighbourhood Statistics website

Nhs.uk website

HRA initial screening map



Appendix B Rottingdean Parish Neighbourhood Plan Vision & Objectives

VISION	
<p>We want Rottingdean to remain a characterful, chalk downland village by the sea, with its distinctive and vernacular architecture and varied natural features.</p> <p>We want a village which celebrates, respects and protects its heritage and promotes learning, culture and recreation. We want to ensure a healthier, more sustainable environment with access to quality open spaces and an improved public realm where residents and visitors can visit thriving shops, businesses and heritage assets with ease.</p>	
CORE STRATEGIC OBJECTIVES	INTENTION
<p>THEME: Employment & Enterprise</p> <p>To foster trade, tourism and economic development in Rottingdean</p>	<ul style="list-style-type: none"> • To protect the local shopping areas, retain and preserve small shop and business premises along the lines of those that currently exist and conform with existing village characteristics. • To maintain the wide variety of retail establishments within the Village, the presumption should be against the appearance or amalgamation of adjacent shops into large single units, as such amalgamation will reduce the number of individual outlets and change the character of the area. • To support and encourage a vibrant retail and service environment to cater for the needs of the local and wider community. • To support and encourage improved pedestrian and disabled access to retail outlets, businesses, amenities and the public realm • To support and encourage improved broadband access within the Parish • To encourage and expand seaside tourism. • To maintain and enhance facilities and amenities for visitors and residents • To encourage and expand cultural tourism and participation in arts and community events by both residents and visitors • To facilitate access to heritage assets and open spaces • To encourage coach and public transport as means of accessing Rottingdean and take opportunities to promote sustainable tourism • To use tourism to promote local trade and the local economy
THEME: Air Quality and Traffic Reduction	<ul style="list-style-type: none"> • To relieve congestion in the High Street,

<p>To reduce the volume of vehicle traffic passing through Rottingdean to tackle congestion and improve air quality, whilst encouraging sustainable transport</p>	<p>particularly at peak travel times, i.e. between <i>8am</i> and <i>9am</i> and <i>3pm</i> and <i>6pm</i> when volumes are increased both on the High Street and the A259 Coast Road due to commuter traffic, delivery vehicles and school journeys.</p> <ul style="list-style-type: none"> • To address the high air pollution levels caused by idling traffic and vehicle acceleration by diesel fuelled vehicles at key points in Rottingdean High Street and thus reduce the risk to public health. • To encourage greater footfall and increased spend in the High Street by reducing traffic noise, volume and fumes and providing a safer, more accessible and ambient environment. • To support a modal shift to greater use of public transport and cycles to access Rottingdean. • To support and encourage the set-up of car clubs in the Parish • To encourage improved public transport links north of Woodingdean, including to Lewes. • To reduce damage to the historic built environment within the Conservation Area through a reduction in vibrations caused by heavy goods vehicles passing through the High Street.
<p>THEME: Environment & Biodiversity</p> <p>To protect and enhance green and open spaces within the Parish, maintaining the strategic gaps which define the village</p>	<ul style="list-style-type: none"> • To maintain and improve access to green spaces in Rottingdean for public use, for recreation or amenity space. • To use the Planning Brief for the former St Aubyns School, together with Local Green Space designation, to seek to retain the playing-field, potentially under local civic management, offering greater opportunities for public recreational use. • To maintain the strategic gaps provided by key green and open spaces which define Rottingdean as a village, distinct from the conurbation of Brighton and Hove and the surrounding villages. • To protect and improve the biodiversity located in Rottingdean's green and open spaces, including existing wildlife corridors • To maintain and enhance recreational facilities provided by green and open spaces within the Parish of Rottingdean
<p>THEME: Character & Design</p>	<ul style="list-style-type: none"> • To maintain Rottingdean as a thriving,

<p>To maintain the character and key design features of Rottingdean, a historic chalk downland village</p>	<p>vibrant and distinctive village by protecting and enhancing the unique characteristics, including its green spaces, promoting the much loved 'village feel', supporting small-scale, sustainable development and maintaining the high quality natural environment.</p> <ul style="list-style-type: none"> • To ensure that any further development and change will be based on a real understanding of the village's past and present and will contribute positively to the future of Rottingdean and enhance its special nature. • To adhere to the planning guidance contained in the St Aubyns Planning Brief • To maintain the historic access to the seafront, improving access and the public realm
<p>THEME: Access</p> <p>To improve disabled access & permeability through the village, making it more pedestrian friendly. To improve IT connectivity.</p>	<ul style="list-style-type: none"> • To have regard to disability and pedestrian access throughout the village in all relevant policies • To support development which enhances broadband access and connectivity
<p>THEME: Planned Housing Growth</p> <p>To ensure that suitable and adequate infrastructure is provided in a timely manner to match identified needs in a period of expansion</p>	<ul style="list-style-type: none"> • To identify suitable sites for development where housing will support the City Plan but also take into consideration the needs of the infrastructure, the need for affordable housing, and ensuring any development respects the unique character of the Parish. • To make best use of any brownfield site within the Parish taking into consideration the need for housing, economic development, employment and recreational facilities • To make best use of any windfall sites which come available during the Plan period, taking into consideration the need for housing, economic development, employment and recreational facilities. • To make provision for local young people to be able to access market housing in the Parish

Appendix C Statutory consultation responses

From: [PlanningSSD](#)
To: [Helen Pennington](#)
Subject: Brighton & Hove: Consultation on SEA screening for Rottingdean Neighbourhood Plan
Date: 07 December 2015 14:32:35

Dear Helen

Thank you for consulting us for a SEA screening opinion on the Rottingdean Neighbourhood Plan.

We are pleased to see that water resource and quality and flood risk have been considered in the draft SEA screening report.

We understand that it is highly unlikely that the Neighbourhood Plan would consider allocating development in the beach area (Flood Zones 2 and 3).

Based on the above and based on the scale of development proposed through the Neighbourhood Plan, we consider the plan would not have a significant environmental effect and as such would not require an SEA in relation to the issues in our remit.

Kind Regards

Sustainable Places
Environment Agency
Solent & South Downs Area



Historic England

Helen Pennington
Sustainability Appraisal Officer
Brighton & Hove City Council
Planning Policy
Room 201, Kings House, Hove, BN3 2LS

Helen.Pennington@brighton-hove.gov.uk
By email only

Our ref: 2015.12.03
Your ref: Rottingdean
NP SEA
Screening HE
RLS
Comments
01483 252028

Telephone
Fax

10th December 2015

Dear Ms. Pennington

Re: Rottingdean Neighbourhood Plan Draft SEA Screening Report

Thank you for consulting Historic England on the Screening Opinion for Strategic Environmental Assessment of the Rottingdean Neighbourhood Plan. In coming to our opinion on whether Strategic Environmental Assessment is required for the neighbourhood plan due to the likelihood of significant effects on the historic environment and heritage assets we have taken the following factors into account:

- The Plan objectives include giving a high priority to the conservation of the character of the village, including consideration of specific details such as separation from neighbouring settlements and access to the seaside.
- The plan will guide the location of new development, including prioritising the use of previously developed land and restricting development of other land.
- The plan area includes a number of designated heritage assets, whilst there may be potential for previously unidentified heritage assets, including archaeological remains of historic interest.
- Impacts to heritage assets may be direct – including their inclusion within allocation sites, or indirect including development that affects their setting, that results in indirect impact such as increases in traffic or that affects their viability.
- Impacts of development are likely to be long-term or permanent.
- 'Significant effects' may be both positive as well as negative.
- It is not clear from the evidence presented whether the plan will be allocating sites for development, what form such development will take and whether



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Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



these have been assessed previously through SEA of a higher-level planning document.

Based on these factors it is considered that there is a likelihood of the plan having significant environmental effects on the historic environment that should be subjected to appropriate assessment, although there is some uncertainty about what those effects might be at present. It should be considered, for example that constraining new development within the existing settlement area may place greater pressure on heritage assets, such as the conservation area or the curtilage of listed buildings by promoting the subdivision of gardens for infill development. As such we agree with the conclusion of the draft screening report that Strategic Environmental Assessment is required for the plan, although we recommend waiting to scope the SEA until it is clearer what the likely proposals for land use are to better guide appropriate evidence gathering (if this is not already known).

Our opinion is based only on the information presented in the draft screening report issued and there is potential that provision of further information could result in a different opinion being reached. If, for example, at a time when the plan has been sufficiently developed to provide certainty, the Parish Council demonstrated that none of their proposals would have an impact on heritage assets or the character of the historic environment, it would be legitimate to request a review of the screening opinion's conclusions on these grounds. Nevertheless we encourage the use of SEA as a helpful tool to ensure plan documents are prepared in a robust and transparent manner, documenting the alternatives considered in the development of the plan, with evidence that appropriate consideration has been given to relevant environmental issues including the conservation and enjoyment of the historic environment. SEA can be useful in demonstrating that the plan does meet the requirement of the basic conditions to promote sustainable development (i.e. that it complies with the requirements of the NPPF) and to be in general conformity with the strategic policies of the Local Plan. In doing so it is also helpful in ensuring there are no conflicts within the plan between its different objectives and policies.

As a minor point, we would suggest amending the text of the report at 1(a) and 1(b) in Table 2. The SEA Regulations require only that Neighbourhood Plans are in **general** conformity with the **strategic policies** in the local plans, rather than having to conform with the local plan as a whole as suggested in the table. As such the plan could present a rather different agenda for development in the plan area than the local plan and so affect the implementation of a higher level document. The National Planning Practice Guidance recommends that Councils support their neighbourhood planning fora by identifying which policies of the local plan are considered 'strategic' at an early point in the plan-making process. Section 156 of the NPPF sets out what matters planning authorities should set out in the strategic priorities for the area in the local plan, including delivering the conservation and enhancement of the natural and historic environment. This should be helpful in identifying which policies are 'strategic'. Neighbourhood Plans also have an equivalent, rather than hierarchically

lower, status to the Local Plan in forming an element of the statutory development plan and, in determining planning applications will in actuality take precedence over the National Planning Policy Framework (which is not a document with a status in statute).

We hope these comments are of assistance to you and would be grateful if you would pass any relevant recommendations onto the Parish Council. Please don't hesitate to contact us if you have any queries.

Yours sincerely

Robert Lloyd-Sweet

Historic Places Adviser (South East England)

Historic England

Guildford

Tel. 01483 252028

E-mail: Robert.lloydsweet@HistoricEngland.org.uk



From: [Tonge, Catherine \(NE\)](#)
To: [Helen Pennington](#)
Subject: Consultation on SEA screening for Rottingdean Neighbourhood Plan
Date: 02 December 2015 11:29:32
Attachments: [NE Feedback Form 2015.pdf](#)
[ATT00001.txt](#)

Dear Helen

Thank you for giving Natural England the opportunity to comment on the SEA screening for the Rottingdean Neighbourhood Plan. My brief comments are as follows:

We agree with the conclusion that the plan is unlikely to impact upon a European designated site and therefore a full HRA is not required

We also agree with the conclusion that the Plan could have significant effects upon nationally and locally designated sites and that, using the precautionary principle, a SEA should be undertaken.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing this document. Nevertheless, I hope you have found our comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.

If you wish to comment on the service provided by Natural England please use the appended form.

Catherine

Catherine Tonge
Lead Adviser
Sussex Coast & Marine
Natural England
Mobile: 07768 038881

Home-based. Post to:

Mail Hub Block B
Whittington Road
Worcester
WR5 2LQ

<https://www.gov.uk/government/organisations/natural-england>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

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Annex 1 Pre-screening for Habitats Regulations Assessment

Habitat Regulations Assessment pre-screening notification Rottingdean Neighbourhood Area September 2015

1. Introduction

This initial Habitat Regulations Assessment (HRA) pre-screening has been undertaken to assess whether any European sites exist within or in proximity to the neighbourhood area which could potentially be affected by any future proposals or policies within the Neighbourhood Plan.

Where a European site does exist, this pre-screening report sets out the council's opinion on whether the Neighbourhood Plan could affect the designated features of the site and whether a full screening to meet the requirements of the Conservation of Habitats and Species Regulation should take place as the Neighbourhood Plan is developed further.

The purpose of this report is to provide an early indication to the Rottingdean Neighbourhood Forum whether the Neighbourhood Plan is likely to require a full screening/HRA assessment. This report is based on the Rottingdean Neighbourhood Plan Vision & Objectives 2015.

2. European sites

There is a network of protected sites across Europe, which includes Special Protected Areas (SPA), Special Areas of Conservation (SAC) and RAMSAR sites. These sites are designated for their fauna, flora or birds under the EC Birds or Habitats Directives. The majority of these sites are also Sites of Special Scientific Interest (SSSI).

All plans and projects, which may have a significant effect on the designated features of one of these sites, are required to undertake a Habitat Regulations Assessment to meet the requirements of the Conservation of Habitats and Species Regulations. There are various stages to a HRA assessment including the screening stage, which assesses the likelihood of impacts. A full Habitat Regulations Assessment (also known as an Appropriate Assessment) is then only required to take place if the screening stage indicates that significant impacts on the designated features are likely.

3. Local European Sites

The Rottingdean Neighbourhood Area covers the entire parish area. See map in Appendix A. As is evident from the map the Neighbourhood Area is in close proximity to the Castle Hill SAC with the nearest points of the SAC and RNA boundary approximately 600m apart, although is located approximately 1,900m from the central point of the SAC. In addition, the Lewes Downs SAC is located approximately 6km from the city boundary, and approximately 8km from the Neighbourhood Area boundary.

Within the wider area, the Arun Valley SAC/SPA, Ashdown Forest SAC/SPA and Pevensey Levels SAC/RAMSAR site are all located more than 20km the Neighbourhood Area boundary. These sites are not considered any further in this assessment due to their distance from the Neighbourhood Area.

The following table sets out the reason for the sites' designations, potential issues and approximate distance from Rottingdean Neighbourhood Area boundary. These sites will be considered further in this pre-screening report.

Site	Designation	Potential Issues and problems	Closest distance to BH (km)	Closest distance to RNA boundary (km)
Castle Hill SAC	Chalk grassland with a mosaic of calcareous semi-natural dry grassland communities. Important assemblage of rare and scarce species including early spider orchid (one of the largest colonies in the UK), early gentian and burnt orchid.	Air pollution or inadequate grazing can lead to scrub encroachment. Leaching and spray drift from surrounding farmland.	Within boundary	600m
Lewes Downs SAC	Chalk grassland with Festuca ovina – Avenula pratensis and Bromus erectus calcareous grasslands. Important assemblage of rare and scarce orchids.	Air pollution can exacerbate scrub encroachment. Leaching and spray drift from surrounding farmland.	6	approx 8km

4. Brighton & Hove City Plan Part 1 – HRA screening

An [HRA screening](#)¹ has been undertaken on the City Plan Part 1 at various stages of its development, including the most recent assessment at Proposed Modification stage 2014. At this stage, the City Plan set out a housing target of 13,200 dwellings to be delivered over the plan period, as well as other quantum of development. This included the urban fringe as a broad source of potential for housing, capable of delivering 1,200 dwellings in total. There are three urban fringe sites within the Rottingdean Neighbourhood Area which have been identified as having residential potential; sites 42, 45 and 50, with an approximate potential of 59 dwellings in total.

¹ Brighton & Hove Submission City Plan Part 1 – Proposed Modifications July 2014 Updated Appropriate Assessment Report

The HRA screening assessed the likely impacts of the proposed amounts of development set out in the City Plan on European Sites within 20km of its boundary including Castle Hill, Lewes Downs and Ashdown Forest. It concluded that the possible impacts amount to water abstraction, air pollution and recreational pressure. Of these:

- *Water abstraction would not have a significant effect on any European site because there are no such sites which are vulnerable to water abstraction within the water catchment area of Brighton and Hove.*
- *Despite policies which promote travel choice and minimise air pollution, it is still possible that air pollution may worsen as a result of the City Plan Part 1. However localised air pollution of this nature would not have a significant effect on any European site, according to Natural England advice.*
- *Recreational pressure on downland in the vicinity of Brighton and Hove may increase as a consequence of the City Plan Part 1. However only one of the European sites assessed is vulnerable to recreational pressure (Ashdown Forest) and studies elsewhere have shown that this site is far enough away from Brighton and Hove to safely conclude that there would be no significant recreational impact on it as a result of the City Plan Part 1.*

Therefore the HRA screening on the City Plan Part 1 (Proposed Modifications) discounted all possible significant impacts that would affect the designations of the SACs or SPA and therefore did not progress to a full Habitats Regulations Assessment (Appropriate Assessment).

5. Rottingdean Neighbourhood Plan - Vision & Objectives

The Rottingdean Neighbourhood Plan must be in conformity with the local development plan, as well as national planning policy. This includes both the adopted Brighton & Hove Local Plan and the emerging City Plan Part 1. It must also be in conformity with the South Downs National Park Authority emerging Local Plan.

The Neighbourhood Forum has published its Visions and Objectives for the Neighbourhood Area, which can be found in full in Appendix B. It includes the following objectives:

- **Employment & Enterprise** - to foster trade, tourism and economic development in Rottingdean.
- **Air Quality and Traffic Reduction** - to reduce the volume of vehicle traffic passing through Rottingdean to tackle congestion and improve air quality, whilst encouraging sustainable transport.
- **Environment & Biodiversity** - to protect and enhance green and open spaces within the Parish, maintaining the strategic gaps which define the village.

- **Character & Design** - to maintain the character and key design features of Rottingdean, a historic chalk downland village.
- **Access** - to improve disabled access & permeability through the village, making it more pedestrian friendly. To improve IT connectivity.
- **Planned Housing Growth** - to ensure that suitable and adequate infrastructure is provided in a timely manner to match identified needs in a period of expansion.

The Vision & Objectives document indicates that the Plan will identify sites suitable for housing development, however the location of these sites is currently unknown.

There could be some adverse impacts arising under the themes of Planned Housing Growth and Employment & Enterprise. The majority of the other themes are largely focused around protection and improvement and are considered more likely to result in beneficial impacts for various receptors.

6. Rottingdean Neighbourhood Area - Sites

As outlined under section 3, the boundary of the Rottingdean Neighbourhood Area is within close proximity to the boundary of the Castle Hill SAC. However, as can be seen from the map, the Neighbourhood Area contains a large expanse of land that is situated within the South Downs National Park. This includes the expanse of land from the northern-most edge of the boundary (adjacent to Castle Hill) down to the built up area boundary of Rottingdean to the south, and Saltdean to the south-east.

It is not known which sites the Rottingdean Neighbourhood Plan will allocate. It has the power to allocate sites that are within the South Downs National Park, which would then fall under the planning jurisdiction of the South Downs National Park Authority. However, for the purpose of this assessment, it is assumed that the Neighbourhood Plan will not be allocating sites within the SDNP.

Some approximate distances of sites/areas within Rottingdean from Castle Hill (nearest point on boundary) are as follows. *Please note these are for illustrative purposes only and do not suggest that these will be sites that will be allocated in the Rottingdean Neighbourhood Plan.*

- Site 42 Urban Fringe site (land adjacent to Falmer Road and Ovingdean Road): 1,900m
- Longhill School: 2,000m
- Top of Dean Court Road: 2,200m
- Elvin Crescent area: 2,300m
- Site 50 Urban Fringe site (land west of Falmer Avenue): 2,500m
- Rottingdean High Street: 3,000m
- St Aubyn's playing field: 3,100m

If the Neighbourhood Plan does not allocate sites within the SDNP, from looking at the distances of various points within Rottingdean it becomes evident that it is unlikely that any development will take place within the Neighbourhood Area that is closer than 1,900m to the nearest point of

the Castle Hill SAC boundary. In the City Plan HRA, Natural England suggested that development of sites at around this distance from the SAC should not lead to an increase in recreational impacts on the SAC, e.g. through loss of open space. This comment is relevant to urban fringe site 42. However, as this site is privately owned and not currently publically accessible and is therefore not providing an official recreational use, and due to the topography and landscape of the land that lies between the site and the SAC, it is considered unlikely that development of this site would lead to a direct increase in recreational use at the Castle Hill SAC.

7. Impact Risk Zones

Natural England have produced the Impact Risk Zone dataset which maps zones around each Site of Special Scientific Interest according to the particular sensitivities of the features for which it is notified. It also specifies the types of development that have the potential to have adverse impacts. This tool is mainly used at planning application stage to determine whether a proposed development requires more detailed consideration as part of Natural England's consultation process. However, it is also a useful tool in helping to identify potential risks at plan-making stage.

As the basis of the SAC designation is underpinned by the SSSI designation, it can be assumed that if a development has an impact on the SSSI characteristics, it will also impact on the characteristics of the SAC.

Castle Hill SAC

The IRZ tool assesses the potential for adverse impacts on the designation arising from different types of development at the following approximate distances from the site: within 50m, 50-200m, 200-500m, 500-1000m, 1000-2000m. As discussed under section 6, it is assumed unlikely that any sites will be allocated within 1,900m of the SAC. Development at around this distance from the SAC falls into the 1000-2000m Impact Risk Zone. Within this zone, Natural England consider there to be potential risks associated with the following types of development:

Infrastructure: Airports, helipads and other aviation proposals.

Waste: Landfill. Incl: inert landfill, non-hazardous landfill, hazardous landfill.

Composting: Any composting proposal with more than 75000 tonnes maximum annual operational throughput.

Air Pollution: Pig & Poultry Units. Any other development/ industrial or commercial process that could cause air pollution.

Combustion: General combustion processes >20MW energy input.

The tool does not consider the following types of development to pose a risk to the designation:

- **Wind & Solar Energy**
- **Rural Non Residential**
- **Residential**

There are certain types of development which a Neighbourhood Plan cannot incorporate, which includes all those listed in Schedule 1 of the Environmental Impact Regulations. This includes for example airports. In addition, as outlined under Section 5, the Rottingdean Neighbourhood Plan is only likely to allocate sites for housing development, but not for any other purpose. It can therefore be assumed that the Rottingdean Neighbourhood Plan will not identify sites for waste, pig or poultry units or development that will require combustion.

The IRZ tool does not consider residential development to pose a risk to the designation. However, it is noted that development which could cause air pollution may pose a risk to the designation, and this could include air pollution arising from residential development, e.g. through the potential for vehicular movements to be increased.

From the Impact Risk Zone tool it can be concluded that the only type of development within the Rottingdean Neighbourhood Area, that is likely to be identified within the Neighbourhood Plan and which could impact upon the characteristics of the SAC is residential development that could result in an increase in air pollution. This is within the 1000-2000m distance from the SAC.

Distances greater than this range are not considered further by the toolkit, and it is therefore assumed that development outside this range is not considered to pose a risk to the designation. It is considered likely that the majority of development taking place within the Rottingdean Neighbourhood Area will be outside this range.

Lewes Downs SAC

The Impact Risk Zone tool does not identify development within the Rottingdean Neighbourhood Area to pose a risk to the Lewes Downs SAC, due to the distance from the designation and the potential issues and problems with the SAC.

8. Air quality

The Impact Risk Zone tool identifies air pollution as one of the potential risks. The HRA of the City Plan Part 1 discussed the potential impacts of air pollution in some detail. As outlined in Section 4, air pollution was identified as a potential risk for the Castle Hill SAC, however the HRA concluded that effects of air pollution were not considered to pose a significant risk. Some of justification to this is set out in the two paragraphs below.

As quoted in the City Plan Part 1 HRA screening, the Highways Agency Design Manual for Roads and Bridges² provides detailed guidance for the assessment of the potential impact of road projects on local air quality, including sites designated under the Habitats Directive. The guidance states that 'where appropriate, the advice may be applied to existing roads'. The Manual identifies plans or projects which lead to daily traffic flows changing by 1,000 annual average daily traffic (AADT) or more or Heavy Duty Vehicle flows changing by 200 AADT or more as being potentially significant. However the Manual states that 'Only properties and Designated Sites within 200m of roads affected by the project need be considered.'

As quoted in the City Plan Part 1 HRA screening, Natural England stated in their response to another local planning authority: "In terms of pollution from vehicular emissions the concentrations decline exponentially from the road edge. Though it varies with a range of factors and from pollutant to pollutant the concentrations of pollutants from roads can be said to have localised impacts up to 200m from the road side. Therefore the effects of vehicular atmospheric emissions should be considered if the roads on which the vehicles travel are closer than 200m from the Natura 2000 site."

There are two main roads used by vehicles entering or exiting Rottingdean; the A259 east-west coast road, and the B2123 Falmer Road that leads north out of Rottingdean through Woodingdean to the A27. Both are regularly congested at peak times and a small section of Rottingdean High Street has designated an Air Quality Management Area due to the exceedence of Nitrogen Dioxide.

At its nearest point, the A259 is located over 3,000m from the Castle Hill SAC and therefore poor air quality arising from this road, including the High Street area, is considered unlikely to impact significantly upon the SAC.

The nearest point of the B2123 to Castle Hill lies north of Woodingdean, where the road is approximately 400m from the SAC. This distance is greater than the 200m distance advised by both the Highways Agency and Natural England and therefore it is considered unlikely that air pollution from this location will have significant adverse effects on the SAC.

9. Conclusion

This purpose of this report is to provide an early indication of whether a more detailed HRA assessment is likely to be required. From the consideration of the local area, sites and issues, this report concludes that a full HRA screening, or full HRA assessment is unlikely to be required for the Rottingdean Neighbourhood Plan. This is based on:

- The Vision and Objectives, August 2015
- The distance of the boundary of the built up area (including urban fringe sites) from the boundary of the SAC
- The assumption that the Plan will not allocate sites located within the SDNP

² Highways Agency (2007): Design Manual for Roads and Bridges: Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 1 Air Quality

- The types of development that are considered likely to impact upon the SAC, based on Natural England's Impact Risk Zone tool
- The types of development that are likely to be supported in the Rottingdean Neighbourhood Plan
- The assumption that the amount of development supported or identified within the Rottingdean Neighbourhood Plan will be below that in the City Plan Part 1 (Proposed Modifications)
- The conclusion of the HRA Screening for the City Plan Part 1 (Proposed Modifications) particularly relating to air quality impacts

This HRA pre-screening should be reviewed as the Rottingdean Neighbourhood Plan progresses, and as policies are drafted and sites are allocated, to ensure the above concluding points are still of relevance.