

Your ref:
Our ref: Crowhurst NP
Please ask for: David Marlow
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Date: 12th June 2018



Ms A Wynn
Greenhayes Planning

Dr Anthony Leonard
Executive Director of Business Operations

BY EMAIL ONLY:
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Dear Mr Wynn,

Crowhurst Neighbourhood Plan: HRA Screening Assessment

I refer to your letter dated 9th May 2018 regarding the above.

Any potential impacts on European Sites arising as a consequence of the Neighbourhood Plan have previously been screened out by the Development and Site Allocations Plan (incorporating Neighbourhood Plans) HRA Initial Screening Report (August 2016). That re-assessed the key issues identified as part of the Core Strategy HRA process and reviewed whether there have been any change in circumstances that would lead to a conclusion that the RDC Development and Site Allocations (DaSA) Plan and/or Neighbourhood Plans within the District, either alone or in combination with other relevant projects and plans, would now likely result in a significant effect upon European sites. It concludes that they are not likely to result in significant adverse effects on the integrity of European sites or associated sensitive areas, assuming continued conformity with Core Strategy policies.

Subsequent to that Screening Report, Wealden District Council (WDC) has been undertaking monitoring to further investigate the impacts of nitrogen deposition on the Ashdown Forest Special Area of Conservation (SAC), leading to the publication of a briefing document in February 2017 and, subsequently, an Air Quality report (in two parts) in November 2017. The report covers a range of future year scenarios for 2028. It states that the critical level for annual mean NH₃ (ammonia) concentrations is being exceeded close to certain roads within the Ashdown Forest SAC, but these are also achieved albeit to a lesser extent at other locations away from roads, suggesting that emissions from road traffic are driving these exceedances. Also, NO₂ (nitrogen dioxide) concentrations suggest that the critical level for annual mean NO_x (nitrogen oxides) concentrations is also being exceeded close to many roads and is also being achieved to a lesser extent in locations away from roads. Determining whether or not any of these changes would result in ecological harm is outside of the scope of the report.

WDC has also published a report: 'Air Quality Input for Habitats Regulations Assessment: Lewes Downs SAC October 2017' in November 2017, which provides information in order to



inform the Habitats Regulations Assessment of the Wealden Local Plan regarding the potential for adverse air quality impacts on that SAC. It does not conclude on any existing problems, but adds that NO_x concentrations are predicted to increase in the worst-case scenario, such that the potential for significant impacts cannot be discounted without an analysis of the sensitivity of the habitat to NO_x concentrations. Similar statements are made in relation to ammonia concentrations and nutrient-nitrogen deposition impacts.

In the light of these reports and having regard to the 'precautionary principle', Rother District Council has undertaken further work, also having regard to the progress of projects elsewhere. This has resulted in the publication of a '**Habitats Regulations Assessments - Interim Approach to considering planning applications and emerging Plans**'. It has been developed in consultation with transport and environmental consultants, as well as Natural England.

The general approach for residential developments is to identify the number of additional journeys to work by car or van that is likely to be created by the proposal, based on commuting patterns in the 2011 Census for the particular MSOA. By looking at the destination of commuting journeys and by considering routing options from the main settlement(s) in the MSOA, then the number of trips likely to affect a SAC (which also involves multiplying the commuter number by 2) can be calculated.

It is also noted that WDC has published a report: 'Air Quality Input for Habitats Regulations Assessment: Lewes Downs SAC October 2017' in November 2017, which provides information in order to inform the Habitats Regulations Assessment of the Wealden Local Plan. At the same time, Lewes District Council, within whose area the SAC lies, has published its Lewes Local Plan Part 2 HRA in October 2017, which will have taken into account existing commitments from other plans which found:

The Joint Core Strategy HRA undertook air quality calculations (including consideration in combination with other projects and plans). This concluded no adverse effect upon the integrity on Lewes Downs SAC would result alone or 'in combination' with other projects and plans, a conclusion that has also been reached in 2017 in the HRA of the South Downs Local Plan. As such Lewes Downs SAC can be screened out from further consideration in this HRA and is not discussed further.¹

You advise that the Neighbourhood Plan is anticipated to allocate land for some 30 new homes across several sites in and around the village of Crowhurst.

Crowhurst Parish is within the MSOA of Rother 006, so journey to work data is taken for that area (Nomis table: WU03EW). Traffic flows are expressed in terms of annual average daily traffic (AADT), as this is the measure used in air quality monitoring.

The methodology focuses on commuter flows in part because the morning and afternoon peak hour flows contribute substantially to total movements affecting the SACs, but moreover because it is assumed that other trips would be more local, having regard to Crowhurst having its own primary school and ready access to a much wider range of retail, personal business, educational, medical, leisure, entertainment etc. in Hastings and Battle. Social trips are also very likely to be far more local to the village.

¹ Paragraph 3.10, <http://www.lewes-eastbourne.gov.uk/planning-policy/habitats-regulations/>



The AADT calculation for the likely impact on the Ashdown Forest is set out below.

| Ashdown Forest SAC AADT Calculation | |
|--|---------------|
| # of Car/Van Drivers out-commuting from MSOA | 1,749 |
| # of dwellings within MSOA | 3,532 |
| % of MSOA commuting likely to be by Car/Van from each new dwelling | 49.52% |
| # of Car/Van Drivers out-commuting from MSOA likely to encroach on SAC | 12.56 |
| # of Car/Van Drivers out-commuting from MSOA | 1,749 |
| % of MSOA out-commuting likely to be by Car/Van and encroach on SAC | 0.72% |
| Trips (to and from destination) | 2 |
| # of net additional dwellings likely to be provided by development | 30 |
| AADT of development affecting Ashdown Forest SAC | 0.2134 |

This means that the increase in average annual (two-way) daily traffic from the proposed development would be approximately 0.2 of one vehicle. (As noted above, one commuter is equal to two AADT.)

Screening assessment

This screening has regard to a number of sources of information available since the DaSA Local Plan and Neighbourhood Plans Screening Report was published (and agreed by Natural England). It is considered that this Assessment need only further consider impacts on the Ashdown Forest SAC, as there are no evident changes of circumstances in relation to other relevant European sites that would warrant a review.

It is evident from the calculations of likely traffic generation from the developments in the Neighbourhood Plan, based on available evidence of commuting data for this locality, that the likely effects of additional traffic on the Ashdown Forest SAC would be nugatory and indistinguishable from background variations.

It is concluded that, on the basis of the housing numbers advised, any likely significant effects upon European sites as a consequence of the Crowhurst Neighbourhood Plan, even in combination with other relevant plans and projects, can reasonably be screened out.

Finally, I would remind you that there is still a requirement for an SEA.

Yours sincerely,



David Marlow
Planning Policy Manager |

